



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

SEP 3 0 2009

REPLY TO THE ATTENTION OF:  
AE-17J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Larry Siebenberger  
Area Manager Regulatory Affairs  
United States Steel  
20<sup>th</sup> & State Street  
Granite City, Illinois 62040

Dear Mr. Siebenberger:

This is to advise you that the U.S. Environmental Protection Agency has determined that United States Steel, Granite City Works ("U.S. Steel" or "facility") located at 20<sup>th</sup> & State Street, Granite City, Illinois is in violation of the Clean Air Act (the "Act"), the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for Iron and Steel Manufacturing Facilities at 40 C.F.R. Part 63, Subpart FFFFF ("Iron & Steel MACT"), NESHAP for Coke Oven Batteries at 40 C.F.R. Part 63, Subpart L ("Coke Oven Batteries MACT"), and the Illinois State Implementation Plan. We are today issuing to you a Notice of Violation and Finding of Violation ("NOV/FOV") for these violations.

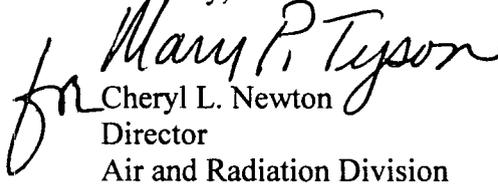
EPA performed an inspection on May 8, 2008, and subsequently issued an information request to U.S. Steel on July 3, 2008. In addition, EPA obtained U.S. Steel's Semi-Annual Iron & Steel MACT reports for the period between January 1, 2006, and June 30, 2009, and U.S. Steel's Coke Oven Batteries MACT report for February 2008. The EPA inspection, U.S. Steel's response to the information request, the Semi-Annual Iron & Steel MACT reports, and February 2008 Coke Oven Batteries MACT report revealed that U.S. Steel had not properly controlled air emissions from its blast furnace casthouse basic oxygen furnace shop and Coke Oven Battery A. In addition, U.S. Steel failed to apply for and obtain the proper air emission permit for its Blast Furnace B.

Section 113 of the Act, 42 U.S.C. § 7413, gives EPA several enforcement options to resolve these violations, including issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action, and bringing a judicial criminal action. EPA is offering you the opportunity to request a conference with us about the violations alleged in the NOV/FOV. A conference should be requested within 10 days following receipt of this notice. A conference should be held within 30 days following receipt of this notice. This conference will provide you a chance to present information on the identified violations, any

efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

EPA's contacts in this matter are Brian Dickens, Ethan Chatfield, and Reza Bagherian. If you wish to request a conference, you may call them at (312) 886-6074, (312) 886-5112, and (312) 886-0674, respectively. EPA hopes that this NOV/FOV will encourage U.S. Steel's compliance with the requirements of the Act.

Sincerely,

  
for Cheryl L. Newton  
Director  
Air and Radiation Division

Enclosure

cc: David W. Hacker, U.S. Steel Law Department

Jeff Benbenek  
Illinois Environmental Protection Agency

**United States Environmental Protection Agency  
Region 5**

**IN THE MATTER OF:**

**United States Steel  
20<sup>th</sup> & State Street  
Granite City, Illinois 62040**

)  
)  
) **Proceedings Pursuant to Section 113(a)(1)  
and (a)(3) of the Clean Air Act, 42 U.S.C.  
§7413(a)(1) and (a)(3)**  
)  
)  
)

) **EPA-5-09-21-IL**  
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)

**FINDING OF VIOLATION**

The U.S. Environmental Protection Agency is issuing this Notice of Violation and Finding of Violation (“NOV/FOV”) to United States Steel, Granite City Works (“U.S. Steel” or “facility”) for violation of the Clean Air Act (the “Act”), including: Section 111 of the Act, 42 U.S.C. 7411; Section 165 of the Act, 42 U.S.C. § 7475; Title V of the Act, 42 U.S.C. §§ 7661a and 7661b; the National Emission Standards for Hazardous Air Pollutants (“NESHAP”) for Iron and Steel Manufacturing Facilities at 40 C.F.R. Part 63, Subpart FFFFF (“Iron & Steel MACT”); NESHAP for Coke Oven Batteries at 40 C.F.R. Part 63, Subpart L (“Coke Oven Batteries MACT”); and the Illinois State Implementation Plan (“SIP”) at the U.S. Steel facility located at located at 20<sup>th</sup> & State Street, Granite City, Illinois.

