



## Response to Comments

**Project:** New Steel International / MMK Americas  
**Ohio EPA ID #:** NPDES – 01D00016 (state), OH0139726 (federal)  
Wastewater PTI – 634030  
Air PTI – 07-00587

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Ohio EPA held a public hearing on March 20, 2008 regarding a draft air permit-to-install, a draft wastewater permit-to-install and a draft NPDES permit issued to New Steel International, Inc (also known as MMK Americas) for a steel mini-mill facility to be constructed and operated in Scioto County. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on March 27, 2008.

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. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

### **Surface Water Comments and Responses (pp. 1-10)**

#### Monitoring Concerns and Discharge Limits

**Comment 1:** Neighbors expressed concerns regarding possible water, air, noise and other pollution from the site.

**Response 1:** To protect the Ohio River, the permit limits the discharge of pollutants to ensure that public health, fish and other organisms are protected. The permit requires compliance

with Water Quality Standards approved by Ohio and the Ohio River Valley Water Sanitation Commission (ORSANCO).

To protect ground water supplies, the permit-to-install requires liners for all process water ponds at the facility.

**Comment 2:** **Please add enforceable limits and monitoring for solids, cadmium, mercury and temperature to the permit.**

**Response 2:** The permit contains monitoring requirements for these parameters. Limits are not being required for these pollutants for several reasons. First, there is no maximum water quality standard for total dissolved solids (TDS), due to differences in the toxicity of different ionic mixtures. The limit on acute toxicity was included to limit toxicity due to TDS, as well as regulate any mixture of pollutants that might be toxic.

Ohio EPA does not expect cadmium or mercury to be present at levels greater than background in the Ohio River. Monitoring for these compounds was included as a check on this judgment. These pollutants were selected because the water quality standards for these pollutants are low.

The processes proposed by MMK do not typically contain these pollutants in treated wastewater. MMK is participating in a steel industry initiative to keep mercury switches out of steel scrap. Also, those plant processes that are normally associated with mercury (furnaces, in particular) have no wastewater discharges.

Based on the relatively small flows from the plant (2.2 MGD maximum), we do not expect temperature to have the reasonable potential to cause or contribute to exceedences of water quality standards. We have included temperature monitoring of the discharge because contact cooling waters are a portion of the discharge; however, all wastewaters are routed to a pond prior to discharge, which should reduce temperatures in the final discharge. Also, much of the 2.2 MGD is expected to be used in slag quenching and will not be discharged at all. Based on this information, we do not believe that temperature limits are needed to protect the Ohio River.

**Comment 3:** **Estimate the number of fish killed and other aquatic damage, including mollusks, from elevated**

**temperatures of 327 MGD of non-contact cooling water and 87 MGD of process water. Please provide information on the impact of fish kills and other aquatic damage to fish and wildlife including threatened, endangered, and sensitive species (especially mollusks), and on their recovery plans.**

**Response 3:** Ohio EPA does not expect any fish kills or aquatic damage to Ohio River fish, mollusks or other aquatic life from the temperature of the discharge.

First, the flows cited in the comment seem to assume that MMK will be using once-through cooling and process wastewater systems. This is not the case. Due to recycling and reuse of cooling and wastewaters, the maximum discharge of the plant is expected to be 2.2 MGD. For the reasons listed in responses above, Ohio EPA does not expect the temperature of the discharge to have an adverse impact on fish, mollusks and other aquatic life in the Ohio River.

**Comment 4:** **Please provide an analysis of how the degraded water quality of the Ohio River resulting from OEPA's permitting of water degradation by New Steel would impact human uses of the Ohio River including any increased microbial contamination resulting from uncontrolled thermal pollution.**

**Please provide information on how degraded uses for humans would be minimized, mitigated, and what compensation would be provided for this natural resource degradation to affected residents of Ohio.**

**Response 4:** Ohio EPA does not expect the additional pollutants from MMK to have an impact on human health. First, the degradation mentioned in Ohio's water permits refers to the addition of pollutants to the water, not a projected impact to the river. Second, the thermal pollution is expected to be controlled by recycling of non-contact cooling waters, and their reuse in process wastewater systems.

When the steel plant is constructed, discharges from the plant are expected to be rare, because excess waters would be used to quench slag as much as possible, and only water volumes beyond the need for slag quenching would be discharged.

The facility would use chlorine to control microbes in the non-contact and contact cooling water systems. The chlorine can be expected to reduce microbial levels in the discharge. Discharge levels of chlorine must meet water quality standards.

**Comment 5:** **MMK does not believe that the treatment systems described in the permit-to-install are capable of consistently meeting Total Suspended Solids limits of 20 mg/l (monthly average) and 30 mg/l (daily maximum). The company requests that these limits be changed to 30 mg/l (monthly) and 45 mg/l (daily) as specified in the NPDES application.**

**Response 5:** Based on a review of the water applications, it is clear that only about 10% of the wastewater receives end-of-pipe filtration. Because the draft effluent limits assumed that all or most process waters would be filtered, we agree that the draft limits should be changed. The final TSS concentration limits are 30/45 mg/l, as specified in the company's application.

**Comment 6:** **Certain permit monitoring requirements begin on the effective date of the permit. MMK requests that the NPDES permit become effective on September 1, 2009. The company expects that the wastewater treatment plant would be nearing completion at that time and certain startup procedures using river water would be initiated to check out the system before any actual wastewater is generated.**

**Similarly, MMK requests that the biomonitoring requirements go into effect at plant startup, and that the storm water pollution prevention plan be completed within six months of startup of the wastewater treatment facility.**

**Response 6:** We agree. The final permit contains these changes.

**Comment 7:** **MMK requests explanation of the upstream monitoring requirements for lead and acute toxicity. The company assumes that these requirements could be used to determine net discharge for these parameters.**

**Response 7:** These requirements are not related to net limits. The acute toxicity monitoring is required as a control water for the effluent test. The lead monitoring was included to get an accurate measure of the upstream concentration. ORSANCO data for 1992-98 showed that lead concentrations at the R.C. Byrd Dam exceeded water quality standards.

Since the permit was sent to public notice, Ohio EPA has received updated information from ORSANCO (2000-07 data) that shows lead meeting water quality standards at the Byrd Dam. Since there is no longer an issue with background concentrations, Ohio EPA has removed the lead monitoring requirement from the upstream requirements.

**Comment 8:** **Part II G indicates that the influent would be monitored for mercury, but is not listed in Part I. B, Upstream Monitoring Requirements. Presumably this parameter should be included here, as well, and the data can also be used to determine net discharge.**

**Response 8:** Including the influent reference was an error. The language in Part II G related to influent sampling has been removed.

**Comment 9:** **Part V of the draft permit does not describe the outfall location for the discharge of coal pile runoff authorized in Section V. USEPA recommends that the permit identify the outfall location and clarify what is meant by the phrase “weather conditions permitting”.**

**Response 9:** The company has not proposed a coal pile runoff discharge. The requirements of Parts III-VI of the permit are standard conditions that are the same for all permits; as a result, they contain conditions that are not applicable to a given permittee. The coal pile runoff limits in the storm water monitoring requirements are one of those requirements.

#### Intake Structure Concerns

**Comment 10:** **Please provide information and correspondence regarding Ohio EPA’s consultation with the US Fish and Wildlife Service and with state fish and wildlife authorities regarding the water intake, pollutants to be discharged, and on habitat recovery plans for the affected segment of the Ohio River.**

**Response 10:** Ohio EPA provided public notice to both the US Fish and Wildlife Service and the Ohio Department of Natural Resources, Division of Wildlife. These agencies were notified of the antidegradation public notice on the application, and of the draft NPDES permit. Neither raised concerns about the discharges or intake from this facility.

**Comment 11:** **Estimate the number of fish and other aquatic life that will be killed by the water intake from this facility. Please provide an estimate of the impact of the direct fish kill on fish, mollusk, and other aquatic populations. Please provide information on how these impacts are to be minimized or mitigated.**

**The permit must identify MMK Americas as a new facility with a cooling water intake structure subject to the requirements of the Phase I 316(b) regulations in 40 CFR Part 125. The permit/fact sheet should also identify whether the facility has made a Track I or Track II demonstration as defined in 40 CFR 125.86. The permit should also identify the proposed location of the cooling water intake and proposed flow rates for that intake.**

**The permit must include Ohio EPA's Best Technology Available determination, and identify the technologies and performance standards that the facility will be required to meet to comply with the 316(b) rule.**

**Response 11:** Part II K has been rewritten to identify MMK as a Phase I facility under the 316(b) rules. The information submitted to date indicates that MMK will be demonstrating compliance as a Track I facility under 40 CFR 125.86(b). From flow diagrams and the PTI application, it is clear that the cooling waters at this facility are closed-cycle systems, with large flow reductions compared with what flows would be from a once-through system.

In MMK's proposal, non-contact cooling waters would be recycled through a cooling tower and reused in the cooling system. The blowdown from this system would be used in the contact cooling water system. This latter system would also be recycled to and from a scale pit. Wastewater from the scale pit would be directed to the quench pond to be used as slag quench water or discharged.

As a result of this recycling, non-contact cooling water is not directly discharged at all, but only through its use in other wastewater systems. This level of recycling/reuse is beyond normal closed cycle cooling operations.

Because this system is a closed-cycle system and would meet the intake velocity requirement of 0.5 feet/second as specified in the rule, no significant harm is expected due to impingement and entrainment of organisms. In addition, the design intake flow is less than 5% of the mean annual flow of the Ohio River, which is another requirement for Track I facilities. Ohio EPA believes that further measures to reduce impingement and entrainment are not necessary, since we are not aware of any threatened or endangered species, or species of concern that could be affected by this intake.

Because this intake would meet these federal design standards, the Phase I 316(b) rule does not require such systems to provide estimates of impingement and entrainment prior to construction. Data collection is required after the intake is constructed and operating to verify compliance with design standards.

Based on these comments, Ohio EPA has reworded Part II K to indicate the applicability of the Phase I rule, more clearly define the design standards and find that they meet BTA. The language also identifies the location of the intake and cites the design flow.

