

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR  
PERMIT SECTION

September 3, 2009

RESPONSIVENESS SUMMARY FOR  
PUBLIC QUESTIONS AND COMMENTS ON THE  
CAAPP OPERATING PERMIT APPLICATION FROM  
U. S. Steel Corporation Granite City Works, Stein Steel Mill Services, AKJ Industries, Inc., and  
Tube City IMS, LLC for initial CAAPP Permits and  
Granite City Slag, LLC and Oil Technology, Inc. for CAAPP Permit Renewals  
in GRANITE CITY, ILLINOIS

Source Identification No.: 119813AAI

Application No.: 96030056

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## **DECISION**

On 9/3/2009, the Illinois Environmental Protection Agency (Illinois EPA) issued air pollution control operating permits to U. S. Steel Corporation Granite City Works, Stein Steel Mill Services, AKJ Industries, Inc., and Tube City IMS, LLC for initial CAAPP Permits and Granite City Slag, LLC and Oil Technology, Inc. for CAAPP Permit Renewals. All six facilities are located in Granite City, Illinois and are considered co-located sources for CAAPP applicability. In response to comments, the issued permits include a number of additional requirements and clarifications when compared to the draft permits.

## **BACKGROUND**

CAAPP permits identify the applicable rules governing emissions from a source and establish enforceable production and emission limitations on its various operations. CAAPP permits also establish appropriate testing, monitoring, recordkeeping and reporting requirements for compliance demonstration with those limits and applicable emission standards.

On 03/06/1996, the Illinois EPA, Bureau of Air received an operating permit application from National Steel (U.S. Steel is the current owner/operator), requesting a permit under the provisions of the Clean Air Act Permit Program (CAAPP) for an existing integrated steel mill operation in Granite City, Illinois. During review of the CAAPP application for U.S. Steel, it was determined that Stein Steel Mill Services, AKJ Industries, Inc., Tube City IMS, LLC, Granite City Slag, LLC and Oil Technology, Inc. all located in Granite City were co-located sources with U.S. Steel. Granite City Slag, LLC and Oil Technology, Inc. had previously been issued CAAPP permits as individual sources however their permits are being renewed indicating that they are co-located sources.

## **COMMENT PERIOD AND PUBLIC HEARING**

The Illinois EPA Bureau of Air evaluates applications and issues permits for sources of emissions. An air permit application must appropriately address compliance with applicable air pollution control laws and regulations before a permit can be issued. Following its initial review of U.S. Steel's and the co-located sources applications, the Illinois EPA Bureau of Air made preliminary determinations that the applications met the standards for issuance of CAAPP permitting and prepared draft permits for public review and comment.

The notice of public hearing and public comment period for the six sources was published in the Granite City Press Record Journal on 10/15/08, 10/22/08 and 10/29/08 and also in the East St. Louis Monitor on 10/16/08, 10/23/08 and 10/30/08. The hearing was held on 12/02/08 at the Knights of Columbus Hall located in Granite City. The comment period was originally set to close on January 2, 2009. At the request of commentators the comment period was extended to February 27, 2009.

Comments were received during the hearing and comment period relating to the CAAPP permits for U.S. Steel and Stein Steel sources. No comments were received on the other co-located sources.

## AVAILABILITY OF DOCUMENTS

Copies of the final permit decisions and Responsiveness Summary can be obtained by the following means:

1. From the Illinois EPA's website:

<http://www.epa.state.il.us/public-notice/2008/general-notice.html>

2. By viewing documents at one of the following repositories:

Six Mile Regional Library District 2001 Delmar Avenue Granite City, IL 62040 618/452-6238	Illinois EPA Collinsville Regional Office 2009 Mall Street Collinsville, IL 62234 618/346-5120	Illinois EPA 1021 N. Grand Ave., East Springfield, IL 62794 217/782-7027
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3. By contacting the Illinois EPA by telephone, facsimile or electronic mail:

Illinois EPA  
Bradley Frost, Office of Community Relations  
888/372-1996 Toll Free – Environmental Helpline  
217/782-7027 – Desk Line  
217/782-9143 – TDD  
217/524-5023 – Facsimile  
[brad.frost@illinois.gov](mailto:brad.frost@illinois.gov)

To obtain a printed copy of the documents free of charge, please contact the Illinois EPA through the contact information listed in #3 above.

## QUESTIONS AND COMMENTS WITH RESPONSES BY THE AGENCY

### **I. U.S. Steel Comments on the U.S. Steel CAAPP**

1. Contact Information – Updates, Page 1

Issue: The responsible official has changed from Sharon Owen to Richard E. Veitch.

**IEPA response: Changes have been made.**

2. Citation: Page 1, Attn; and Page 4; Section 1.3 Operator

Issue: The permit is sent to the attention of Larry Siebenberger. Mr. Siebenberger is to retire from USS on or about February 27, 2009; therefore, the permit needs to be addressed to reflect a current addressee.

**USS Position/Proposed Language:**

Page 1 - Attn: Jill A. Foust

Page 4: Section 1.3 Operator

U. S. Steel Corporation  
Granite City Works  
20th and State Streets  
Granite City, Illinois 62040  
Jill A. Foust, 618/451-3456

**IEPA response: Changes have been made.**

3. **Citation:** Page 2, Table of Contents

**Issue:** Slab Reheat Furnaces is the wrong title for section 7.7.

**USS Position/ Proposed Language:** The Table of Contents is inconsistent with the body of the permit. Specific Unit Description in the Table of Contents in Section 7.7 should be changed to Hot Strip Mill.

**IEPA response: Changes have been made.**

4. **Citation:** Page 3, Table of Contents

**Issue:** Proper Operating Procedures of Basic Oxygen Furnaces (BOF) Electrostatic Precipitator (ESP) Control System is the wrong title for Attachment 4.

**USS Position/ Proposed Language:** The Table of Contents is inconsistent with the body of the permit. Change the reference to Attachment 4 in the Table of Contents to “Guidance,” and remove the reference to an Attachment 5 in the Table of Contents since no such Attachment exists.

**IEPA response: Changes have been made.**

5. **Citation:** Page 8, Condition 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210 (a) (4) through (18).

**Issue:** Remove references to operating areas and list each of the insignificant activities (under 201.210(a)(4) through (a)(18)) that occur once for the entire facility.

**USS Position/Proposed Language:** There is no need to list these insignificant activities separately for each operating area of the plant. The permit should list insignificant activities source-wide once in the permit as each activity, as long as it means the insignificant activity criteria, remains an insignificant activity regardless where it conducted at USS.

**IEPA response: No changes were made. The source is too complex to list all numerous insignificant activities without reference to association with certain departments/operations. In addition, there are multiple insignificant activities within different departments that fall within the same insignificant activity category. For better inventory purposes and readability, these activities have been left itemized by department.**

6. **Citation:** Page 7, Condition 3.1

**Issue:** The identification of insignificant activities in Section 3.1 is incomplete in that it does not include several activities that were provided in USS’ Title V permit application.

**USS Position:** USS provided IEPA with an extensive list of insignificant activities that occur at Granite City Works, but many of these are not included in permit. The Title V permit should list these other insignificant sources.

**IEPA response: No changes were made. IEPA reviewed all application materials and did not find where insignificant activities were left out of the permit.**

7. **Citation:** Section 4.0, Page 15, Coal Handling

**Issue:** Under coal handling operations, identify control equipment as the Pulverizer baghouse.

**USS Position:** Only *one* baghouse is utilized for coal handling emission units from the coal pulverizer, as it is correctly identified in the table in Section 7.1.2 on page 49.

**IEPA response: Changes have been made.**

8. **Citation:** Section 4.0, Page 15, Coke Oven Gas By-Products Recovery Plant.

**Issue:** Under Coke Oven Gas By-Products Recovery Plant in Table, IEPA incorrectly lists “None,” as control devices for tar and flushing liquor and light oil when these sources are equipped with a “closed system with vapor recovery”.

**USS Position:** These processes are controlled in accordance with the by-products plant NESHAP using a vapor recovery system. The permit needs to correctly identify the emission control equipment for tar and flushing liquor and light oil.

**IEPA response: No changes have been made. CAAPP application does not identify a vapor recovery system. Construction permit 03110032 references to a vapor recovery system used for light oil loading only.**

9. **Citation:** Section 4.0, Page 15-16, Fugitive Emissions.

**Issue:** Under Fugitive Sources on pages 15 -16, the permit fails to identify control devices for fugitive dust.

**USS Position:** USS maintains a Fugitive Dust Control Plan, in which it identified various controls for fugitive dust from these sources. The controls include road sweeping, paving, and application of dust suppressants at strategic locations. The permit needs to correctly identify these controls for fugitive dust.

**IEPA response: No changes have been made. Various fugitive PM control techniques used by the source are not classified as an air pollution control device(s) described for other emission units in Section 4.0. The permit incorporates by reference the fugitive dust control plan where, as the company states, these control techniques are identified.**

10. **Citation:** Page 17, Condition 5.2.1

**Issue:** Remove PM<sub>10</sub> from the list of non-attainment pollutants and add it to the list of attainment pollutants. The region has been designated as in attainment of the PM<sub>10</sub> ambient air quality standard.

**USS Position:** The text should be revised as follows: “This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment), PM<sub>2.5</sub>, and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>).”

**IEPA response: Changes have been made. The area was redesignated as attainment for PM10.**

11. **Citation:** Page 17, Condition 5.2.2

**Issue:** Page 17, 5.2.3: Beelman Truck Company should be changed to “Granite City Slag, LLC,” as identified in its permit.

**USS Position/Proposed Language:** For purposes of the CAAPP, U.S. Steel is considered a single source with Granite City Slag, LLC, (I.D. 119040ATF) located at 20th Street and Edwardsville in Granite City. Granite City Slag, LLC has elected to obtain a separate CAAPP permit for its operations.

**IEPA response: Changes have been made.**

12. **Citations:** 1) Page 18, Condition 5.3.2.c; 2) Page 19, Condition 5.3.2.d; 3) Pages 29 through 33, Condition 5.7.c - This NESHAP applies to the emission units at the by-products plant and is not "Plant-Wide."; 4) Page 38, Condition 5.9.5 – Subpart FF is not a source-wide requirement. (Section 7.3 requirement)

**Issue:** The permit incorrectly identifies emission unit-specific requirement as source-wide requirements. This is incorrect and could lead to confusion as to the applicability of the requirements to other sources to which the cited regulation does not apply.

**USS Position/Proposed Language:** These requirements are not source-wide, and they only apply to specific emissions units. These requirements should be removed from the "Source-Wide Applicable Provisions and Regulations" and placed in the appropriate individual permit sections.

**IEPA response: Changes have been made and requirements of Subpart FF are presented in Section 7.3 only.**

13. **Issue:** The permit incorrectly states that the stationary source (i.e., U. S. Steel Granite City Works) is subject to 40 CFR 40 CFR 68. This is incorrect. Because USS does not exceed any thresholds for materials regulated in 40 CFR 68, it is not currently required to maintain and implement a Risk Management Plan. The language of the permit incorrectly suggests that USS is currently subject to the RMP provisions.

**Citation:** Page 21, Condition 5.3.6

**USS Position/Proposed Language:** USS requests that the permit language be changed to reflect the source's current regulatory status under 40 CFR 68, "a. If this stationary source, as defined in 40 CFR 68.3 is currently or if it becomes subject to 40 CFR 68, it shall comply with the provisions provided at 40 CFR Part 68, the federal regulations for Chemical Accident Prevention. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(1). b. The owner or operator of a stationary source shall revise and update the RMP submitted pursuant to 40 CFR 68.150, as specified in 40 CFR 68.190."

**IEPA response: Changes have been made to address these comments (current Condition 5.3.10 of the permit).**

14. **Issue:** The permit incorrectly limits fuel usage to the "blast furnaces" when the condition is intended to limit fuel usage at the blast furnace stoves. The blast furnace stoves are the fuel combustion sources and not the blast furnaces as identified in the permit. In addition, the term "blast furnace gas flares" should be singular as the condition is intended to apply to the existing blast furnace gas flare (singular.)

**Citation:** Page 25, Condition 5.6.3.b.i

**USS Position/Proposed Language:** Change first line to read " Total fuel usage for blast furnace stoves (A and B), boilers 1-10 & 11/12, ladle drying preheaters and blast furnace gas flares shall not exceed the following limits:

**IEPA response: Changes have been made to address these comments .**

15. **Issue:** The permit should be streamlined by removing the individual fuel limitations imposed by Condition 5.6.3.iii as the limits provided at 5.6.3.b.ii are more appropriate and allow more flexible conditions in accordance with EPA White Paper No. 3 and EPA's Flexible Air Permitting Rule, finalized January 13, 2009.

**Citation:** Page 25, Conditions 5.6.3.b.iii; 5.6.3.b.iv; 5.6.3.c.

**USS Position/Proposed Language:** Conditions 5.6.3.b.iii; 5.6.3.b.iv; 5.6.3.c should be deleted from the permit.

**IEPA response: No changes were made. Condition 5.6.3(b)(iii) addresses emissions from different mode of operations (fuels) utilized at the source and established in the permit 95010001 (production increase project). U.S. Steel did not apply or justify the appropriateness for this Title I revision. In addition, White Paper 3 has never been published in final form and the Flexible Air Permitting Rule has been pulled back and is still under reconsideration.**

16. **Issue:** The permit requires USS to “maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.3, pursuant to Section 39.5(7)(b) of the Act.” However, not all of the emission units covered by Section 7 have emission limitations imposed by Condition 5.6.3.

**Citation:** Page 35, Condition 5.9.1

**USS Position/Proposed Language:** Not all emission units in Section 7 have emission limits in Section 5.6.3 additionally this permit requires maximum permit fees therefore emission calculations for compliance with permit fee requirements are not necessary. The condition should be changed to provide, "The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units **with emission limits** in Section 5.6.3 to demonstrate compliance with condition 5.6.3 pursuant to section 39.5(7)(b) of the Act.

**IEPA response: Changes have been made to address these comments.**

17. **Issue:** The permit requires USS to “maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7)(b) of the Act.” However, not all of the emission units covered by Section 7 have HAP emission limitations.

**Citation:** Page 35, Condition 5.9.2

**USS Position/Proposed Language:** Not all emission units in Section 7 have emission limits in Section 5.6.3 additionally this permit requires maximum permit fees therefore emission calculations for compliance with permit fee requirements are not necessary. The condition should be changed to provide, "The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units **with HAP emission limits** to demonstrate compliance with condition 5.6.3 pursuant to section 39.5(7)(b) of the Act.

**IEPA response: Condition 5.9.2 was modified to include all emission units or/and group of emission units emitting HAPs.**

18. **Issue:** The requirement is onerous.

**Citation:** Page 39, Condition 5.10.1

**USS Position/Proposed Language:** The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has

prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response:** *No changes were made. IEPA does not accept new reporting proposals made by the source at this time. This streamlining effort requires more analysis and determination than what was provided in the comment.*

19. **Issue:** This condition needs to be clarified that 212.316(g)(5) quarterly reports apply *only to fugitive particulate matter control measures used to meet the limitations of 212.316(b) through (f)*.

**Citation:** Page 40, Condition 5.10.4.a

**USS Position/Proposed Language:** This condition as written could be incorrectly interpreted to apply to *any* control measure at the facility. The permit condition should provide, “Pursuant to 212.316(g)(5), the permittee shall provide quarterly reports regarding its fugitive particulate matter control measures used to meet the limitations of 212.316(b) through (f).”

**IEPA response:** *Condition (currently under 5.10.5(a)(ii)) was clarified.*

20. **Issue:** The reporting requirement is overly burdensome.

**Citation:** Page 41, Condition 5.10.6

**USS Position/Proposed Language:** USS agrees, pursuant to Illinois regulations, that reports of malfunctions and breakdowns that result in deviations from emission limitations should be reported by the next business day. However, additional reporting other than the semi-annual malfunction and breakdown report is unnecessary and burdensome. USS believes that the permit should not contain requirements to provide additional malfunction and breakdown reports. The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response:** *IEPA does not accept new reporting proposals made by the source (see also response to #18). Condition 5.10.6 was removed from Section 5. These reporting requirements are addressed in appropriate parts of Section 7.*

21. **Issue:** The condition is onerous and unnecessary.

**Citation:** Page 43, Condition 5.10.7

**USS Position/Proposed Language:** This requirement is onerous and unnecessary, and currently not required by any permit condition or regulation, unless the start up results in excess emissions. The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response:** *IEPA does not accept new reporting proposals made by the source (see also response to #18). Condition 5.10.7 was removed from Section 5. These reporting requirements are addressed in appropriate parts of Section 7.*

22. **Issue:** The condition cites an incorrect section of the permit.

**Citation:** Page 51, Condition 7.1.7.a

**USS Position/Proposed Language:** This condition refers to a limit established in Condition 7.1.3(f) and not (e.) The condition should be revised to reflect the correct condition.

**IEPA response:** *Condition 7.1.7 was rewritten and the reference to Condition 7.1.3 was removed*

23. **Issue:** The permit unnecessarily requires USS to keep files regarding the maximum operating capacity of each affected operation (ton/hr.) This requirement should be removed because it is not in any existing permit, is not required by any existing regulation, nor is it necessary to determine compliance with any other permit condition, permit limitation or regulatory requirement.

**Citation:** Page 53, Condition 7.1.10.a.i.B

**USS Position/Proposed Language:** As noted in Section 7.1.6, USS does not have production or emission limitations set forth for the affected coal handling operations. USS is not currently required to maintain such records and there is no need to do so. This condition should be removed from the permit.

**IEPA response:** *“.....the maximum operating capacity” was changed to “design capacity”. IEPA recognizes that maximum operating capacity can be non-descript given variations in the operations. However, to ensure that when emission units are replaced, there is no change in emissions, this type of information is necessary.*

24. **Issue:** With no basis or apparent purpose, the permit requires USS to maintain monthly and annual records of the amount of coal received and processed. This requirement should be removed because it is not in any existing permit, is not required by any existing regulation, nor is it necessary to determine compliance with any other permit condition, permit limitation or regulatory requirement.