**STATUTORY AND REGULATORY BACKGROUND**

**Prevention of Significant Deterioration**

1. On June 19, 1978, U.S. EPA promulgated the prevention of significant deterioration of air quality standards (the “PSD regulations”) pursuant to Subchapter I, Part C of the Act 43 *Fed. Reg.* 26403 (June 19, 1978). These regulations were revised on August 1, 1980, (45 *Fed. Reg.* 52676) and December 31, 2002, (67 *Fed. Reg.* 80186), and are codified at 40 C.F.R. § 52.21.

2. Subchapter I, Part C of the Act, and the PSD regulations implementing Part C at 40 C.F.R. § 52.21, prohibit a major stationary source from constructing a modification without first obtaining a PSD permit if the modification is “major” in that it will result in a “significant net increase” in emissions of a regulated NSR pollutant, and if the source is located in an area which has either achieved the National Ambient Air Quality Standards (“NAAQS”) for that pollutant or has been designated as unclassifiable for that pollutant. Part C and its implementing regulations further require that a source subject to the PSD regulations shall install Best Available Control Technology (“BACT”) to control the emissions of each regulated NSR pollutant. 40 C.F.R. § 52.21(j).

3. 40 C.F.R. § 52.21(a)(2) states, in part, that the PSD regulations, including the need to obtain a PSD permit prior to beginning actual construction, apply to the major modification of any existing major stationary source in an area designated as attainment or unclassifiable.

4. 40 C.F.R. § 52.21(b)(1)(i)(a) defines a “major stationary source” as any source, including Iron and Steel mills, which emit or has the potential to emit 100 tons per year or more of a regulated NSR pollutant, which includes, with limited exceptions, any pollutant subject to the regulation under the Act. 40 C.F.R. § 52.21(b)(50). Particulate matter, sulfur dioxide, carbon monoxide, and nitrogen oxide (NO<sub>x</sub>) are regulated NSR pollutants subject to regulation under the Act.

5. 40 C.F.R. § 52.21(b)(2)(i) defines a “major modification” as any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of a regulated NSR pollutant.

6. 40 C.F.R. § 52.21(b)(23)(i) defines, in part, “significant” net emissions increase as a rate of emissions which would equal or exceed 25 Tons Per Year (tpy) of PM, 15 tpy of PM-10, 40 tpy of sulfur dioxide, 100 tpy of carbon monoxide, and 40 tpy of NO<sub>x</sub>.

7. 40 C.F.R. § 52.21(i)(1) provides that “no stationary source or modification to which the requirements of paragraphs (j) through (r) of this section apply shall begin actual construction without a permit that states that the stationary source or modification would meet those requirements.”

8. 40 C.F.R. § 52.21(i)(2) provides that “the requirements of paragraphs (j) through (r) of this section apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the Act.”

9. 40 C.F.R. § 52.21(n) states that an applicant for a permit to modify a stationary source is required to provide all relevant information to allow the permitting authority to perform an analysis or make the determination required in order to issue the appropriate permit.

10. 40 C.F.R. § 52.21(a)(2)(iii) prohibits the actual construction or major modification of a major stationary source without a permit which states that the major stationary source or modification would meet the requirements of 40 C.F.R. 52.21 (j) through (r).

11. 40 C.F.R. § 52.21(r) states that any owner or operator of a source subject to the PSD regulations who operates a source or modification without applying for and receiving approval under the PSD regulations is subject to enforcement action.

12. 40 C.F.R. § 52.23 states, among other things, that failure to comply with any approved regulatory provision of a SIP, shall render the person or governmental entity so failing to comply in violation of a requirement of an applicable implementation plan and subject to enforcement action under section 113 of the Act.

13. On August 7, 1980, U.S. EPA incorporated the provisions of 40 C.F.R. § 52.21(b) through (w) into the Illinois SIP. 40 C.F.R. § 52.738 (45 *Fed. Reg.* 52741, as amended at 46 *Fed. Reg.* 9584).

14. On August 7, 1980, U.S. EPA also delegated to the Illinois Environmental Protection Agency ("IEPA") authority to review and process PSD permit applications and to implement the PSD program. 46 *Fed. Reg.* 9584.

