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VIA EMAIL AND FIRST CLASS MAIL

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July 19, 2010

**Group Against Smog & Pollution Comments Regarding the Title V
Operating Permit for United States Steel Corporation, Mon Valley Works,
Clairton Plant (0052)**

Dear Ms. Etzel,

Please accept these comments regarding the Title V operating permit for United States Steel Corporation, Mon Valley Works, Clairton Plant (0052) on behalf of the Group Against Smog and Pollution.

If you have any questions or require any additional information please do not hesitate to get in touch.

Sincerely,

Joe Osborne, Esq.
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**GROUP AGAINST SMOG & POLLUTION COMMENTS REGARDING THE
TITLE V OPERATING PERMIT FOR UNITED STATES STEEL
CORPORATION, MON VALLEY WORKS, CLAIRTON PLANT**

1. The Final Title V Permit Must Include the Applicable Requirements from 40 CFR Part 60 for All Equipment Subject to New Source Performance Standards.

The provisions of 40 CFR Part A apply to all equipment subject to new source performance standards.¹ The final Title V permit must include the applicable provisions of 40 CFR Part A for all equipment subject to New Source Performance requirements (such as the No. 1 and No. 2 Continuous Barge Unloaders). Important Part 60 Requirements include the following:

- “At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.”²
- “No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.”³

2. The Final Title V Permit Must Include Parametric Monitoring, Recordkeeping, and Reporting Requirements for Battery Standpipe Venting Activities to Ensure Such Activities are Carried out Consistent with Good Air Pollution Control Practices.

Soaking-related emissions from oven standpipes are a significant source of emissions.⁴ The draft permit requirements are insufficient to ensure soaking operations are carried out consistent with good air pollution control practices. The final permit must require physical parameter monitoring, recordkeeping, and reporting for the time and duration of standpipe venting activities. This data would improve capacity to understand and quantify emissions resulting from standpipe venting. Without this data, it is not possible to subject such emissions to reduction and pollution prevention measures and is inconsistent with federally enforceable good air pollution control practice requirements.⁵

¹ 40 CFR § 60.1(a).

² 40 CFR § 60.11(d).

³ 40 CFR § 60.12.

⁴ See e.g., Form K submissions, U.S. Steel Clairton Coke Works, Submittal of Revised Title V Application (Mar. 2, 2001).

⁵ See e.g., Article XXI § 2105.03; RACT Plan 234, Plan Approval Order and Agreement No. 234 (Dec. 30, 1996).

3. Scot Plant Incinerator VOC Emissions Do Not Satisfy VOC RACT and Raise Doubts Regarding the Incinerator H₂S Destruction Efficiency.

Table V-K-1 lists the VOC emissions limit for the Scot Plant Incinerator as 8.9 lb/hr and 38.9 tons per year (TPY).⁶ GASP questions whether this relatively high VOC limit satisfies VOC RACT requirements⁷ and whether, given this VOC limit, the incinerator is achieving sufficiently high destruction efficiency for hydrogen sulfide (H₂S) and other total reduced sulfur compounds.

4. The H₂S Emissions Data in the Title V Permit is Inconsistent with the Data Used in the C Battery NSR Netting Analysis. These Numbers Must be Reconciled. If Revised Numbers Exceed the PSD Significance Threshold a BACT Analysis is Required.

The C Battery installation permit application states that a 277 TPY reduction of H₂S emissions will result from the shutdown of Batteries 7-9.⁸ This 277 TPY reduction is necessary for the C Battery project to net out of hydrogen sulfide and TRS BACT review.⁹ However, US Steel's Title V application Form K emission summaries show actual H₂S emissions of only 9.96 tons per year from Batteries 7-9.¹⁰ If the Title V application Form K H₂S numbers are correct, then the Applicant has violated new source review requirements during Battery C permitting. If so, the title V permit cannot be issued until the compliance issue is resolved.¹¹

5. The Draft Title V Battery Fugitive Inspection Requirements are Inadequate to Ensure Compliance and Must be Strengthened in the Final Permit

Title V permits must contain sufficient monitoring to ensure compliance,¹² and local permitting authorities have the authority to supplement inadequate monitoring requirements in Title V permits.¹³ The draft Title V battery fugitive inspection requirements are inadequate to ensure compliance because the inspection requirements only require the observer to record collecting main pressure after each performance test.¹⁴ The inspection requirements also state that “[t]he permittee shall not adjust the pressure

⁶ ACHD, US Steel Clairton Coke Works Title V Permit – Draft, p.191, Table V-K-1.

⁷ 70 FR 71611, 71617.