**Citation:** Page 53, Condition 7.1.10.c

**USS Position/Proposed Language:** As noted in Section 7.1.6, USS does not have production or emission limitations set forth for the affected coal handling operations. USS is not currently required to maintain such records and there is no need to do so. This condition should be removed from the permit.

**IEPA response:** *No changes were made. These emission units are subject to the process weight rate at 35 IAC 212.322. Without records of amount of coal being processed, verification of compliance with process weight rule (Condition 7.1.3(g)) is impossible. This recordkeeping requirement is necessary to address periodic monitoring to demonstrate compliance.*

25. **Issue:** The permit condition is onerous and unnecessary.

**Citation:** Page 55, Condition 7.1.11 – Reporting Requirements

**USS Position:** Deviation reporting should be conducted semi-annually in the monitoring report required in 8.6. and not daily unless deviations result from malfunctions and breakdowns and result in excess emissions. The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response:** *No changes were made. See also response to #18.*

26. **Issue:** The Coke Production Emission Unit/Air Pollution Control Equipment does not identify Tower/Baffles as a pollution control device for Coke Quenching.

**Citation:** Page 58, Condition 7.2.2

**USS Position/Proposed Language:** “Tower/Baffles” should be identified in the emission control equipment column for coke quenching.

**IEPA response:** *Condition 7.2.2 was clarified appropriately to show that one tower has baffles and the other is a back-up tower without baffles..*

27. **Issue:** The permit requires USS to maintain “records of the total annual coke production at batteries ‘A’ and ‘B’ (ton/yr) and separately for the battery ‘B.’” Because there is no limit on the amount of coke produced from A or B, and the required recordkeeping is not required in any existing permit or regulation; nor is it necessary to determine compliance with any permit condition, the condition is unnecessary.

**Citation:** Page 92, Condition 7.2.11.c

**USS Position/Proposed Language:** As noted in Section 7.1.6, USS does not have production or emission limitations set forth for the affected coal handling operations. USS is not currently required to maintain such records and there is no need to do so. This condition should be removed from the permit.

**IEPA response:** *No changes were made. Condition 7.2.11(c) requires records of the coke production for the purposes of compliance demonstration with the PM emission limits from the mobile scrubbers (PCS cars #3 and #4, Condition 7.2.6(a)(ii)), as required by construction permit 88070071, PM emission limit for pushing emissions (lb/ton of coke produced) of Condition 7.2.3-5(c), emissions calculations/establishing emission factors. This recordkeeping is necessary to address periodic monitoring to demonstrate compliance.*

28. **Issue:** This requirement is a general reporting requirement and is more appropriate in section 8.6

**Citation:** Page 97, Condition 7.2.12.a.v

**USS Position/Proposed Language:** Deviation reporting should be conducted semi-annually in the monitoring report required in 8.6. and not daily unless deviations result from malfunctions and breakdowns and result in excess emissions. The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response:** *No changes were made. See also response to #18.*

29. **Issue:** The Coke Production Emission Unit/Air Pollution Control Equipment does not identify Tower/Baffles as a pollution control device for Coke Quenching.

**Citation:** Page 58, Condition 7.2.2

**USS Position/Proposed Language:** “Tower/Baffles” should be identified in the emission control equipment column for coke quenching.

**IEPA response:** *See response to #26.*

30. **Issue:** This requirement is onerous and unnecessary.

**Citation:** Page 98, 7.2.12.d

**USS Position:** Deviation reporting should be conducted semi-annually in the monitoring report required in 8.6; not daily, unless deviations result from malfunctions and breakdowns and result in excess emissions. The reporting requirements should be streamlined. This condition should be deleted from

the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response: No changes were made. See also response to #18.**

31. **Issue:** The by-products plant is already subject to MACT monitoring and inspections. The newly developed inspection requirements are onerous and unnecessary.

**Citation:** Page 117, Condition 7.3.9.a

**USS Position/Proposed Language:** The by-products plant is already subject to MACT monitoring and inspections. The permit should be streamlined and additional inspections beyond MACT do not need to be incorporated. These conditions should be removed from the permit.

**IEPA response: No changes were made. Annual/semi-annual inspection/monitoring requirements established by both federal statutes (40 CFR 61, Subparts L and V) are focused primarily on the control equipment and/or specific units subject to those standards without specific frequencies of required inspections. The Illinois Environmental Protection Act gives IEPA more discretion in establishing proper inspection procedures for the CAAPP sources.**

32. **Issue:** The permit has created a new inspection requirement for the COG flare.

**Citation:** Page 117, Condition 7.3.9.b

**USS Position/Proposed Language:** This requirement does not exist in any applicable regulation or underlying permit. The permit should be streamlined and additional inspections beyond those currently required are not necessary or appropriate. Additionally, the draft requirement is unduly burdensome because the flare does not shutdown, except under extreme circumstances, and such a flare outage is unpredictable, making such an inspection requirement, as drafted, impossible. This condition should be removed from the permit.

**IEPA response: No changes were made. 39.5(7)(d) of the Environmental Protection Act gives IEPA more discretion over the federal standards in establishing proper periodic/inspection procedures for the CAAPP sources.**

33. **Issue:** The permit condition contains an errant “unrepaired” at the end of the condition.

**Citation:** Page 124, Condition 7.3.11.c.iii.G

**USS Position/Proposed Language:** “[U]nrepaired” should be removed at the end of the permit condition.

**IEPA response: Changes have been made.**

34. **Issue:** The permit has created a new recordkeeping condition that requires USS to “maintain records of the raw coke oven gas received from the coke ovens (scf/mo and acf/yr).” This condition does not exist in any existing permit or regulation; nor is it needed to demonstrate compliance with any applicable regulation or permit condition.

**Citation:** Page 126, Condition 7.3.11.d.i

**USS Position/Proposed Language:** This condition should be removed from the permit.

**IEPA response: No changes were made. Emission factors for calculating emissions are based on the units of raw material received and processed. Therefore, without records of the raw coke oven gas being**

**received/processed, records of emissions required by Condition 7.3.11(d)(vi) are impossible to establish and verify.**

35. **Issue:** In this draft Title V permit, IEPA has created a new recordkeeping condition that requires USS to maintain records of the byproducts being produced, clean coke oven gas, light oil, and tar. This condition does not exist in any existing permit or regulation; nor is it needed to demonstrate compliance with any applicable regulation or permit condition. Such a condition is beyond the scope of the Title V permit program.

**Citation:** Page 126, Condition 7.3.11.d.ii

**USS Position/Proposed Language:** This condition should be removed from the permit.

**IEPA response: No changes were made. See response to #34.**

36. Additional reporting requirements are unnecessary and burdensome and do not serve to streamline the draft permit.

**Citation:** Page 130, Condition 7.3.12.d

**USS Position:** By-products plant operations are already covered under the reporting requirements contained in two (2) MACT standards as well as the general reporting requirements in 40 CFR 63 Subpart A. Additional reporting requirements are unnecessary and burdensome and do not serve to streamline the draft permit. The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments

**IEPA response: No changes were made. See response to #18.**

37. **Issue:** Backdrafting and beaching operations are operations conducted under the startup, shutdown and malfunction procedures permitted under permit conditions 7.4.5-2.a and b, and as provided in the existing underlying operating permits.

**Citation:** Page 133, 7.4.3.c

**USS Position/Proposed Language:** Backdrafting and beaching should be removed from the operations listed as being subject to 212.322 or 212.321.

**IEPA response: No changes were made. Beaching is a separate operation and apart from start-up/shutdown and malfunction (SSM). There are many causes that require beaching for which one is the result of a SSM event in the blast furnace(s). However, beaching itself is not a SSM event in and of itself.**

38. **Issue:** The permit contains an incorrect sentence structure by the inclusion of an errant “of.”

**Citation:** Page 134, 7.4.3-1.d.i

**USS Position/Proposed Language:** The word “of” should be removed from the second line so the condition would be “Particulate matter emissions from a control device shall not exceed ~~of~~ 0.01 gr/dscf;”

**IEPA response: Changes have been made.**

39. **Issue:** This requirement duplicates the SSM plan requirements and should be eliminated in order to streamline the permit.

**Citation:** Page 139, Condition 7.4.5-2.c.ii

**USS Position/ Proposed Language:** Under condition 7.4.5-2.a the facility is required to have a SSM plan in accordance with 40 CFR 63 Subpart A requirements. This requirement duplicates the SSM plan requirements and should be eliminated in order to streamline the permit.

**IEPA response: No changes were made. These startup provisions address applicable state rules/regulations. Federal SSM requirements are different than state SSM requirements. This streamlining effort requires more analysis and determination than what was provided in the comment.**

40. **Issue:** This is a redundant condition that simply requires USS to comply with a condition provided elsewhere in the permit and, therefore, it serves no independent, appropriate purpose.

**Citation:** Page 139, Condition 7.4.5-2.c.v

**USS Position/Proposed Language:** Condition 7.4.5-2.c.v should be removed from the permit because it is a duplicate of Condition 7.4.5-3(a)

**IEPA response: Changes have been made and condition was removed.**

41. **Issue:** The recordkeeping in this requirement conflicts with the general recordkeeping requirement of this permit.

**Citation:** Page 140, 7.4.5-3.b

**USS Position/Proposed Language:** The recordkeeping portions of this requirement should be removed from the permit.

**IEPA response: No changes were made. The IEPA cannot find a conflict nor is it clear from this comment the substance of the conflict and to what specific condition of the general recordkeeping requirements this comment references to.**

42. **Issue:** In this draft Title V permit, IEPA has created a new substantive condition that would require USS to water material prior to digging beached material and transferring it to vehicles. This condition does not exist in any existing permit or regulation; nor is it needed to demonstrate compliance with any applicable regulation or permit condition. This is contrary to the Title V program in that it is not intended to create new substantive requirements.

**Citation:** Page 141, Condition 7.4.5-4.b

**USS Position/Proposed Language:** This new condition is beyond the scope of Title V permitting and should be removed from the permit.

**IEPA response: No changes were made. This new condition (currently designated as 7.4.5-4(c)) was established in accordance with the Act in order to minimize fugitive emissions from material handling operations. The IEPA has the authority to establish Title I conditions in a CAAPP permit in order to further the purposes of the Act.**

43. **Issue:** In this draft Title V permit, IEPA has created a new substantive condition that would require USS to develop new work practices for backdrafting. This condition does not exist in any existing permit or regulation; nor is it needed to demonstrate compliance with any applicable regulation or permit condition. This is contrary to the Title V program in that it is not intended to create new substantive requirements.

**Citation:** Page 141, Condition 7.4.5-4.c

**USS Position/Proposed Language:** This new condition is beyond the scope of Title V permitting and should be removed from the permit

**IEPA response:** *No changes were made. This new condition (currently designated as 7.4.5-4(d)) was established in accordance with the Act in order to minimize emissions during backdrafting in the instances not associated with malfunction and breakdown . See response to #37.*

44. The permit does not identify the underlying source of the condition. For clarification, the existing permit from which the permit condition is derived should be referenced.

**Citation:** Page 141, Condition 7.4.6.a.i

**USS Position/Proposed Language:** For clarification, the citation, [permit #95010001], should be placed at the end of the paragraph.

**IEPA response:** *Condition 7.4.6(i) references to the appropriate construction permits.*

45. **Issue:** This requirement duplicates the limit in Condition 5.6.3.a

**Citation:** Page 141, Condition 7.4.6.a.ii

**USS Position/Proposed Language:** For streamlining purposes, Condition 7.4.6.a.ii should be removed from the permit because it is a duplicate to Condition 5.6.3 and it offers no independent purpose.

**IEPA response:** *This condition was modified by making a reference to Condition 5.6.3(a).*

46. **Issue:** The permit does not identify the underlying source of the condition. For clarification, the existing permit should be referenced.

**Citation:** Page 143, Condition 7.4.6.b.h

**USS Position/Proposed Language:** For clarification, the citation, [permit #95010001], should be placed at the end of the paragraph.

**IEPA response:** *Condition 7.4.6(i) references to the appropriate construction permits.*

47. **Issue:** The permit should include inspection requirements under the Inspection Header instead of referring to other sections of the permit for “details on baghouse inspections.”

**Citation:** Page 143, 7.4.7-1

**USS Position/Proposed Language:** The inspection requirements listed in Conditions 7.4.5-1 and 7.4.9 regarding Work Practices, should be removed from said sections and placed into Section 7.4.7-1 under the appropriate Inspection Header.

**IEPA response:** *In order to protect integrity for inspection requirements written in the different sections of MACT (work practice and monitoring) it was decided to keep them together in 7.4.5-1 and 7.4.9 by using the reference in Condition 7.4.7-1.*

48. **Issue:** The permit condition 7.4.11.b.ii is repetitive to the requirement of 5.9.4.h

**Citation:** Page 153, Condition 7.4.11.b.ii

**USS Position/Proposed Language:** To streamline the permit, Condition 7.4.11.b.ii should be removed from the permit as it serves no independent purpose.

**IEPA response: No changes were made. Condition 5.6.3(a) establishes the source-wide limits on production of iron. In the final permit Condition 7.4.6(a)(ii) references to those limits in 5.6.3(a). IEPA does not see any contradiction or confusion for keeping the same recordkeeping on iron production in both Sections 5 and 7.**

49. **Issue:** The furnaces are subject to the Iron & Steel MACT and are required to maintain O&M data in accordance with the MACT. This independent condition does not offer any advantage over the MACT O&M requirements, therefore, the permit should simply refer to the MACT requirements.

**Citation:** Page 154, Condition 7.4.11.c.ii

**USS Position/Proposed Language:** To avoid redundancy and to streamline the permit, Condition 7.4.11.c.ii should be removed from the permit since the MACT provisions require USS to maintain the relevant O&M data.

**IEPA response: No changes were made. Records of maintenance and repair log, as part of recordkeeping for startup procedures in Condition 7.4.11(c)(ii), reference to the general provisions for startup under 40 CFR Part 63 identified in Condition 7.4.11(a).**

50. **Issue:** The permit has created a new recordkeeping condition that would require USS to maintain a record “showing the dates and times the furnaces were backdrafted for planned shutdowns and/or routine maintenance.” The records would be required to include, “for each occurrence, the blast furnace identification, timeframe of the backdraft, reason, and steps taken to minimize emissions during the backdraft period.” This condition does not exist in any existing permit or regulation; nor is it needed to demonstrate compliance with any applicable regulation or permit condition. This is contrary to the Title V program in that it is not intended to create new substantive requirements.

**Citation:** Page 155, Condition 7.4.11.e

**USS Position/Proposed Language:** This new condition is beyond the scope of Title V permitting and should be removed from the permit. This requirement should be removed because it is not in any existing permit, is not required by any existing regulation, nor is it necessary to determine compliance with any other permit condition, permit limitation or regulatory requirement.

**IEPA response: No changes were made. During backdrafting (as a deviation from normal operations) level of emissions is increased. Therefore, additional recordkeeping is required to minimize emissions during backdrafting. Also, according to 39.5(7)(l)(i) of the Act, a CAAPP permit shall include the records of reasonably anticipated operating scenarios.**

51. **Issue:** This is a general MACT requirement and should be moved to general reporting conditions.

**Citation:** Page 158, Condition 7.4.12.a.iv

**USS Position/Proposed Language:** The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response: Changes have been made. This condition was moved to Section 5 of the final permit.**

52. **Issue:** U.S. Steel wishes to streamline reporting requirements in the Title V and eliminate individual permit reports and replace with an overall Title V reporting system.

**Citation:** Page 159, Conditions 7.4.12.b and 7.4.12.c

**USS Position/Proposed Language:** The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments.

**IEPA response: No changes were made. See response to #18.**

53. **Issue:** The permit references requirements for BOFs that have a closed hood system. USS does not have a closed hood system on its BOFs; therefore this requirement does not apply to USS.

**Citation:** Page 165, Condition 7.5.3-1.c.i.A

**USS Position/Proposed Language:** This condition does not apply to USS; therefore the condition should be removed from the permit for clarity.

**IEPA response: Changes have been made and this condition was removed from the final permit.**

54. **Issue:** The condition places a limitation on “all emission units” burning coke oven gas, when the condition applies to Ladle Dryers/Preheaters are the only potential COG combustion devices in the affected units included in the BOF section (7.5.2).

**Citation:** Page 164, Condition 7.5.3-1.b.i

**USS Position/Proposed Language:** The phrase “from all emission units” should be changed to “from Ladle Dryers/Preheaters” to clarify the PM10 limitation on COG combustion only applies to the Ladle Dryers/Preheaters.

**IEPA response: Changes have been made and condition was modified accordingly.**

55. **Issue:** Binfloor and Trackhopper baghouses are not affected units under 40 CFR 63 Subpart FFFFF and should be identified as such under Non-Applicability of Regulations of Concern so that no confusion exists as to which units MACT requirements apply.

**Citation:** Pages 166 and 167, Condition 7.5.4

**USS Position/Proposed Language:** Insert statement saying that Iron & Steel MACT does not apply to binfloor and trackhopper baghouses as these are not affected units under 40 CFR 63 Subpart FFFFF.

**IEPA response: Changes have been made and condition was modified accordingly.**

56. **Issue:** The Material Handling Tripper Conveyor is not an affected unit under the Iron and Steel MACT.

**Citation:** Pages 166 and 167, Condition 7.5.4

**USS Position/Proposed Language:** Material Handling Tripper Conveyor is not an affected unit under the Iron & Steel MACT and the permit should reflect that fact. The permit should include a statement identifying the Material Handling Tripper Conveyor as a unit not affected unit under the Iron & Steel MACT and therefore is not subject to those limitations.