**Comment 12:** **Part II, K of the draft permit requires the facility to submit monitoring data required by 40 CFR 125.87 with the next renewal application. This rule requires monitoring for impingement, entrainment, velocity at intake, and visual inspection of the intake. The Source Water Baseline Biological Characterization Study or Comprehensive Demonstration Study is to be used in identifying species of concern, the monitoring methods to be used, and the timing of entrainment sampling.**

**Paragraph K also does not require MMK to submit the monitoring required by 40 CFR 125.87 until submission of the next renewal application. Rule 40 CFR 125.88 requires yearly submittal of this information; Ohio EPA must add permit conditions implementing these requirements.**

**Response 12:** Ohio EPA has expanded the language in Part II K to include details on the data to be submitted, and annual reporting requirements for the studies.

Ohio/Kentucky Jurisdictional Issues

**Comment 13:** **The NPDES and permit-to-install both state that: “I have determined that a lowering of water quality in the Ohio River is necessary”. However, the U.S. Supreme Court has ruled that the Ohio River belongs to Kentucky. By what right can OEPA Director Chris Korleski determine that the State of Ohio may degrade waters under the ownership and jurisdiction of another state?**

**Response 13:** First, Ohio and Kentucky have concurrent jurisdiction over the Ohio River (See Ohio v. Kentucky (1980), 444 U.S. 335). Under Ohio law, the Ohio River is “waters of the state”. As a water of the state, Ohio has the obligation under State law and rules to protect the water quality standards of the Ohio River (See Ohio Revised Code 6111 and Ohio Administrative Code 3745-1, particularly 3745-1-32). Ohio has applied these requirements, along with all other requirements of ORC 6111 and OAC 3745-1 in this permit to prevent pollution of the Ohio River.

**Comment 14:** **Were the citizens and government of Kentucky provided full public notice of Ohio’s draft determination to degrade Kentucky’s waters? Please provide copies of the public notice for the water degradation determination and water permits sent to Kentucky. Please provide copies of the letter of determination by Kentucky authorizing Ohio to degrade their waters.**

**Response 14:** Yes. Ohio provided a copy of the public notice, draft permit and fact sheet to the Kentucky Department of Environmental Protection and ORSANCO.

**Comment 15:** **Ohio has apparently unilaterally determined that it is permissible to pollute other states’ waters to benefit the Ohio economy. This determination has negative implications for waters under Ohio’s jurisdiction as well. Given Ohio’s position on this issue, how can Ohioans be assured that the State of Ohio, and specifically Ohio EPA, will not likewise allow other states or nations to truck or pipe their industrial or agricultural pollutants into Ohio’s waters based on their unilateral**

**determination that such dumping would benefit their state or nation economically?**

**Response 15:** In any case like this, all Ohio standards would need to be met; therefore, there could be no degradation that would cause violations of Ohio WQS. Ohio's antidegradation procedures would apply to Ohio waters, regardless of where the discharge originates.

Ohio and Kentucky are members of the Ohio River Valley Water Sanitation Commission Compact. The Compact recognizes the concurrent jurisdiction of the river between Ohio and Kentucky and the need for standards to protect it. To that end, Ohio EPA adopts the ORSANCO standards and this permit is consistent with those standards.

For other waters, discharges from other states must meet Ohio Water Quality Standards when the water enters Ohio. This includes meeting Ohio's Antidegradation Rule requirements. If the discharge is transported into Ohio, and discharged, all state permitting, water quality standards and antidegradation requirements apply.

Other concerns

**Comment 16:** **Neighbors expressed concern about how the plant will deal with high river water levels. Will this facility make flooding worse for neighbors? Where will the discharge go when water levels increase?**

**Response 16:** While Ohio EPA has a very limited jurisdiction over flood control issues, the Agency's Construction Storm Water General Permit, and MMK's permit-to-install application do address these issues to some extent. Flood control is primarily regulated by local flood control regulations and the flood plain administrator

The OEPA Construction Storm water permit requires facilities to reduce the flow rates of storms up to a 3/4 inch rain event through the stormwater outfalls. Many of these controls will remain in place after the facility is constructed. Although this requirement was set up for stream protection and pollutant removal it does help with flooding. Also, the PTI application shows that MMK will be retaining significant amounts of storm water for process use.

## End of Response to Surface Water Comments

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### Air Comments and Responses (pp. 10-64)

#### Comments Received at the Public Hearing

**Comment 1:** All comments received at the public hearing on March 20, 2008 were in support of the facility and of the draft air PTI.

**Response 1:** No response is necessary.

#### Comments Received from Daniel A. & Elizabeth R. Pollock

**Comment 2:** Why would EPA approve a permit for any new plants at air and/or water emission levels below what is technically achievable TODAY? That would be irresponsible wouldn't it?

Regarding the draft permit for the proposed steel mill in Portsmouth, the emission levels for all pollutants are very high and we ask that Ohio EPA require pollution control equipment that will significantly reduce all emission levels. This will result in better protection of public health and the Ohio River watershed.

Of significant concern are the following:  
Mercury emissions which are estimated at 1,800 pounds per year – which would make it, according to reports, the largest mercury emitter in Ohio. There is technology that can significantly reduce the mercury emissions and this is a request to require mercury reduction technology that should result in a 90% reduction in the mercury emissions.

The site would emit an additional 20,584 tons or 41 million pounds of particulate emissions in an area that is already non-attainment for PM2.5. This plant can do far better than the draft permit and should not be allowed to add more particulates in an area that already has problems.

Portsmouth can have this steel mill AND much cleaner air than proposed at this time!

**PLEASE review the permit for this project with the best long-term interest of all of the present and future inhabitants of the region held in your heart and mind.**

**Response 2:**

The draft New Steel Permit-to-install (PTI) allowed annual mercury emissions at a level of 1,820 pounds per year. This emission rate was compared to the current air toxics analysis as called for in Ohio Administrative Code (OAC) rule 3745-114-01. The predicted impact of the modeled mercury emission is well below the limit specified in the rule. However, due to the comments received concerning the mercury emissions from this project, New Steel has committed to installing mercury specific controls on both the Rotary Hearth Furnace / Boiler and Electric Arc Furnace / Ladle Metallurgy Furnace Operations (Emission Units B001 thru B006, P001 thru P006, P018, P019, P020, P021, P022, and P023) which will reduce the potential mercury emissions to less than 100 pounds per year.

If this project goes forward, this steel facility will be the first one in Ohio to use mercury specific controls.

Comments received in writing from a Haverhill, Ohio Resident

**Comment 3:**

**Comments received from a Haverhill, Ohio resident with concerns of the effects of the pollution caused by the several existing industrial plants in the area questioning how much worse it may get with yet another facility.**

**Enclosed with the letter was an article from October 29, 2007 Columbus Dispatch. The comments received referenced the article stating that the city of where MMK is based is “one of the 30 dirtiest places to live in the world” ....and “If you have a company that has a lot of environmental problems in another country, I would certainly wonder if they’re going to keep up with environmental protections here.”**

**Finally, the comments received stressed great concerns for their own health and that of other local residents and please no MMK and no additional polluting plants in this area.**

**Response 3:**

Ohio EPA has reviewed interactive modeling that includes surrounding sources, including nearby industrial plants,

within 50 kilometers of the proposed New Steel facility. No violations of the national ambient air quality standards (NAAQS) were predicted from the cumulative source modeling.

Ohio EPA also evaluated the analysis of the ambient air quality impacts proposed by New Steel with regard to criteria pollutants that triggered the need for such modeling to predicted levels of air emissions. As such, Ohio EPA determined that the emission levels were acceptable to be protective of health and the environment.

Any facility operating within Ohio must comply with all applicable state and federal environmental regulations. Ohio EPA has developed extensive monitoring, record keeping, reporting and testing requirements in this permit to ensure ongoing compliance.

Comments received in writing from Ohio Chapter of the Sierra Club

**Comment 4:** Please require control of emissions from roadways and parking. Alternatively, please explain why New Steel is not been required to implement the kinds of fugitive dust controls and subject to the testing by OEPA regarding their monumental fugitive emissions from roadways and parking areas which OEPA has previously employed in Jefferson County and in their Particulate SIP plan submission to US EPA?

**Response 4:** The draft permit terms for roadways require best available control measures with an estimated control efficiency of 95%. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of wet suppression, vacuuming, and/or sweeping at sufficient treatment frequencies to ensure compliance.

**Comment 5:** The draft permit shows that New Steel would secure a Synthetic Minor designation which would exempt them from Title V permitting. The CAA prohibits the withholding as CBI emissions data. Yet emissions data is missing from the New Steel application. Please provide missing data. Please provide all calculations verifying that New Steel would qualify for an exemption from Title V by virtue of reduced emissions potential.

**Response 5:** The purpose of the Synthetic Minor determination was to avoid Prevention of Significant Deterioration (PSD) review for the pollutant Lead. New Steel will not be exempt from Title V permitting and will be designated as a Title V facility.

**Comment 6:** On December 28, 2007, US EPA's area source rule for air toxics emitted by arc furnaces became final.

According to US EPA's fact sheet:

**"This rule reduces mercury emissions by requiring that EAF steelmakers buy motor vehicle scrap from providers that participate in an EPA-approved program for the removal of mercury switches."**

**"This rule also reduces emissions of other toxic metal compounds by limiting particulate matter (PM) emissions as a surrogate. Facilities that produce less than 150,000 tons per year (tpy) of stainless or specialty steel need to comply with an emissions limit of 0.8 pounds of PM per ton of steel. All other facilities are required to meet a PM limit of 0.0052 grains per dry standard cubic foot. A 6 percent opacity limit applies to fugitive emissions from EAFs."**

**"This rule reduces emissions of toxic air pollutants such as mercury, lead, manganese, nickel, and chromium. These chemicals are known or suspected to cause cancer, other serious health problems and environmental damage."**

**Ohio EPA accepts the facility's claim that they will participate in "the industry's program to eliminate mercury switches from steel scrap" but this does not appear to be a condition of the permit, and, even if it were, it would fail to comply with federal law. Federal law requires that EAF's adopt an EPA-approved program for mercury switch removal as a part of their permitting requirements. *The voluntary promise* by New Steel to participate in an *industry program* fails to meet federal requirements.**

**According to OEPA's PTI, "No more than 15%, by weight, of the scrap fed to the EAF will be mercury**

**containing scrap, on a daily basis. Based upon the results of performance testing, the percent feed rate may be adjusted.” It is unacceptable for the PTI to allow violations of the law to be addressed by an adjusted feed rate without time frame, parameters, or legal consequences. Permit requirements requiring conformance with an EPA-approved program must be included in the PTI, monitoring data must be public, and violations must result in enforcement.**

**The particulate emissions limits granted to the facility as emissions credits are unacceptable because limits on particulate matter not only are necessary for compliance with criteria air pollution limits, but area also serve as a surrogate for compliance with air toxics compliance for the arc furnace including limitations for mercury, lead, manganese, nickel, and chromium. Please demonstrate how the particulate emissions limits for the arc furnace will ensure compliance with area source MACT standards limiting mercury, lead, manganese, nickel, and chromium.**

**Please demonstrate that all other parts of the facility are meeting any applicable federal air toxics standards for both major and area sources.**

**Response 6:**

This facility is not subject to the recently promulgated area source MACT for Iron and Steel Foundries. However, NSI has committed to obtaining scrap from supplies that participate in a USEPA program designed to remove readily accessible mercury switches from steel scrap (automobiles and white goods). The permit terms will be revised to include the appropriate language.

