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VIA E-MAIL: jennifer.vanvlerah@epa.ohio.gov

July 6, 2015

Ms. Jennifer Van Vlerah
Ohio Environmental Protection Agency, DAPC
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

RE: Comments on Demonstration for Attainment of the 1-Hour Sulfur Dioxide Standard in Nonattainment Areas State Implementation Plan

Dear Ms. Van Vlerah:

On behalf of Mountain State Carbon (MSC), we appreciate the opportunity to comment on Ohio Environmental Protection Agency's (OEPA's) April 3, 2015 State Implementation Plan (SIP) submittal for Attainment of the 1-hour Sulfur Dioxide Standard. This letter provides MSC's comments on the draft SIP.



Background

The April 3, 2015 State Implementation Plan (SIP) addresses the 2010 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) and specifically the three nonattainment areas for this standard in Ohio. The SIP was submitted as a draft to U. S. EPA and OEPA recently extended the public comment period to July 9, 2015. MSC's comment's, which are outlined in the following paragraphs, pertains to OEPA's demonstration for the Steubenville OH-WV nonattainment area, and specifically the Mingo Junction Energy Center, LLC (MJEC) and the former Wheeling Pittsburgh Mingo Junction Steel Facility (MJSF) emission rates utilized in the demonstration.

The Steubenville OH-WV nonattainment area 1-hour SO₂ NAAQS compliance demonstration includes a modeling and reasonably available control technology (RACT) analysis for the more significant SO₂-emitting sources in the nonattainment area. Given the definition of the nonattainment area, the demonstrations consider Ohio-based sources in Jefferson County and West Virginia-based sources in parts of Brooke County, including MSC. The modeling analysis is included in Appendix K of the SIP submittal while the RACT analysis is included as Chapter 6 of the main SIP report document. OEPA's proposed Ohio Administrative Code (OAC) rule 3745-18-47 incorporates the facility-specific requirements from the analyses. Two of the sources considered in the compliance demonstration are MJEC and MJSF.

According to the SIP, the MJSW is currently undergoing a purchase agreement in hopes of resuming operations. The facility's main sources of SO₂ emissions are a ladle metallurgy furnace (LMF) and electric arc furnace (EAF).

The SIP states that MJEC is comprised of four (4) 180 MMBtu/hr boilers permitted to burn a combination of natural gas, blast furnace gas or coke oven gas (COG) and, for two of the units, desulfurized COG. OEPA is proposing a 0.11 lbs SO₂/MMBtu limit, the approximate equivalent to 20.34 lb/hr, for each of the MJEC boilers. OEPA's air dispersion modeling compliance demonstration is the sole basis for the proposed MJEC limit. However, as noted

most succinctly by OEPA in Chapter 6 of the main SIP document, natural gas is highly likely to be the only viable fuel for continued operation of the MJEC boilers due to: 1) MSC's commitment that COG or desulfurized COG will no longer be provided to the facility, and 2) the permanent shutdown of the blast furnace at the former Wheeling Pittsburgh Mingo Junction Steel facility.

MJEC Comments

MSC offers the following comments for consideration of the MJEC sources as they have been characterized in the draft SIP:

- **MJEC's Current Operating Status.** It is unclear in the record whether or not the facility is considered to be an active and properly authorized stationary source of air emissions. That is, the SIP does not document that MJEC has appropriately maintained the existing permits or its equipment to entitle the facility to retain its SO₂ emissions in this SIP. If this facility has not properly maintained these aspects of its operations, then the facility would be required to undergo permitting under New Source Review requirements and should be excluded from this SIP process.
- **MJEC's Future Operating Situation:** It is unclear as to the actual viability of the facility. In light of the current business conditions, including access to customers, and coke oven gas, it seems questionable that the MJEC is a viable business unit. We do not believe that the current owners have articulated a clear plan to reactivate this source in the near future. To point, in early 2015 representatives from the MJEC indicated to AK Steel personnel that the current configuration of the facility's boilers was not economically viable.

Therefore, MSC respectfully requests that the MJEC facility be removed from SIP.

- **Proposed Emission Limits.** Notwithstanding the prior comments, based on the data provided in the SIP and as we currently understand conditions at MJEC, the only viable fuel for this facility is natural gas. The exclusion of the MJEC SO₂ emissions is also appropriate considering that the analyses and proposed revisions to OAC 3745-18-47 for MJEC should be reflective of an emission rate commensurate with the future viable fuel option determined by OEPA (i.e., natural gas), which for natural gas would be much less than 1 lb/hr. Accordingly, should MJEC and OEPA demonstrate that the source is entitled to be included in this SIP, then only emissions needed to operate the sources on natural gas, the only viable fuel, should be included in the demonstration.
- **Potential inconsistency with the WVDEP SIP.** The development of the West Virginia SIP is ongoing. The current draft WVDEP SIP incorporates considerably different MJEC emission rates. Therefore, we request OEPA consider a SIP approach that is consistent with WVDEP.

MJSF Comment

MSC offers the following comment for consideration of the MJSF sources as they have been characterized in the draft SIP:

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- We respectfully request that OEPA take a deeper look into the proposed RACT emission limits for the MJSF LMF and EAF. AK Steel believes that lower SO₂ emission rates than those proposed may that have been achieved and demonstrated.

We appreciate the agency's review of these comments. Should you have any questions or wish to further discuss our comments, you can reach me directly at (724) 284-2267.

Sincerely,



Russell J. Dudek
Senior Environmental Manager
AK Steel Corporation

cc: William F. Durham, WV DEP
Mike Remsberg
Patrick Smith