



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUL 03 2013

Sarah Seelen  
Air Quality Permits Section  
Industrial Division, Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155

Dear Ms. Seelen:

We have reviewed the Minnesota Pollution Control Agency's (MPCA) draft/proposed permit major amendment for U.S. Steel Corp, Minnesota Ore Operations (Minntac), located in Mountain Iron, Minnesota (permit number 13700005-006). The proposed permit authorizes the replacement of the existing main kiln burners with low nitrogen oxide (NO<sub>x</sub>) main burners on the facility's induration lines 4 and 5.

The draft permit states that the project will reduce NO<sub>x</sub> emissions from baseline emission rates and other criteria pollutants will remain at previous rates.

In order to ensure that the project meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, U.S. Environmental Protection Agency has the following comments:

- 1) P. A-16; the draft permit authorizes construction of CE 181 and CE 182 for a period of five years. Upon expiration of the construction authorization, the permit allows the Permittee to apply for an extension, by means of administrative amendment under Minnesota Rule 7007.1400. This type of change is not authorized by the administrative amendment rules, currently approved as part of Minnesota's State Implementation Plan (SIP). Moreover, this permit condition is authorized under Title I of the Clean Air Act. Title I conditions cannot be revised with an administrative amendment. Under Minnesota's combined construction and operating permit program, Title I conditions are revised as major amendments under Minnesota Rules. Please modify the language to specify that an extension could be granted with a major permit amendment.
- 2) The Taconite Maximum Achievable Control Technology (MACT), Part 63, subpart RRRRR, required taconite facilities to achieve and maintain compliance with its requirements by October 30, 2006. At the time of the last permit action for Minntac, in

2008, the following language regarding the Taconite MACT was included in the Technical Support Document (TSD): "conditions that require the Permittee to comply with these rules would be incorporated more conveniently at reissuance of the Title V permit (which expires on February 26, 2008), although the Permittee is required to comply with them as of their effective date." It is noted that this permit action is not a Title V permit reissuance. However, it has been over five years since Minntac's Title V permit has expired and well past the compliance date of the Taconite MACT. Since MPCA implements a combined construction and operating permit program, it is reasonable to incorporate applicable requirements on an ongoing basis. Please consider adding all applicable requirements to this permit action or provide a timeframe by which a Title V renewal permit will be issued.

- 3) P. A-16, GP 010, Agglomeration lines 4 & 5; the Taconite MACT rule limits hazardous air pollutant (HAP) emissions by regulating total particulate matter (PM). Although the Taconite MACT rules are not incorporated into the draft permit at this time, Minntac is required to comply with the MACT. As such, control equipment for Group 10, existing indurating furnaces (lines 4 & 5) are utilized to comply with the standards in the MACT. The TSD states "that emissions from PM<sub>10</sub> and PM<sub>2.5</sub> have decreased from baseline rates due to implementation of the Taconite MACT." If controls required to comply with the Taconite MACT were used as the basis in calculations of new source review applicability for criteria pollutants, including PM<sub>10</sub> and PM<sub>2.5</sub>, the control efficiencies or other operating requirements relied upon for applicability calculations should be included in the permit. Moreover, Minnesota Rule 7007.0800, subpart 14, requires permits to specify operating and maintenance requirements for each piece of control equipment located at the stationary source. Please add control efficiency requirements for PM<sub>10</sub> and PM<sub>2.5</sub> to the draft permit where necessary or provide a justification for the reason it is not required.
- 4) P. A-16; the last permit condition reads "Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735; or alternatively, as below:" However, there is no option below. This language implies that the source can choose between the numerical limit and the control efficiency on the next page or is language missing in this permit condition. Please correct or clarify.

If you have any questions with respect to this letter, please contact Jennifer Darrow, of my staff, at (312) 886-6315.

Sincerely,



Genevieve Damico  
Chief  
Air Permits Section