The Rotary Hearth Furnaces and Boilers are subject to OAC rule 3745-31-28 case-by-case MACT. NSI has proposed compliance with the boiler MACT as compliance with OAC rule 3745-31-28.

Comments Received in writing from U.S.E.P.A.

**Comment 7:**

**The application says that the CALPUFF Class 1 modeling used the VISTAS CALMET.DAT file, obtained from the West Virginia Division of Environmental Protection. Where those the original VISTAS CALMET.DAT files, which were processed using the “VISTAS version” of CALMET, or did the New Steel**

**modeling use raw meteorological data from VISTAS, reprocessed with the regulatory version of CALMET? The original VISTAS CALMET data is not acceptable because the “VISTAS version” of CALMET included non-regulatory settings.**

**Response 7:** NSI has re-run the modeling using the U.S. EPA approved CALPUFF modeling system and using the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report. The modeling shows that the project will not cause an exceedance of the Class I PSD Increment for SO<sub>2</sub> and NO<sub>x</sub> and will not cause an exceedance of the Class I Visibility and Nitrogen and Sulfur Deposition Air Quality Related Values (AQRV) established by the FLM.

**Comment 8:** For units P001, P003, P004, P028, there seems to be a error in the language for the visible emissions limitations under 3745-31-05(A)(3). It seems that a short time period was left out of the sentences. This applies to the above mentioned emission units, but please check the entire permit for any other units which may need this correction.

**Response 8:** The permit terms will be revised to include the “1-minute” short term time period, as appropriate.

**Comment 9:** Regarding the cooling towers and the 3,000 ppm Total Dissolved Solids (TDS) LAER/BACT limit: While conducting the top-down LAER/BACT analysis, how did the 3,000 ppm TDS permit limit compare to those found in other steel plant permits mentioned in the permit application?

**Response 9:** During the review of the LAER/BACT analysis, other steel plant permits were found which incorporated a TDS permit limit of less than 3,000 ppm. However, in order to achieve a zero water discharge into the Ohio River, a 3,000 ppm limit was given. Even with this level of particulate loading, the amount of emissions from the cooling towers is expected to be minimal.

**Comment 10:** What is the control efficiency of the lime spray dryer for SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> for the coal-fired boilers?

**Response 10:** The estimated control efficiency for SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> is 95%.

**Comment 11:** What is the control efficiency of the wet scrubbers for unit P031 and other scrubbers throughout the permit?

**Response 11:** The estimated control efficiency of the wet scrubbers and mist eliminators is 99%.

**Comment 12:** Looking through the permit at the material handling units P901 – P922, the use of enclosures are LAER/BACT for particulate emission control, but it's difficult to determine which pieces of process equipment will have a total enclosure. Please keep in mind that if a total enclosure is used, that the opacity and visible emissions should be zero, and if the total enclosure is a building, the doors and windows should remain closed and visible emissions and opacity should be zero from all building doors and windows and all other openings as well. As reference, the SIP for Northwest Indiana (Lake County) requires zero percent opacity from buildings in similar material handling operations.

**Response 12:** Fugitive emissions from emissions units P901 through P922 are limited to "No visible fugitive particulate emissions except for 1 minute in any 60-minute observation period." Ohio EPA believes this opacity emission limitation is approximately the same as the "no visible emission" limit.

**Comment 13:** For the natural –gas fired boilers (B007 and B008) and the rotary hearth furnaces (P001 to P006), opacity is limited to 20%. But will these units be within enclosures, and if so, shouldn't the opacity be limited to zero percent?

**Response 13:** The natural-gas fired boilers (B007 and B008) and the rotary hearth furnaces (P001 to P006) 20% opacity limitations are applied to the stack emissions which are not within enclosures.

**Comment 14:** For the meltshops in units P015 to P019, opacity is limited to 6%. However, in the permit-to-install issued to Wheeling Pittsburgh Steel Corporation on 8/27/03 (application no. 06-07034) opacity is limited to zero percent for the EAF meltshops.

**Response 14:** Emissions units P015 and P016 have the following limitation: "There shall be no visible particulate emissions

from the baghouse exhaust stack.” Emissions units P015 and P016 do not contain a 6% opacity limit.

Emissions units P018 and P019 include the following language: There shall be no visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit except for 1 minute in any 60-minute observation period. Ohio EPA believes this opacity emission limitation is approximately the same as the “no visible emission” limit. This fugitive opacity limit is part of the BAT determination and is more stringent than the fugitive opacity limit in 40 CFR Part 60, Subpart AAa. The fugitive opacity limit from Subpart AAa has been removed.

Emissions units P018 and P019 include the following language: “The permittee shall not cause to be discharged into the atmosphere any gases which exit the #12 baghouse and exhibit 3 percent opacity or greater.” This stack opacity limit is from 40 CFR Part 60, Subpart AAa.

This comment refers to emissions units P015 to P019. Emissions unit P017 is the cooling tower for the boilers and rotary hearth furnaces and should not be included in this comment. Even so, the only opacity limit contained in emissions unit P017 is the following:

There shall be no visible particulate emissions from the stack serving this emissions unit.

**Comment 15:** **Regarding the coal-fired boilers: Should they have mercury control? Should they have mercury Continuous Emission Monitoring Systems (CEMS)? Should they have PM CEMS?**

**Response 15:** See the responses to comments #2, #29 and #31.

There is no rule requirement to install PM CEMS. At this time, we do not believe PM CEMS are necessary.

**Comment 16:** **Does the permit have a mercury management plan or some way of minimizing/managing the amount of material that is processed on site that may contain mercury, cadmium, or lead?**

- Response 16:** NSI has committed to implement the scrap management plan developed by U.S. EPA for the EAF area source MACT. They have committed to only accept scrap steel from suppliers that have committed and implemented a mercury switch removal program. In addition, they have committed to install add-on mercury specific controls (lignite injection) that will not only control mercury, but are also expected to reduce the emission of other compounds like cadmium and lead. Ohio EPA is not aware of any other U.S. EAF steel facility utilizing mercury specific controls.
- Comment 17:** **Please consider that the permit specify that EPA Test Method 22 be used when Visible Emissions checks are conducted.**
- Response 17:** We do not expect visible emissions and believe visible emission checks are appropriate.
- Comment 18:** **For the EAFs, should oxygen (O<sub>2</sub>) injection be used instead of air infiltration? We think oxygen injection would result in reduced CO and VOC emissions.**
- Response 18:** NSI will be using oxygen injection.
- Comment 19:** **If there is onsite slag processing, this should be included in the permit. The only reference to slag in this permit is “slag pot dumping” as part of the title of the emission unit for P015 and P016.**
- Response 19:** The facility plans to use a subcontractor to operate the slag plant. A permit-to-install application for the slag processing plant will be submitted by the subcontractor. However, emissions from the slag plant were included in the permit application for PM<sub>10</sub> offset and PM<sub>10</sub> modeling purposes only.
- Comment 20:** **Should the use of an afterburner be included in the CO BACT analysis for the rotary hearth furnaces? An afterburner is used by Steel Dynamics, one of the sources NSI compares itself to. (P. 25 in Volume II of the application).**
- Response 20:** The CO emissions from the Rotary Hearth Furnaces (RHF) will be burned in the boilers. Each RHF has a dedicated boiler, a dedicated control system and a dedicated 50 MW steam generator.

**Comment 21:** For the HRSG Boilers, the PM-10 LAER limit was 0.016 lb/MMBtu in the application (p. 29, Volume II), but is 0.036 in the permit. Shouldn't it be 0.016?

**Response 21:** The PM10 filterable + condensable limit is 0.036 lb/mmBtu while the PM10 filterable only limit is 0.016 lb/mmBtu.

**Comment 22:** The application (Volume II, p. 59-60) specifies BACT for the EAFs for CO and VOC to be 661.39 lbs/hr and 33.07 lb/hr respectively, which are higher than the compared BACT limits for Republic Engineered Products. Why are NSI's BACT limits not as low as Republic's limits here?

**Response 22:** NSI's hourly CO limit of 661.39 lbs/hr is based on an emission rate of 2 lbs/ton which is the same as Republic Engineered Products. The VOC limit in the draft permit is 25.05 lbs/hr not 33.07 lbs/hr. NSI's hourly VOC limit of 25.05 lbs/hr is based on an emission rate of 0.07 lb/ton which is the same as Republic Engineered Products.

**Comment 23:** Since this source would be a major source of HAPs, it is not subject to the requirements of the electric arc furnace area source standard. The area source standard would prevent the use of auto scrap unless mercury devices have been removed. By contrast, the draft permit would allow the use of up to 15 percent of the scrap fed into the EAF to be "mercury containing scrap," including auto scrap from which mercury devices have not been removed. USEPA intends to develop maximum available control technology (MACT) standards for major source EAFs, including work practice standards in the permit, similar to those in the area source EAF standard, to limit the use of mercury-containing scrap.

