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

REPLY TO THE ATTENTION OF:

JUL 09 2014

Ms. Katie Koster
Detroit District Office
Michigan Department of Environmental Quality
Air Quality Division
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202

Dear Ms. Koster:

The U.S. Environmental Protection Agency has reviewed the draft renewal of the Renewable Operating Permit (ROP) for U.S. Steel Great Lakes Works, State Registration Number A7809, located in Ecorse, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1) In the staff report on page 4, the description of the primary iron production facility on Zug Island describes three blast furnaces, two of which are in operation. For the blast furnace that is not in operation, please specify which blast furnace it is (A1, B2, or D4), and the duration of its inoperation.

2) In the staff report beginning on page 9, the Michigan Department of Environmental Quality (MDEQ) describes terms and conditions of the draft ROP that the applicant did not agree upon. Specifically, MDEQ is requiring the use of a certified visible emission (VE) reading if emissions are observed during a non-certified reading. EPA supports such a condition for the use of a certified VE reading to assure compliance with the applicable opacity requirements.

3) On pages 23, 25, and 124, there are emissions limits for "Nitrogen Oxide [NO_x] as NO_2" and "Nitrogen Oxide expressed as NO_2". However, the monitoring/testing method associated with this permit condition requires the permittee to calculate and maintain records for NO_x. Are the NO_2 emissions the only forms of nitrogen oxides being emitted from these emissions units? Are the NO_2 and NO_x emissions presumed to be equivalent? Please explain how the permittee will assure compliance with the permit limit for nitrogen oxide as NO_2 when recording NO_x emissions.

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4) On page 126 of the permit, the process/operational restriction for the types of fuels that can be burned in the boiler house boilers has its origin and authority solely based on the state implementation plan consent order number 27-1993. On Page 122, Section IX, item 4, the permit states that the conditions contained in this ROP for which a consent order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the consent order. Does the consent order number 27-1993 have a future termination date associated with it? In the event of the consent order termination, does the permit contain any other permit conditions which would restrict the types of fuels that can be burned in the boiler house boilers? EPA recommends that a permit condition be included which specifies the types of fuels that the boilers can burn and is not subject to potential termination through a consent decree.

5) On pages 28, 33, 38, 65, 73, 81, 91, 98, and 141, the permit contains a requirement that the permittee shall conduct performance tests no less than once per permit term. Due to the length of time between the permit application and the final issuance of the ROP, EPA believes that a more stringent closed-ended time period be included as part of this condition. Furthermore, in MDEQ's response to comments on the recently issued Severstal permit, MDEQ determined that it is appropriate to require Severstal to stack test more frequently. MDEQ revised the draft permit to require Severstal to stack test every three years from the previous stack test. Based on the compliance history at U.S. Steel and the similarity in the facilities, EPA strongly recommends that this condition be revised so that the permittee shall conduct these performance tests once every three years from the date of the previous test.

Thank you for the opportunity to provide comments on this draft permit. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely,

Genevieve Damico

Genevieve Damico
Chief
Air Permits Section