



November 7, 2025

VIA EMAIL (tjoseph@pa.gov)

Mr. Thomas Joseph, Environmental Engineering Manager
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222

Re: Draft Title V Operating Permit # 65-00853 (the “Draft Permit”)
Cleveland Cliffs Monessen Coke LLC/Monessen Coke Plant (the “Facility”)

Dear Mr. Joseph:

I have attached comments regarding the above-referenced draft Title V Operating Permit that I am submitting on behalf of the Group Against Smog and Pollution. According to the October 11, 2025, edition of the Pennsylvania Bulletin, the Department is accepting comments on the Draft Permit for thirty days, or through November 10, 2025. Thanks in advance for your attention to these comments.

Sincerely,

/s

John K. Baillie
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING THE DRAFT TITLE V OPERATING PERMIT FOR
CLEVELAND CLIFFS MONESSEN COKE LLC (# 65-00853)**

I. THE PERMIT MUST EITHER INCLUDE THE FACILITY'S APPROVED COMPLIANCE ASSURANCE MONITORING PLAN FOR PM EMISSIONS FROM THE FACILITY'S PUSHING OPERATIONS OR INCORPORATE THAT PLAN BY REFERENCE

A Title V Operating Permit must incorporate monitoring, recordkeeping, and reporting conditions that assure compliance with the permit's emission and operating limits.¹ A Title V Operating Plan may require a facility's operator to submit a monitoring or recordkeeping plan to the permitting authority for its approval, and if it does so must either include the plan in the permit or incorporate it by reference in the permit. Otherwise, the permit impermissibly omits monitoring or recordkeeping requirements that are necessary to assure compliance with its other terms and conditions.²

The Permit establishes a limit for PM emissions from the Facility's Pushing operations.³ The Department's Review Memo for the Permit states that the Facility's Pushing operations are subject to the Compliance Assurance Monitoring ("CAM") Plan requirements of 40 C.F.R. Part 64.⁴ Although the Permit excerpts most if not all of the CAM provisions contained in 40 C.F.R. Part 64, it does not appear to specifically require the submission of a CAM plan, include the Facility's approved CAM plan for the Pushing operations, or incorporate that plan by reference.

¹ See 42 U.S.C. § 7661c(a), (b), and (c); 40 C.F.R. § 70.6(a)(3)(i)(B); 25 Pa. Code § 127.441(a); 25 Pa. Code § 127.512(h).

² See Administrator, United States Env'tl. Prot. Agency, *In the Matter of Midwest Generation, LCC Fisk Generating Station* (March 25, 2005), at 7 (partially granting a petition to object to a Title V Operating Permit where the Permit required the facility to submit a monitoring plan for approval pursuant to 40 C.F.R. § 60.49b(c) but did not include the plan or incorporate it by reference in the Permit), available at: https://www.epa.gov/sites/default/files/201508/documents/midwest_generation_fisk_decision2004.pdf.

³ Permit, Part D, Source ID 802, § I#001(b), at 90.

⁴ Review Memo, at 22.

Consequently, the Permit does not include all monitoring requirements necessary to assure compliance with its limit on PM emissions from the Facility's Pushing operations. So that the Permit includes all monitoring requirements necessary to assure compliance with that emission limit, the Permit must either include the Facility's approved CAM plan for PM emissions from the Facility's Pushing operations or incorporate that plan by reference.

II. THE PERMIT MUST INCLUDE ALL OPERATIONAL REQUIREMENTS THAT ASSURE COMPLIANCE WITH PERMIT REQUIREMENTS

A Title V Operating Permit must include "[e]missions limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance."⁵

A. The Permit Must Include a Rolling Twelve-Month Limit on the Mass of Coal that is Charged in the Facility's Coke Oven Batteries

The amounts of NOx and VOCs that are emitted by the Facility's Charging operations depend on the mass of coal that is charged in the Facility's coke oven batteries. The Permit establishes rolling twelve-month limits on emissions of NOx and VOCs from the Facility's Charging operations that apparently have their origin in "RACT Operating Permit 65-000-853."⁶ However, the Permit does not include a rolling twelve-month throughput limit (or any other operational limit) that would assure compliance with those NOx and VOC emission limits. In the absence of such a throughput limit, it is not clear how the Permit assures compliance with its

⁵ 40 C.F.R. § 70.6(a)(1); *see also* 25 Pa. Code § 127.512(h) ("The permit shall contain emission limits and standards, including those operational requirements and limitations that assure compliance with the applicable requirements at the time of permit issuance").

⁶ Permit, Part D, Source ID 801, § VII#001, at 88.

rolling twelve-month limits on emissions of NOx and VOCs from the Facility's Charging operations.

Consequently, the Permit lacks an operational requirement or limitation that is necessary to assure compliance with its rolling twelve-month limits on NOx and VOC emissions from the Facility's Charging operations. The Permit must include, or incorporate by reference, an annual limit on the mass of coal that is charged in the Facility's coke oven batteries to assure compliance with those emission limits.