### **Illinois SIP Nonattainment Construction and Operating Permit Requirements**

15. On December 17, 1992, EPA approved the incorporation of the Illinois nonattainment NSR rules ("NA NSR"), 35 Illinois Administrative Code ("IAC") Part 203, into the Illinois SIP. 57 *Fed. Reg.* 59928. The NA NSR rules became effective on February 16, 1993. On September 27, 1995, EPA approved a revision to the Illinois NA NSR rule as part of the SIP. (60 *Fed. Reg.* 49778) This revision became effective on October 27, 1995.

16. 35 IAC § 203.206(b)(1) defines "major stationary source," in part, for an area designated as nonattainment for ozone, as a stationary source which emits or has the potential to emit volatile organic material in an amount equal to or greater 100 tons per year (tpy) in an area classified as marginal or moderate nonattainment for ozone.

17. 35 IAC § 203.207(a) defines "major modification" as a physical change, or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant for which the area is designated a nonattainment area.

18. 35 IAC § 203.207(b) provides that any net emissions increase that is significant for volatile organic material or nitrogen oxides shall be considered significant for ozone.

19. 35 IAC § 203.203(a) states that a construction permit is required prior to actual construction of a major new source or major modification.

20. 35 IAC § 203.103 defines "actual construction" as initiation of physical on-site construction activities on an emissions unit which are of a permanent nature. Such activities include, but are not limited to, installation of building supports and foundations, laying of underground pipework, and erection of permanent storage structures.

21. 35 IAC § 203.201 states that in any nonattainment area, no person shall cause or allow the construction of a new major stationary source or major modification that is major for the pollutant for which the area is designated a nonattainment area, except as in compliance with 35 IAC Part 203 for that pollutant. In areas designated nonattainment for ozone, this prohibition shall apply to new major stationary sources or major modifications of sources that emit volatile organic materials or nitrogen oxides.

### **Iron and Steel MACT (Subpart FFFFF)**

22. On May 20, 2003, EPA promulgated 40 C.F.R. Part 63, Subpart FFFFF – National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities (40 C.F.R §§ 63.7780 – 63.7852). 68 *Fed. Reg.* 27663

23. 40 C.F.R Part 63, Subpart FFFFF, applies to owners and operators of integrated iron and steel manufacturing facilities that are (or are a part of) a major source of hazardous air pollutants (HAP) emissions. 40 C.F.R § 63.7781

24. 40 C.F.R Part 63, Subpart FFFFF, applies to new and existing affected sources at an integrated iron and steel manufacturing facility, including any new or existing blast furnace and basic oxygen process furnace (BOPF). 40 C.F.R. § 63.7782

25. Pursuant to 40 C.F.R. Part 63, Subpart FFFFF, an owner or operator of a casthouse at an existing blast furnace must not cause to be discharged to the atmosphere any secondary emissions that exit any opening in the casthouse or structure housing the blast furnace that exhibit opacity greater than twenty percent (20%) opacity on a six-minute average.

26. Pursuant to 40 C.F.R. Part 63, Subpart FFFFF, an owner or operator of a BOPF must not cause to be discharged to the atmosphere any secondary emissions that exit any opening in the BOPF shop or any other building housing the BOPF or BOPF shop operation that exhibit opacity greater than twenty percent (20%) opacity on a three-minute average.

27. Pursuant to 40 C.F.R. § 63.7834(a)(1), an owner or operator of capture systems and control devices subject to an operating limit in §63.7790(b) must demonstrate continuous compliance with the operation and maintenance requirements in §63.7800(b) by making monthly inspections of capture systems and initiating corrective action according to §63.7800(b)(1) and recording all information needed to document conformance with these requirements.

28. Pursuant to 40 C.F.R. § 63.7800(a), an owner or operator must operate at all times according to a written operation and maintenance plan for each capture system or control device subject to an operating limit in §63.7790(b). Specifically, an owner or operator must operate the capture system or control device according to a written operation and maintenance plan that indicates the level of the ventilation draft and the damper position settings for the capture system or control device.

## **Coke Oven Batteries MACT (Subpart L)**

29. Pursuant to 40 C.F.R. § 63.302(a)(3)(i), on and after July 14, 2005, no owner or operator shall cause to be discharged or allow to be discharged to the atmosphere more than 4.0 percent leaking coke oven doors for each tall by-product coke oven battery and for each by-product coke oven battery owned or operated by a foundry coke producer, as determined by the procedures in 40 C.F.R. § 63.309(d)(1).