**IEPA response: Changes have been made and condition was modified accordingly.**

57. **Issue:** The permit does not reflect that the fact that the reladling and desulfurization baghouse is exempt from the referenced MACT baghouse requirements per 40 CFR 63.7830(b)(3).

**Citation:** Pages 166 and 167, Condition 7.5.4

**USS Position/Proposed Language:** The exemption applies to the reladling and desulfurization baghouse because the baghouse was installed prior to August 30, 2005, and it is a positive pressure baghouse with no stack. USS suggests that the permit include a statement that identifies the exemption from requirements to install bag leak detectors on the reladling and desulfurization baghouse.

**IEPA response: Changes have been made and condition was modified accordingly.**

58. **Issue:** Requirements for overlapping operations of the BOF vessels and subsections (A-E).

**Citation:** Pages 170 and 171, Condition 7.5.5-3.a.i

**USS Position/Proposed Language:** Under EPA's flexible permit approach, these requirements should be incorporated into an operations and maintenance plan so any changes to the operating program would not require a permit modification. The permit could refer to the plan, i.e., "The Permittee shall operate a dual vessel operation according to the operation and maintenance plan." The conditions for overlapping operations of the BOF vessels and subsections (A-E) should be replaced with a condition requiring the operations to comply with an O&M Plan.

**IEPA response: No changes were made. With such proposals, this condition (borrowed from the previously issued state permit) would be practically unenforceable by IEPA and the public. In addition, the preamble for Permitting Rule has been pulled back and is still under reconsideration.**

59. **Issue:** 40 CFR 63 Subpart A requirements on minimum COMs availability and data completeness takes precedence over additional opacity monitoring in lieu of COMS data as required here. As long as USS maintains COMS availability as required, the opacity readings should not be required.

**Citation:** Page 175, Condition 7.5.7-1.c.ii

**USS Position/Proposed Language:** The condition should be removed from the permit.

**IEPA response: No changes were made. The Agency disagrees that Subpart A takes precedence over this Title I requirement. Condition 7.5.7-1(c)(ii) clearly identifies that opacity readings are taken place only in the situations when COMS is down and not functioning. In addition, U.S. Steel did not appropriately apply to have such condition removed and provide supporting documentation for such change.**

60. **Issue:** While the permit correctly references Consent Order 05-CH-750, which was entered on December 18, 2007, to resolve, *inter alia*, opacity excursions at the BOF roof monitor, it misleadingly states that, "[a]s of the date of issuance of this permit draft, an acceptable compliance schedule that would demonstrate compliance with the above referenced violations has yet to be submitted." Contrary to the permit language, U. S. Steel has submitted a Compliance Schedule to Illinois EPA and continues to meet with Illinois EPA on the matter.

**Citation:** Page 192, Condition 7.5.14

**USS Position/ Proposed Language:** The permit should reflect that U. S. Steel has satisfied its obligation to submit a compliance schedule under the Order, and it continues to discuss resolution of this matter with IEPA.

**IEPA response: Changes have been made. The compliance schedule was revised and states that schedule was submitted on time by US Steel, however, the schedule was not approvable as required under Section 39.5(10)(a)(ii). See also response #**

61. **Issue:** The permit does not clearly delineate that Section 212.309 applies only to the Material Handling System and Baghouse #1 because this unit is an affected unit under 212.305 & 212.307.

**Citation:** Page 196, Condition 7.6.4

**USS Position/Proposed Language:** 212.309 applies only to the Material Handling System and Baghouse #1 because this unit is an affected unit under 212.305 & 212.307. The other units are fugitive sources and are not limited under 212.316; nor are they affected units under 212.304 through 212.308. The non-applicability provision of Condition 7.6.4 should include a statement identifying that 212.309 does not apply to the deslagging station, caster molds or spray chambers, slab cut-off or slab ripping because these units are not subject to 212.304 through 212.308 or 212.316.

**IEPA response: Changes have been made and Condition 7.6.4 was modified accordingly.**

62. **Issue:** The condition should clarify that the provisions apply to the slab reheat furnaces and not the hot strip mill in general.

**Citation:** Page 203, Condition 7.7.1

**USS Position/Proposed Language:** Insert Heading under description identifying "Slab Reheat Furnaces"

**IEPA response: No changes were made. Comment is not clear. All slab reheat furnaces are properly identified in 7.7.1.**

63. **Issue:** The permit does not identify the underlying source of the condition. For clarification, the existing permit from which the condition is derived should be referenced.

**Citation:** Page 206, Condition 7.7.7

**USS Position/Proposed Language:** For clarification, the citation, [permit #72080038], should be placed at the end of the paragraph

**IEPA response: Condition 7.7.7(f) identifies permit 72080038.**

64. **Issue:** The test methods referenced in Condition 7.7.8.b are not the appropriate test methods specific to PM<sub>10</sub>. PM<sub>10</sub> testing should be performed using Method 201A.

**Citation:** Page 207, Condition 7.7.8.b

**USS Position:** The condition should reference Method 201A in lieu of Method 5.

**IEPA response: Changes have been made and condition was modified accordingly.**

65. Compliance with the process weight rate limits and the ton per hour limitations in permit #72080038 are based on monthly production records at the slab furnaces as shown by condition 6 of that permit.

**Citation:** Page 207, Condition 7.7.10.a

**USS Position/ Proposed Language:** Remove this requirement for recordkeeping of hourly amounts of slabs processed.

**IEPA response: No changes were made. Agency disagrees with such approach. Reference to Condition #6 of permit 72080038 is irrelevant, because technically no records required by that permit. Therefore, hourly slab production rate of Condition 7.7.7(a) is required hourly recordkeeping . This recordkeeping requirement is necessary to address periodic monitoring to demonstrate compliance.**

66. Records should be required only if startup results in excess emission.

**Citation:** Page 208, Condition 7.7.11.b

**USS Position/Proposed Language:** This requirement is onerous and unnecessary, and currently not required by any permit condition or regulation, unless the start up results in excess emissions. The condition should be removed from the permit.

**IEPA response: Changes were made. Reporting requirements on start-up events have been removed because the excess emission reports (including during start-ups) required by 7.7.11 anyway.**

67. **Issue:** Information on HAPS emissions are limited for the fuels used.

**Citation:** Page 209, Condition 7.7.13.c

**USS Position/Proposed Language:** This new condition is beyond the scope of Title V permitting and should be removed from the permit. This requirement should be removed because it is not in any existing permit, is not required by any existing regulation, nor is it necessary to determine compliance with any other permit condition, permit limitation or regulatory requirement. The phrase (including HAP's) should be removed from the condition.

**IEPA response: No changes have been made. These emission units are subject to the 112(j) determination currently out to public notice for which knowledge of HAP emission levels is needed. Also, without clear understanding/emission calculations of HAP emissions, the source will be unable to provide this information at the time of CAAPP renewal as required by 39.5(5)(w) and annually as part of Annual Emission Report.**

68. **Issue:** Testing should be contemporaneous with the submittal of a renewal application.

**Citation:** Page 219, Condition 7.8.8.b.ii

**USS Position/Proposed Language:** The permit condition should reflect that test should be conducted no more than two months prior to the Permittee's submittal of a renewal Application.

**IEPA response: Changes have been made. This condition was modified accordingly.**

69. **Issue:** The permit does not identify the underlying source of the condition. For clarification, the existing permit from which the permit condition is derived should be referenced.

**Citation:** Page 221, Condition 7.8.11.b.i.A

**USS Position/Proposed Language:** For clarification, the citation, [permit #95010005], should be placed at the end of the paragraph.

**IEPA response: Changes have been made. This condition was modified accordingly.**

70. **Issue:** USS wishes to streamline reporting requirements in the Title V and eliminate individual permit reports and replace with an overall Title V reporting system.

**Citation:** Pages 222, 223 and 224, Condition 7.8.12 (and throughout the permit.)

**USS Position/Proposed Language:** The reporting requirements should be streamlined. These conditions should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments

**IEPA response: No changes were made. See response to #18.**

71. **Issue:** The permit contains a benzene limitation that did not previously exist in any permit or regulation.

**Citation:** Page 228, Conditions 7.9.6.a and b.

**USS Position/Proposed Language:** There is no existing limitation in any rule or permit and new limitations should not be added to this permit. The rule allows the facility to exceed the total annual benzene and be subject to the control requirements of 63 Subpart FF. The limitation of 10 Mg/yr should be removed and the permit should simply require USS to comply with Subpart FF. Conditions 7.9.6.a should be removed from the permit.

**IEPA response: No changes were made. This is an avoidance limit that ensures that no control option is applied to the source under 40 CFR Part 61, Subpart FF, National Emission Standards for Benzene Waste Operations.**

72. **Issue:** USS agrees that startup procedures should be maintained, however, procedures and information contained in the startup plan should be determined by the facility and subject to change; and therefore, the items listed at paragraphs A through G should not be listed in the permit.

**Citation:** Page 233, Condition 7.10.3.h.iii

**USS Position/Proposed Language:** Remove the listed measures A through G from Condition 7.10.3.h.iii.

**IEPA response: No changes were made. U.S. Steel has mistakenly referenced to Condition 7.10.3(h)(iii) – Malfunction and Breakdown while actually commenting on Startup provisions (7.10.3(g)(iii)). The data required to be collected during startup procedures is a standard package of data (amount and type of fuel used; temperature levels achieved; time and duration of startup) that the Permittee collects during normal/routine operations of the affected boilers.**

73. **Issue:** The permit does not clearly reflect that 219.303 exempts fuel combustion emission units from the referenced 8 lbs/ hour rule.

**Citation:** Page 240, Condition 7.11.3.b

**USS Position/Proposed Language:** Internal Combustion Engines are fuel combustion emission units as defined in 211.2470. Because the internal combustion units are exempt, and to create a clearer permit condition, the condition should be removed from the permit and the permit should reflect the fact that the requirements are not applicable under 7.11.4.

**IEPA response: No changes were made. Engines are process emission units and therefore are not the fuel combustion emission units as defined in 35 IAC 211.2470. As a process emission unit, they are subject to 35 IAC 219.301.**

74. **Issue:** Internal combustion engines are not process emission units as defined in the rule because they are fuel combustion emission units as defined in 211.2470.

**Citation:** Page 240, Condition 7.11.3.c

**USS Position/Proposed Language:** Internal combustion engines are not process emission units as defined in the rule because they are fuel combustion emission units as defined in 211.2470. The requirement should be removed

**Proposed Language:** Remove this requirement and reflect that requirements are not applicable under 7.11.4.

**IEPA response: No changes were made. See response to #73.**

75. **Issue:** The referenced affected units are not fugitive PM sources and therefore are not subject to 212.316(g) and are not process emission units subject to 212.324(g).

**Citation:** Page 243, Condition 7.11.10.c

**USS Position/Proposed Language:** The condition should be removed from the permit and the permit should clearly reflect that the requirements are not applicable under 7.11.4.

**IEPA response: Condition has been modified and reference to 35 IAC 212.316(g) was removed. Engines are process emission units and not the fuel combustion emission units as defined in 35 IAC 211.2470, therefore 35 IAC 212.324(g) is still applicable requirement. See response to #73.**

76. U.S. Steel wishes to streamline reporting requirements in the Title V and eliminate individual permit reports and replace with an overall Title V reporting system.

**Citation:** Pages 244 – 248, Condition 7.11.11

**USS Position/Proposed Language:** The reporting requirements should be streamlined. These conditions should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments

**IEPA response: No changes were made. See response to #18.**

77. **Issue:** The table in Condition 7.12.2 is inaccurate.

**Citation:** Page 249, Condition 7.12.2

**USS Position/Proposed Language:** Add the following line to the end of the Emission Control Equipment list "(tanks with 1,000 gallon capacity)".

**IEPA response: Changes have been made and condition was modified accordingly.**

78. **Issue:** No limitations exist for the affected units and records of throughputs and emissions are not required.

**Citation:** Pages 252 and 253, Condition 7.12.9.b and 7.12.9.c

**USS Position/Proposed Language:** This new condition is beyond the scope of Title V permitting and should be removed from the permit. This requirement should be removed because it is not in any existing permit, is not required by any existing regulation, nor is it necessary to determine compliance with any other permit condition, permit limitation or regulatory requirement.

**IEPA response: No changes were made. Any gasoline tanks emission calculations (TANKS program, establishing emission factors, etc.) are based on the gasoline throughput. Without clear records of gasoline throughput and understanding/ calculations of emissions of regulated air pollutants, the source will be unable to provide emission information at the time of CAAPP renewal as required by 39.5(5)(w) and annually as part of Annual Emission Report.**

79. **Issue:** U.S. Steel wishes to streamline reporting requirements in the Title V and eliminate individual permit reports and replace with an overall Title V reporting system.

**Citation:** Page 253, Condition 7.12.10

**USS Position/Proposed Language:** The reporting requirements should be streamlined. This condition should be deleted from the permit; and replaced with a new Source-Wide Reporting Section. USS has

prepared a counter proposal for reporting requirements under the CAAPP permit and has included that proposal as an attachment to these comments

**IEPA response: No changes were made. See response to #18.**

80. **Issue:** Compliance with the emission limits in the construction permit was based on maintaining the level of fugitive dust control required in the permit.

**Citation:** Page 258, Condition 7.13.13.c

**USS Position/Proposed Language:** The permit should be revised to read, "Compliance with the emission limits of Condition 7.13.6 shall be achieved by keeping the records required by Condition 7.13.9.b." and the reference to Condition 5.12.1(b) should be removed.

**IEPA response: No changes were made. There are no records required by Condition 7.13.9(b). These are monitoring requirements.**

81. **Issue:** This is not a compliance procedure and should not be required.

**Citation:** Page 258, Condition 7.13.13.d

**USS Position/Proposed Language:** The requirement should be removed from the permit, consistent with the comment above, i.e., records required by Condition 7.13.9.b should be used to determine compliance.

**IEPA response: No changes were made. See response to #80.**

## II. Washington University/ABC comments on the U.S. Steel CAAPP

1. **Comment I.B:** American Bottom Conservancy requests that this draft CAAPP permit be reviewed in an environmental justice context.

*IEPA response: Notwithstanding the uncertain role of EJ issues to Title V permitting, during the permitting of US Steel, the Illinois EPA has responded to the issue of Environmental Justice in several ways. As part of the public comment period, the Illinois EPA held a public hearing on the draft permit for these operations to facilitate input into the permitting process by the public. In addition, questions that could not be adequately answered during the hearing were answered in a follow-up document and submitted to those who asked the question. Also, an additional time extension was provided to the 30 day comment period to provide sufficient time for the public to review the large amount of material related to this permit as well as the additional information requested through the FOIA process.*

*The Illinois EPA reviewed the provisions of the draft permit for the operations at US Steel to identify possible enhancements to the provisions for control of PM emissions. The extent of such potential enhancements was limited, because CAAPP permits are intended to address existing regulations and requirements for control of emissions, not to create new control requirements. In addition, nearly all operations at the source are covered by a NESHAP standard of some sort that already require maximum achievable control technology. Thus this permit should not and does not set limits for PM emissions that are lower than the limits that apply under existing regulations.*

*Concern has been expressed for the effect of emissions from US Steel on public health. As such, the suggestion has been made that the Illinois EPA should limit emissions to levels below those that are required by current regulations and force the sources to install additional control equipment. As stated elsewhere, the purpose of the CAAPP is to assure compliance with “applicable requirements.” The CAAPP does not authorize a state to impose substantive new requirements. This is particularly true where there exists no basis to do so. The applications and comments for these permits lack the information that could form the basis for the requested measures. What commentors seek are newer, more stringent regulations. This is simply not something that would be accomplished through permitting, much less CAAPP permitting. Rather, this is something that must be accomplished by adoption of new laws or regulations, on either the state or national level, as is occurring.*

*The Illinois EPA shares the concerns expressed by this comment about the current levels of PM2.5 air quality in Granite City and the Greater St. Louis Area. However, current PM2.5 air quality is being appropriately addressed by activities to lower emissions and come into compliance with the NAAQS for PM2.5. These activities are separate from the permitting of the proposed project and must proceed irrespective of the proposed project to bring the area into attainment. In this regard, the health and well-being of the public is generally addressed by the process that starts when an area is designated nonattainment, which requires the State and/or USEPA to take needed measures to reduce emissions, improve air quality, and bring the area into attainment. This process includes a detailed evaluation of the role that different sources and categories of sources have in contributing to nonattainment status, so as to allow a comprehensive set of control measures to be developed that will prove both effective and feasible in achieving the ultimate result of attainment. This detailed evaluation is a critical step in the process, as the contribution of*

sources to nonattainment status may be affected by their location and influenced by specific sets of meteorological conditions, so that certain reductions in emissions are more effective in actually improving PM2.5 air quality. For example, a key action to improve air quality both on a regional basis and throughout the eastern United States has been the adoption of the Clean Air Interstate Rule (CAIR) by USEPA. CAIR addresses the emissions of sulfur dioxide (SO2) and nitrogen oxides (NOx) from coal-fired power plants, as SO2 and NOx are precursors to the formation of PM2.5 in the atmosphere and contribute to background levels of PM2.5, most critically in urban areas.

The presence of poor and minority populations in the area is another reason why the emissions of existing sources need to be reduced as quickly as reasonably practicable to improve air quality and bring the area into attainment with the NAAQS while also minimizing disruption to the local economy on which area residents also depend.

Lastly, in the Onyx Order Responding to Petitioners Request that the Administrator Object to Issuance of a State Operating Permit (Petition number V-2005-1) the USEPA stated the following regarding the role of EJ within the Title V permit process:

“Environmental justice issues can be raised and considered in a variety of actions carried out under the Act; for example, when U.S. EPA or a delegated state issues a NSR permit. Unlike NSR permits, however, title V generally does not impose new, substantive emission control requirements, but rather requires that all underlying applicable requirements be included in the operating permit. Title V also includes important public participation provisions as well as monitoring, compliance certification, and reporting obligations intended to assure compliance with the applicable requirements.