There is a broad agreement on the cost-effectiveness and environmental importance of removing mercury switches from auto scrap prior to charging the scrap into a steelmaking furnace. The Environmental Protection Agency, the Environmental Council of States, environmental groups, steel makers, auto manufacturers, auto recyclers, and scrap dealers all signed a memorandum of understanding to create a National Vehicle Mercury Switch Recovery Program (NVMSRP). As part of this MOU, The American Iron and

**Steel Institute (AISI), the Steel Recycling Institute (SRI) and the Steel Manufacturers Association (SMA) committed to a number of actions on behalf of their members, including to: participate in the NVMSRP notify relevant suppliers that individual steelmakers intend to utilize in their respective operations, to the maximum extent possible, scrap from vehicles which do not contain mercury switches or from which mercury switches have been removed and to adapt their respective purchasing practices to that end use appropriate means to demonstrate that scrap suppliers are participating as anticipated in the NVMSRP and periodically re-affirm their commitment to provide only reduced-mercury auto shred, conduct occasional spot checks, site visits or other means of corroboration to ensure that suppliers are aware of the need and are implementing appropriate steps to minimize the presence of mercury in auto shred.**

**Therefore, such actions should be considered standard good practice for the steel industry, and the company should have no objection to including scrap management measures in their permit, as outlined in the area source standard.**

**Response 23:** NSI has committed to purchasing automotive scrap only from those suppliers that participate in the National Vehicle Mercury Switch Removal Program. If scrap is purchased from suppliers outside of the US, the suppliers must employ a mercury removal program that is equivalent to the National Vehicle Mercury Switch Removal Program.

Comments received in writing from Mary Beth Lohse, Pomeroy, Ohio

**Comment 24:** I am concerned that the draft air permit for the New Steel International Plant in Haverhill, Ohio does not protect the health of Ohioans. The permit would allow the plant to be among the top mercury emitters in the nation.

**Mercury is an extremely dangerous toxin and is particularly harmful to pregnant women and young children. The U.S. EPA has found that over 10% of Ohioans have a dangerous amount of mercury in their bodies. There is no justification for the generous mercury limits allowed by this permit. Ohio EPA should**

**require pollution control equipment that will reduce the levels of mercury 90% below what this permit would allow.**

**Response 24:** See the response to comment #2.

Comments received in writing from Minnesota Pollution Control Agency.

**Comment 25:** State of the art mercury control equipment should be considered for inclusion in this facility's construction and operating permit.

**More specifically, each of the six rotary hearth furnaces/boilers should be required to install mercury control equipment, such as activated carbon injection equipment. Permit conditions should be included to require that the equipment be operated to maximize mercury control, verified by a series of stack tests, and that subsequently routine monitoring is conducted to maintain a high degree of ongoing control. Activated carbon injection has been demonstrated to achieve a significant mercury control on coal-fired boilers, particularly if a halogenated carbon is used. The MPCA believes that 90% reduction of mercury is not an unreasonable goal for mercury controls at a coal-fired boiler.**

**The electric arc furnaces (EAFs) should also be required to install and operate mercury control equipment such as sorbent injection prior to the baghouses. For these emission units, it is also important to consider restricting flyash to landfill rather than to allow reuse such as re-refining. Mercury captured in this flyash would likely be released elsewhere if the ash were reprocessed.**

**Response 25:** See the response to comment #2.

**Comment 26:** Comment received encouraging Ohio EPA to consider requiring New Steel to participate in the National Vehicle Mercury Switch Removal Program, a steel industry initiative that has been recently codified into U.S. Environmental Protection Agency's National Emissions Standard for Hazardous Air Pollutants for Electric Arc Furnaces. The initiative seeks to remove mercury

switches from automobiles before the auto bulks are shredded for processing in EAFs. Participation in this program would provide for minimizing fugitive mercury emissions from the shredding and handling of auto bulks, if they are intended to be included as feedstock to the EAFs at this facility.

**Response 26:** See response to comment #23.

Comments received in writing from David Coburn

**Comment 27:** During the public presentation on March 20, 2008, EPA personnel discussed formation of the basis for pollution limits and the proposed resulting effects/levels to the local community being found to be in accordance with state and federal limits. As discussed, this is based on many inputs that included a review of the type of mill technology to be used and by the use of a computer model (i.e. computer aid, computer software). During the EPA presentation, when talking and accepting questions about pollutants affecting the local residents out side of the mill boundary the EPA staff discussed the use of a computer model during the evaluation and utilized terms such as “we believe” and “hard to predict” during the public presentation.

In respect to the computer model and evaluations performed:

Does the model consider specific attributes for the Scioto County Site? Does the thermal mass of the adjacent Ohio River create any temperature inversions that may affect local air currents that would results in an exceeded level in concentration of any pollutant to any or a portion of the local residents? Specifically in the spring and late fall, the air and Ohio River water temperature can have a large temperature delta.

Relating to the delta temperatures between local air temperature and river temperatures, in these conditions high localized air humidity can result. High air moisture levels would most probably result in a higher local fall out of pollutants. In these conditions, is there any potential of exceeding any pollutant levels established for public health?

**It is understood that instrumentation at the mill site will measure concentration levels and rates of pollutants leaving the plant boundary. However, outside and adjacent to the plant boundary will offside air monitoring stations be installed to determine if any local adverse concentrations exist? If not, how will the results, assumptions, and evaluations performed by the EPA be quantitatively validated for site adjacent residents?**

**Response 27:** The model takes into account the topography and land use of the area. On site meteorological data was not required for this project. As a result the National Weather Service meteorological data from the Huntington, West Virginia was determined to be representative of the Scioto County area.

The meteorological data from the National Weather Service Huntington, West Virginia site are representative of the Scioto County site. The meteorological data takes into account high moisture levels and models concentrations accordingly. All modeled concentrations were protective of human health.

Federal and state rules require large new sources of air pollution to install ambient air quality monitors outside the plant boundary if computer modeling shows expected concentrations above certain thresholds. Modeling has been performed to determine concentrations beyond the facility fence line. All modeled concentrations were at levels that did not trigger the need for monitoring of emissions outside of the property boundary. All modeled concentrations beyond the plant property were protective of human health.

Comments received in writing from Lance Traves, President of Labyrinth Management Group

**Comment 28:** **The public comment period should be extended 60 days based on the lack of legal and regulatory transparency resulting from the blocking from public review of key process parameters in the permit application.**

**Response 28:** In deciding whether to extend the comment period, Ohio EPA considers many factors including, but not limited to: the level of public interest, the amount of advanced notice on the project, the amount and type of information available to interested parties, the significance of the project, and the

timing needs of the company. Based on an evaluation of these and other factors, Ohio EPA decided that an extension of the comment period was not necessary.

Ohio EPA worked with NSI to re-evaluate the material NSI felt was business confidential. Based on this re-evaluation, NSI has agreed to release a large portion of the previously redacted information. The revised application with the additional information exposed has been posted at the following location:

<http://www.epa.state.oh.us/dapc/transfer/newsteel>.

**Comment 29:** **Mercury emissions associated with the Emission Units P018, P019, P020, P021, P022, and P023 are subject to the equivalent of a 90% Mercury emission reduction under established Ohio BAT.**

**Response 29:** See the response to comment #2.

**Comment 30:** **The New Steel Plant Application did not evaluate potential mercury emission limitations, BAT control measures, physical mercury form speciation or other aspects of mercury control review for any mercury emission source.**

**Response 30:** The commentor is correct that the application did not propose the use of add-on mercury control. The reason for this is that NSI did not commit to utilizing add-on mercury controls until after the draft permit was issued. NSI has since committed to a two-pronged approach toward mercury control. First, they have committed to obtaining scrap from supplies that participate in a USEPA program designed to remove readily accessible mercury switches from steel scrap (automobiles and white goods). Second, they have committed to install mercury specific controls on the Rotary Hearth Furnace / Boiler and Electric Arc Furnace / Ladle Metallurgy Furnace Operations (Emission Units B001 thru B006, P001 thru P006, P018, P018, P020, P022, and P023). The combination of these two control strategies will reduce the potential mercury emissions to less than 100 pounds per year.

**Comment 31:** **Emission Units B001/P001, B002/P002, B003/P003, B004/P001, B005/P005, B006/P006, P018, P019, P020, P021, P022, P023 with mercury emissions should be subject to Continuous Mercury Emission Monitoring.**

**Response 31:** NSI has now committed to the use of continuous mercury monitoring utilizing the sorbent trap monitoring system requirements specified in 40 CFR Part 60, Subpart Da and 40 CFR Part 75.

**Comment 32:** **Mercury emission testing for Emission Units P018, P019, P020, P021, P022, and P023 should incorporate the requirement for Ontario-Hydro Method and Pre and Post-Control emissions.**

**Response 32:** Mercury specific testing will be required to determine compliance with the mercury emission limits. This testing will utilize the Ontario-Hydro method or other U.S. EPA approved methods.

Comments Received from the National Park Service

**Comment 33:** **We would like to reiterate concerns we have raised with Ohio EPA on previous actions related to Federal Land Manager (FLM) consultation procedures in the Ohio Administrative Code for PSD permitting actions (OAC 3745-31). It has recently come to our attention that the Ohio State Implementation Plan (SIP) lacks the specific requirements for FLM notification procedures that are identified in federal EPA regulations. Specifically, the procedures to not establish a process by which FLM notification should occur, including what information should be submitted for FLM review, when this information should be submitted, and when FLM concerns and agency responses should appear in a public notice.**

**Response 33:** Ohio has a fully approved Prevention of Significant Deterioration (PSD) program that follows the requirements of 40 CFR Part 51.166. Our PSD approved rules are found in Ohio Administrative Code (OAC) Chapter 3745.31. Moreover, as approved, our State Implementation Plan was not required to contain the additional requirements of 40 CFR, Part 51, Subpart P, per 40 CFR 51.300(b).

Ohio EPA believes that it followed all current legal requirements concerning the FLM process. However, we recognize that it would be best to set up procedures to use in the future to provide FLMs ample notice on projects of interest to them. As such, we plan to work with the FLMs to

develop procedures that will adequately meet the FLM notice and comment needs.