30. Pursuant to 40 C.F.R. § 63.302(a)(3)(ii), on and after July 14, 2005, no owner or operator shall cause to be discharged or allow to be discharged to the atmosphere more than 3.3 percent leaking coke oven doors for each by-product coke oven battery not subject to the emission limitation in paragraph (a)(3)(i) of this section, as determined by the procedures in 40 C.F.R. § 63.309(d)(1).

## **Title V Operating Permit Requirements**

31. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), provides that no source may operate without a Title V permit after the effective date of any permit program approved or promulgated under Title V of the Act. EPA first promulgated regulations governing state operating permit programs on July 21, 1992. *See 57 Fed. Reg.* 32295; 40 C.F.R. Part 70. EPA promulgated regulations governing the Federal operating permit program on July 1, 1996. *See 61 Fed. Reg.* 34228; 40 C.F.R. Part 71.

32. Section 503 of the CAA, 42 U.S.C. § 7661b, sets forth the requirement to submit a timely, accurate, and complete application for a permit, including information required to be submitted with the application.

33. Section 504(a) of the CAA, 42 U.S.C. § 7661c(a), requires that each Title V permit include enforceable emission limitations and standards, a schedule of compliance, and other conditions necessary to assure compliance with applicable requirements, including those contained in a state implementation plan. 42 U.S.C. § 7661c(a).

34. 40 C.F.R. § 70.1(b) provides that: “[a]ll sources subject to these regulations shall have a permit to operate that assures compliance by the source with all applicable requirements.”

35. 40 C.F.R. § 70.2 defines “applicable requirement” to include “(1) [a]ny standard or other requirement provided for in the applicable implementation plan approved or promulgated by EPA through rulemaking under title I of the Act that implements the relevant requirements of the Act, including revisions to that plan promulgated in part 52 of this chapter . . .”

36. 40 C.F.R. § 70.7(b) provides that no source subject to 40 C.F.R. Part 70 requirements may operate without a permit as specified in the Act.

37. 40 C.F.R. § 70.5(a) and (c) require timely and complete permit applications for Title V permits with required information that must be submitted and 40 C.F.R. § 70.6 specifies

required permit content.

38. 40 C.F.R. § 70.5(b) provides that: “[a]ny applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.”

39. U.S. EPA promulgated interim approval of the Illinois Title V program on March 7, 1995 (60 *Fed. Reg.* 12478), and the program became effective on that date. U.S. EPA granted final full approval of the Illinois Title V program effective November 30, 2001. *See* 40 C.F.R. Part 70, Appendix A.

### **FACTUAL BACKGROUND**

40. U.S. Steel owns and operates an iron and steel producing facility that is located at 20<sup>th</sup> & State Street, Granite City, Illinois.

41. U.S. Steel owns and operates, among other emission sources, Blast Furnace A, Blast Furnace B, blast furnace casthouse, BOPF Shop, Coke Oven Battery A, Coke Oven Battery B, Hot Metal Runners, Short Slag Runner, Iron Spout Baghouse, and Casthouse Baghouse at its Granite City facility (“facility”).

42. U.S. Steel’s Granite City’s Coke Oven Battery A is a short by-product coke oven battery, because its ovens are less than 6 meters (20 feet) in height.

43. The U.S. Steel facility uses a tilting runner system at Blast Furnace B, alternating between two torpedo cars.

44. On March 6, 1996, Illinois Environmental Protection Agency received an application for Title V operating permit, Application No. 96030056. A final draft of this Title V operating permit was issued on October 7, 2003.

45. On May 6-8, 2008, EPA inspected the U.S. Steel facility.

46. In U.S. Steel’s response to EPA’s July 3, 2008, request for information, U.S. Steel supplied documents describing the major relines and enhancements made to Blast Furnace B.

47. U.S. Steel uses Blast Furnace B to produce Hot Metal. Prior to 1994, the furnace was designed for a hot blast of 1800° F and used a volume of cooling water that resulted in relatively high refractory temperatures. In 1994, U.S. Steel changed the design of Blast Furnace B by increasing the hot blast to 2000° F and redesigning the cooling system.