To justify exercising an objection by U.S. EPA to a title V permit pursuant to section 505(b)(2) of the Act, 42 U.S.C. § 7661d(b)(2), Petitioners must demonstrate that the permit is not in compliance with the applicable requirements of the Act, including the requirements of the Illinois State Implementation Plan (“SIP”).

Petitioners first present environmental justice arguments as support for the position that the Administrator must object to the permit. Petitioners have not shown that their particular civil rights concerns are grounds under the Act for objection to the Onyx permit. For these reasons, the petition is denied on these issues”.

**2. Comment II:** The CAAPP permit should be revised to include all applicable requirements from, and specific references to the following permits:

Permit No. 06070022 - Emission Reduction Credits permit issued January 18, 2007 (Attached hereto as Exhibit 6)

Permit No. 06070023 - Cogeneration Project permit issued January 30, 2008 (Attached hereto as Exhibit 7)

Permit No. 06070088 - Coke Conveyance System Permit issued March 13, 2008 (Attached hereto as Exhibit 8)

Permit No. 06070020 - Coke Plant Permit issued March 13, 2008 to Gateway Energy & Coke Company, c/o SunCoke Company

As the Project Summary for the draft CAAPP states that no source-wide streamlining was involved in this case," IEPA must include the permits referenced below or explain why they are not applicable requirements under the Title V CAAPP regulations.

IEPA response: No changes were made. CAAPP permit for U.S. Steel reflects only current

**operations. All sources permitted through construction permits mentioned above are under construction and not operatable yet .**

3. **Comment II.1:** IEPA must revise the draft L'SS-GCW CAAPP to include all of USS-GCW's requirements under the emission reduction permit (06070022), the cogeneration project permit (06070023), and the coke conveyance system permit (06070088).

**IEPA response:** *No changes were made. See explanation to comment #2 above.*

4. **Comment II.2:** Revised Draft CAAPP Must Include Case-By-Case MACT Limit for Hazardous Air Pollutant Emissions from Cogeneration Boiler. IEPA should re-issue the revised draft CAAPP for further public notice before issuing a proposed final CAAPP.

**IEPA response:** *No changes were made. A draft of significant modification including a case-by-case determination for the vacated boiler MACT is on the public notice. See the appropriate placeholders in this permit where those requirements will be incorporated.*

5. **Comment II.3:** The draft CAAPP (Condition 5.3.4) should be revised to append the PM 10 Contingency Plan currently in force to the permit, or expressly include its provisions within the CAAPP .

**IEPA response:** *No changes were made. The PM10 Contingency Plan is incorporated by reference into this permit and enforced by regular inspections of IEPA's field office in Collinsville. Incorporation by reference is the act of including a second document within another document by only mentioning the second document. If done properly, the entire second document became part of the main document. In order for a document to be properly incorporated by reference, there are 3 criteria: 1) document have existed at the time the main document was created; 2) the main document must describe the particular document to be incorporated with enough specificity to be identified; and 3) must clearly identify the intent that the document be incorporated by reference.*

6. **Comment III:** The offsetting reductions that enabled the coke plant project to be permitted and that are federally-enforceable requirements, must be included in the CAAPP. Specifically, those offsets include: Construction and operation of coke oven gas desulfurization system (permit 06070088, section 3.1.1 and permit 06070022); and road cleaning activities (permit 06070088, section 3.1.1 and 3.6).

**IEPA response:** *No changes were made. See response to #2 above.*

7. **Comment IV(C)(1)(a):** The following draft CAAPP source-wide permit conditions set forth limits on fugitive particulate matter emissions, yet the draft CAAPP fails to require periodic monitoring to determine compliance with the limits, and fails to specify the frequency with which monitoring must take place (Conditions 5.3.2(a), 5.3.2(c)(i) and 5.3.2(c)(iii)).

IEPA should revise the draft CAAPP permit to require USS-GCW to conduct daily inspections using Method 9 to ensure USS-GCW's

compliance with the above-listed source-wide emission limits for fugitive particulate matter.

**IEPA response:** ***No changes were made. The source is operated under provisions of the fugitive particulate matter operating program required by Condition 5.3.3 and appropriate recordkeeping requirements outlined by Conditions 5.9.3(a) and (c). These provisions are sufficient to satisfy requirements of 39.5(7)(d) of the Act. In addition, there are more stringent regulations in Sections 5 and 7 for Granite City area for which there is periodic monitoring.***

8. **Comment IV(C)(1)(b):** The following draft CAAPP source-wide permit conditions set forth opacity limits for emissions from emission units, yet the draft CAAPP fails to require periodic monitoring to determine compliance with the limits, and fails to specify the frequency with which monitoring must take place (Conditions 5.3.2(b) and 5.3.2(d)(i)(B)).

IEPA should revise the draft CAAPP permit to require USS-GCW to use COMS on applicable emission units to ensure that USS-GCW's compliance with the above-listed opacity limits.

**IEPA response:** ***Changes have been made. Opacity limit for continuous caster spray chambers (Condition 5.3.2(d)(i)(B)) is monitored (visually observed) with a frequency outlined by Condition 7.6.8(b) and (c). All opacity limits for the different individual operations at this source are more stringent than a general 30% opacity limit referenced by Condition 5.3.2(b) for which there is periodic monitoring.***

9. **Comment IV(C)(1)(c):** The following draft CAAPP permit conditions set forth particulate matter emission limits, yet the draft CAAPP fails to require periodic monitoring to determine compliance with the limits, and fails to specify the frequency with which monitoring must take place (Conditions 5.3.2(d)(i)(A), 7.6.3-1(b)(i), 5.3.2(d)(i)(C), 5.3.2(d)(i)(D), 5.3.2(d)(i)(E) and 5.3.2(d)(i)(F)).

Because these limits apply on a continuous basis, the draft CAAPP permit should be revised to require the use of PM CEMS (continuous emission monitoring systems). PM CEMS provide periodic monitoring and are sufficient to assure compliance with this limit.

**IEPA response:** ***Changes have been made. CEMs are generally not required for periodic monitoring. Other existing methods are sufficient to demonstrate compliance. Condition 5.7(c) of the final CAAPP identifies emission units for which annual, no visible emission observations shall be made.***

10. **Comment IV(C)(2):** The draft CAAPP should be revised to specify periodic monitoring to assure compliance with the emission limits identified by Conditions 5.6.3(b)(iii)(A) through (C). At the very least, the recordkeeping requirements set forth in the production increase permit from which these fuel-based emission limits are derived should be set forth in the revised CAAPP.

**IEPA response:** ***Changes have been made. Condition 5.9.5 of the final CAAPP addresses appropriate production/ emission recordkeeping requirements.***

**11. Comment IV(C)(3):** Because the PM 10 limit in condition 7.1.3.f applies on an hourly basis, the draft CAAPP should be revised to require USS-GCW to employ a PM CEMS to conduct an annual stack test to ensure that PM 10 emissions from the coal pulverizer are in compliance with the above permit limits.

**IEPA response:** Recordkeeping requirements of Conditions 7.1.10(b), (d), 5.9.3(d) and inspection requirements of Condition 7.1.8 are sufficient to satisfy requirements of 39.5(7)(d) of the Act and ensure that control device is operated properly. Also, PM CEM's do not measure PM10 directly. See also response to #9.

**12. Comment IV(C)(4)(a):** The draft CAAPP permit must be revised to require daily monitoring designed to ensure that USS-GCW is complying with the visible emission limits in conditions 7.2.3-1.a and c, 7.2.3-2.a and b, 7.2.3-3.a and b, and 7.2.3-4.a and b.

**IEPA response:** No changes were made. Daily testing of visual emissions are required by Condition 7.2.7-3(a) pursuant to 40 CFR Part 63, Subpart L.

**13. Comment IV(C)(4)(b):** The draft CAAPP lacks necessary monitoring requirements and frequency to demonstrate compliance with the PM emission limitations in condition 7.2.3-7. Because the PM limits must be met on a continuous base, the draft CAAPP should be revised to require the use of a PM CEMS.

**IEPA response:** Changes have been made. Condition 7.2.7(d) of the final CAAPP addresses testing requirements for coke oven combustion stacks. See also response to #9.

**14. Comment IV(C)(4)(c):** **Bypass/Bleeder Stack (Flare):** The draft CAAPP permit should be revised to require that USS-GCW undertake monitoring on a daily basis to ensure that it is complying with the no visible emissions limitation of Condition 7.2.3-8.

**IEPA response:** No changes were made. 40 CFR 63.309(h) does not specify the frequency of no visible emissions observations.

**15. Comment IV(C)(4)(d):** IEPA should revise Section 7.2.9 of the draft CAAPP to require CEMS for determining compliance with the applicable limits for SO<sub>2</sub>, PM, and NO<sub>x</sub>. The draft CAAPP should be revised to require annual stack tests to determine compliance with the applicable VOM limits. Appropriate recordkeeping and reporting must also be included in sections 7.2.11 and 7.2.12.

IEPA should revise the draft CAAPP to include these three applicable regulations (35IAC 2 16.12 1, 35 IAC 214.421, and 35 IAC 2 17.141) in section 7.2.3-7. IEPA should require the use of CEMS to ensure compliance with the emission limits in these regulations.

**IEPA response:** Changes have been made. Condition 7.2.7-3(d) of the final CAAPP requires stack testing of VOM, PM, CO and NOx emissions from the coke oven combustion stacks one year before expiration of the current CAAPP. Condition 7.2.4(c) of the final CAAPP indicates that coke oven operations are not the fuel combustion emission units/sources as defined in 35 IAC 211.2470 and therefore not subject to the fuel combustion emission regulations addressed in 35 IAC Parts 212, 214, 216 and 217.

16. **Comment IV(C)(5)(a):** **Condition 7.3.8.** The permit, however, does not actually require these test methods to ever be performed. The permit contains no frequency of testing, record keeping, or reporting sufficient to yield reliable data representative of the source's compliance with this condition of the permit. At a minimum there should be annual testing to demonstrate compliance with this condition.

**IEPA response:** **Changes have been made. Condition 7.3.8(c)(vi) of the final CAAPP requires annual observations of a flare by using USEPA Method 22 and monthly ignition system inspections.**

17. **Comment IV(C)(5)(b):** **Conditions 7.3.10(a)(iii).** The draft CAAPP permit should be revised to require continuous video monitoring of flares to demonstrate USS-GCW's compliance with the no visible emissions limitation.

**IEPA response:** **No changes were made. Flaring events are not frequent due to the use of this material as a fuel. Regular monthly ignition system inspections (see response #16) would assure that flare system operates properly. Video monitoring of flare is not needed due to established testing provisions of Condition 7.3.8(c)(vi), inspection requirements of Condition 7.3.9 and the recordkeeping requirements of Condition 7.3.11(c)(iv)(D).**

18. **Comment IV(C)(6)(a):** **BF Gas Flare.** The draft CAAPP permit, however, completely fails to establish whether any regulations apply to the flare. At a minimum, the CAAPP permit should be revised to require the BFG flare to comply with source-wide permit Condition 5.3.2.b, which states:

Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 2 12.122, except as allowed by 35 IAC 2 12.123(b) and 212.124.

Because the opacity limit applies, the draft CAAPP permit must also require USS-GCW to monitor the flare, in order to yield reliable data that are representative of CSS-GCW's compliance with the limit. The draft CAAPP permit should be revised to require continuous video monitoring of flares to demonstrate USS-GCW's compliance with no visible emissions limitation.

**IEPA response:** **Changes have been made. Condition 7.4.5-4(e) of the final CAAPP requires operation of flares without visible emissions pursuant to 39.5(7)(a) of the Act. Condition 7.4.7-1 of the final CAAPP establishes monthly inspection requirements of the flare's ignition system. Condition 7.4.7-2(c) of the final CAAPP requires annual observations of a flare by using USEPA Method 22. Video monitoring of flare is not needed due to the inspection and testing requirements referenced above.**

19. **Comment IV(C)(6)(b):** In lieu of monthly visual emissions testing, and in addition to the ongoing use of bag leak detection systems, the draft CAAPP permit should be revised to require continuous compliance demonstrations through the installation, certification, operation, and monitoring of a COMS on the casthouse baghouse and the iron spout baghouse.

**IEPA response:** No changes were made. 40 CFR Part 63, Subpart FFFFF does not require simultaneous application of both monitoring techniques – bag leak detection system (BLDS) and continuous opacity monitoring system (COMS) – on the blast furnace baghouses. 40 CFR 63.7830(b)(2) clearly states that a COMS should be installed and operated only if a source does not install and operate a bag leak detection system (monitoring option used by U.S. Steel). For iron/steel making industry, a BLDS gives the following advantages over COMS:

- a). Reliably operates at lower emission levels;
- b). Lower maintenance due to lense cleanliness and alignment issues from frequent vibration;
- c). COM's cannot localize bag failures;
- d). BLDS can be correlated to opacity; and
- e). Generally preferred technology in the steel industry as evidenced by the requirements for their use in several NSPS/NESHAP's.

The IEPA believes that the monitoring and testing procedures outlined in Subsection 7.4 of the final CAAPP and the MACT standard are sufficient enough to demonstrate continuous compliance with the applicable emission standards.

**20. Comment IV(C)(6)(c):** Condition 7.4.7-2.c further specifies that such stack testing shall be performed in 2.5 year intervals. In order to generate data sufficient to assure compliance with the terms and conditions of the CAAPP permit, stack testing should be required annually, together with the additional monitoring per EPA's considerations outlined below. Thus, periodic monitoring must be revised in the LSS-GCW CAAPP permit to require annual stack testing along with additional monitoring in order for USS-GCW to comply with emission limitations.

**IEPA response:** No changes were made. For blast furnaces regulated by Subpart FFFFF, 40 CFR 63.7821(c) requires that "...For each emission unit equipped with a baghouse, you must conduct subsequent performance tests no less frequently than once during each term of your Title V operating permit". Therefore, Condition 7.4.7-2(a)(ii) of the final CAAPP correctly identifies frequency of subsequent testing. Condition 7.4.7-2(d) of the final CAAPP requires emission testing of SO2 one year prior to CAAPP renewal. The IEPA believes that the monitoring and testing procedures outlined in Subsection 7.4 of the final CAAPP and the MACT standard are sufficient enough to demonstrate continuous compliance with the applicable emission standards.

**21. Comment IV(C)(6)(d)(i)(1): Condition 7.4.6(b) – SO2.** Because CEMS for SO2 are readily available, the SO2 emissions limit is substantial, and CEMS is the only truly reliable means of generating data sufficient to show continuous compliance with a limit, the revised CAAPP should require USS-GCW to install, certify, operate, and maintain a CEMS to monitor its SO2 emissions to ensure its compliance with the permit limit.

**IEPA response:** No changes were made. SO2 limits of Condition 7.4.6(b) shall be verified by testing requirements of Condition 7.4.7-2(d)(ii) of the final CAAPP. The initial testing data indicates the actual level of SO2 emissions from casthouse baghouse is almost four times lower than the allowable levels established in this condition. Also, concentration of H2S (a main contributor to SO2 while burning coke oven gases) is well monitored. Therefore, application of CEMS is unnecessary. The IEPA believes that the monitoring and testing procedures outlined in Subsection 7.4 of the final CAAPP and the MACT standard are sufficient enough to demonstrate continuous

compliance with the applicable emission standards.

22. **Comment IV(C)(6)(d)(i)(2): Condition 7.4.6(b) – NO<sub>x</sub>.** The draft CAAPP should be revised to require an annual stack test to demonstrate compliance with this yearly limit.

**IEPA response:** *No changes were made. The initial testing data indicates the actual level of NO<sub>x</sub> emissions from casthouse baghouse is almost three times lower than the allowable levels established in this condition. Therefore, application of CEMS is unnecessary. The IEPA believes that the monitoring and testing procedures outlined in Subsection 7.4 of the final CAAPP and the MACT standard are sufficient enough to demonstrate continuous compliance with the applicable emission standards.*

23. **Comment IV(C)(6)(d)(i)(3): Condition 7.4.6(b) – VOM.** The draft CAAPP permit should be revised to require USS-GCW to determine compliance with these limits by conducting an annual stack test for VOM using EPA Method 25 or equivalent. Compliance during other periods should be determined using CO as a surrogate for VOCs. A CO CEMS should be installed, certified, and operated to measure CO. A statistically significant relationship should be established between hourly CO and VOM using VOM stack tests and CO CEMS data. A CO emission limit should be established that is equivalent to the subject VOM limits. The CAAPP should clearly state that violations of this equivalent CO limit constitute a violation of the underlying VOM limit.

**IEPA response:** *No changes were made. The initial testing data indicates the actual level of VOM emissions from casthouse baghouse is eight times lower than the allowable levels established in this condition. Because of such large margin of compliance, the IEPA does not support suggestions of VOM annual tests. Also, a blast furnace is not a fuel combustion emission source and direct correlation between CO emission levels and VOM emissions is uncertain for the operations were carbon being released mainly due to the chemical reactions during iron production but not as a by-product of burning fuels typical for a fuel combustion sources. Therefore, application of CO CEMS is unnecessary.*

24. **Comment IV(C)(6)(d)(ii)(1): Condition 7.4.6.c** specifies an SO<sub>2</sub> emission limit of 21.94 tons/year. But the draft CAAPP lacks a periodic monitoring requirement to determine whether USS-GCW is operating in compliance with this limit. IEPA should revise the draft CAAPP permit to specify a periodic monitoring requirement, employing an appropriate and reliable monitoring method and specifying an appropriate frequency of monitoring.

