



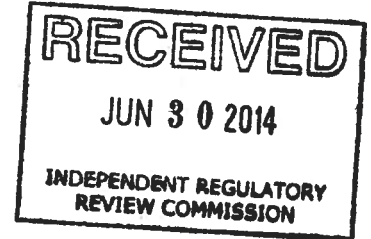
3052  
United States Steel Corporation  
Environmental Affairs  
1350 Penn Avenue  
Pittsburgh, PA 15222

Dan Havalo  
Environmental Engineer

**Via Online Submittal: <http://www.ahs.dep.pa.gov/RegComments>**

June 30, 2014

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477



**RE: United States Steel Corporation  
Comments to Proposed Changes of 25 PA. 121 and 129**

To Whom It May Concern:

Please find attached United States Steel Corporation's comments to the proposed regulatory changes to Chapters 121 and 129 of Title 25 relating to amending the reasonably available control technology requirements for nitrogen oxides and volatile organic compounds.

Feel free to contact me with any questions at [DCHavalo@uss.com](mailto:DCHavalo@uss.com) or 412-433-6544.

With Regards,

A handwritten signature in black ink, appearing to read 'Dan Havalo'.

Dan Havalo

## 1. Refinery Gas is undefined in the rule and existing regulations

### Comment:

In the proposed rulemaking the Department uses an undefined term, “refinery gas” to describe a form of presumptive RACT and what constitutes RACT for major sources of NO<sub>x</sub> and VOCs. The term refinery gas is not defined; and therefore, the applicability of the refinery gas units may be ambiguous.

### Proposed Resolution:

U. S. Steel proposes, consistent with the existing definitions of “refinery” and “refinery unit” found in §121.1, that a definition of “refinery gas” be added to §121.1 as, “a gas produced at a refinery which produces petroleum products, including gasoline, from refinery units.”

## 2. RACT determination limits need further clarification and support

### Comment:

PaDEP proposes within §129.97(g) various NO<sub>x</sub> limits for different gas and oil fired combustion units. Within the rulemaking, PaDEP proposes no technical basis or economic justification for the limits. PaDEP simply asserts that the proposed limits will allow nonattainment areas to attain and maintain attainment status within the Commonwealth. The basis of RACT, is for each source to set an appropriate control strategy that is technologically and economically feasible for RACT affected facilities. PaDEP makes no basis whether technological nor economical that the limits prescribed in §129.97(g) of the proposed rule will constitute RACT. Furthermore, USEPA’s New Source Performance Standards provide a limit of 0.1 lb/NO<sub>x</sub> million Btu for new or modified natural gas-fired boilers.

U. S. Steel believes, based on the installation of NO<sub>x</sub> control technologies in various applications, that 0.08 lb NO<sub>x</sub>/MMBtu for many natural gas-fired combustion units is not RACT, but instead, it is beyond RACT. The economic feasibility to install certifiable 0.08 lb NO<sub>x</sub>/MMBtu equipment is cumbersome and not RACT economical.

### Proposed Resolution:

U. S. Steel respectfully requests that the proposed rulemaking include the technological and economical basis for determining presumptive RACT. U. S. Steel also requests that the presumptive RACT limit not be applicable to combustion units to which no technological and economical basis exist. U. S. Steel also believes that the Department provide, with specificity, what constitutes economic feasibility in terms of dollars per ton removed.

## 3. Dual-fuel fired units are not sufficiently defined

### Comment:

PaDEP lists multiple types of fuel-fired combustion units in §129.97 of the proposed rule. PaDEP has failed to properly categorize units which may be fired by two or more fuels of varying ratios and may or may not be listed in §129.97.

#### **Proposed Resolution**

U. S. Steel proposes the PaDEP properly define the fuel ratio that constitutes the type of units listed within §129.97. U. S. Steel proposes, similar to the Boiler MACT, that units that combust 90 percent by volume or more of a specific fuel not be considered as a dual fuel unit and appropriately be categorized as the corresponding single fuel unit.

#### **4. Good Engineering Practices**

##### **Comment:**

Sections 129.97(b)(1)(i) and (c) provide for the maintenance and operation of the source in accordance with the manufacturer's specifications. Subsection (b)(1)(i) and (c) do not currently allow for good engineering practices. In some circumstances, manufacturer's specifications may not be available for older emission sources or better practices have been developed since installation based on site-specific factors or experience gained in operating the sources.

##### **Proposed Resolution:**

Sections 129.97(b)(1)(i) and (c) should be revised to provide for the maintenance and operation of the source in accordance with the manufacturer's specifications or good engineering practices. Please revise both subsection (b)(1)(i) and (c) to allow for operation under either guideline. In some circumstances, manufacturer's specifications may not be available for older emission sources or better practices have been developed based on site-specific factors or experience gained in operating the sources.

#### **5. Unreasonable Deadlines**

The deadlines imposed in the proposed rule are unreasonable and do not take into consideration the real world implications. While in limited applications the proposed schedule may be appropriate, for most case-by-case determinations, the dates do not consider the significant amount of site specific engineering, construction and trial required prior to the compliance deadline. Several months may be necessary to evaluate overall project feasibility and cost per ton of NO<sub>x</sub> removed. If the proposed NO<sub>x</sub> control technology is determined to be technically feasible for the intended application, then additional time would be required to obtain any necessary permits and capital approval, and to complete the detailed engineering, installation and start up. The proposed rule's schedule does not consider these factors or the time to fabricate and install the equipment. In addition, for certain combustion units, a plant outage may be necessary. Generally, such outages are scheduled in advance and coincide with other operational outages. The rule should be revised to allow for an appropriate amount of time to develop case-by-case RACT proposals and to implement the approved RACT. As noted above, the proposed schedule is woefully insufficient for many case-by-case determinations. U. S. Steel respectfully request that the EQB provide at least 18 months from the effective date of the rule to submit a proposed RACT. In addition, as noted above the one-year allowed for implementing RACT is also unreasonable. This assumes that the air

pollution agency will be able to approve or deny every RACT proposal within the one-year period. U. S. Steel is not certain that the Department and other local air pollution control agencies have the sufficient resources to review all such submittals. In addition, as noted above, even if a RACT proposal is timely reviewed and approved, the proposal may require the issuance of a plan approval or installation permit to install the equipment. Capital expenditures for any controls related to the project are generally not available until a permit is issued. U. S. Steel believes that for many case-by-case applications, the proposed schedule is arbitrary. U. S. Steel respectfully requests that a compliance schedule be determined on a case-by-case basis.