48. The 1994 project at Blast Furnace B resulted in an increase in emissions that exceed “significant” levels for sulfur dioxide (SO<sub>2</sub>), particulate matter (specifically PM<sub>10</sub>), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>).

49. U.S. Steel’s Title V Operating Permit Application No. 96030056 did not include the applicable requirements related to the 1994 PSD and NA NSR project at Blast Furnace B.

50. From 1992 to 1997, Granite City was designated nonattainment area for PM<sub>10</sub>.

51. U.S. Steel submitted 40 C.F.R. Part 63, Subpart FFFFFFF Semi-Annual Compliance Reports to the IEPA on the following dates: July 31, 2006; January 31, 2007; July 31, 2007; January 30, 2008; July 30, 2008; January 30, 2009; and July 6, 2009. These reports contain U.S. Steel’s deviations from the Iron and Steel MACT.

52. On March 5, 2008, U.S. Steel submitted its 40 C.F.R. Part 63, Subpart L Report to the EPA containing February 2008 monitoring results for its Coke Oven Batteries A and B.

## **VIOLATIONS**

### **Prevention of Significant Deterioration Violation**

53. U.S. Steel violated and continues to violate Section 165 of the Act, 42 U.S.C. § 7475, Section 173 of the Act, 42 U.S.C. § 7503, 40 C.F.R. § 52.21, and 35 IAC 203 by constructing a major modification in 1994 to Blast Furnace B at the U.S. Steel facility without applying for or obtaining the PSD/NA NSR permits and operating the modified source without applying BACT/LAER or going through PSD/NA NSR review, and installing appropriate emission control equipment in accordance with a BACT/LAER analyses.

### **Iron and Steel MACT (Subpart FFFFF) Violations**

54. U.S. Steel self-reported in its Semi-Annual Compliance Reports to IEPA the following exceedances at its blast furnace casthouse roof monitor:

<b>Date</b>	<b>Time</b>
04/02/2007	11:31 – 11:37
10/17/2007	11:25 – 11:31
10/30/2007	10:16 – 10:22
10/30/2007	10:22 – 10:28
10/30/2007	10:28 – 10:34
01/16/2008	09:33 – 09:39
06/17/2008	09:08 – 09:14

Visible emissions exceeding twenty percent (20%) opacity on a six-minute average from blast furnace casthouse roof monitors are violations of 40 C.F.R Part 63, Subpart FFFFF.

55. U.S. Steel self-reported in its Semi-Annual Compliance Reports to IEPA the following monitoring results for its BOPF Shop roof monitor:

<b>Date</b>	<b>Time</b>
05/23/2006	10:15 – 10:18
05/23/2006	10:34 – 10:37
06/19/2006	11:14 – 11:17
07/25/2006	12:04 – 12:07
07/28/2006	13:07 – 13:10
08/11/2006	11:43 – 11:46
10/24/2006	11:57 – 12:00
10/24/2006	12:00 – 12:03
11/13/2006	13:45 – 13:48
01/29/2007	12:12 – 12:15
01/29/2007	12:15 – 12:18
02/07/2007	13:31 – 13:34
02/07/2007	13:34 – 13:37
02/07/2007	13:37 – 13:40
03/20/2007	10:27 – 10:30
03/20/2007	10:30 – 10:33
04/05/2007	08:27 – 08:30
04/10/2007	09:21 – 09:24
04/12/2007	08:20 – 08:23
04/12/2007	08:29 – 08:32
04/13/2007	08:35 – 08:38
04/13/2007	08:38 – 08:41
04/13/2007	09:09 – 09:12
04/16/2007	08:29 – 08:32
04/18/2007	08:56 – 08:59
04/24/2007	14:26 – 14:29
04/24/2007	14:29 – 14:32
04/24/2007	14:32 – 14:35
04/24/2007	15:29 – 15:32
04/24/2007	15:32 – 15:35
04/24/2007	15:35 – 15:38
04/24/2007	16:30 – 16:33
04/24/2007	16:33 – 16:36
04/24/2007	16:36 – 16:39
04/25/2007	12:45 – 12:48
05/10/2007	14:08 – 14:11
05/21/2007	15:23 – 15:26
07/04/2007	06:25 – 06:28
07/25/2007	13:29 – 13:32
07/25/2007	13:32 – 13:35