**IEPA response:** *No changes were made. This condition references to uncaptured (fugitive) SO<sub>2</sub> emissions and it is not clear what monitoring/testing method is proposed by commentor considering the nature of BF operations. At the same time, condition 7.4.7-2(b)(i) of the final CAAPP establishes weekly visual observations of fugitive emissions released from the casthouse and supported by appropriate recordkeeping.*

25. **Comment IV(C)(6)(d)(ii)(2): Condition 7.4.6.c** specifies a NO<sub>x</sub> emission limit of 1.14 tons/year, but the draft CAAPP lacks a periodic monitoring requirement to determine whether USS-GCW is operating in compliance with this limit. IEPA should revise the draft CAAPP permit to specify a periodic monitoring requirement, employing an appropriate and reliable

monitoring method and specifying an appropriate frequency of monitoring.

**IEPA response:** ***No changes were made. This condition references to uncaptured (fugitive) NOx emissions and it is not clear what monitoring/testing method is proposed by commentor considering the nature of BF operations. At the same time, condition 7.4.7-2(b)(i) of the final CAAPP establishes weekly visual observations of fugitive emissions released from the casthouse and supported by appropriate recordkeeping.***

**26. Comment IV(C)(6)(d)(ii)(3):** Condition 7.4.6.c specifies a VOM emission limit of 7.42 tons/year, but the draft CAAPP lacks a periodic monitoring requirement to determine whether USS-GCW is operating in compliance with this limit. IEPA should revise the draft CAAPP permit to specify a periodic monitoring requirement, employing an appropriate and reliable monitoring method and specifying an appropriate frequency of monitoring.

**IEPA response:** ***No changes were made. This condition references to uncaptured (fugitive) VOM emissions and it is not clear what monitoring/testing method is proposed by commentor considering the nature of BF operations. At the same time, condition 7.4.7-2(b)(i) of the final CAAPP establishes weekly visual observations of fugitive emissions released from the casthouse and supported by appropriate recordkeeping.***

**27. Comment IV(C)(6)(d)(iii):** Condition 7.4.6.e specifies an SO<sub>2</sub> emission limit of 15.83 tons/year, but the draft CAAPP lacks a periodic monitoring requirement to determine whether USS-GCW is operating in compliance with this limit. IEPA should revise the draft CAAPP permit to specify a periodic monitoring requirement, employing an appropriate and reliable monitoring method and specifying an appropriate frequency of monitoring.

**IEPA response:** ***No changes were made. This condition references to uncaptured (fugitive) SO<sub>2</sub> emissions from the slag pits and it is not clear what monitoring/testing method is proposed by commentor considering the nature of BF operations. At the same time, condition 7.4.7-2(b)(i) of the final CAAPP establishes weekly visual observations of fugitive emissions released from the casthouse and supported by appropriate recordkeeping.***

**28. Comment IV(C)(6)(d)(iv):** Condition 7.4.6.f specifies an SO<sub>2</sub> emission limit of 13.89 tons/year, but the draft CAAPP lacks a periodic monitoring requirement to determine whether USS-GCW is operating in compliance with this limit. The draft CAAPP should be revised to require periodic monitoring to ensure USS-GCW's compliance with the permit limit. Because CEMS for SO<sub>2</sub> are readily available, the SO<sub>2</sub> emissions limit is substantial, and CEMS is the only truly reliable means of generating data sufficient to show continuous compliance with a limit, the revised CAAPP should require USS-GCW to install, certify, operate, and maintain a CEMS to monitor its SO<sub>2</sub> emissions to ensure its compliance with the permit limit.

**IEPA response:** ***No changes were made. See response to #21.***

**29. Comment IV(C)(6)(e):** **PM<sub>10</sub> emission limits for the casthouse baghouse and the iron spout baghouse (Subsection 7.4).** The permit is unacceptably vague as to

whether the above-referenced bag leak detection system requirement applies to the baghouses listed in Condition 7.4.2 (i.e. the Casthouse Baghouse *and* the Iron Spout Baghouse) of the draft CAAPP permit, or whether it applies to only one - or neither- of these baghouses. Accordingly, the bag leak detection system requirement is of questionable enforceability. The draft permit should be revised to make clear that 40 CFR 63.7830(b) applies to both the casthouse baghouse and the iron spout baghouse, since the description of 7.4.1 states that emissions from the casthouse structure are controlled by the casthouse baghouse and iron spout baghouse. The CAAPP permit should also be revised to make clear that the bag leak detection system requirement in Conditions 7.4.9.a.ii explicitly applies to both the Casthouse Baghouse and the Iron Spout Baghouse. Condition 7.4.9.a.i, which requires USS-GCW to install, operate, and maintain a GPMS, must also be revised such that it explicitly applies to the Casthouse Baghouse and the Iron Spout Baghouse in use at the facility. In addition, the draft CAAPP should be revised to require USS-GCW to complete an annual stack test for PM10 emissions from each baghouse. These stack tests should be used to determine baghouse and leak detection system performance and effectiveness in complying with the specified PM10 limits.

**IEPA response:** **Changes have been made. Condition 7.4.9(a)(ii) of the final CAAPP clearly identifies that each baghouse is equipped with a bag leak detection system. See response to #20 in respect to the test frequencies of both baghouses .**

**30. Comment IV(C)(6)(e)(i):** Blast Furnace Charging emissions: Condition 7.4.6.d of the draft CAAPP permit specifies a PM10 emission limit of 5.17 tons/year, but does not specify any periodic monitoring to demonstrate compliance with this limit. In order to assure compliance with the limit, the draft CAAPP permit should be revised to require USS-GCW to complete an annual stack test for PM10 emissions.

**IEPA response:** **Changes have been made. Condition 7.4.11(f) of the final CAAPP does require to keep records of iron pellets charged(t/mo and t/yr) to Blast Furnace. These records in conjunction with established emission factors are sufficient to establish actual emissions and to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act. Also, iron pellet charging does not have individual emission stack and that makes testing impossible.**

**31. Comment IV(C)(6)(e)(ii):** Slag Pit emissions: Condition 7.4.6.e specifies a PM10 emission limit of 6.60 tons/year, but the draft CAAPP lacks a periodic monitoring requirement to determine whether USS-GCW is operating in compliance with this limit. IEPA should revise the draft CAAPP permit to specify a periodic monitoring requirement, employing an appropriate and reliable monitoring method and specifying an appropriate frequency of monitoring.

**IEPA response:** **Changes have been made. Condition 7.4.11(g) of the final CAAPP does require to keep records of slag processed (t/mo and t/yr). These records in conjunction with the established emission factors are sufficient to establish actual emissions and to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act. Also, slag pits do not have emission stack and that makes testing impossible.**

**32. Comment IV(C)(6)(e)(iii):** Iron Pellet Screen Emissions, Condition 7.4.6.

In order to assure compliance with the limit, the draft CAAPP permit should be revised to require USS-GCW to complete an annual stack test for PM10 emissions.

**IEPA response:** **Changes have been made. Condition 7.4.11(h) of the final CAAPP does require to keep records of iron pellets screened (t/mo and t/yr). These records in conjunction with the established emission factors are sufficient to establish actual emissions and to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act. Also, pellet screening does not have individual emission stack and that makes testing impossible.**

**33. Comment IV(C)(6)(f):** The draft CAAPP does not actually require that USS-GCW conduct any such testing to ensure compliance with the crushing and screening operations opacity limit in condition 7.4.3-1 .b. The draft CAAPP permit should be revised to require daily 40 CFR Part 60, Appendix A, Method 9 visual emissions tests for the crushing and screening operations to ensure that USS-GCW is in compliance with 35 IAC 212.316(b).

**IEPA response:** **Changes have been made. Crushing and screening operations are contained within the building and weekly opacity reading from the casthouse are addressed by Condition 7.4.7-2(b).**

**34. Comment IV(C)(6)(g):** (7.4.3-1.c) The draft CAAPP should be revised to require daily observations in accordance with 40 CFR Part 60, Appendix A, Method 9 to ensure that USS-GCW is in compliance with this opacity limit. The draft CAAPP permit should be revised to require USS-GCW to comply with the recordkeeping and reporting requirements of 35 IAC 212.316(g), which the draft CAAPP permit fails to address despite making applicable other provisions from within 35 IAC 212.316.

**IEPA response:** **Conditions 7.4.3-1( c) (35 IAC 212.316(g)) and 7.4.3-1(d) (40 CFR 63.7790(a)) represent identical numerical opacity limits (20 percent). For the MACT purposes, weekly opacity observations are addressed by Condition 7.4.7-2(b). Recordkeeping requirements of 35 IAC 212.316(g) are addressed in Condition 5.9.3( c).**

**35. Comment IV(C)(6)(h):** (Condition 7.4.7-2(a)(iv)(B)) The draft permit should be revised to require daily observations in accordance with 40 CFR Part 60, Appendix A, Method 9 to ensure that USS-GCW is in compliance with 40 CFR 63.7790(a).

**IEPA response:** **Condition 7.4.7-2(a)(ii) identifies frequency of opacity observations (once during each term of the Title V permit) as established by 40 CFR 63.7821( c) . The IEPA believes that the MACT are sufficient enough to demonstrate continuous compliance with the applicable emission standards.**

**36. Comment IV(C)(7)(a)(i)( 1):** (Condition 7.5.6.c) Emission limit for NOx (69.63 Tons/year) has no periodic monitoring requirement. The draft CAAPP permit should be revised to require an annual stack test to demonstrate compliance with this yearly limit. The NOx emission test should be conducted according to one of the applicable methods (Method 7, 7A, 7B, 7C, 7D or 7E) specified in 40 CFR Part 60, Appendix A.

**IEPA response:** **NOx emission limits and emission factor had been established in the production**

**increase construction permit 95010001 and based on the testing of NOx emissions performed by the source. This data along with the steel production records are sufficient to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act.**

- 37. Comment IV(C)(7)(a)(i)( 2): (Condition 7.5.6.c)** Emission limit for VOM (10.74 Tons/Yr) has no periodic monitoring requirement. The draft CAAPP permit should be revised to require an annual stack test to demonstrate compliance with this yearly limit. Note that 35 IAC 219.301 requires that organic material emissions not exceed 8.0 pounds per hour (3 kg/hr). The draft CAAPP permit, however, did not subject the BOF ESP Stack emissions point to this hourly limit. The final draft of the CAAPP permit must either subject the VOM emissions measured at the BOF ESP Stack to the requirements of 35 IAC 219.301, and establish adequate monitoring (e.g. VOM correlation or 40 CFR Part 60, Appendix A, Method 25 testing) to demonstrate compliance with the regulation, or the permit must describe why this regulation does not apply in the statement of basis.

**IEPA response: VOM emission limits and emission factor had been established in the production increase construction permit 95010001 and based on the testing of VOM emissions performed by the source. This along with the steel production records are sufficient to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act. 35 IAC 219.301 regulates organic photochemical reactive materials (mostly solvents) and/or organic materials having odor nuisance. Organic solvents are not used at BOF and no odor problems directly attributed to BOF have been adjudicated or confirmed.**

- 38. Comment IV(C)(7)(a)(i)( 3):** Emission limit for CO (16,097.47 Tons/Yr) has no periodic monitoring requirement. The draft CAAPP permit should be revised to require a CO CEMS to demonstrate compliance with this very high yearly limit. CO CEMS are available and used in similar industrial facilities.

**IEPA response: CO emission limit and emission factor had been established in the production increase construction permit 95010001 and based on the testing of CO emissions performed by the source (actual stack test results conducted in October 2006 demonstrate CO emission 10 times lower than established 95010001 permit). All these, along with the steel production records, are sufficient to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act.**

- 39. Comment IV(C)(7)(a)(ii): (in respect to Condition 7.5.6.e)** Emission limit for VOM (1.58 Tons/Yr) has no periodic monitoring requirement. We request that the CAAPP permit require an annual stack test to demonstrate compliance with this yearly limit. Although 35 IAC 219.30 1 requires that organic material emissions not exceed 8.0 pounds per hour (3 kg/hr), the draft CAAPP permit did not subject the Desulfurization and Reladling (Hot Metal Transfer) emissions point to this hourly limit. The final draft of the CAAPP permit must either subject the VOM emissions measured at the Desulfurization and Reladling (Hot Metal Transfer) to the requirements of 35 IAC 219.301, and establish adequate periodic monitoring to demonstrate compliance with the emission limit, or document why this regulation does not apply.

**IEPA response: This deminimus VOM emission limit is based on the engineering estimates presented by the source for 95010001 construction permit. VOM emission factors, along with the steel production records, are sufficient to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act. See also response #37 on 35 IAC 219.301.**

**40. Comment IV(C)(7)(b):**

Due to USSGCW's significant lead emissions, we are requesting that CEMS for lead included from the ESP BOF stack determine compliance with the respective annual lead limits. A multi-metal CEMS is available and has been certified by the U.S. EPA's Environmental Technology Verification program." We are requesting that annual stack tests be required for other sources with lead limits where no periodic monitoring has been included in the draft CAAPP permit: This omission affects the following emission lead limits:

- i. BOF ESP Stack (charge, refine, and tap processes) (see condition 7.5.6.c of the draft CAAPP permit): The limit of 1.26 Tons/Yr has no periodic monitoring requirement. The draft CAAPP permit should be revised to require the use of a multi-metals CEMS to demonstrate compliance with this significant yearly limit. We request that Pb CEMS monitoring be required to adequately demonstrate compliance with the annual Pb emissions limit.
- ii. BOF Roof Monitor emissions (see condition 7.5.6.d of the draft CAAPP permit): The limit of 0.08 tons/yr has no periodic monitoring requirement. The draft CAAPP permit should be revised to require an annual stack test using 40 CFR Part 60, Appendix A, Method 12 to demonstrate compliance with this yearly limit.
- iii. Desulfurization and Reladling (Hot Metal Transfer) (see condition 7.5.6.e of the draft CAAPP permit): The limit of 0.08 tons/yr has no periodic monitoring requirement. The draft CAAPP permit should be revised to require an annual stack test using 40 CFR Part 60, Appendix A, Method 12 to demonstrate compliance with this yearly limit.
- iv. BOF Additive System (i.e., fluxes. with BOF Hopper Baghouse) (see condition 7.5.6.f of the draft CAAPP permit): The limit of 0.09 tons/yr has no periodic monitoring requirement. The draft CAAPP permit should be revised to require an annual stack test using 40 CFR Part 60, Appendix A, Method 12 to demonstrate compliance with this yearly limit.

**IEPA response:** **No changes were made. The most significant source of lead emissions from BOF shop is a BOF ESP stack (see Condition 7.5.6( c)). The initial testing data indicates the actual level of lead emissions from ESP stack is around 3.5% of the allowable levels established in this condition. All other much smaller limits for lead emissions listed by commentor are based on conservative estimates where as the actual emissions still maintain a generous margin of compliance.**

**41. Comment IV(C)(7)(c):**

**(Condition 7.5.8(b)(i) – BOF baghouses))** The draft CAAPP should be revised to make clear which baghouses at the BOF process are subject to Subpart FFFFF, and specify the monitoring requirements according to whether USS-GCW is employing bag leak detection system or COMS for each regulated baghouse.

Additionally, it is not clear how 40 CFR 63.7830(b) should be applied to the baghouses, making the permit's incorporation by reference of the regulation of questionable enforceability. The regulation does not require

bag leak detection or COMS on positive pressure baghouses not equipped with exhaust gas stacks and installed before 2005. The permit states that the reladling and desulfuration baghouse is a positive pressure baghouse, but does not give any information about exhaust gas stacks. No information is given about the slag skimming baghouse. The permit should clearly define how 40 CFR 63.7830(b) applies to each baghouse based upon the type of baghouse, installation date, and exhaust gas stacks.

Monitoring of the baghouse performance and maintenance of the baghouse must be included in the permit in order to assure compliance. The permit should include requirements similar to those found in Condition 7.4.5- 1 .b.iv as they would be applied to CEMS to initiate corrective actions for emission violations in a timely manner.

**IEPA response:** **Changes have been made. Condition 7.5.8(b)(i) of the final CAAPP clarifies that only Baghouse #2 is subject to monitoring requirements of Subpart FFFFF and equipped with a bag leak detection system. Condition 7.5.8(a)(iii) of the final CAAPP provides an explanation why reladling and desulfurization baghouse is not subject to monitoring requirements of Subpart FFFFF. Baghouse's performance and maintenance procedures are clearly described in Conditions 7.5.5-1 and 7.5.8(b) of the final CAAPP.**

**42. Comment IV(C)(7)(c)(i):** **(PM10 emission limit of Condition 7.5.6.f)** The draft CAAPP permit should be revised to require an annual stack test for PM10 emissions (as defined in 7.5.6.f) from the trackhopper baghouse which controls the emissions from this process. Additionally, due to the importance of bag leak detection, as noted in comment 7.c.vii below, a bag leak detection system should be required to be installed on the binfloor baghouse. The installation, maintenance, and operation requirements of Subsection 7.4 of the draft CAAPP permit for baghouses and bag leak detection systems should be expanded to include this bag house in order to provide necessary maintenance, cause prompt response to emission control equipment malfunction and assure compliance.

**IEPA response:** **No changes were made. The quantity of PM10 emissions from the BOF Additive system controlled by a hopper baghouse (0.57 t/yr of allowable emissions) when compared to the BOF primary operations is minor. PM10 emission factors, along with the steel production records, are sufficient to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act. Coupled with inspection requirements, the likelihood of exceedance is minimal.**

**43. Comment IV(C)(7)(c)(ii):** **(PM10 emission limit of Condition 7.5.6.g)** The draft CAAPP permit should be revised to require an annual stack test for PM10 emissions from the binfloor baghouse which controls the emissions from this process. Additionally, due to the importance of bag leak detection, as noted in subsection 7.c.vii below, a bag leak detection system should be required to be installed on the binfloor baghouse. The installation, maintenance, and operation requirements of Subsection 7.4 of the draft CAAPP permit for baghouses and bag leak detection systems should be expanded to include this baghouse as well.

