



GROUP AGAINST SMOG & POLLUTION

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December 4, 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 the Revised Installation Permit for Battery C at U.S. Steel's Clairton Plant (Permit # 0052-I011a)

Dear Sir or Madam:

Please accept these comments regarding the Revised Installation Permit for Battery C at U.S. Steel's Clairton Plant (Permit # 0052-I011a) (the "Permit"), 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 December 4, 2017.

Very truly yours,

/s

John K. Baillie
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING INSTALLATION PERMIT # 0052-I011a
FOR U.S. STEEL'S CLAIRTON PLANT**

The Permit is to amend the installation permit that authorized the construction of a new battery of coke ovens (“Battery C”) at U.S. Steel’s Clairton Plant (the “Facility”), specifically, IP #0052-I011. The Facility was required to construct Battery C and shut down Batteries 7, 8, and 9 by a March 17, 2008 Consent Order and Agreement. The amendments to the original installation permit for Battery C include substantial increases to emission limits for Battery C from those in IP #0052-I011, but will generally decrease emission limits as compared to those that were authorized for Batteries 7, 8, and 9. However, Battery C’s annual emission limit for SO₂ (296 tons/year) will be greater than the annual emission limit that was authorized for SO₂ for Batteries 7, 8, and 9 (262.7 tons/year).

The Facility is located in an area of Allegheny County that does not attain the 2010 National Ambient Air Quality Standard for SO₂. Accordingly, the Department prepared a nonattainment State Implementation Plan for SO₂, and submitted that plan (the “SO₂ SIP”) to the United States Environmental Protection Agency earlier this year. The Projected Point Source Emissions Inventory for Battery C for 2018 that was included with the Department’s modeling analysis for the SO₂ SIP projects that SO₂ emissions from Battery C will be substantially less than the emission limits that would be authorized by the Permit:

Process	SO₂ SIP Projected Emissions for 2018	Permit Emission Limits for SO₂
Pre Push	0.400	0.023
Pushing Fugitives		0.800
PEC Baghouse	9.671	37.900
Travelling Car	16.306	24.100
PEC Fugitives	2.210	3.500
Stacks		195.600
Soaking	2.350	34.100
Quench Tower	7.880	
Underfiring Coke Oven Gas	113.010	
Underfiring Natural Gas	0.010	
SCOT Stack	<u>38.806</u>	_____
TOTAL	190.643	296.023

The Department may not issue an installation permit for a source if emissions from the source will prevent the attainment of any applicable ambient air quality standard in any area of Pennsylvania.¹ It is not clear that the nonattainment area will meet the 2010 SO₂ standard if SO₂ emissions from Battery C in 2018 are more than 105 tons per year greater than the emissions that the Department used for its modeling analysis demonstrating attainment in 2018 in the SO₂ SIP. The Department must either reduce allowable SO₂ emissions from Battery C in the Permit to match the projected emissions that it used to model attainment in the SO₂ SIP, or perform a new modeling analysis that demonstrates that the higher SO₂ emissions allowed by the Permit will not prevent attainment of the 2010 SO₂ standard in any area of Pennsylvania, including Allegheny County.²

¹ See Art. XXI, § 2102.04.b.4.

² A state implementation plan for a nonattainment area must demonstrate attainment using an air quality model. See 40 C.F.R. § 51.112(a)(1).