B. The Permit Must Include a Rolling Twelve-Month Limit on the Mass of Coal that is Pushed Through the Facility's Coke Oven Batteries

Similarly, the amounts of NOx and VOCs that are emitted by the Facility's Pushing operations depend on the mass of coal that is pushed through the Facility's coke oven batteries. The Permit establishes rolling twelve-month limits on emissions of NOx and VOCs from the Facility's Pushing Operations,⁷ but does not include a rolling twelve-month throughput limit (or any other operational limit) that would assure compliance with those NOx and VOC emission limits. In the absence of such a throughput limit, it is not clear how the Permit assures compliance with its rolling twelve-month limits on emissions of NOx and VOCs from the Facility's Pushing operations.

Consequently, the Permit lacks an operational requirement or limitation that is necessary to assure compliance with its rolling twelve-month limits on NOx and VOC emissions from the Facility's Pushing operations. The Permit must include, or incorporate by reference, an annual limit on the mass of coal that is pushed at the Facility's coke oven batteries to assure compliance with those emission limits.

⁷ Permit, Part D, Source ID 802, § I#002, at 90.

C. The Permit Must Include Rolling Twelve-Month Limits on the Mass of Coal that is Quenched at the Facility's Coke Oven Batteries and the Chemical Composition of the Quench Water Used at the Facility's Coke Oven Batteries

The amounts of VOCs that are emitted by the Facility's quenching operations also depend on the mass of coal that is pushed through the Facility's coke oven batteries, as well as the chemical composition of the water that is used to quench coke. The Permit establishes two rolling twelve-month limits on emissions VOCs from the Facility's quenching operations,⁸ but does not include a rolling twelve-month limit on the Facility's throughput of coal or any restrictions on the chemical composition of the Facility's quench water that would assure compliance with those VOC emission limits. In the absence of such a throughput limit and restriction, it is not clear how the Permit assures compliance with its rolling twelve-month limits on emissions of VOCs from the Facility's quenching operations.

Consequently, the Permit lacks operational requirements or limitations that are necessary to assure compliance with its rolling twelve-month limits on VOC emissions from the Facility's quenching operations. The Permit must include an annual throughput limit on the mass of coke that the Facility quenches and restrict the chemical composition of the Facility's quench water to assure compliance with those emission limits.

D. The Permit Must Include a Rolling Twelve-Month Limit on the Mass of Coal that is Underfired by the Facility's Coke Oven Batteries

The amounts of NOx and VOCs that are emitted by the Facility's Underfiring operations also depend on the mass of coal that is pushed through the Facility's coke oven batteries. The Permit establishes rolling twelve-month limits on emissions of NOx and VOCs from the

⁸ Permit, Part D, Source ID 803, §§ I#001 (1.0 ton per year limit) and VII#002 (5.4 tons per year limit), at 103-4.

Facility's Underfiring Operations,⁹ but does not include a rolling twelve-month throughput limit (or any other operational limit) that would assure compliance with those NOx and VOC emission limits. In the absence of such a throughput limit, it is not clear that the Permit assures compliance with its rolling twelve-month limits on emissions of NOx and VOCs from the Facility's Underfiring operations.

Consequently, the Permit lacks an operational requirement or limitation that is necessary to assure compliance with its rolling twelve-month limits on NOx and VOC emissions from the Facility's Underfiring operations. The Permit must include an annual limit on the mass of coal that is underfired by the Facility's coke oven batteries to assure compliance with those emission limits.

III. THE PERMIT MUST INCLUDE TESTING, MONITORING, AND RECORDKEEPING SUFFICIENT TO ASSURE COMPLIANCE WITH EMISSION LIMITS

A Title V Operating Permit must incorporate monitoring, recordkeeping, and reporting conditions that assure compliance with the Permit's emission and operating limits.¹⁰

As discussed above, the Permit establishes limits for emissions of NOx and VOCs from the Facility's Charging, Pushing, and Underfiring operations, and for emissions of VOCs from its Quenching operations. The Facility's permit application states that compliance with those limits is to be assured by recordkeeping.¹¹ However, the Permit does not appear to include

⁹ Permit, Part D, Source ID 805, § VII#005, at 106-7.

¹⁰ See 42 U.S.C. § 7661c(a), (b), and (c); 40 C.F.R. § 70.6(a)(3); 25 Pa. Code § 127.441(a); 25 Pa. Code § 127.512(h).

¹¹ COY BALBONI ENVTL., INC., Title V Operating Permit Renewal Application for Cleveland-Cliffs Monessen Coke LLC Monessen Coke Plant (July 2024), Attachment B at 30 (NOx and VOC limits for Charging operations),

recordkeeping requirements for those sources. Without such recordkeeping requirements, it is not clear how the Permit assures compliance with its limits on NO_x and VOC emissions from the Facility's Charging, Pushing, Quenching, and Underfiring operations.

Accordingly, the Permit lacks recordkeeping requirements that are sufficient to assure compliance with its limits on emissions of NO_x and/or VOCs from the Facility's Charging, Pushing, Quenching, and Underfiring operations. The Permit must be revised to require that the Facility keep records that are sufficient to assure compliance with those emission limits.

31 (NO_x and VOC limits for Pushing operations), 32 (VOC limits for Quenching operations), and 33 (NO_x and VOC limits for Underfiring operations).