**IEPA response:** **No changes were made. Response to #42 is fully applicable to the operation of binfloor baghouse.**

44. **Comment IV(C)(7)(c)(iii):** **(PM10 emission limit of Condition 7.5.6.h)** The permit already acknowledges the importance of baghouse leaks by requiring bag leak detection for other baghouses. In order to comply with the emission limit and effectively detect bag leaks to ensure proper operation of the baghouse, a PM CEMS should be required. CEMS rather than a bag leak detection system is necessary in this case because of the numerous processes being ducted to this baghouse as well as the higher emission limit in comparison to the flux conveyor and BOF additive system.

**IEPA response:** **Maximum Achievable Control Technology (MACT) for the integrated iron/steel making facilities is presented in 40 CFR 63 Subpart FFFFF and does not require CEMS for slag skimming baghouse. Also, PM CEM's do not measure PM10 directly. PM10 emission factors, along with the steel production records, are sufficient to meet monitoring requirements pursuant 39.5(7)(d)(ii) of the Act.**

45. **Comment IV(C)(7)(d):** **(In respect to opacity limit of Condition 7.5.3-1(a)(iii))** The draft CAAPP permit should be revised to require daily visual emissions testing, using 40 CFR Part 60, Appendix A, Method 9 procedures.

**IEPA response:** **No changes were made. MACT presented in Subpart FFFFF does not require visual observation frequencies other than those established in the permit. Condition 7.5.7-1( c)(i) identifies frequency of opacity observations (on a weekly basis) which are adequate to insure compliance .**

46. **Comment IV(C)(7)(e):** **(In respect to opacity limit of Condition 7.5.3-1(c)(iv))** The draft CAAPP permit should be revised to require daily opacity monitoring according to 40 CFR Part 60, Appendix A, Method 9. Daily observations are supported by EPA Region VII guidance.

**IEPA response:** **Changes have been made. Condition 7.5.7-2(d) of the final CAAPP identifies frequency (weekly and daily) of roof monitor opacity visual observations.**

47. **Comment IV(C)(7)(f):** **(In respect to opacity limit of Condition 7.5.3-1(f))** The draft CAAPP permit should be revised to require daily opacity monitoring to demonstrate compliance with condition 7.4.3-1 .c (**typo ???**) in accordance with 40 CFR Part 60, Appendix A, Method 9. Daily observations using EPA Method 9 are supported by EPA Region VII guidance on opacity monitoring for Title V permits.

**IEPA response:** **Changes have been made. MACT presented in Subpart FFFFF does not require visual observation frequencies other than those established in the permit. Condition 7.5.7-1( c)(1) of the final CAAPP identifies frequency (weekly) of opacity readings from BOF shop openings. This is sufficient to yield compliance with Condition 7.5.3-1(f).**

48. **Comment IV(C)(7)(g):** **(In respect to recordkeeping and reporting of Subsection 7.5)** The draft CAAPP permit should be revised to require USS-GCW to comply with the recordkeeping and reporting requirements of 35 IAC 212.316(g), which the draft CAAPP permit fails to address, despite making applicable other provisions from within 35 IAC 212.316.

**IEPA response:** **Changes have been made. Condition 7.5.10(f) of the final CAAPP references to**

**Conditions 5.9.3(c) and (d) for appropriate records required by 35 IAC 212.316(g) and 212.324(g). Reporting requirements are addressed in Conditions 5.10.5(a) and (b).**

- 49. Comment IV(C)(7)(h):** **(In respect to Condition 7.5.7-1(c))** The permit should adjust the language in this subsection to account for the fact that the BOF ESP operates twenty four hours, *seven days a week*. Every day of the week, that is Monday through Sunday, is a "work day" so that the permit should determine opacity from the BOF ESP stack every day of the week. Moreover, neighbors of the facility are more likely to be at home, and exposed to excess emissions, on Saturday and Sunday, making monitoring those days of particular importance.

**IEPA response:** **Changes have been made. Condition 7.5.7-1(c) of the final CAAPP was adjusted appropriately.**

- 50. Comment IV(C)(8)(a):** **(In respect to NO<sub>x</sub> emission limit of Condition 7.6.7(b))** The draft CAAPP permit should be revised to require a CEMS to demonstrate compliance with this emission limitation, according to one of the applicable methods (Method 7, 7A, 7B, 7C, 7D or 7E) specified in 40 CFR Part 60, Appendix A.

**IEPA response:** **No changes were made. There is no stack for caster molds with which to install a monitor and/or perform a stack test. Emission factors and recordkeeping requirements are sufficient to yield compliance with Condition 7.6.7(b).**

- 51. Comment IV(C)(8)(b):** The draft CAAPP permit should be revised to require USS-GCW to conduct an annual stack test for PM<sub>10</sub> emissions to determine USS-GCW's compliance with the following emission limits:
- i. Deslagging Station and Material Handling Station (see 7.6.7.a): PM<sub>10</sub> emissions must not exceed 6.35 Tons/Yr.
  - ii. Caster Molds (see 7.6.7.b) PM<sub>10</sub> emissions must not exceed 10.74 Tons/Yr.
  - iii. Casters Spray Chambers (see 7.6.7.c): PM<sub>10</sub> emissions must not exceed 15.25 Tons/Yr.
  - iv. Slab Cut-off (see 7.6.7.d): PM<sub>10</sub> emissions must not exceed 12.71 Tons/Yr.
  - v. Slab Ripping (see 7.6.7.e): PM<sub>10</sub> emissions must not exceed 12.92 Tons/Yr.

**IEPA response:** **No changes were made. Number of operations from above do not have individual stacks and emissions associated with those units are uncaptured and/or not controlled. Emission factors, recordkeeping requirements and opacity reading are sufficient to yield compliance with different emission limits of Condition 7.6.7.**

- 52. Comment IV(C)(8)(c):** **(In respect to Condition 7.6.8(a)(iii))** The draft CAAPP permit should be revised to require opacity testing sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit, achievable through the installation, certification, operation, and monitoring of a COMS. Where operation of a COMS is technically non-feasible (e.g. roof vents that exceed the practical path length of the opacity monitor), compliance demonstration should be achieved through daily visual emissions testing according to the observation procedures in 40 CFR Part 60, Appendix A, Method 9.

**IEPA response:** Changes have been made. Condition 7.6.8-1(c)(i) of the final CAAPP identifies frequency (weekly and daily) of opacity reading from continuous casting operations. See also responses to #50 and #51 in respect to inability of installation of COMS.

**53. Comment IV(C)(9)(a):** (In respect to Condition 7.7.8) The draft CAAPP permit should be revised to install and operate a PM CEMS to determine USS-GCW's compliance with this significant PM10 emissions limitation.

**IEPA response:** Changes have been made. Condition 7.7.8(d) of the final CAAPP establishes frequency of testing PM10 emissions (once in five years at the time of CAAPP renewal) from slab reheat furnaces. Also, PM CEM's do not measure PM10 directly.

**54. Comment IV(C)(9)(b):** Since these records will be used to determine compliance with the maximum hourly heat input limitation in Condition 7.7.7(b), the permit should contain an *hourly fuel* usage recordkeeping requirement.

**IEPA response:** Condition 7.7.7(b) of the final CAAPP was revised in order to remove obsolete total heat input of all reheat slab furnaces (1,915 million Btu/hr). Current total maximum heat input is 1/3 lower than limit.

**55. Comment IV(C)(9)(c):** (In respect to Subsection 7.7) The permit neither mentions nor imposes emission limits, monitoring, or recordkeeping requirements regarding NOx emissions from the hot strip mill. The final CAAPP and/or Project Summary/Statement of Basis should explain this fact and either add applicable NOx requirements or explain why no such requirements apply to these emissions.

**IEPA response:** Changes have been made. Condition 7.7.4(d) of the final CAAPP provides explanation that the affected slab reheat furnaces are not the fuel combustion emission units and, therefore, no NOx and CO standards applicable to those process emission units. Neither are there any construction permits with limitations on these emission units for NOx or CO.

**56. Comment IV(C)(10):** (In respect to Condition 7.8.8) This frequency of testing is not sufficient to assure compliance with the terms and conditions of the CAAPP permit. The draft CAAPP permit should be revised to require performance testing pursuant to 40 CFR 63.1162(a)(1) on at least an annual basis.

**IEPA response:** Changes have been made. Condition 7.8.8(a) and (b) of the final CAAPP adopts a 2.5 year interval between the tests required by 40 CFR 63.1161 and 63.1162. This schedule is in line with an option established by 63.1162(a)(1). The IEPA retains the rights to request more frequent tests, if needed.

**57. Comment IV(C)(11)(a):** We therefore request that USS-GCW install, certify, operate, and monitor a PM CEMS to determine compliance with the hourly PM limit in 7.10.3.c.

**IEPA response:** This regulation will never become applicable because the boilers are only allowed to burn gaseous fuels (see Condition 7.10.3(i)). This was done to limit the requirements associated with case-by-case determination. See also significant modification

*application materials addressing case-by-case determination.*

- 58. Comment IV(C)(11)(b):** **(In respect to Condition 7.10.7(d)(i))** In order to yield reliable data from the relevant time period that that are representative of the source's compliance with the permit, performance tests of the affected boilers ought to be required at a minimum on an annual basis. Furthermore, the final CAAPP permit should outline which variables and parameters will be measured in the above-referenced performance tests. In order to yield reliable data from the relevant time period that are representative of USS-GCW compliance with this limit, we request that the CAAPP permit require an annual performance test to demonstrate compliance with 200 ppm limit In order to yield reliable data from the relevant time period that are representative of USS-GCW's compliance with this limit, we request that the CAAPP permit require an *CO COMS*.

*IEPA response: Changes have been made. Condition 7.10.7(d) of the final CAAPP establishes frequency of PM10 testing requirements for the affected boilers. Such tests shall be conducted once in 5 years, at the time of scheduled CAAPP renewal. Condition 7.10.3(i) allows burning only gaseous fuels (natural gas, coke oven gas, and blast furnace gases). See case-by-case determination permit that requires a CO CEMS and some testing as well. In addition, 10 boilers will be permanently shutdown upon startup of the cogeneration plant.*

- 59. Comment IV(C)(11)(c):** The final CAAPP permit ought to specify the testing method(s) that USS-GCW shall use to produce the records required by Condition 7.10.9(c).

*IEPA response: As explained in Response #58 above, all liquid fuels are removed as applicable fuels for the affected boilers from the final CAAPP along with appropriate recordkeeping.*

- 60. Comment IV(C)(11)(d):** The final CAAPP permit ought to specify the testing method(s) that USS-GCW shall use to produce the records required by Condition 7.10.9(d).

*IEPA response: In the case-by-case determination liquid fuels have been removed such that 112(j) limits did not need to be established for these fuel types. See also responses #58 and #59.*

- 61. Comment IV(C)(12)(a):** As an instantaneous limit is specified it is recommended that a CEMS for particulate matter be required to monitor emissions in order to demonstrate compliance. If a CEMS is used then the necessary record keeping and reporting requirements to demonstrate compliance are contained in conditions 7.11.10(e)(iv) and 7.11. 11 (a)(iii), respectively. If, however, it is shown that less frequent monitoring is sufficient to demonstrate compliance then record keeping requirements must be specified since condition 7.11.10(e)(iv) only applies to CEMS and CPMS.

*IEPA response: Changes have been made. Reference to the CEMS recordkeeping requirements (Condition 7.11.10 of the final CAAPP) was removed because no CEMS is used with affected engines/generators . MACT (Subpart ZZZZ) establishes certain criteria for CPMS (monitoring catalyst inlet temperature and the catalyst pressure drop) which are addressed in Condition 7.11.9. It is not clear from the comments why PM CEMS is addressed by the commentor? Neither SIP or MACT specified PM standards/limits for these engines. CO CEMS is not applicable to the engine which uses*

*formaldehyde reduction option and technique.*

- 62. Comment IV(C)(12)(b):** A stack test for each pollutant should be required once every 5 years to establish emission factors from the emergency generator. Since the generator is only used for emergency situations, this will provide adequate data for compliance with the hourly and annual emission limits.

**IEPA response:** *No changes were made. Condition 7.11.8(d) of the final CAAPP requires a stack testing of emergency generator if the total operation exceeds 500 hr/yr, as required by Condition 7.11.7(a). Under normal/actual operation scenario, this emergency generator is used only several hours per year.*

- 63. Comment IV(C)(12)(c):** The permitting authority must specify the parameters to be continuously monitored, periodically monitored, and measured during performance tests. Not addressing this issue causes conditions 7.11.6(a) and 7.11.9(b) to become unenforceable. The permit should specify these parameters in order to contain monitoring sufficient to represent compliance with the permit.

**IEPA response:** *Changes have been made. In the final CAAPP, operating limitations of the affected engine are moved from Condition 7.11.6(a) to 7.11.9(a). Also, previously described CEMS in Condition 7.11.9(a) of the preliminary CAAPP was removed because this option does not actually exist under current operating scenario. Operating parameters presented in Condition 7.11.9(a) shall be verified through the continuous compliance procedures of Condition 7.11.9(c).*

- 64. Comment IV(C)(13):** If the use of the submerged loading pipe and vapor balance system do exempt the source from limiting emission to below 8 lb/hr by absorbing and condensing 85 percent of materials that would otherwise be emissions then that should be noted in the permit and condition 7.12.3(b)(ii) should be put in section 7.12.4, as it would no longer apply. If the exemption in 35 IAC 219.302(b) and (c) does not apply then the permit should specify periodic monitoring sufficient to demonstrate compliance.

**IEPA response:** *No changes were made. Compliance with 35 219.301 is achieved by using TANKS program and monthly gasoline throughput, considering that station in service for 24 hours/day. Recordkeeping requirements of Condition 7.12.9 and compliance procedures of Condition 7.12.12 are sufficient to meet monitoring requirements pursuant to 39.5(7)(d) of the Act.*

- 65. Comment V:** Concomitant with the need to add the monitoring requirements described above are parallel needs to specify recordkeeping and monitoring requirements so that IEPA, USEPA, and the public can have access to the monitoring data to confirm USS-GCW's compliance status. While monitoring data known only to USS-GCW can inform the company's operations and facilitate its efforts to attain and maintain compliance, the Title V/CAAPP permit is also designed to facilitate compliance and enforcement by the federal and state government and the public. Accordingly, when IEPA revises the draft CAAPP to include the additional, required, periodic monitoring as described above, IEPA should also revise the draft CAAPP to require USS-GCW to maintain records and report the results of its monitoring activities sufficient to determine USS-GCW's compliance status.

**IEPA response:** *This comment does not require immediate actions on the proposed permit. It is*

**IEPA practice when the new monitoring requirements are established for a source in a permit to establish new corresponding permit recordkeeping and reporting requirements.**

66. **Comment VI(a):** Neither the draft CAAPP permit nor the Project Summary addresses USS-GCW's efforts to comply with the numerous requirements and deadlines in the Consent Order, many of which requirements overlap with conditions in the draft CAAPP. The revised CAAPP and/or Project Summary/Statement of Basis should do so.

**IEPA response:** **The revised compliance schedule was submitted by the source on July 23, 2009. This compliance schedule outlines repair of different sections of ESP with several deadlines for each individual repair step. This schedule is currently under review of IEPA and the Illinois Attorney General Office.**

67. **Comment VI(b)(1):** As set forth in section IV.C.4 above, documents filed by USS-GCW to IEPA suggest that the facility is violating its NO<sub>x</sub> emission limit in 35 IAC 217.141. IEPA should investigate this and include a compliance schedule in a revised CAAPP if appropriate.

**IEPA response:** **No changes were made. Coke ovens are process emission units and are not subject to 217.141. Non-applicability of NO<sub>x</sub> emission standards (35 IAC 217.141) for coke ovens was also addressed in response #15 above.**

68. **Comment VI(b)(2):** We request that IEPA investigate this (existence of SSM Plans under different MACT's), if appropriate, and clarify the status of USS-GCW's compliance with all of its SSM Plan obligations in a revised draft or final CAAPP.

**IEPA response:** **No changes were made. The final CAAPP addresses different applicable SSM plans accordingly. Also, IEPA frequent source inspections do not reveal any violations of running certain operations without required SSM plans. The IEPA does not see where any further investigation is needed.**

69. **Comment VII:** The following provisions in the draft CAAPP that would exempt USS-GCW's emissions from MACT standards during SSM events must be revised in the final permit as a direct result of this court decision, to make clear that emissions during startup, shutdown, and malfunction are not exempt from otherwise-applicable emission limits: Sections 7.2.3.d.ii and 7.2.3.e.ii; Section 7.2.5-3.a.i; Section 7.2.5-3.b.vi; and Section 7.11.6.b.i.

Because Illinois law directs IEPA to issue CAAPP permits "consistent with the [federal] Clean Air Act," 41 5 ILCS 5/39.5(3)(a), and because the Illinois SSM exemption violates the Clean Air Act by authorizing SSM emissions not subject to emission limits, *Sierra Club v. EPA*, 55 1 F.3d 1019 (D.C. Cir. 2008), IEPA must remove all references to the Illinois SSM exemption from the draft CAAPP before issuing it in final form.

**IEPA response:** **No changes were made. With respect to the court decision on vacatur of SSM, no final mandate was issued yet. According to recent USEPA guidance (07/22/2009, Office of Civil Enforcement) and analysis of the Section 112(d) source category rules indicates that the majority of the rules include specific regulatory text that exempts or excuses compliance during SSM events and the Table 2 of this guidance identifies the source category rules that USEPA believes will not be impacted when the mandate issues. Except Subpart CCC (Steel Pickling), no any other MACT standard addressed in the final CAAPP for U.S. Steel will be affected by future court decision. Also, this pending court decision will not affect SSM addressed in the**

Illinois SIP.

