



GROUP AGAINST SMOG & POLLUTION

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March 29, 2017

VIA EMAIL

Allegheny County Health Department
Air Quality Program
301 39th St., Bldg. 7
Pittsburgh, PA 15201
aqpermits@alleghenycounty.us

**Re: Comments of Group Against Smog and Pollution, Regarding Draft
Title V Operating Permit for TMS International at U.S. Steel
(Permit # 0225)**

Dear Sir or Madam:

Please accept these comments regarding the draft Title V Operating Permit (#0225) (the "Permit") for TMS International at U.S. Steel (the "Facility"), which I am submitting on behalf of the Group Against Smog and Pollution. According to the notice posted on its website, the Allegheny County Health Department is accepting comments on the Permit through March 29, 2017.

Very truly yours,

/s

John K. Baillie

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING THE DRAFT TITLE V OPERATING PERMIT FOR
TMS INTERNATIONAL AT U.S. STEEL (#0225)**

I. The Permit Must Include Monitoring, Recordkeeping, and Reporting Requirements Sufficient to Assure Compliance with the Terms of the Permit

All Title V Operating Permits are required to impose monitoring, recordkeeping, and reporting requirements that are “sufficient to assure compliance with the terms and conditions of the permit.”¹ When a Permit’s monitoring, recordkeeping, or reporting requirements are “not sufficient to assure compliance with permit terms and conditions, permitting authorities must supplement [them] to assure such compliance.”²

A. The Permit Must Include Monitoring, Recordkeeping, and Reporting Requirements that are Sufficient to Assure Compliance with Hourly Limits on the Slag Processing Plant’s Production

The Permit limits the throughput of the Facility’s Slag Processing Plant on an hourly basis,³ but does not require the Facility to monitor, record, or report the amount of slag that the plant processes on an hourly basis.⁴ The Facility’s compliance with the hourly limit on the amount of slag that is processed by the Slag Processing Plant cannot be assured unless the Facility monitors, records, and reports the amounts of slag it processes on an hourly basis. Accordingly, the Permit must require that the Facility determine the amounts of slag that are

¹ 40 C.F.R. § 70.6(c)(1); *accord* Art. XXI, § 2103.12.h.1.

² *See, e.g., In the Matter of Shell Chem. LP and Shell Oil Co.*, 2015 EPA CAA Title V LEXIS 6, *52-53 (Sept. 24, 2015) (discussing monitoring requirements).

³ *See* Permit, § V.A.1.a.

⁴ *See id.*, §§ V.A.3 (no requirement for hourly monitoring); V.A.4.a.1 (requiring the Facility to keep production records without specifying a time period); V.A.5.a.2 (requiring that the Facility report the “types and amounts of materials processed” on a monthly basis and an annual basis).

processed by the Slag Processing Plant on an hourly basis, and record and report its determinations to the Department.

B. The Permit Must Include Monitoring, Recordkeeping, and Reporting Requirements that are Sufficient to Assure Compliance with Hourly and Annual Limits on the Production of the Oxygen Lancing Process

Similarly, the Permit limits the production of steel slag and scrap by the Facility's Oxygen Lancing operation on an annual basis and an hourly basis, but does not require the Facility to monitor such production on an hourly basis,⁵ keep records of production on an hourly basis,⁶ or report annual or hourly production.⁷ The Facility's compliance with the hourly limits on the Oxygen Lancing process's production cannot be assured unless the Facility monitors such production on an hourly basis, keeps records of the process's hourly production, and reports hourly production numbers to the Department. Further, the Facility's compliance with the annual production limit for the Oxygen Lancing process cannot be assured unless the Facility reports the process's annual production to the Department. The Permit must be revised to require the Facility to monitor, record, and report the Oxygen Lancing process's production on an hourly basis, and the report the process's annual production.

II. Miscellaneous Clarifications and Corrections

Section V.A.1.b of the Permit should be revised to clarify that the Facility must minimize visible emissions from the operation of the Slag Processing Plant rather than "operation of the slag."

⁵ See *id.*, § V.B.3 (no requirement for hourly monitoring).

⁶ See *id.*, § V.B.4 (requiring that records of monthly production be kept).

⁷ See *id.*, § V.B.5 (requiring that instances of non-compliance with the Permit be reported).

Section V.A.5.c of the Permit is missing an internal reference to another Permit term.

Section V.C.1.a of the Permit should be revised to clarify that the density of the pot-coat antifreeze shall not exceed 12.5 lbs/gallon.