GASP
GROUP AGAINST SMOG & POLLUTION

October 26, 2026

VIA eMAIL: aqpermits@AlleghenyCounty.US

Allegheny County Health Department
836 Fulton Street
Pittsburgh, PA 15233

Re: Proposed New Source Review/Prevention of Significant Deterioration Permit for United States Steel Corp. – Edgar Thomson
Permit # 0051-I011 (the "Permit")

Dear Sir or Madam:

I have attached comments regarding the above-captioned Permit that I am submitting on behalf of the Group Against Smog and Pollution. Thanks in advance for your consideration of these comments.

Sincerely,

/s / John K. Baillie

John K. Baillie
Senior Attorney

COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION REGARDING DRAFT INSTALLATION PERMIT #0051-I011 (HOT STRIP MILL AT U.S. STEEL'S EDGAR THOMSON WORKS)

I. THE PERMIT DOES NOT INCORPORATE MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS SUFFICIENT TO ASSURE COMPLIANCE WITH ALL EMISSION LIMITS AND OPERATING RESTRICTIONS

Under Article XXI, the Department "may issue [installation] permits subject to such terms and conditions as are appropriate to assure continued compliance with the requirements of [Article XXI], the Air Pollution Control Act, and the Clean Air Act,"[1] including reporting, monitoring, operating, and maintenance requirements.[2] Because the Permit will implement the requirements of Article XXI, the Air Pollution Control Act, and the Clean Air Act, it must include reporting monitoring, operating and maintenance requirements that are sufficient to assure compliance with those requirements.

A. Permit Section V.A.1.b (Hourly Limit on Heat Input to Each Walking Beam Furnace)

Section V.A.1.b of the Permit imposes a 476 MMBtu/hour limit on the heat input to each of the Facility's Walking Beam Reheat Furnaces. Further, the Permit limits the total inputs of natural gas and coke oven gas to the Walking Beam Reheat Furnaces[3] and requires U.S. Steel to monitor, record, and report the amount of each fuel used on a daily, monthly, and rolling 12-month basis.[4] However, the Permit does not require U.S. Steel to monitor, record, or report fuel usage on an hourly basis. Such a requirement is necessary to assure compliance with the hourly limit heat input limit imposed by Section V.A.1.b.

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1 Art. XXI, § 2102.04.e.
2 *See id.*
3 Permit, §§ V.A.1.d and V.A.1.e.
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In order to assure compliance with the hourly limit imposed by section V.A.1.b of the Permit, the Permit must require U.S. Steel to monitor, record, and report the Walking Beam Reheat Furnaces' fuel usage on an hourly basis as well as the daily, monthly, and rolling 12-month bases that the Permit already requires.

B. Permit Section V.A.1.c (Hourly Limit on Steel Slab Throughput to the Hot Strip Mill)

Permit section V.A.1.c provides in part that "[t]he maximum steel slab throughput for the hot strip mill shall not exceed 600 tons/hr per furnace." The Permit also requires that U.S. Steel "shall maintain records of the daily, monthly, and 12-month rolling totals of steel slab throughput."[5] However, the Permit does not require U.S. Steel to monitor, record, or report steel slab throughput on an hourly basis. Such a requirement is necessary to assure compliance with the hourly limit on steel slab throughput imposed by section V.A.1.c of the Permit.

In order to assure compliance with the hourly limit on steel slab throughput imposed by section V.A.1.c of the Permit, the Permit must require U.S. Steel to record and report the steel slab throughput to Walking Beam Reheat Furnaces on an hourly basis as well as the daily, monthly, and rolling 12-month bases that the Permit already requires.

C. Permit Section V.B.1.c (Hourly Limit on Steel Throughput Charged to the Ladle Metallurgical Facility)

Section V.B.1.c limits the maximum steel throughput charged to the Ladle Metallurgical Facility vessel to no more than 500 tons per hour. Further, the Permit requires that U.S. Steel record the Ladle Metallurgical Facility's daily, monthly, and 12-month liquid steel production.[6]

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5 Permit, § V.A.4.b.

6 Permit, § V.B.4.a.1).

However, the Permit does not require U.S. Steel to record steel throughput charged to the Ladle Metallurgical Facility on an hourly basis. Such a requirement is necessary to assure compliance with the hourly limit on steel throughput charged to the Ladle Metallurgical Facility imposed by section V.B.1.c of the Permit.

In order to assure compliance with the hourly limit on steel slab throughput imposed by section V.B.1.c of the Permit, the Permit must require U.S. Steel to record and report the steel throughput charged to the Ladle Metallurgical Facility on an hourly basis as well as the daily, monthly, and rolling 12-month bases that the Permit already requires.

II. THE PERMIT MUST LIMIT HOURLY STEEL THROUGHPUT TO THE SLAB GRINDER TO THE MAXIMUM DESIGN RATE OF 76 TONS PER HOUR TO ASSURE COMPLIANCE WITH ALL APPLICABLE LIMITATIONS

Under Article XXI, the Department may not issue an installation permit for a new source unless the application for that permit demonstrates that the new source applies Article XXI's Best Available Control Technology ("BACT") requirement.[7] Moreover, for a "major modification" to major source located in a nonattainment area, Article XXI also requires that modification complies with the "Lowest Achievable Emission Rate" requirement from 25 Pa. Code § 127.205(1).[8]

The sources in the Hot Strip Mill, including the Slab Grinder, are a subject to both BACT and LAER because their emissions of fine particulate matter ("PM2.5") qualify them collectively as a "major modification" of an existing "major source" of PM2.5 that is located in a nonattainment area for the PM2.5 NAAQS. The Department has determined that BACT for the

[7] *See* Art. XXI, § 2102.04.b.6

[8] Any Installation Permit for a "Major Source" must comply with all applicable requirements of Part B of Article XXI, *see* Art. XXI, § 2102.04.c, including the requirement that a "major modification of an existing source which is located in a nonattainment area." *Id.*, § 2102.06.a.1.

slab grinder is a baghouse with an emission rate of 0.8 lb/hour[9] and LAER for the slab grinder is a baghouse with 99% control efficiency and an effective emission rate of 0.0004 gr/dscf.[10] However, although the Permit requires that emissions from the Slab Grinder be controlled by a baghouse, it does not specify that the baghouse comply with the BACT emission rate of 0.8 lb/hour or the LAER control efficiency of 99% and effective emission rate of 0.0004 grains/dscf.[11] The Permit must be revised so that it expressly requires the Slab Grinder to comply fully with the applicable BACT and LAER requirements.

[9] Review Memo, at 24.
[10] Review Memo, at 17.
[11] *See* Permit, § V.C.1.