**Comment 34:** **Class 1 modeling files for the New Steel facility were not submitted within the prescribed federal time frames. (Our consultant had to download them from the OH EPA website). Additionally, no other information, such as a written notice, the public notice, or draft permit, was officially submitted to the FLM agencies.**

**Response 34:** Please see the response to comment #33.

**Comment 35:** **New Steel utilized AERMOD dispersion coefficients (MDISP = 2) rather than the default, PG dispersion (MDISP = 3). According to current EPA policy, this makes it a non-guideline application of the CALPUFF model, as the AERMOD dispersion coefficients have not been tested and approved by EPA for the CALPUFF system.**

**Response 35:** Both MDISP = 2 and MDISP = 3 are both regulatory default values. MDISP = 2 uses the AERMOD dispersion coefficients while MDISP = 3 uses ISC dispersion coefficients. CALPUFF was validated using MDISP = 2 but New Steel chose to set MDISP = 3 because AERMOD is the preferred short range transport model. NSI has rerun the model using the values recommended by the FLMs. See the response to Comment #7.

**Comment 36:** **The visibility analysis did not consider any NO<sub>x</sub> emissions; i.e. the CALPUFF file that links to the CALPOST visibility analysis modeled zero NO<sub>x</sub> emissions and the nitrate extinction in the CALPOST visibility results were zero. This is a major modeling error, and despite relatively low predicted visibility impacts, we can not place any confidence in the analysis until it is corrected.**

**Response 36:** New Steel has rerun the model using the NO<sub>x</sub> and SO<sub>2</sub> emissions approach recommended by the FLMs. See the response to Comment #7.

**Comment 37:** **It appears that New Steel did not use the FLAG “natural background” values for the Class I areas in its modeling. While the values generally appear to be in the**

expected range for the given areas, New Steel supplied no documentation of where it obtained these values. Again, we request that the FLM recommended natural background values reported in the FLAG document be used for the modeling analysis. If New Steel chooses to use alternate values, it should provide justification for how these values were developed so we can verify that they are appropriate for the Class I area of concern.

- Response 37:** The FLMs and New Steel agreed that the FLAG “natural backgrounds” used were the correct backgrounds during a conference call on April 22, 2008. These natural backgrounds correspond to the EPA 2003 East Background Values.
- Comment 38:** The modeling analysis considered all  $PM_{10}$  emissions as PMC (PM coarse). Unless New Steel can demonstrate that all PM emissions from the facility are sized greater than 2.5 microns, this will likely result in an under-prediction of the PM extinction in the visibility calculations. Furthermore, no PM speciation was modeled. As different species and size classes of PM have varying effects on light extinction, this could alter the visibility results in a similar fashion. FLMs have developed speciation profiles for various boiler types, including pulverized coal (PC) boilers. We recommend that New Steel use the profiles for the PC boilers (B001 through B006) associated with this project.
- Response 38:** New Steel has rerun the model using the  $PM_{10}$  speciation recommended by the FLMs. Please see the response to Comment #7.
- Comment 39:** It appears that New Steel did not include condensable  $PM_{10}$  emissions in the modeling analyses. For reasons previously stated, condensable  $PM_{10}$  emissions should be included in the modeling analyses.
- Response 39:** New Steel has rerun the model using the condensable  $PM_{10}$  emissions as recommended by the FLMs. Please see the response to Comment #7.
- Comment 40:** The most significant source of emissions modeled were from the six PC boilers (B001 through B006) and to a lesser extent the Electric Arc Furnaces (EAFs). A review of the proposed emission limitations in the draft permit

as compared to the emissions modeled in the CALPUFF analysis show that a somewhat lower SO<sub>2</sub> emission rate was modeled for the PC boilers than what is proposed. The draft permit is proposing a short-term (3-hour) and an annual SO<sub>2</sub> emission limitation for each of the six boilers. The proposed annual SO<sub>2</sub> limit reported in the draft permit for each boiler is 141.17 lbs/hour, while only 105 lbs/hour was modeled in the CALPUFF analysis for each PC unit. Again, we are concerned that this could result in an underestimate of impacts in the Class I areas. Furthermore, 24-hour emission rates should be used for the visibility analysis. In the absence of a 24-hour limit, applicants should model the maximum 3-hour rate in the visibility analysis. Again, this is a major modeling error, and despite relatively low predicted visibility impacts, we cannot place any confidence in the analysis until it is corrected.

**Response 40:** The SO<sub>2</sub> emissions for each RHF/Boiler included in the Class I modeling are correct - the emissions in the draft permit are incorrect and should be changed to 105 lbs/hr and 384 tons/yr. The SO<sub>2</sub> scrubber efficiency was increased from 93.5% to 95% after the PTI application was submitted to Ohio EPA.

**Comment 41:** It appears that New Steel did not include any of its H<sub>2</sub>SO<sub>4</sub> emissions in the modeling analysis. These emissions can contribute to visibility impairment, and should have been included in the modeling analysis.

**Response 41:** New Steel has rerun the model using the H<sub>2</sub>SO<sub>4</sub>, HCL, HF, and condensable inorganic values recommended by the FLMs. Please see the response to Question #7.

Comments Received from the United Steelworkers

**Comment 42:** Production rates, energy consumption and other emissions data have been redacted from the Public Record thereby making it impossible for the public to review or verify emission calculations or meaningfully in the permitting process for New Steel's proposed new steel mill.

**Response 42:** Ohio EPA worked with NSI to re-evaluate the material NSI felt was business confidential. Based on this re-evaluation,

NSI has agreed to release a large portion of the previously redacted information. The revised application with the additional information exposed has been posted at the following location:

<http://www.epa.state.oh.us/dapc/transfer/newsteel>.

**Comment 43:** **Emission limitations set forth in the Draft PTI particularly for hazardous air pollutants (“HAPs”) including (“Pb”) and mercury (“Hg”) – both of which are persistent bioaccumulative toxins (“PBTs”) – are not protective of human health and the environment.**

**Response 43:** Ohio EPA believes the emission limits set forth in the draft permit-to-install are protective of public health. We base this belief on the fact that the computer modeling we conducted demonstrated that the ambient concentrations of the HAPs are well below levels that are expected to cause adverse health effects.

**Comment 44:** **Emissions limitations for criteria pollutants including CO, NOx, SO2, and Lead, and HAPs such as lead and mercury set forth in the PTI are not practicably enforceable due to inadequate monitoring requirements; continuous emission monitors (“CEMs) should be required to assure compliance with CO, NOx, SO2, and mercury emission limitations, and continuous opacity monitors (“COMs”) should be required for the monitoring of lead emissions from the Electric Arc Furnaces (“EAFs”).**

**Response 44:** Ohio EPA believes that the monitoring level is consistent with other similar facilities and is adequate to verify compliance with the emission limitations. Compliance for many of the emission limitations for criteria pollutants is based on emission tests using a USEPA-approved reference test method. The electric arc furnaces are subject to 40 CFR Part 60, Subpart AAa which provides for operational flexibility. Under this federal rule, New Steel may choose to employ opacity monitors or they may choose other options available under the rule.

**Comment 45:** **As proposed, the lax emission limitations standards and monitoring requirements set forth in the Draft PTI grants New Steel an unfair and inappropriate economic advantage over other steel mini-mills within Ohio and throughout the United States.**

**Response 45:** Ohio EPA does not agree with this statement. In determining the appropriate Best Available Control Technology (BACT) and Best Available Technology (BAT) emission limits, Ohio EPA evaluated many similar facilities. Based on this detailed analysis, the emission limits set for this facility are as stringent as or more stringent than those of other similar facilities in the United States.

Comments Received from the Natural Resources Defense Council and Ohio Environmental Council

**Comment 46:** **The Draft PTI would allow unacceptably high mercury emissions.**

**Response 46:** See the response to comment #2.

**Comment 47:** **Many of the Emission Limits in the Draft Permit are based on a fundamentally flawed BACT analysis.**

**Ohio EPA and NSI failed to rely on up-to-date information.**

**Ohio EPA and NSI failed to provide support for the assumptions and conclusions in the BACT analysis. Ohio EPA and NSI failed to base emission limits on the use of cleaner fuels.**

**NSI's own application suggests that the NO<sub>x</sub> emission limits in the draft PTI do not reflect BACT.**

**Response 47:** Ohio EPA does not agree with the above assessment. NSI and Ohio EPA conducted extensive research evaluating other similar facilities in order to determine appropriate limits for BACT. NSI followed the standard top-down BACT analysis to evaluate significant BACT controls. Supporting data was supplied in the application and other materials submitted by NSI.

Ohio EPA does not believe that BACT dictates the use of a particular fuel type. Instead, we believe that the selection of fuels is a decision the permittee must make based on business decisions. We believe this approach follows U.S. EPA expectations concerning BACT. Once the permittee decides on the fuel type, we evaluate the BACT level that is required taking into consideration the fuel selected.

Ohio EPA believes the NO<sub>x</sub> BACT limits detailed in this permit are appropriate for BACT.

**Comment 48:** **Ohio EPA failed to directly analyze increased PM 2.5 emissions from the proposed NSI Steel Mill as required by the Clean Air Act.**

**Ohio EPA must directly apply non-attainment NSR requirements to PM 2.5. Use of PM10 as a surrogate for PM2.5 violates federal and state law. Ohio EPA cannot rely on guidance that is in conflict with statutory and regulatory requirements, and is no longer technically justified. The PM10 limits in the Draft PTI do not satisfy the non-attainment requirements.**

**Response 48:** Currently, U.S. EPA has dictated that Ohio EPA use PM-10 as a surrogate to PM-2.5. The draft permit terms has a clarifying term to convey this position. As such, Ohio EPA believes that PM-2.5 is addressed in the permit terms.

**Comment 49:** **Ohio EPA and NSI failed to account for increased CO<sub>2</sub> emissions from the Mill and to conduct a CO<sub>2</sub> BACT analysis as required by law.**

**Ohio EPA must fulfill its duty to protect and preserve human health and welfare by addressing CO<sub>2</sub> emissions. CO<sub>2</sub> is a pollutant under the Clear Air Act and Ohio Law. CO<sub>2</sub> is subject to regulation under the Clean Air Act. Ohio EPA must conduct a BACT analysis and establish a binding BACT limit for CO<sub>2</sub> emissions from the proposed NSI Steel Mill. Even if the Clean Air Act did not require binding BACT limits for CO<sub>2</sub>, it would be unreasonable for Ohio EPA to not exercise its authority to consider CO<sub>2</sub> emissions and establish appropriate permit conditions.**

**Response 49:** Ohio EPA is not required to regulate CO<sub>2</sub> under any current state law or federal regulation. Ohio EPA has not proposed or issued any rule or guidance that addresses greenhouse gas emissions, including CO<sub>2</sub>.