**70. Comment VIII:** (CAM applicability) The 1996 application cannot be considered the application for the draft U.S. Steel Permit that was public noticed in 2008. See 41 5 ILCS 5 39.5-5(j) ("The Agency shall issue or deny the CAAPP permit within 18 months after the date of receipt of the complete CAAPP application. ... Where the Agency does not take final action on the permit within the required time period.... The failure to act shall be treated as a final permit action.. ..").

Thus, both the facts underlying the permit and the law governing the process require that the CAM rules be included in any current CAAPP permit for the U.S. Steel-Granite City Works.

IEPA response: ***The application submitted by the source in 1996 (with number of later updates) is the only one considered for this final CAAPP. Therefore, based on the dates of CAAPP application submission (on or after April 20, 1998) established in 40 CFR 645.5(a)(1), CAM rules are not applicable for this final CAAPP. Additionally, most of the sources that would be subject to CAM are already covered by a MACT standard and therefore CAM would not be applicable as well.***

**71. Comment IX:** The draft CAAPP permit and/or Project Summary should be revised to indicate clearly the extent and sources of USS-GCW's PM2.5 emissions and provide an explanation of the absence of any emission limits regarding those emissions.

IEPA response: ***Federal or state emission limits for PM2.5 have not been established for any affected operations performed by U.S. Steel. Neither any of construction permits incorporated into final CAAPP contain PM2.5 limits. The permit will be revised accordingly when any affected regulations addressing PM2.5 will be promulgated. See also Response #1.***

**72. Comment X(A):** Typographical Errors

IEPA response: ***Corrected.***

**73. Comment X(B):** Provisions Requiring Recordkeeping and Reporting in Order to Demonstrate Compliance

1) Condition 7.1.13

IEPA response: ***Reference to the recordkeeping requirements was reinstated in the final CAAPP.***

2) We request that conditions 32.c.i and 32.c.ii from the production increase permit be included in section 5.6.3 of the draft CAAPP permit and that conditions 35.21, and 35.b. from the production increase permit be included in section 5.9 Source-Wide Recordkeeping Requirements of the draft permit. We also request that condition 40.a, of the production increase permit be included in section 5.10 Source-Wide Reporting Requirements of the draft CAAPP permit.

IEPA response: ***Condition 5.10.4 of the final CAAPP establishes certain reporting requirements data (annual iron and steel production, gaseous/liquid fuels consumption) that should be submitted each year with an Annual Emission Report and identified in production increase construction permit 95010001. Condition 5.12.2(b) of the final CAAPP reinstates conditions from construction permit 95010001 on how compliance with***

**annual production limits shall be demonstrated. Condition 5.9.5 of the final CAAPP reinstates recordkeeping requirements from construction permit 95010001.**

- 3) The production increase permit does include reporting and recordkeeping requirements in conditions 35.c and 40.b, and c. Condition 35.c must be included in Section 5.9 Source-Wide Recordkeeping Requirements. Conditions 40.b. and c. must be included in Section 5.10 Source-Wide Reporting Requirements. These recordkeeping and reporting requirements must be included in the permit to ensure compliance with the fuel usage limits. We request that these conditions be added to the draft CAAPP permit.

**IEPA response: Referenced recordkeeping and reporting requirements from permit #95010001 have been reinstated**

- 4) We request that the draft CAAPP permit include recordkeeping and reporting in Section 5.9 Source-Wide Recordkeeping Requirements and Section 5.10 Source-Wide Reporting Requirements that is sufficient to ensure compliance with the annual emission limits of Condition 5.6.3(b)(ii).

**IEPA response: Condition 5.9.1 of the final CAAPP requires recordkeeping for emission production limits presented in Condition 5.6.3.**

- 5) **(Annual emission limits in Condition 5.6.3(b)(iii)(A) through (C)).** The draft CAAPP permit should include the following:
- identification of the emission unit
  - description of test methods used to directly measure the emissions rate including a description of the sampling train, analysis equipment and test schedule
  - measured emissions rate
  - data and detailed calculations to determine emissions, including raw data sheets and records of laboratory analyses, sample calculations and data on equipment calibration.
  - unit specific emissions
  - total emissions

Requiring such records would establish consistency with conditions already established in the draft CAAPP permit in section 5.7 b.v.E. The CAAPP permit should include a requirement in section 5.9 that the above information be submitted to the IEPA on an annual basis. We request that the draft CAAPP permit include these recordkeeping and reporting requirements in Section 5.9 Source-Wide Recordkeeping Requirements and Section 5.10 Source-Wide Reporting Requirements to ensure compliance with these annual emission limits.

**IEPA response: Condition 5.9.5 of the final CAAPP addresses these comments .**

- 6) 5.7.c.i.D should contain a reporting clause, as self-reporting is the only possible and practical way to determine compliance.

**IEPA response:** **In the final CAAPP, Condition 5.7( c) (testing quantity of source-wide benzene generated waste) was moved to Subsection 7.3. Also, in the case of exceedance of the benzene waste limit established in Condition 7.9.6 a deviation report shall be sent within 30 days pursuant to Condition 7.9.10(a)(ii).**

- 7) **(In respect to Condition 7.9.4(a))** There is no way for any interested party to know if the facility has changed and met this conditions without some sort of reporting requirement. This provision should include an annual reporting requirement.

**IEPA response:** **Recordkeeping and reporting requirements on annual quantities of benzene generated waste are addressed in Conditions 7.9.9 and 7.9.10 of the final CAAPP, respectively. See also response to #73.6 above.**

74. **Comment X( C)(1):** The provision (Condition 7.2.7-2) should simply require that the quench samples be taken five days a week.

**IEPA response:** **State and federal regulations require different frequencies and now streamlining request was presented by the source. Therefore, state and federal standards have been referenced to in Conditions 7.2.7-2(a) and (b).**

75. **Comment X( C)(2):** Condition 33(b) of Construction Permit #95010001 should also appear in the final CAAPP permit (Condition 7.4.7-2(a)(iv)(B)(1).

**IEPA response:** **No changes were made. Blast furnace opacity observation methodology presented in construction permit 95010001(issued long before the federal standard) is obsolete after promulgation of 40 CFR Part 63 Subpart FFFFF. Also, this condition contradicts opacity procedure reading established by Subpart FFFFF and allowing non-certified observers perform such reading.**

76. **Comment X( C)(3):** The CAAPP should be revised to specify the applicable regulation (Condition 7.5.3-1(a)(i)).

**IEPA response:** **Condition 7.5.3-1(a)(ii)(B) of the final CAAPP was revised with a reference to 35 IAC 212.322.**

77. **Comment X( C)(4):** 7.5.3-1 a.ii.B similarly references three regulations, only one of which actually governs USS-GCW's emissions from the hot metal transfer, hot metal desulfurization, and ladle lancing operations.

**IEPA response:** **See response #76 above.**

78. **Comment X( D)(1):** **(In respect to Condition 7.13.3)** The actual text of the plan and program (PM10 Contingency Plan and fugitive dust operating program) need to be incorporated into the permit, and thus make the permit provisions enforceable. This also prevents IEPA and the permittee from making changes in the permit without the legally required review process.

**IEPA response:** **See response #5 above.**

79. **Comment X( D)(2):** **(Condition 5.3.10)** The actual text of the plan (episode action plan) should be incorporated into the permit, thus making the permit provisions

practically enforceable and also preventing changes in the permit without the legally required review process.

**IEPA response:** *See response #5 above for explanation of incorporation by reference.*

**80. Comment X(D)(3):** We request that IEPA include in Section 5.3.3.a a statement confirming that the initial operating plan was submitted, the title of the operating plan, the date the plan was submitted, any approval or disapproval of the plan by the IEPA, and the date of any such approval, We also request the IEPA include in Section 5.3.3 b any and all amendments to the operating plan, the dates such updates were submitted to the IEPA, and the dates of any and all IEPA approvals or disapprovals of such amendments.

**IEPA response:** *IEPA approval is not required for a plan for fugitive particulate matter operating program. The only requirement is for a review of the plan. The plan was last time updated in August 2007. See also response #5 above for explanation of incorporation by reference.*

**81. Comment X(D)(4):** We request that section 5.3.4 include the title of the PM10 Contingency Plan, the date submitted to the IEPA, the date of the IEPA's approval, any amendments to the plan, the dates of amendments submitted to the IEPA and the dates of any IEPA approval of amendments.

**IEPA response:** *The date of submission of PM10 Contingency Plan is November 15, 1994. See also response #5 above for explanation of incorporation by reference.*

**82. Comment X(D)(5):** We request that section 5.3.10 include the title of the Episode Action Plan, the date of submission to the IEPA, the date of the IEPA's approval, any amendments to the plan, amendment submission dates and the dates of any IEPA approval of amendments.

**IEPA response:** *The Plan was submitted on September 14, 1987. See also response #5 above for explanation of incorporation by reference.*

**83. Comment X(D)(6):** Section 7.2.5- 1 should include the Soaking Plan, the date it was submitted to the IEPA, the date of the IEPA's approval, any amendments to the plan, the dates such amendments were submitted to the IEPA and the dates of IEPA's approval of such amendments.

**IEPA response:** *No changes were made. 39.5(7) of the Act does require to include in the CAAPP permits applicable emission limitations and standards, monitoring, reporting, recordkeeping and compliance certification requirements that the IEPA deems necessary to assure compliance with the Clean Air Act. All applicable work practice plan requirements are included in this CAAPP. IEPA's frequent and regular inspections of the source are designed to verify compliance with all permit requirements, including plans required by several MACT's. Also, IEPA is not required to approve the Soaking Plan. The Soaking Plan was initially prepared on March 22, 2006 (received by IEPA on April 14, 2006) and revised (Revision #1) on July 12, 2006 (received by IEPA on May 29, 2007).*

**84. Comment X(D)(7):** Condition 7.2.5-2 should include the text of the work practice plan, the date it was submitted to the IEPA, the date of IEPA's approval, any revisions to the plan, the dates such revisions were submitted to the IEPA, and the dates of any IEPA approval of revisions.

**IEPA response:** No changes were made. See response # 83 for identical question regarding Soaking Plan.

**85. Comment X( D)(8):** The permit should include a placeholder that includes provisions allowing for future public comment (Condition 7.15.14).

**IEPA response:** No changes were made. The public comments are allowed when a CAAPP permit is on the 30-day public review period pursuant to 39.5(8) of the Act. It is the IEPA's understanding that this pertains to of the 112(j) requirements as well as any future compliance schedules that result from enforcement activity. The 112(j) requirements have already gone through public notice and comments as a result of significant modification process. Any future schedules included will also go through the significant modification process which includes a 30-day comment period.

**86. Comment X( E)(1):** We request that the IEPA include a specific list of sources of fugitive particulate matter that are regulated under section 5.3.2 a. of the draft CAAPP permit.

**IEPA response:** No changes were made. This level of details is included in the fugitive particulate matter operating plan which have been incorporated by reference. In addition, Subsection 7.13 provides such groups of activities and it is unreasonable to expect identification of each particular storage pile or paved/unpaved roads subject to generic requirements of Condition 5.3.2(a). Also, emission units/operations are presented and/or grouped together in the CAAPP permit based on association with particular operations/departments at this source.

**87. Comment X( E)(2):** We request that the IEPA include a specific list of units that emit particulate matter and that are regulated by the 30 percent opacity limit under section 5.3.2 b of the draft CAAPP permit.

**IEPA response:** No changes were made. Condition 5.3.2(b) is a generic standard applicable to all activities performed by stationary sources in Illinois and presented in all issued CAAPP permits. However, for Granite City area more stringent opacity standards have been designed and all these standards are presented in Section 5 and Section 7. Also, emission units/operations are presented and/or grouped together in the CAAPP permit based on association with particular operations/departments at this source.

**88. Comment X( E)(3):** We request that the IEPA include a specific list of units that are regulated under this 20 percent opacity limit (Condition 5.3.2(c)(i)(v)).

**IEPA response:** No changes were made. Clarification on the specific emission units was done in the appropriate parts of Section 7. See also response to #86 and #87.

**89. Comment X( E)(4):** We request that the IEPA include a list of specific units that emit particulate matter that are regulated by the particulate matter limit under section 5.3.2 d.i.A. of the draft permit.

**IEPA response:** No changes were made. Clarification on the specific emission units was done in the appropriate parts of Section 7. See also response to #86 and #87.

**90. Comment X( E)(5):** We request that IEPA specifically identify the emissions units to which this PM10 emission limit applies (Condition 5.3.2(d)(i)(C)) .

**IEPA response:** **No changes were made. Clarification on the specific emission units was done in the appropriate parts of Section 7. See also response to #86 and #87.**

**91. Comment X (E)(6):** We request that IEPA specifically identify the slab reheat furnaces #1-4 as the emissions units to which the PM10 emission limit applies (Condition 5.3.2(d)(i)(D)).

**IEPA response:** **No changes were made. Clarification on the specific emission units was done in the appropriate parts of Section 7.**

**92. Comment X (E)(7):** We request that IEPA specifically identify boilers #1-10 boilers #11 and #12 as the emissions units to which the PM10 emission limit applies (Condition 5.3.2(d)(i)(E)).

**IEPA response:** **No changes were made. Clarification on the specific emission units was done in the appropriate parts of Section 7.**

**93. Comment X (E)(8):** We request that IEPA include a list of specific basic oxygen furnace process which must comply with this PM10 emission limit (Condition 5.3.2(d)(i)(F)).

**IEPA response:** **No changes were made. Clarification on the specific emission units was done in the appropriate parts of Section 7. Also, referenced Condition 5.3.2(d)(i)(F) includes a reference to all basic oxygen furnace processes described in 35 IAC 212.446(a).**

**94. Comment X (E)(9):** 7.1.3.e fails to state the emission units to which the 20% opacity limit applies. Without specifying a list of the such emission units, the permit is practically unenforceable.

**IEPA response:** **Coal conveyors are identified in Condition 7.1.2 and are subject to 20% opacity limit as stated in Condition 7.1.3(e).**

**95. Comment X (F)(1):** 5.5.a should include both a frequency of visual inspections and reporting requirements.

**IEPA response:** **Condition 5.5.(b) identifies monthly inspections as a frequency of visual inspections of control equipment.**

**96. Comment X (F)(2):** 5.8.i should contain a date by which the permittee must comply with the requirement (monitoring of H2S content).

**IEPA response:** **Changes have been made. Condition 5.8(i) of the final CAAPP was clarified by removing “.....shall install”. Original language was established in permit 94120017 requiring installation of H2S monitoring system. This system has been operating for many years and modification of this condition is needed to avoid unnecessary confusion.**

**97. Comment X (F)(3):** “One pass observation provisions (Conditions 7.2.3-2(a)(i), 7.2.3-3(a) and 7.2.3-4(a)) should, at minimum, list the frequency with which such observations shall take place.

**IEPA response:** **No changes were made. This comment is technically right but irrelevant to the opacity observations of the coke ovens: the state standards referenced in those**

conditions are less stringent than the federal standards (40 CFR Part 63, Subpart L) outlined in Subsection 7.2. The opacity observations are conducted in accordance with provisions of Subpart L.

98. Comment X( F)(4): IEPA should rephrase these requirements (“per permit cycle”, Conditions 7.1.7 and 7.2.10(a)(i)(B)) in terms of five years, the maximum amount of time for which a permit may remain valid.

IEPA response: Changes have been made. Condition 7.1.7(b)(i)(A) of the final CAAPP establishes annual opacity observations. Condition 7.2.10(a)(i)(B) of the final CAAPP establishes frequencies of the testing requirements as twice during each term of the Title V operating permit (at mid-term and renewal).

99. Comment X( G)(1): Condition 5.9.3.c allows the operator to keep written records "as may be needed for compliance" is completely practically unenforceable.

IEPA response: No changes were made. Referenced condition 5.9.3( c)(i) is a direct citation of 35 IAC 212.316(g). Also, this comment does not take into account next condition 5.9.3( c)(ii) where those minimum records are identified to meet this requirement.

100. Comment X( G)(2): The provisions (“other generally accepted engineering calculations”, Condition 5.12.1(b)) should either list the acceptable ways to calculate emissions, adding a catch-all provision that allows it to update or further restrict these ways during the 5-year permit period or state more specific criteria by which the public and permittee can determine whether a calculation is "generally accepted."

IEPA response: Changes have been made. Condition 5.12.1(b) of the final CAAPP is modified by using "...other engineering calculations accepted by the Illinois EPA".

101. Comment X( G)(3): 7.2.5-3(b)(i) and 7.4.5- 1.a requires the permittee to operate emission units and associated pollution control equipment "in a manner consistent with good air pollution control practice." This provision should reference some standard of good air pollution control practices.

IEPA response: Changes have been made. These are direct citations of 40 CFR 63.310(a)and 63.7800 were modified in the Final CAAPP with a reference to "...supported by the recordkeeping of the maintenance activities performed....".

102. Comment X( G)(4): Any standard that is based on "manufacturer's specifications" or "manufacturer's instructions" is practically unenforceable. As such, the following sections should be amended to include such information on where the applicable specifications can be located in order to ensure practical enforceability: 7.3.10.b.ii, 7.4.5-1.b.ii, 7.4.9.b.vi.D, 7.5.5-1.b.ii, 7.5.8.b.i.D, 7.8.6.b.ii.B, 7.8.10.c, 7.10.3.g.iii.

IEPA response: Changes have been made. Recordkeeping requirements of the final CAAPP (subsections 7.3, 7.4, 7.5, 7.8 and 7.10) address that manufacturer's specifications or manufacturer's instructions shall be kept at the source as part of the required records.

103. Comment X( G)(5): The unenforceable "normal" standard appears a number of places in the draft CAAPP Permit. The following provisions need to be more specific so as to ensure practical enforceability: 7.2.3-7.b.i, 7.2.3-8.a.i, 7.2.7-3.a.ii.B, 7.2.7-3.b.iv.A, 7.2.7-3.b.v.A.1, 7.2.7-3.b.v.B.1, 7.2.7-3.b.v.C.1,

7.2.10.a.v.A, 7.4.9.a.iii.A, 7.4.11.c.i.A, 7.4.11.c.i.B, 7.5.7-2.a.v.A, 7.5.8.a.iv.A, 7.7.10.g.A.1, 7.7.10.g.A.2, 7.8.11.b.ii.D, 7.8.11.b.iii.B, 7.10.9.e.i.A, 7.13.3.c, 7.13.5.a.i.C.