07/25/2007	13:35 – 13:38
08/15/2007	12:14 – 12:17
08/30/2007	12:39 – 12:42
10/25/2007	13:27 – 13:30
12/21/2007	13:50 – 13:53
12/26/2007	13:05 – 13:08
01/18/2008	09:33 – 09:36
01/23/2008	08:39 – 08:42
01/30/2008	15:24 – 15:27
01/30/2008	15:49 – 15:52
02/08/2008	08:22 – 08:25
02/08/2008	12:54 – 12:57
02/08/2008	12:57 – 13:00
03/26/2008	13:28 – 13:31
08/29/2008	08:12 – 08:15
10/01/2008	13:07 – 13:10

Visible emission from the BOPF Shop roof monitor exceeding twenty percent (20%) opacity on a three-minute average is a violation of 40 C.F.R. Part 63, Subpart FFFFF.

56. During the period between July 1, 2006, and December 31, 2006, U.S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse – daily compressed air and quarterly physical integrity; Casthouse Baghouse – daily compressed air and quarterly physical integrity; Reladle/Desulfurization Baghouse – monthly bag tension inspection and quarterly physical integrity; Slag Skimmer Baghouse – monthly cleaning mechanisms and quarterly physical integrity; Ladle Metallurgy Furnace Baghouse – monthly cleaning mechanism in violation of 40 C.F.R. § 63.7834(a)(1).

57. During the period between January 1, 2007, and June 30, 2007, U.S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse – quarterly physical integrity; Casthouse Baghouse – quarterly physical integrity; Reladle/Desulfurization Baghouse – monthly bag tension inspection and quarterly physical integrity; Slag Skimmer Baghouse – monthly cleaning mechanism and quarterly physical integrity; Ladle Metallurgy Furnace Baghouse – monthly cleaning mechanism in violation of 40 C.F.R. § 63.7834(a)(1).

58. During the period between July 1, 2007, and December 31, 2007, U.S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse – quarterly physical integrity; Casthouse Baghouse – quarterly physical integrity; Reladle/Desulfurization Baghouse – monthly bag tension inspection and quarterly physical integrity; Slag Skimmer Baghouse – quarterly physical integrity; Ladle Metallurgy Furnace Baghouse – monthly cleaning mechanism in violation of 40 C.F.R. § 63.7834(a)(1).

59. During the period between January 1, 2008, and June 30, 2008, U.S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse – quarterly physical integrity and daily inspections; Casthouse Baghouse – quarterly physical integrity and daily inspections; Reladle/Desulfurization Baghouse – quarterly physical integrity; Slag Skimmer

Baghouse – quarterly physical integrity; Ladle Metallurgy Furnace Baghouse – monthly cleaning mechanism and quarterly physical integrity in violation of 40 C.F.R. § 63.7834(a)(1).

60. During the period between July 1, 2008, and December 31, 2008, U.S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse – daily compressed air inspections and quarterly physical integrity; Casthouse Baghouse – daily compressed air inspections and quarterly physical integrity; Ladle Metallurgy Furnace Baghouse – monthly cleaning mechanism in violation of 40 C.F.R. § 63.7834(a)(1).

61. From January 1, 2006, to June 30, 2006, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp and damper position requirements of its written operation and maintenance plan for a period of 2 hours and 5 minutes in violation of 40 C.F.R. § 63.7834(a)(1).

62. From July 1, 2006 to December 31, 2006, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp and damper position requirements of its written operation and maintenance plan for a period of 58 hours and 11 minutes in violation of 40 C.F.R. § 63.7834(a)(1).

63. From July 1, 2006, to December 31, 2006, U.S. Steel failed to comply with the Casthouse Baghouse #1 fan amp requirements of its written operation and maintenance plan for a period of 208 hours 20 minutes 40 C.F.R. § 63.7834(a)(1).

64. From January 1, 2007, to June 30, 2007, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp requirements of its written operation and maintenance plan for a period of 44 hours 40 C.F.R. § 63.7834(a)(1).

65. From January 1, 2007, to June 30, 2007, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 42 hours and 5 minutes 40 C.F.R. § 63.7834(a)(1).