On the federal level, U.S. EPA has not issued any regulation that would require Ohio EPA to include a review of CO<sub>2</sub> emissions as part of the Prevention of Significant Deterioration (PSD) permit. In order for Ohio to be required

to regulate CO<sub>2</sub> under the PSD rules, U.S. EPA must regulate CO<sub>2</sub> under the Clean Air Act. U.S. EPA has not taken any action to regulate CO<sub>2</sub> under the Clean Air Act. Therefore, Ohio EPA is not required (nor do we feel like we have the authority) to do so under federal regulations.

Comments received from New Steel International Inc.

*General Comments*

**Comment 50:** All references to timing triggered upon issuance of the permit should be changed such that the start-date is triggered by start-up of production following the initial debugging, etc. We have suggested specific language in several places. “Within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but no later than 180 days after initial start-up of the emissions unit...” We raise this as a general comment in case we have missed any of the timing references that trigger from the permit issuance.

**Response 50:** The suggested language “Within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after the initial start-up of the emissions unit” has been added where appropriate.

**Comment 51:** For many of the emission units, Ohio EPA has proposed terms and conditions relating to visible emission “checks” (as compared to Method 9 opacity readings). In many of those instances, our specific comment asks that those requirements be deleted as unduly redundant of other requirements or unnecessary in light of the nature of the particular emission unit. To the extent the agency does not remove these provisions, where deletion is requested, we ask that in all instances the frequency of VE checks be reduced to weekly (instead of daily).

**Response 51:** The daily VE check language will not be removed from any emission units. However, the permit terms will be revised to incorporate the following “tiered approach” language, as appropriate:

“Notwithstanding the frequency of reporting requirements specified in section A.IV., the permittee may reduce the

frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

For 1 full quarter this emissions unit's visual observations indicate the emissions are representative of normal operations; and the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings for this emissions unit if the emissions are not representative of normal operations. The permittee may again reduce the frequency of visual observations from daily to weekly after obtaining 1 full quarter of observations with visible emissions that are representative of normal operations for this emissions unit.”

**Comment 52:** **We note that once a revised draft PTI is made available, it would be useful to have an opportunity to re-review the entire permit for consistent and correct cross-referencing among permit paragraphs and sections.**

**Response 52:** New Steel will be provided an opportunity to review the draft PTI prior to final issuance if time allows.

**Comment 53:** **For your information, New Steel has concluded that it is not necessary to remove emission units from this permit that are eligible for the Permit by Rule so we are no longer making that request. We do, however, propose the removal of those emission units that are exempt under OAC 3745-31-03(A) [see P034 below].**

**Response 53:** No response necessary.

**Comment 54:** **For all material handling operations, reduce the frequency of inspections from daily to weekly.**

**Response 54:** The daily inspection language will not be removed from any emission units. However, the permit terms will be revised to incorporate the following “tiered approach” language, as appropriate:

Notwithstanding the frequency of inspection requirements specified above, the permittee may reduce the frequency of inspections for the material handling operations from daily to weekly if the following conditions are met:

- a. for 1 full quarter the inspections of the material handling operations indicate no need for implementing the above-mentioned control measures; and
- b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section A.III.

The permittee shall revert to daily inspections of the material handling operations if the inspections of the material handling operations indicate the need for implementing the above-mentioned control measures. The permittee may again reduce the frequency of inspections from daily to weekly after obtaining 1 full quarter of inspections of the material handling operations that indicate no need for implementing the above-mentioned control measures.

**Comment 55:** Please revise the list of emissions units at p.10 for which legal ownership of the particulate emission offsets will be obtained from the shutdown of the New Boston Coke facility to include F001 and P001.

**Response 55:** The permit terms will be revised to reflect the suggested change.

*B001 – B006 (RHF Boilers) Comments*

**Comment 56:** It is unclear to us that OAC 3745-31-28 is the correct citation relative to Boiler MACT requirements in light of the D.C. Circuit Court of Appeals vacatur of Subpart DDDDD on June 8, 2007 and remand of the rulemaking back to U.S. EPA. We understand that there may be a need for a facility-specific MACT determination under Section 112(j) of the Clean Air Act (the so-called “hammer provision”), although exactly how and when that provision applies is less clear. On the assumption that a facility-specific MACT determination is required as part of this permit action, we are amenable to treating the now-vacated Subpart DDDDD provisions as that facility-specific MACT determination.

The draft PTI contains cross-references to Subpart DDDDD, but in way that seems to eliminate some of the flexibility and options that were contained in Subpart DDDDD. For example, the vacated Subpart DDDDD rule allowed a permittee to rely upon a Health-Based

**Alternative relative to HCl emissions in lieu of add-on technology and fuel analysis relative to mercury emissions. The vacated Subpart DDDDD rule also gave a permittee an option between bag leak detection and COMS.**

**We suggest that terms and conditions be developed to ensure all of these provisions and options are available to New Steel, as they are to others who are or will be subject to the Boiler MACT.**

**In addition, we suggest that language be included that provides an alternative path, whereby New Steel retains the option by submitting a facility-specific MACT determination that varies from the vacated Subpart DDDDD, provided such a facility-specific MACT determination is submitted by some date certain, say within 6 months of issuance of the PTI.**

**Finally, it does not seem to be appropriate to cite specific sections of Subpart DDDDD given that the rule has been vacated and remanded.**

**Response 56:**

We believe the correct rule citation is OAC rule 3745-31-28. Language was added to emission units B001 thru B006 and P001 thru P006 to clarify that the boiler MACT has been vacated.

Including the Health-Based Compliance Alternative (HBCA) from the vacated boiler MACT would not be appropriate due to the June 19, 2007 Court ruling in the Plywood MACT case that threw out the U.S. EPA's use of the risk-based compliance approach. Therefore, the use of a HBCA option in a 112(g) case-by-case determination should not be accepted at the State level.

NSI did not provide a detailed facility-specific MACT determination in the permit application utilized to draft the terms for the draft permit. Instead, NSI proposed to comply with the vacated boiler MACT. Therefore, a permit modification would be necessary to incorporate a facility-specific MACT determination into the permit.

**Comment 57:**

**All short term limits (lbs/hr, lbs/MMBtu, and gr/dscf) should be expressed as a "(3-hour average)", which is consistent with the applicable test methods.**

- Response 57:** We agree that short-term emission limitations (i.e., lbs/hr and lbs/mmBtu) are on a 3-hour average basis if compliance with the emission limitations are based on data from a continuous emission monitor system (CEMS). If compliance is based on a USEPA-approved reference test method, we believe it is inherently true that the emission limitation is based on a 3-hour average. If compliance for an emission limitation is based on a calculation, it should not be represented as a 3-hour average.
- Comment 58:** **A.I.2.a: For PM, NO<sub>x</sub>, SO<sub>2</sub>, and H<sub>2</sub>SO<sub>4</sub>, add the phrase “or equivalent technology” after each control device.**
- Response 58:** We believe stating “or equivalent technology” after a BACT determination would not be appropriate. If New Steel wants us to consider another control technology after a Best Available Control Technology (BACT) determination has been made, it would require a permit-to-install (PTI) modification. If a PTI modification application is received, we would consider the new control technology based on evaluation of BACT at that time.
- Comment 59:** **A.I.2.b: Add the phrase “or equivalent technology” after baghouse.**
- Response 59:** See the response to Comment #58.
- Comment 60:** **A.II.3: This term and condition is incorrectly identified as A.II.1.**
- Response 60:** The permit terms will be revised to correct this error.
- Comment 61:** **A.II.3.b: Replace “(c)(2)(i) through (iii) with “A.II.3.b.i through A.II.3.b.iii”.**
- Response 61:** The permit terms will be revised to reflect the suggested changes.
- Comment 62:** **A.II.3.c: Replace “(c)(3)(i) through (iii)” with “A.II.3.c.i through A.II.3.c.iii”.**
- Response 62:** The permit terms will be revised to reflect the suggested changes.
- Comment 63:** **A.III.I: Replace with the following:**

**“The permittee shall prepare and submit to the Portsmouth Local Air Agency a unit-specific monitoring plan for each monitoring system (Opacity, SO<sub>2</sub>, NO<sub>x</sub>, CO and CO<sub>2</sub> or O<sub>2</sub>) at least 45 days before commencing certification testing of the monitoring systems. The plan must address the requirements in 40 CFR Part 60.”**

**This change will merge A.III.1, A.III.4, A.III.7, and A.III.10. This change also corrects the timing requirement for preparing the monitoring plan.**

**Response 63:** We do not agree that the proposed language is appropriate, whereas 40 CFR Part 60, Subpart Da is not applicable to the boilers in this permit. However, terms A.III.1, A.III.4, A.III.7, and A.III.10 were removed from the monitoring and record keeping sections of the relevant emissions units. Appropriate quality assurance language was added to the additional terms and conditions section of each affected emissions unit.

