

June 7, 1999

(AR-18J)

Mike Hopkins, Manager
Air Quality Modeling and Planning
Division of Air Pollution Control
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hopkins:

The purpose of this letter is to provide you with further guidance on North Star BHP Steel, LLC's (NS BHP) request to modify their Prevention of Significant Deterioration Permit to Install (PTI #03-9212) for their Delta, Ohio facility. Our concerns are over NS BHP's request to allow an increase in their allowable Best Available Control Technology (BACT) emission limits for Carbon Monoxide (CO) and Nitrogen Oxide (NOx).

NS BHP is requesting an increase in their allowable BACT CO and NOx emission limits from 2.0 to 7.0 and 0.35 to 0.54 pounds per ton of steel produced, respectively. Although NS BHP has provided their justification for such a request, we believe that their justification is not reasonable considering that other similar sources are either permitted at or able to test near emission limitation levels similar to NS BHP's current emission limitations. As a result, we are not in agreement with NS BHP's request and suggest that we schedule a conference call with the involved parties to resolve this issue.

Due to our concerns, it is our position that PTI #03-9212, as currently drafted, does not meet the requirements of the Clean Air Act. We look forward to an expeditious remedy of our concerns as we continue to work with you to develop an acceptable permit. If we can answer any questions regarding the information contained in this letter or you would like to arrange for a conference call, please contact Steve Gorg, of my staff, at (312) 353-4145.

Sincerely yours,

/s/

Pamela Blakley, Acting Chief
Permits and Grants Section (IL/IN/OH)