**IEPA response:** *No changes were made. Exact citation from either 40 CFR 61/63 or SIP.*

**104. Comment X(G)(6):** “All reasonable efforts” (7.7.5(a)) are not defined and as result unenforceable.

**IEPA response:** *No changes were made. Exact citation of 35 IAC 201.262.*

**105. Comment X(G)(7):** “As soon as practicable” (7.8.12(b)(iii)) is not defined and as result unenforceable.

**IEPA response:** *No changes were made. Exact citation of 40 CFR 63.1164.*

**106. Comment X(G)(8):** “Proper working order” (7.12.(b)(iii)) is not defined and as result unenforceable.

“Operating parameters” ( 5.10.3(a)(iv), 7.3.11(b)(iv)(B), 7.3.11(b)(v)(B), 7.5.9(b)(iv)(A), 7.5.9(b)(iv)(B), 7.7.5(b)(ii), 7.8.6(c), 7.8.10(b), 7.8.11(b)(ii)(D), 7.8.11(b)(iii)(B), 7.10.3(g)(iii)(B), 8.6.2(c) ) are not defined and as result unenforceable.

“Reasonable steps” (9.10.2(a)(iv)) are not defined and as result unenforceable.

**IEPA response:** *“Proper working order” and “Reasonable steps” are direct citation of applicable regulations: no changes were made.*

**“Operating parameters” are defined and specified in the final CAAPP permit at the appropriate Section 7, where applicable.**

**107. Comment X(H):** Semantic comments on “shall develop and implement” of SSM plans for several MACT standards (reference to Conditions 7.2.5-3.a.ii, 7.2.5-3.b.ii, 7.4.5-2a, 7.5.5-2a, 7.8.12.bii.A). Deadlines and existing status of SSM plans required under different MACT standards.

**IEPA response:** *No changes were made. This is exact citation from several MACT standards. “Implementation” of a SSM is not a static process and shall be done both initially and during any future operations. See also response to #68 on the status of existing SSM plans.*

**108. Comment XI(1):** The 1996 GCW CAAPP application lists tanks #306-310, 800 and 815 as holding hydrochloric acid or liquids with similar properties. Hydrochloric acid is listed as a hazardous air pollutant. The GCW application provided no justification or supporting calculations for listing these tanks as insignificant activities as required under 35 IAC 201.211 (b). Therefore, we request that the IEPA remove these tanks from section 3.1.1 (g) of the draft permit.

**IEPA response:** *No changes were made. The IEPA has conducted an independent evaluation which supported insignificant status of these storage tanks.*

**109. Comment XI(2):** Condition 3.1.1 g of the draft CAAPP permit lists Scale Pits as an insignificant activity. However, the application does not provide any calculations to support the claim that hourly VOM emission are less than 1.0 pounds. We request that the IEPA remove the scale pits from the list of insignificant activities in section 3.1. 1 g of the draft permit.

**IEPA response:** **No changes were made. The IEPA has conducted an independent evaluation which supported insignificant status of the Scale Pits.**

**110. Comment XII(a):** Emission reports for all pollutants in 2004 and 2006 are identical to the hundredth of a ton. The IEPA should check to see whether there were some errors or misunderstandings in the submitted reports. At the very least, the project summary should provide an explanation as to why all emission limits correspond with the report so as to sufficiently notify the public of any problem in the submission of emission reports.

**IEPA response:** **No changes were made. This data was placed on IEPA database from the source' Annual Emission Reports. The IEPA does not see where this has any relevance to a specific permit term or condition of the affected CAAPP.**

**111. Comment XII(b):** **(Statement of Basis)** The Initial MACT Compliance Test chart located in section V.e.i. on page 17 lacks a date of submission to the IEPA for pickling line. Missing text fails to indicate permit conditions as required by federal and state laws.

**IEPA response:** **Test results of the Pickling Line was submitted to the IEPA on 5/22/01 and approved by IEPA on 10/02/02.**

**112. Comment XII(c):** **(Statement of Basis)** The New Source Review/Title I conditions paragraph in section V1.b. on page 18 contains two inadequacies:

- a. It is missing text; the last sentence is incomplete. Missing text fails to indicate permit conditions as required by federal and state laws.
- b. Second to last sentence references possible changes to pre-existing Title I permits without indicating which permits and what "possible" changes are requested or proposed in the CAAPP.

**IEPA response:** **Under the agreement with USEPA-Region V, the IEPA retains the rights to modify (revise) certain conditions of construction permits incorporated into the CAAPP permits with a designation "TIR".**

**113. Comment XII(d):** The project summary lacks an explanation of the exclusion of emission reduction credits, cogeneration, and coke plant permits.

**IEPA response:** **See response #2.**

**114. Comment XII(e):** The project summary fails to discuss the applicability or inapplicability of insignificant regulations and provisions lacking periodic monitoring standards. The project summary fails to indicate limits for which there is no monitoring and to provide explanation of why the permit lacks monitoring for certain provisions.

**IEPA response:** See responses in this document to the specific concerns raised on each individual emission unit.

**115. Comment XII(f):** (Statement of Basis) Description of 2005-2007 enforcement action is incomplete as it stands in section V.b on pages 15- 17. Thus the permit should include details of the finalized compliance plan and until then, at the very least, should include a reference to the developing compliance plan.

**IEPA response:** The IEPA believes the discussion in the project summary is sufficiently detailed enough to establish the need for compliance schedule. Any further discussions at this point could be an interference with ongoing deliberation.

**116. Comment XII(g):** The project summary provides a summary of key requirements of applicable regulations for coal handling (7.1) but not for coke production. Further, it does not explain how applicable regulations apply and to what activities they apply or do not apply. The Battery B permit omission fails to fulfill the USEPA's recommendation that all permits issued to the same site and applicant be enumerated in the project summary

**IEPA response:** The IEPA cannot find where it failed to provide a discussion of the coke production in the Project Summary.

### III. USEPA-Region V Comments on the U.S. Steel CAAPP

1. The permit authorizes the source to operate its units in violation of the applicable standards during start-up and malfunction. The project summary doesn't mention this exemption nor does it detail why such an exemption is appropriate. Is there minimal impact on the NAAQS? Historically what has been the increase in emissions during startup? The project summary should have some discussion about why IEPA thinks it is appropriate to reauthorize this exemption. I also have a legal authority question. How does this SIP exemption apply to MACT requirements? On the face of the rule I would assume that the SIP cannot override MACT requirements. I would appreciate IEPA's viewpoint on its own authority and to possibly continue the discussion of this issue and how the SIP exemption should be portrayed in the permit.

**IEPA response:** *See our response #69 (Section II of this document) for detailed discussion on start-up, shutdown and malfunction (SSM) exemptions from MACT emission standards. SIP exemptions are separate from NSPS/NESHAP SSM's and they are identified separately. Currently, NAAQS for lead and PM2.5 emissions are the only standards that could be potentially impacted by SSM. However, SSM impact of each individual emission unit or group of emission units is very different and its actual value could be established only after certain modeling procedures.*

2. Why aren't the requirements from 63.7295(a)(2) and (b)(1) and(2) not included in 7.2.3-6?

**IEPA response:** *Changes have been made. Condition 7.2.3 -6 of the final CAAPP incorporates requirements of 40 CFR 63.7295(a) and (b).*

3. The following terms are missing citations to the origin and authority: 7.2.3-5(e) , 7.2.11(c) , 7.3.11(d)), 7.6.8, 7.7.8

**IEPA response:** *Changes have been made. Origin and authorities were added.*

4. 7.2.5-2(d) does not accurately reflect the requirements in 63.306 (d).

**IEPA response:** *Changes have been made. Requirements have been included.*

5. Shouldn't the alternatives listed in 7.2.7-3(b)(v)(A) and (B) be alternative operating scenarios? As the permit is currently drafted it doesn't appear as if 63.7295(a)(1)(ii) is an applicable requirement under 7.2.3-6.

**IEPA response:** *No changes were made. 40 CFR 63.7295(a)(1)(ii) is an alternative option to the concentration limit of total dissolved solids (63.7295(a)(1)(i)) and this alternative is not used by the source. However, the permit retains a testing option for this alternative scenario (see condition 7.2.7-3(b)(v)(B)) if the source decides to utilize an alternative requirement of 63.7295(a)(1)(ii).*

6. What is the relevance of the note in 7.3.6(b)(iii)?

**IEPA response:** *No changes were made. It was done for clarification purposes only. The note was presented here to further identify compliance with the "no emissions" requirement.*

7. Why is 63.7834(b) not required in 7.4.11?

**IEPA response:** **Changes have been made. The final CAAPP clarifies Condition 7.4.11(a)(iii) with a direct reference that a current copy of the operation and maintenance plan shall be kept at the source.**

8. Why isn't 63.7800(b)(6) required in 7.5.5-2? Doesn't the ESP have a COM?

**IEPA response:** **Probably, initial intent of this comment was referenced to Condition 7.5.5-1. Changes have been made and new Condition 7.5.5-1(b)(v) fully addresses requirements of 40 CFR 63.7800(b)(6).**

9. How often is the testing in 7.6.8 and 7.7.8 required? Requiring testing upon request isn't periodic.

**IEPA response:** **Changes have been made. Condition 7.6.8(c)(1)(A) and (B) requires weekly and daily observations. Condition 7.7.8(d) requires testing once in five years.**

10. Shouldn't U.S. Steel have a synthetic minor limit to keep them out of being applicable to 214.423? (See 7.7.4(b))

**IEPA response:** **No changes have been made. Residual oil was used sporadically by reheat furnaces and the maximum levels of SO2 emissions are well below applicability threshold of 730 lb/hr. In the significant modification addressing 112(j), the authorization to burn residual oil has been removed.**

11. The test data relied on in 7.7.7(b) is 20 years old? Why is it appropriate to use data from a 20-year old test?)

**IEPA response:** **Changes have been made. No more recent test data is available at this time. Next testing shall be performed prior to renewal of the CAAPP permit (Condition 7.7.8(d)).**

12. The Project Summary does not provide any justification for why particular monitoring requirements are sufficient. Appendix 4 of the Project Summary does detail the process which IEPA will use to consider the appropriate monitoring but the Project Summary itself does not provide any of this detail. One example is in section 7.1.7(c) and (d). Why is testing opacity annually and PM 10 every five years sufficient to assure compliance?

**IEPA response:** **See responses in this document pertaining to specific monitoring requirements.**

13. The Project Summary does a terrific job of outlining the compliance history of the facility. However, it appears that very little in the way of a compliance schedule is included in the permit. In fact Section VII (i) of the Project Summary states that a compliance schedule is under development. How will this be incorporated into the permit?

**IEPA response:** **The compliance schedule will be incorporated into the permit using the significant modification procedures.**

#### IV. Stein Steel Mill Services Comments (co-located source I.D.119813AAD) on the Stein Steel CAAPP

##### 1. Section 4 (table)

In the vertical column entitled “Emission Control Equipment” all categories have “None” identified as the Emission Control Equipment. Stein believes that a more accurate description of the Emission Control Equipment (except for the Unit/Operations for Gasoline Storage Tanks) should be identified as “Residual Moisture”. The moistness of the material being processed plays a significant role in the control and reduction of fugitive emissions in all of the unit/operations identified in this table.

**IEPA response:** *No changes were made. Currently no air pollution control equipment/devices are used by the source and moisturizing of processed materials is not a such control/device.*

##### 2. Section 5.7(b) and (c)

These sections identify the owner/operators responsibility for providing certain testing holes and scaffolding needed for conducting sampling tests. Since all sources at Stein are fugitive and there are no ducts, chimneys, vents, etc., Stein believes that Section 5.7(a) is appropriate, but believes that subsections (b) and (c) are inappropriate.

**IEPA response:** *No changes were made. This is a generic statement placed in all IEPA CAAPPs and originated from Illinois rules.*

##### 3. Section 5.9.3(b)(i-vii)

Stein understands that the purpose of the CAAPP permit is to be in compliance at all times. Compliance includes proper recordkeeping. However, Stein believes that the requirements in these sections are overly detailed, too prescriptive, and burdensome. Stein believes that compliance can be achieved by simply stating: “Compliance with the fugitive particulate matter emissions unit shall be based on the recordkeeping and reporting requirements of Section 5.5 and Section 5.6 as compliance procedures in Section 7 (Unit Specific Conditions) of this permit.”

**IEPA response:** *No changes were made. The condition referenced above is a direct citation of the applicable recordkeeping requirements established in 35 IAC 212.316(g).*

##### 4. Section 5.10.2

Stein believes that the wording in Section 5.10.2(c.i) and (c.ii) are overly specific and not compulsory. This section could be eliminated. Stein believes that Section 5.10.2(a) and (b) clearly specify the reporting requirements necessary to meet 35 IAC 212.316(g).

**IEPA response:** *No changes were made. The condition referenced above is a direct citation of the applicable reporting requirements established in 35 IAC 212.316(g).*

**5. Section 7.1.7**

Section 7.1.7 specifies various testing to demonstrate compliance. Section 7.1.7(a)(1)(A) specifies using EPA Method 9 on an annual basis. Stein requests that the wording of this section be revised as follows:

- a. Upon request by the Illinois EPA, the Permittee shall conduct opacity observations of the affected material handling operations by a certified observer in accordance with USEPA Method 9.*
- b. The testing conditions from above are established in accordance with requirements of 39.5(7) of the Act.”*

In addition, the testing requirements specified in Section 7.1.7 (c) cannot be accomplished. That section requires USEPA Test Method 5 testing. Since all sources of emissions at Stein are fugitive emissions, there are no stacks, ducts, or other conveyances for conducting such a stack test. Unless a stack or other device is installed as part of a process in the future, Stein requests that this section stating the requirements for using this test methodology (Method 5) be removed from the current permit.

**IEPA response:** *No changes were made for Condition 7.1.7(a)(1)(A). The proposed by the permittee language is too vague and does not specify frequency of testing of the affected slag processing plant. Periodic monitoring of compliance with applicable standards is impossible to verify without those test frequencies identified in the final CAAPP.*

**Condition 7.1.7(c) was removed.**

**6. Section 7.1.7(d)**

This section requires the measuring of the moisture content of processed slag. This section states using ASTM Procedures (C566-97). Stein Measures the moisture of the slag on a regular basis. Stein request that this section be revised to state the use of ASTM Procedures (C566-97) “or equivalent” for total moisture content of the material.

**IEPA response:** *No changes were made. The Permittee does not provide “equivalent” procedures for measuring a moisture content of the material.*

**7. Section 7.1.9(b)(i)**

This section requires recordkeeping information obtained during a stack test. See comments above for Section 7.1.7 Testing Requirements. Since Method 5 testing cannot be conducted, Stein requests that this section be removed from the permit.

**IEPA response:** *Condition 7.1.9(b)(i) was removed.*

**8. Sections 7.1.9(c), (d), (e) and (f)**

Stein believes that the wording in these sections is overly detailed, too prescriptive, and burdensome. For example, detailed maps have been submitted as part of the permit application. Stein maintains the same maps. Details on water application will be accomplished through the use operator and supervisor log sheets. Stein believes that compliance can be achieved by simply stating:

*“Compliance of the fugitive sources with conditions specified in the Enhanced Fugitive Dust Plan shall be demonstrated by the recordkeeping requirements of condition 7.1.9.*

Maintain records and logs for implementation of the Enhanced Fugitive Dust Plan pursuant to Sections 5.3.3 and 7.1.5.”

**IEPA response:** **No changes were made. The recordkeeping requirements proposed in the final CAAPP are detailed and clear for a source, IEPA and public. Contrary, the proposed by the Permittee language does not address recordkeeping requirements needed to satisfy Condition 7.1.9.**

**9. Sections 7.2.7 (c)**

The testing requirements specified in Section 7.2.7 ( c) cannot be accomplished. That section requires a USEPA Test Method 5 testing. Since all sources of emissions at Stein are fugitive emissions, there are no stacks, ducts, or other conveyances for conducting such a stack test. Unless a stack or other device is installed as part of a process in the future, Stein requests that the section stating the requirements for using this test methodology (USEPA Test Method 5) be removed from the current permit.

**IEPA response:** **Condition 7.2.7( c) was removed.**

**10. Sections 7.2.9(e)(i) through (vii)**

Stein believes that the requirements of these sections are overly detailed, too prescriptive, and burdensome. Stein believes that compliance can be achieved by simply stating:

*“The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected screening unit with the permit requirements within 30 days of the violation, pursuant to section 395.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.”*

**IEPA response:** **No changes were made. The proposed by the Permittee language does not address recordkeeping requirements needed to satisfy Condition 7.2.9. Contrary, the proposed by the Permittee language does not address recordkeeping requirements needed to satisfy Condition 7.2.9.**

**11. Section 7.4.7(c)**

Non-applicability of USEPA Test Method 5 as discussed above.

**IEPA response:** **Condition 7.4.7( c) was removed.**

**12. Section 7.4.9(k) (i) through (vii)**

Stein believes that the requirements of these sections are overly detailed, too prescriptive, and burdensome. Stein believes that compliance can be achieved by simply stating:

*“The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected screening unit with the permit requirements within 30 days of the violation, pursuant to section 395.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.”*

**IEPA response:** **No changes were made. The recordkeeping requirements proposed in the final CAAPP are detailed and clear for a source, IEPA and public. Contrary, the proposed by the Permittee language does not address recordkeeping requirements needed to satisfy Condition 7.4.9.**

**FOR ADDITIONAL INFORMATION**

Questions about the public comment period and permit decision should be directed to:

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