**Comment 64:** **A.III.2: Refer to SO<sub>2</sub> and NO<sub>x</sub> throughout this term and condition. This change will merge A.III.2 and A.III.5.**

**Response 64:** We do not agree to group the SO<sub>2</sub> and NO<sub>x</sub> terms.

**Comment 65:** **A.III.3: Refer to both SO<sub>2</sub> and NO<sub>x</sub> throughout this term and condition. This change will merge A.III.3 and A.III.6.**

**Response 65:** See the response to Comment #64.

**Comment 66:** **A.III.4: Delete. This change will merge A.III.1, A.III.4, A.III.7, and A.III.10.**

**Response 66:** Term and condition A.III.4 has been removed.

**Comment 67:** **A.III.5: Delete. This change will merge A.III.2 and A.III.5.**

**Response 67:** See the response to Comment #64.

**Comment 68:** **A.III.6: Delete. This change will merge A.III.3 and A.III.6.**

**Response 68:** See the response to Comment #64.

**Comment 69:** **A.III.7: Delete. This change will merge A.III.1, A.III.4, A.III.7, and A.III.10.**

- Response 69:** Term and condition A.III.7 has been removed.
- Comment 70:** **A.III.10: Delete. This change will merge A.III.1, A.III.4, A.III.7 and A.III.10.**
- Response 70:** Term and condition A.III.10 has been removed.
- Comment 71:** **A.III.12: Delete the following phrase “Within 60 days of the effective date of this permit or modification to the system,”.**
- Response 71:** The permit will be revised to remove this language.
- Comment 72:** **A.IV.1: Refer to both the SO<sub>2</sub> and NO<sub>x</sub> throughout this requirement. This change will merge A.IV.1 and A.IV.2.**
- Response 72:** See the response to comment # 64.
- Comment 73:** **A.IV.1.b.iii: Replace with “the location of the continuous SO<sub>2</sub> and NO<sub>x</sub> monitors,” See AMPGS permit.**
- Response 73:** The permit terms will be revised to reflect the suggested changes.
- Comment 74:** **A.IV.1.b.iv: Replace with “the exceedance report as detailed in (a) above,” See AMPGS permit.**
- Response 74:** The permit terms will be revised to reflect the suggested changes.
- Comment 75:** **A.IV.2: Delete. See comment 16. This change will merge A.IV.1 and A.IV.2.**
- Response 75:** See the response to comment # 64.
- Comment 76:** **A.IV.3.iii: Replace with “the location of the continuous CO monitor,” See AMPGS permit.**
- Response 76:** The permit terms will be revised to reflect the suggested changes.
- Comment 77:** **A.IV.3.iv: Replace with “the exceedance report as detailed in (a) above,” See AMPGS permit.**

- Response 77:** The permit terms will be revised to reflect the suggested changes.
- Comment 78:** **A.IV.5 – A.IV.15: These terms and conditions should be identified as A.III.4 through A.IV.14.**
- Response 78:** The permit terms will be revised to reflect the suggested changes.
- Comment 79:** **A.IV.6.b.iii: Replace with “the location of the continuous opacity monitor,” See AMPPGS permit.**
- Response 79:** The permit terms will be revised to reflect the suggested changes.
- Comment 80:** **A.IV.6.b.iv: Replace with “the exceedance report as detailed in (a) above,” See AMPGS permit.**
- Response 80:** The permit terms will be revised to reflect the suggested changes.
- Comment 81:** **A.IV.7: Insert “with each quarterly report” after “statement” in the first sentence.**
- Response 81:** The permit terms will be revised to reflect the suggested changes.
- Comment 82:** **A.IV.7: Delete the following sentence at the bottom of this term: “The signed statement shall be included in each required quarterly report”.**
- Response 82:** The permit will be revised to remove this language.
- Comment 83:** **A.V.1: Replace “Within 60 days of the effective date of this permit,…” with “Within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but no later than 180 days after initial start-up of the emissions unit, …”**
- Response 83:** The permit terms will be revised to reflect the suggested changes.
- Comment 84:** **A.V.1: Refer to SO<sub>2</sub> and NO<sub>x</sub> throughout this requirement. This change will merge A.V.1 and A.V.2.**
- Response 84:** See the response to comment # 64.

**Comment 85:**        **A.V.2: Delete. See comment 27 above. This change will merge A.V.1 and A.V.2.**

**Response 85:**        See the response to comment # 64.

**Comment 86:**        **A.V.3: Replace “Within 60 days of the effective date of this permit, ...” with “Within 60 days after achieving the maximum production but no later than 180 days after initial startup of the emissions unit,...”**

**Response 86:**        The permit terms will be revised to reflect the suggested changes.

**Comment 87:**        **A.V.4: Replace “Within 60 days of the effective date of this permit, ...” with “Within 60 days after achieving the maximum production but no later than 180 days after initial startup of the emissions unit,...”**

**Response 87:**        The permit terms will be revised to reflect the suggested changes.

*B007 & B008 (Vacuum Degass Boilers) Comments*

**Comment 88:**        **All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “3-hour average”).**

**Response 88:**        See the response to Comment #56. The vacuum degass boilers do not employ CEMS. Therefore, the permit terms will not be revised.

*F001 (Paved Roadways) Comments*

**Comment 89:**        **Reduce inspection frequencies to weekly, particularly for paved roadways and parking lots.**

**Response 89:**        See the response to comment # 54.

*P001 – P006 (RHF) Comments*

**Comment 90:**        **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “3-hour average”).**

**Response 90:**        See the response to Comment #57.

**Comment 91:**        **A.I.1: For the fugitive VE limit insert “1-minute” prior to the phrase “during any 60-minute observation period.”**

**Response 91:**        The permit terms will be revised to reflect the suggested changes.

**Comment 92:**        **A.I.2.a: For PM, NO<sub>x</sub>, SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub>, add the phrase “or equivalent technology” after each control device.**

**Response 92:**        We believe stating “or equivalent technology” after a BACT determination would not be appropriate. If New Steel wants us to consider another control technology after a Best Available Control Technology (BACT) determination has been made, it would require a permit-to-install (PTI) modification. If a PTI modification application is received, we would consider the new control technology based on evaluation of BACT at that time.

**Comment 93:**        **A.I.2.b: Add the phrase “or equivalent technology” after baghouse.**

**Response 93:**        See the response to comment # 92.

**Comment 94:**        **A.II.1: Replace the first paragraph with the following “The maximum coal combusted in the RHF burners shall not exceed 109,500 tons of coal, based upon a rolling, 12-month summation of the throughput rates.”**

**Response 94:**        The permit terms will be revised to reflect the suggested changes.

**Comment 95:**        **A.II.4: This term and condition is incorrectly identified as A.II.1.**

**Response 95:**        The permit terms will be revised to correct this error.

**Comment 96:**        **A.II.4.a: Replace “A.II.3.a.i through A.II.3.a.iii” with “A.II.4.a.i through A.II.4.a.iii”.**

**Response 96:**        The permit terms will be revised to reflect the suggested changes.

**Comment 97:**        **A.II.4.b: Replace “(c)(2)(i) through (iii) with “A.II.4.b.i through A.II.4.b.iii”.**

- Response 97:** The permit terms will be revised to reflect the suggested changes.
- Comment 98:** **A.II.4.c: Replace “(c)(2)(i) through (iii) with “A.II.4.c.i through A.II.4.c.iii”.**
- Response 98:** The permit terms will be revised to reflect the suggested changes.
- Comment 99:** **A.III.1: Replace with the following and move to section A.I.2:**
- “The permittee shall prepare and submit to the Portsmouth Local Air Agency a unit-specific monitoring plan for each monitoring system (Opacity, SO<sub>2</sub>, NO<sub>x</sub>, CO and CO<sub>2</sub> or O<sub>2</sub>) at least 45 days before commencing certification testing of the monitoring systems. The plan must address the requirements in 40 CFR Part 60.”**
- This change will merge A.III.1, A.III.4, A.III.7, and A.III.10. This change also corrects the timing requirement for preparing the monitoring plan.**
- Response 99:** See the response to Comment #64.
- Comment 100:** **A.III.2: Refer to both SO<sub>2</sub> and NO<sub>x</sub> throughout this requirement. This change will merge the terms A.III.2 and A.III.5.**
- Response 100:** See the response to Comment #64.
- Comment 101:** **A.III.3: Refer to both SO<sub>2</sub> and NO<sub>x</sub> throughout this requirement. This change will merge the terms A.III.3 and A.III.6.**
- Response 101:** See the response to Comment #64.
- Comment 102:** **A.III.4: Delete. This change will merge A.III.1, A.III.4, A.III.7, and A.III.10.**
- Response 102:** Term and condition A.III.4 has been removed.
- Comment 103:** **A.III.5: Delete. This change will merge A.III.2 and A.III.5.**
- Response 103:** See the response to Comment #64.

- Comment 104:**      **A.III.6: Delete. This change will merge A.III.3 and A.III.6.**
- Response 104:**      See the response to Comment #64.
- Comment 105:**      **A.III.7: Delete. This change will merge A.III.1, A.III.4, A.III.7, and A.III.10.**
- Response 105:**      Term and condition A.III.7 has been removed.
- Comment 106:**      **A.III.10: Delete. This change will merge A.III.1, A.III.4, A.III.7, and A.III.10.**
- Response 106:**      Term and condition A.III.10 has been removed.
- Comment 107:**      **A.III.12: Delete the following phrase “Within 60 days of the effective date of this permit or modification to the system,”.**
- Response 107:**      The permit will be revised to remove this language.
- Comment 108:**      **A.III.22.a: Replace with “the amount of coal combusted in the RHF burners”.**
- Response 108:**      The permit terms will be revised to reflect the suggested changes.
- Comment 109:**      **A.IV.1: Refer to both SO<sub>2</sub> and NO<sub>x</sub> throughout this requirement. This change will merge A.IV.1 and A.IV.2.**
- Response 109:**      See the response to Comment #64.
- Comment 110:**      **A.IV.1.b.iii: Replace with “the location of the continuous SO<sub>2</sub> and NO<sub>x</sub> monitors,” See AMPGS permit.**
- Response 110:**      The permit terms will be revised to reflect the suggested changes.
- Comment 111:**      **A.IV.1.b.iv: Replace with “the exceedance report as detailed in (a) above,” See AMPGS permit.**
- Response 111:**      The permit terms will be revised to reflect the suggested changes.
- Comment 112:**      **A.IV.2: Delete. This change will merge A.IV.1 and A.IV.2.**
- Response 112:**      See the response to Comment #64.

