



United States Steel Corporation  
1350 Penn Avenue  
Pittsburgh, PA 15222



**VIA ELECTRONIC DELIVERY**

Pennsylvania Department of Environmental Protection  
Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477  
[RegComments@pa.gov](mailto:RegComments@pa.gov)

Re: **United States Steel Corporation Comments  
Proposed Additional RACT Requirements for Major Sources of NO<sub>x</sub> and VOCs for the 2015  
Ozone NAAQS**

Dear Sir or Madam:

United States Steel Corporation (U. S. Steel) appreciates the opportunity to submit the following comments in response to the Pennsylvania Department of Environmental Protection (PADEP)'s proposed additional RACT Requirements for Major Sources of NO<sub>x</sub> and VOCs for the 2015 Ozone NAAQS (RACT III). U. S. Steel specifically notes that the scope of the presumptive RACT limits in the RACT III regulations is much broader than the scope of prior RACT rules. We respectfully request PADEP provide additional time for sources to evaluate and comply with the RACT III requirements.

**1. §129.111. Applicability.**

§129.111(a) notes that the owner or operator shall identify and list the following sources and facilities in the written notification required under § 129.115(a) (relating to written notification, compliance demonstration and recordkeeping and reporting requirements):

*(1) The sources and facilities for which a requirement or emission limitation has not been established in §§ 129.51, 129.52(a)–(k) and Table I categories 1–11, 129.52a–129.52e, 129.54–129.63a, 129.64–129.69, 129.71–129.73, 129.75, 129.77 and 129.101–129.107.*

*(2) The sources and facilities subject to §§ 129.51, 129.52(a)–(k) and Table I categories 1–11, 129.52a–129.52e, 129.54–129.63a, 129.64–129.69, 129.71–129.73, 129.75, 129.77 and 129.101–129.107.*

U. S. Steel requests that PADEP revise the written notification to only include the facility's sources that are subject to the additional RACT (RACT III) requirements based on the proposed rulemaking, not sources subject to prior RACT limits or exemptions.

**2. § 129.112. Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

U. S. Steel requests that the PADEP extend the compliance dates for facilities to comply with RACT III requirements to allow the appropriate time for facilities to evaluate the emissions from a source(s), to

consider options for compliance, and if needed allow time to for a facility to petition the agency for an alternative RACT proposal and/or petition for alternative compliance schedule. While the proposed rule does provide a mechanism for sources to apply for alternative RACT limits and alternative schedules, we believe the “presumptive” schedule afforded to sources to otherwise comply with the RACT requirements, i.e., those sources required to comply by January 1, 2023, is unreasonable such that many sources will be compelled to seek an alternative schedule. Such requests will provide an unreasonable burden on sources and regulatory agency resources. If the schedule is revised such that sources are afforded a more reasonable schedule to evaluate and comply (e.g., 2 years instead of ~ 1 year), many sources would not be forced into seeking an alternate compliance schedule.

**3. §129.112. Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

In §129.112(k), PADEP included the following new requirement for presumptive RACT:

*(k) The owner and operator of a direct-fired heater, furnace or oven with a rated heat input equal to or greater than 20 million Btu/hour subject to §129.111 shall comply with the presumptive RACT emission limitation of 0.10 lb NO<sub>x</sub>/million Btu heat input on a daily average basis or as determined through a stack test.*

In the proposed RACT III regulations, PADEP proposed to apply the same NO<sub>x</sub> limit for a direct-fired heater, furnace, or oven as the limit for indirect-fired furnaces established in RACT II. The basis of this determination is not clear from the rulemaking record and is inconsistent with prior determinations. There are significant technological differences between direct-fired heaters, furnaces, and ovens and indirect-fired units. During prior RACT rulemakings and evaluations, the technologies employed for indirect-fired units have been shown to not be technologically or economically feasible for direct-fired units. U. S. Steel and the Allegheny County Health Department (ACHD) very recently completed such an evaluation for certain direct fired furnaces for RACT II which, again, verified that many technologies and limits for indirect-fired units would not be technologically or economically feasible for direct-fired units. U. S. Steel and ACHD just completed this evaluation and determination which was incorporated into permits issued in 2020. However, based upon the proposed rule language, PADEP is requiring sources (and ACHD) to, again, complete a RACT evaluation if the new presumptive RACT limit cannot be met. This is not an efficient use of resources for EPA, PADEP, ACHD or sources. When finalizing the rule, the PADEP should recognize and acknowledge these prior determinations and not require sources to redo case-by-case RACT determinations that were just evaluated and approved in RACT II.

In addition, U. S. Steel respectfully requests that PADEP provide additional information to support the “presumptive RACT” requirement for direct-fired units. Most indirect-furnace technologies are not transferrable to direct-furnace units without major modifications, effects to product capacity and quality, increased fuel usage, and potential derating of a furnace.

At a minimum, U. S. Steel requests that the PADEP recognize that there are direct-fired heaters, furnaces and ovens that are critical to production of steel and other manufacturing and recognize that the broad

stroke of applying a presumptive NO<sub>x</sub> or VOC emission limitation or requirement may have an impact on production and product quality negatively impacting the manufacturer.

U. S. Steel additionally requests that the PADEP identify which fuel or fuels were assumed to be combusted in the direct-fired sources from which the presumptive RACT limit of 0.1 lb NO<sub>x</sub>/mmbtu was derived.

**4. § 129.112. Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

*g(4)(i) E<sub>i</sub> = The emission rate or emission limit for fuel I during the compliance period, expressed in units of measure consistent with the units of measure for the emission limitation.*

For sources that are multi-fuel firing units that are not clearly addressed in (g)(4) by not having a presumptive emission limit, the calculation in (g)(4) should be able to be used. Example fuels are Blast Furnace Gas and Coke Oven Gas which are cleaned process byproduct fuels that are beneficially reused. It is not clear, from the regulation, on how such an evaluation would be completed for multi-fired units burning these beneficially reused process gases. U. S. Steel certainly agrees that a multi-fired unit should have the ability to demonstrate compliance with RACT III. Paragraph (g)(4) should be broadened to include such beneficially reused process gases. Alternative, Paragraph 129.112(k) should be revised to incorporate a multi-fuel fired unit approach.

**5. § 129.115. Written notification, compliance demonstration and recordkeeping and reporting requirements.**

§129.115(a) requests that the facility with sources subject to the additional RACT requirement or RACT emission limitation in §129.112—129.114 submit written notification, but it also requires that the facility provide much more level of detail, including sources exempted from §129.112—129.114, based on §129.111(a)(1) and (2). Further, the written notification must include a description, including make, model and location, of each source, the applicable RACT requirement or RACT emission limitation, or both, how the owner or operator shall comply, and the reason why the source is exempt from the RACT requirements and RACT emission limitations in §129.112—129.114.

The purpose of the requirement is unclear. Furthermore, requiring sources to advise the department of a compliance methodology within 6 months of the effective date is not reasonable considering some sources will have to generate data, determine compliance, and review technologies. Refer to first comment above about the overall compliance deadlines.

Pennsylvania Department of Environmental Protection -

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U. S. Steel Comments – Proposed RACT III Regulations

October 12, 2021

Page 4

U. S. Steel appreciates PADEP's careful consideration of these comments. If you have any questions, please contact me at (412) 433-5904 or [cwhardin@uss.com](mailto:cwhardin@uss.com).

Respectfully,

A handwritten signature in blue ink, appearing to read "Chris Hardin", with a long horizontal flourish extending to the right.

Christopher Hardin

Environmental Manager

Environmental Affairs, U. S. Steel Corporation