⁸ ACHD, U.S. Steel Clairton Works C Battery Project TSD, Table 5, p. 14 (May 6, 2008).

⁹ *Id.*; 40 CFR § 52.21(b)(23).

¹⁰ Form K submissions, U.S. Steel Clairton Coke Works, Submittal of Revised Title V Application pp.K-36 – K-37 (Mar. 2, 2001).

¹¹ 42 USC § 7661b(b); 40 CFR. § 70.5(c)(8)-(9); Article XXI § 2103.12.a.2.A.

¹² 42 USC § 7661c(c), 40 CFR § 70.6, *Sierra Club v. EPA*, 536 F. 3d 673, 678 (D.C. Cir. 2008).

¹³ *Sierra Club v. EPA*, 536 F. 3d 673, 679 (D.C. Cir. 2008).

¹⁴ *See e.g.*, ACHD, US Steel Clairton Coke Works Title V Permit – Draft, p.56, V.A.3.c.3.

to a level below the range of normal operation during or prior to the inspection,”¹⁵ but provide no requirements to ensure the recorded pressure does in fact represent normal operating conditions. This could be remedied simply by adding a requirement that the observer also record and report the average pressure in the hours prior to the inspection.

6. US Steel has Failed to Provide Sufficient Emissions and Emissions Unit Data to Satisfy 40 CFR. § 70.5(c)(3) and Article XXI § 2103.11.b.3

Title V Permit applications must describe “[a]ll emissions of pollutants for which the source is major, and all emissions of regulated air pollutants. A permit application shall describe all emissions of regulated air pollutants emitted from any emissions unit;”¹⁶ further, the application must contain an “[i]dentification and description of all points of [such] emissions,”¹⁷ and the application must include both potential and actual emission rates.¹⁸

The US Steel application contains multiple omissions that must be corrected prior to title V issuance in order to satisfy 40 CFR § 70.5(c)(3) and Article XXI § 2103.11.b.3:

- US Steel has failed to provide decarbonization phase emissions in its title V application. This is a significant omission. US Steel reported 688 TPY of carbon monoxide from batteries 1-3 decarbonization alone in their 2008 application for Battery C construction.¹⁹
- US Steel has failed to list all oven standpipe discharge stacks as identified emission points in the title V application facility description drawings.
- US Steel’s form K submission lists no mercury emissions. While cryogenic processing of coke oven gas might result in negligible mercury emissions from the coke oven combustion stacks, other sources at the site will not have any mercury control inherent in process-related emissions. For example, physical dynamics would mean that mercury emissions from coal combustion from battery fugitives, soaking, decarbonization, charging, and pushing would likely occur. In addition, mercury may be incorporated into coal tar products, with subsequent emissions from hot tank storage of coal tar. All mercury emission points and mercury emissions must be identified. None presently are.

7. ACHD’s Permit Review is Insufficient to Demonstrate the Standards for Permit Issuance are Satisfied.

Prior to issuing a Title V permit, ACHD must conduct “such tests, observations, inspections, and the like necessary to determine that”²⁰ the permit is complete²¹ and

¹⁵ ACHD, US Steel Clairton Coke Works Title V Permit – Draft, p.56, V.A.3.c.3.b.

¹⁶ 40 CFR § 70.5(c)(3)(i); Article XXI § 2103.11.b.3.A.

¹⁷ 40 CFR § 70.5(c)(3)(ii); Article XXI § 2103.11.b.3.B.

¹⁸ Article XXI § 2103.11.b.3.C.

¹⁹ US Steel, Installation Permit Application for the Proposed C Battery Project, Appendix C, Table C1-2 (Jan. 2008).

²⁰ Article XXI § 2103.12.a.1.

ensure the permit will meet a number of additional requirements,²² among them, that the source has met all BACT²³ and MACT²⁴ requirements, and that “[e]missions from the source will not endanger the public health, safety, or welfare”²⁵

ACHD’s permit review has not satisfied these requirements. As detailed in section 6 above, US Steel’s application is not complete. Further, ACHD has not provided a comprehensive table of total source emissions for all criteria, regulated, and hazardous air pollutants. Among the omissions, the department has not provided a complete discussion or disclosure of hydrogen sulfide and total reduced sulfur emissions. At minimum, the department must quantify all emissions from the source prior to making a judgment that the standards for permit issuance such as the BACT; MACT; and health, safety, and welfare requirement have been satisfied.

²¹ Article XXI § 2103.12.a.2.

²² *See e.g.*, Article XXI § 2103.12, § 2103.22.

²³ Article XXI § 2103.12.a.2.D.

²⁴ Article XXI § 2103.12.a.2.G.

²⁵ Article XXI § 2103.12.a.2.E.