



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

APR 16 2015

REPLY TO THE ATTENTION OF:

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

Dear Ms. Seelen:

The U.S. Environmental Protection Agency has reviewed the draft air emission permit 13700061-007, for Hibbing Taconite Company, located in Hibbing, Minnesota. 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) Technical Support Document (TSD):

- Section 3.1 – A 90 percent control efficiency has been assumed for continuous water sprays at 46 of 48 fugitive sources. At the two material loading points, a 75 percent control efficiency is assumed due to the nature of unloading the ore into the crushing units. These control efficiencies seem high for control of fugitive emissions, particularly for water spray systems. Please explain the basis for these control efficiencies using supporting evidence.
- Section 3.1 – The TSD states that a 90 percent control efficiency was assumed for continuous water sprays at 46 of the 48 fugitive sources. A 75 percent control efficiency was assumed at two material loading points. The control of these fugitive emissions are necessary, and assumed in calculations of potential to emit (PTE), to avoid Prevention of Significant Deterioration (PSD) applicability in this permit action. However, the permit only requires continuous operation of the water sprays for emissions units FS 125, FS 129, FS 138 and FS 143. Moreover, the emissions units specified in GP 019 (P. A-42) only lists 28 units. Please explain if other fugitive sources are part of this permit action or where the discrepancy lies. If control efficiencies were assumed for all emission units in GP 019 to avoid PSD applicability, it is appropriate to require water suppression systems for each emission unit in the group. It is also recommended that a requirement be added to maintain a minimum moisture content of any stockpiles where fugitive emissions are predicted and that it be monitored and recorded on a regular basis.

2) Permit:

- P. A-43. Emission Calculation Methodology – the permit requires emissions from the jaw crushers (FS 124 and FS 0138) be generated assuming a control factor of 0.1. According to the TSD, the jaw crushers should assume a 75 percent control. Please revise the permit language to reflect the correct control factor.
- P. A-43, Emission Calculation Methodology – the permit requires emissions from the initial loading system to be calculated. The permit references emissions units from the initial loading system as FW 123 and FS 138. However, the listing of emission units in GP 019 states that the initial loading system units A and B are numbered FS 123 and FS 137, respectively. Please make this correction to the permit.
- P A-43, Monitoring – the permit requires monthly periodic inspections of proper flow to the spray nozzles of the wet suppression system. Since the controlled and limited emissions increase from the modification is fairly close to the PSD applicability threshold, especially for particulate matter <sub>2.5</sub> and the wet suppression system is being utilized to control particulate emissions, monitoring proper operation of the wet suppression system should be performed more frequently, i.e., weekly. Please modify the permit to reflect more frequent monitoring and recordkeeping.

3) The following comment is typographical in nature:

- Section 3.4 of the TSD references a list of insignificant activities in an Appendix number that is missing.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Jennifer Darrow, of my staff, at (312) 886-6315.

Sincerely,



Genevieve Damico  
Chief

Air Permits Section