66. From January 1, 2007, to June 30, 2007, U.S. Steel failed to comply with the Casthouse Baghouse fan amp requirements of its written operation and maintenance plan for a period of 387 hours 40 C.F.R. § 63.7834(a)(1).

67. From July 1, 2007, to December 31, 2007, U.S. Steel failed to comply with the Iron Spout Baghouse #2 fan amp requirements of its written operation and maintenance plan for a period of 28 hours 40 C.F.R. § 63.7834(a)(1).

68. From July 1, 2007, to December 31, 2007, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 63 hours and 34 minutes 40 C.F.R. § 63.7834(a)(1).

69. From July 1, 2007, to December 31, 2007, U.S. Steel failed to comply with the Casthouse Baghouse #1 fan amp requirements of its written operation and maintenance plan for a period of 16 hours 40 C.F.R. § 63.7834(a)(1).

70. From July 1, 2007, to December 31, 2007, U.S. Steel failed to comply with the Casthouse Baghouse #2 fan amp requirements of its written operation and maintenance plan for a period of 32 hours 40 C.F.R. § 63.7834(a)(1).

71. From January 1, 2008, to June 30, 2008, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp requirements of its written operation and maintenance plan for a period of 66 hours 40 C.F.R. § 63.7834(a)(1).

72. From January 1, 2008, to June 30, 2008, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 67 hours and 45 minutes 40 C.F.R. § 63.7834(a)(1).

73. From January 1, 2008, to June 30, 2008, U.S. Steel failed to comply with the Casthouse Baghouse fan amp requirements of its written operation and maintenance plan for a period of 56 hours 40 C.F.R. § 63.7834(a)(1).

74. From July 1, 2008, to December 31, 2008, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp requirements of its written operation and maintenance plan for a period of 31 hours 40 C.F.R. § 63.7834(a)(1).

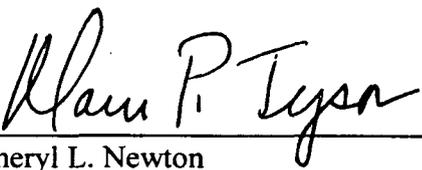
75. From July 1, 2008, to December 31, 2008, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 1 hour and 48 minutes 40 C.F.R. § 63.7834(a)(1).

76. From July 1, 2008, to December 31, 2008, U.S. Steel failed to comply with the Casthouse Baghouse fan amp requirements of its written operation and maintenance plan for a period of 19 hours 40 C.F.R. § 63.7834(a)(1).

**Coke Oven Batteries MACT (Subpart L) Violations**

77. On February 1, 2008, U.S. Steel self-reported in its 40 C.F.R. Part 63, Subpart L Report to EPA coke oven door emissions of 4.4 percent on a 30-day rolling average from Coke Oven Battery A in violation of 40 C.F.R. Part 63, Subpart L.

09/30/09  
Date

  
Cheryl L. Newton  
Director  
Air and Radiation Division

## CERTIFICATE OF MAILING

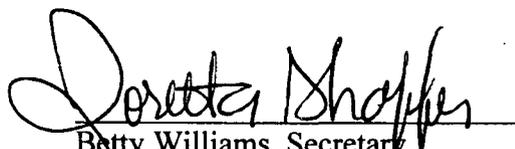
I, Betty Williams, certify that I sent a Notice and Finding of Violation, Docket Number EPA-5-09-21-IL, by Certified Mail, Return Receipt Requested, to:

Larry Siebenberger  
Area Manager Regulatory Affairs  
United States Steel  
20<sup>th</sup> & State Street  
Granite City, Illinois 62040

I also certify that I sent copies of the Notice of Violation and Finding of Violation by first class mail to:

Ray Pilapil, Manager  
Bureau of Air  
Compliance and Enforcement Section  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62702

On the 30 day of Sept, 2009.

  
Betty Williams, Secretary  
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010330000601921543

standard bcc's: official file copy w/attachment(s)

other bcc's: Reza Bagherian, AE-17J  
Ethan Chatfield, AE-17J  
Brian Dickens, AE-17J  
Sabrina Argentieri, C-14J  
William MacDowell, AE-17J

Creation Date:	September 29, 2009
Filename: C:\Documents and Settings\rbagheri\My Documents\Rbagheri\STEEL\US Steel\Granite City	
Legend: ARD:AECAB:AECAS(MN/OH): RBAGHERIAN	