



Division of Air Pollution Control Response to Comments

**Rule: OAC Rules 3745-18-01, 3745-18-03, 3745-18-04, 3745-18-47, and 3745-18-49
SO2 SIP Update**

Agency Contact for this Package

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Ohio EPA held public hearings on June 29, 2015 in Pomeroy, Ohio, June 30, 2015 in Steubenville, Ohio and July 9, 2015 in Painesville, Ohio, and had a 30+day draft rule comment period ending July 9, 2015 regarding the above mentioned rules and the "Demonstration for Attainment of the 1-Hour Sulfur Dioxide Standard State Implementation Plan." This document summarizes the comments and questions received at the public hearings and during the comment period.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

General/Overall Concerns

Comment 1: My name is Douglas McWilliams. I'm with Squire, Patton & Boggs. I represent, today, the City of Painesville. Thank you for the opportunity to provide testimony today with regards to this State Implementation Plan pertaining to the 1-hour SO2 standard.

The City of Painesville has participated in the process and believes that this State Implementation Plan provides an appropriate balance between the State's interest in achieving the SO2 health-based national ambient air quality standard and the City's interests in providing safe, effective and reliable electricity service to its customers. Therefore, the City supports this ruling and is interested in providing whatever support is necessary to the State and Ohio EPA in supporting this rule-making through the process for both public comment and U.S. EPA review. **(Douglas McWilliams on behalf of the City of Painesville, Ohio)**

Response 1: Ohio EPA thanks the commenter for their support.

Comment 2: 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.

(Russell J. Dudek, Sr. Environmental Manager, AK Steel Corporation)

Response 2: At this time, MJEC's current permit still remains active and does allow the facility to burn natural gas as an option. As can be seen in response 3, Ohio EPA will be modifying the emissions limit for MJEC based upon information provided by the commentor.

Comment 3: 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 lbjhr, 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.

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.

(Russell J. Dudek, Sr. Environmental Manager, AK Steel Corporation)

Response 3: Based upon further consideration of Ohio's analysis and the above comments, Ohio EPA will be revising the SIP to include an emissions limitation equivalent to 0.5 lb/hr to ensure natural gas may be burned. Ohio EPA has changed Paragraph (P) of OAC rule 3745-18-47 to reflect a maximum emission rate of 0.0028 pounds of SO₂ per million BTU.

Comment 4: MSC offers the following comment for consideration of the MJSF sources as they have been characterized in the draft SIP:

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.

(Russell J. Dudek, Sr. Environmental Manager, AK Steel Corporation)

Response 4: Ohio EPA believes that they have done a thorough review of emissions limitations necessary to address the SIP requirements and RACT requirements for the LMF and EAF, as documented in our SIP.

End of Response to Comments