



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

NOV 04 2015

REPLY TO THE ATTENTION OF:

Andrew Hall  
Permit Review/Development Section  
Ohio Environmental Protection Agency  
Department of Air Pollution Control  
50 West Town Street Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit, permit number P0105157, for AK Steel Corporation, located in Middletown, Ohio. 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. The Statement of Basis description of visible opacity emission from the Number 3 Blast Furnace (P925) says "if required, compliance will be demonstrated by stack emissions testing performed using EPA-approved methods." The corresponding permit condition 24(f)(1) (page 174 of 254) lists the applicable compliance method, but doesn't specify the frequency of such tests nor does it require testing to necessarily be conducted at any time during the permit term. Pursuant to 40 CFR 70.6(a)(3), the permit must include periodic monitoring "sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit." To satisfy this requirement, the permit must include a specific interval for demonstrating compliance with this emission limit.
2. Permit condition 24(b)(1)(d) (page 163 of 254), regarding visible particulate emission limits for the blast furnace casthouse, should include a reference to permit condition 24(b)(2)(c), which describes particulate and opacity limits pursuant to 40 CFR Part 63, Subpart FFFFF.
3. Permit condition 1(d)(1) (page 28 of 254) for the Number 2 Coke Plant (B918) refers to requirements "specified in term d(3) for emissions unit P067." We recommend that this condition provide a page number for term d(3) (i.e.; page 124 of 254) for better cross-referencing of requirements that apply to this unit.

4. Permit conditions 27(f)(1)(a) and (b) (page 197 of 254) for the desulfurization plant (P956) require Method 9 testing for visible emissions. However, the permit does not specify the frequency of such tests. To satisfy the monitoring and testing requirements of 40 CFR Part 70.6(a)(3), the permit must specify how often testing is to be conducted for these emission limits.
5. Permit condition 27(f)(1)(c) (page 198 of 254) lists the applicable compliance method for the sulfur dioxide (SO<sub>2</sub>) limit as "if required." This permit condition does not specify how often the compliance demonstration is to be conducted, nor does it require the testing to necessarily be conducted at any time during the permit term. To satisfy the monitoring and testing requirements of 40 CFR Part 70.6(a)(3), the permit must specify how often a compliance demonstration will be conducted for this emission limit.
6. Permit condition 29(f)(1)(c) and (d) (page 210 of 254) lists the applicable compliance method for the SO<sub>2</sub> limits at the annealing operations as "if required." This permit condition does not specify how often the compliance demonstration is to be conducted, nor does it require the testing to necessarily be conducted at any time during the permit term. To satisfy the monitoring and testing requirements of 40 CFR 70.6(a)(3), the permit must specify how often a compliance demonstration will be conducted for these emission limits.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely,

  
Genevieve Damico  
Chief  
Air Permits Section