- Comment 113:** A.IV.3.b.iii: Replace with “the location of the continuous CO monitor,” See AMPGS permit.
- Response 113:** The permit terms will be revised to reflect the suggested changes.
- Comment 114:** A.IV.3.b.iv: Replace with “the exceedance report as detailed in (a) above,” See AMPGS permit.
- Response 114:** The permit terms will be revised to reflect the suggested changes.
- Comment 115:** A.IV.4.b.iii: Replace with “the location of the continuous opacity monitor,” See AMPGS permit.
- Response 115:** The permit terms will be revised to reflect the suggested changes.
- Comment 116:** A.IV.4.b.iv: Replace with “the exceedance report as detailed in (a) above,” See AMPGS permit.
- Response 116:** The permit terms will be revised to reflect the suggested changes.
- Comment 117:** A.IV.5: Insert “with each quarterly report” after “statement” in the first sentence.
- Response 117:** The permit terms will be revised to reflect the suggested changes.
- Comment 118:** A.IV.5: Delete the following sentence at the bottom of this term: “The signed statement shall be included in each required quarterly report”.
- Response 118:** The permit will be revised to remove this language.
- Comment 119:** A.IV.14: Replace “throughput limitation” with “coal usage limitation”.
- Response 119:** The permit terms will be revised to reflect the suggested changes.
- Comment 120:** A.V.1: Replace “Within 60 days of the effective date of this permit, ...” with “Within 60 days after achieving the

**maximum production but no later than 180 days after initial startup of the emissions unit,...**

**Response 120:** The permit terms will be revised to reflect the suggested changes.

**Comment 121:** **A.V.1: Refer to both SO<sub>2</sub> and NO<sub>x</sub> throughout this requirement. This change will merge A.V.1 and A.V.2.**

**Response 121:** See the response to Comment #64.

**Comment 122:** **A.V.2: Delete. See comment 27 above. This change will merge A.V.1 and A.V.2.**

**Response 122:** See the response to Comment #64.

**Comment 123:** **A.V.3: Replace “Within 60 days of the effective date of this permit, ...” with “Within 60 days after achieving the maximum production but no later than 180 days after initial startup of the emissions unit,...”**

**Response 123:** The permit terms will be revised to reflect the suggested changes.

**Comment 124:** **A.V.4: Replace “Within 60 days of the effective date of this permit, ...” with “Within 60 days after achieving the maximum production but no later than 180 days after initial startup of the emissions unit,...”**

**Response 124:** The permit terms will be revised to reflect the suggested changes.

*P007 – P014 (Tundish Preheaters) Comments*

**Comment 125:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “(3-hour average)”.**

**Response 125:** See the response to Comment #57. The tundish preheaters do not employ CEMS. Therefore, the permit terms will not be revised.

**Comment 126:** **A.I.1: Replace limits under the heading “OAC rules 3745-31-10 thru 20” with the limits in section A.I.2.d. NSI does not want individual limits cited for each piece of equipment vented to baghouse #15. Compliance with**

**the individual limits cannot be ascertained because the individual emissions units cannot be tested separately.**

**Response 126:** We do not agree with the suggested language. The permit terms will not be revised.

**Comment 127:** **A.I.2.d: The total emissions from baghouse #15 include the emissions from tundish preheaters (P007 – P014), the ladle preheaters, and the continuous casters (P015 & P016).**

**Response 127:** The permit terms will be revised to reflect the suggested changes with exception of inclusion of the exempt ladle preheaters.

**Comment 128:** **A.V.1.b thru g: Delete. NSI does not want individual limits cited for each piece of equipment vented to common baghouse. Compliance with the individual limits cannot be ascertained because the individual emissions units cannot be tested separately.**

**Response 128:** We do not agree with the suggested language. The permit terms will not be revised.

*P015 & P016 (Continuous Casters) Comments*

**Comment 129:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “3-hour average)”.**

**Response 129:** See the response to Comment #56. The continuous casters do not employ CEMS. Therefore, the permit terms will not be revised.

**Comment 130:** **A.I.2.c: The total emissions from baghouse #15 include the emissions from tundish preheaters (P007 – P014), the ladle preheaters, and the continuous casters (P015 & P016).**

**Response 130:** See the response to Comment #127.

**Comment 131:** **Replace all of the terms and conditions with the terms and conditions for P007 – P014. All of these emission units are controlled by baghouse 15 yet P007 – P014 have different monitoring and recordkeeping than P015 and P016. It is also unreasonable to require daily VE checks and continuous pressure drop readings from a**

**baghouse that only vents natural gas combustion sources.**

**Response 131:** We do not agree with the suggested language. The permit terms will not be revised.

*P017 (RHF / HRSG Cooling Towers) Comments*

**Comment 132:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “3-hour average”.**

**Response 132:** See the response to Comment #57. The RHF/HRSG Cooling Towers do not employ CEMS. Therefore, the permit terms will not be revised.

**Comment 133:** **A.III.2: Add the following “The permittee shall continuously monitor the flow rate across the cooling tower and determine the weekly average flow rate.”**

**Response 133:** The suggested language will be added.

**Comment 134:** **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”. As an alternative add “If required,...” to the beginning of the Applicable Compliance Method.**

**Response 134:** The permit terms will be revised to include “If required” to the beginning of the Applicable Compliance Method term.

**Comment 135:** **A.V.1.b: Replace the Applicable Compliance Method with the following: “Compliance with the hourly emission limitation will be determined based on the following calculation: (weekly average flow rate (gal/min) x (0.0005% / 100) x (Weekly Average Total Dissolved Solids Content (ppm) x (60 min/hr) / 1,000,000”**

**Response 135:** The permit terms will be revised to reflect the suggested changes.

*P018 & P019 (EAFs) Comments*

**Comment 136:** **General: Delete all references to emission limits for just the EAF. All emission limits should be expressed as**

**total emissions from the baghouse which includes emissions from one EAF and two LMFs. NSI understands Ohio EPA preference for including hourly emission limits to help establish when a future modification occurs. However, in this case the EAF and LMFs cannot be tested separately therefore compliance with these limits cannot be ascertained. Ohio EPA should also note that some of the pollutants have both combined and individual limits and some do not. NSI is willing to accept an hourly production limit of 330 tons/hr through each EAF.**

- Response 136:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 137:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “3-hour average”.**
- Response 137:** See the response to Comment #57.
- Comment 138:** **A.I.1: Delete the first two limits for lead and mercury under the heading OAC rule 3745-31-05(A)(3). These limits are listed twice under this heading.**
- Response 138:** The permit terms will be revised to reflect the suggested changes.
- Comment 139:** **A.III & IV: Sections III.1, III.3, III.4, III.5, III.6, III.9, III.10, III.11 and IV.2 may or may not apply to NSI depending on whether NSI elects to install a COM or manually record daily opacity readings. These sections should be re-organized and reworded to make it more clear what requirements apply if NSI elects to install a COM and what requirements apply if NSI elects to manually record daily opacity readings.**
- Response 139:** The permit terms have been revised to incorporate by reference 40 CFR Part 60, Subpart AAa.
- Comment 140:** **A.III.7: Delete. This requirement should not be necessary due to the daily VE readings or COM requirements of the NSPS.**
- Response 140:** See the response to Comment #139.

- Comment 141:** **A.IV.1: Delete. This requirement should not be necessary due to the daily VE readings or COM requirements of the NSPS.**
- Response 141:** See the response to Comment #139.
- Comment 142:** **A.IV.2.b.iii: Replace with “the location of the continuous opacity monitor;” See AMPGS permit.**
- Response 142:** The permit terms will be revised to reflect the suggested changes.
- Comment 143:** **A.IV.2.b.iv: Replace with “the exceedance report as detailed in (a) above;” See AMPGS permit.**
- Response 143:** The permit terms will be revised to reflect the suggested changes.
- Comment 144:** **A.V.1: NSI requests that Ohio EPA include the calculations that support all hourly and annual emission limits.**
- Response 144:** Due to time constraints, we have decided not to include this requested change. The language may be added at a later time.
- Comment 145:** **A.V.1.c, d, g-j, and m-n: Delete. Delete all references to emission limits for just the EAF. All emission limits should be expressed as total emissions from the baghouse which includes emissions from one EAF and two LMFs. NSI understands Ohio EPA preference for including hourly emission limits to help establish when a future modification occurs. However, in this case the EAF and LMFs cannot be tested separately therefore compliance with these limits cannot be ascertained. Ohio EPA should also note that some of the pollutants have both combined and individual limits and some do not. NSI is willing to accept an hourly production limit of 330 tons/hr through each EAF.**
- Response 145:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 146:** **A.V.1.g: The emission factor of 0.096 lbs/ton and the hourly emission rate of 31.68 lbs/hr are for combined emissions from the EAF and LMFs.**

**Response 146:** The permit terms will be revised to include the correct emission factor for SO<sub>2</sub> for the EAF from AP-42, Section 12.5, Table 12.5.1-6 of 0.0.10 lb/ton and the associated 33.0 lbs/hr emissions, from the EAF only.

**Comment 147:** **A.V.1.h: The emission factor of 0.096 lbs/ton and the annual emission rate of 105.82 tons/yr are for combined emissions from the EAF and LMFs.**

**Response 147:** The permit terms will be revised to include the correct emission factor for SO<sub>2</sub> for the EAF from AP-42, Section 12.5, Table 12.5.1-6 of 0.10 lb/ton and the associated 110.23 tpy emissions, from the EAF only.

**Comment 148:** **A.V.1.i: The emission factor should be 0.31 lbs/ton not 2 lbs/ton.**

**Response 148:** The permit terms will be revised to reflect the suggested changes.

**Comment 149:** **A.V.1.j: The emission factor should be 0.31 lbs/ton not 2 lbs/ton.**

**Response 149:** The permit terms will be revised to reflect the suggested changes.

**Comment 150:** **A.V.2.a & b: Delete. See comment on A.III.7 above.**

**Response 150:** See the response to Comment #139.

*P020 – P023 (LMFs) Comments*

**Comment 151:** **General: Delete all references to emission limits for just the LMF. All emission limits should be expressed as total emissions from the baghouse which includes emissions from one EAF and two LMFs. NSI understands Ohio EPA preference for including hourly emission limits to help establish when a future modification occurs. However, in this case the EAF and LMFs cannot be tested separately therefore compliance with these limits cannot be ascertained. Ohio EPA should also note that some of the pollutants have both combined and individual limits and some do not. NSI is willing to accept an hourly production limit of 330 tons/hr through two LMFs operating in parallel.**

- Response 151:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 152:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “(3-hour average)”.**
- Response 152:** See the response to Comment #57.
- Comment 153:** **A.I.1: Delete the first lead emission limit under the heading OAC rule 3745-31-05(A)(3). This limit is listed twice under this heading.**
- Response 153:** The permit will be revised to remove this language.
- Comment 154:** **A.I.2.c: The emission limits cited in lbs/ton are the total emissions from the EAF and two LMFs. Was this Ohio EPA’s intent?**
- Response 154:** Yes. The BACT analysis language is reflective of the control device which controls both the EAF and two LMFs.
- Comment 155:** **A.III & IV: Sections III.1, III.3, III.4, III.5, III.6, III.8, III.9, III.10 and IV.1 may or may not apply to NSI depending on whether NSI elects to install a COM or manually record daily opacity readings. These sections should be re-organized and reworded to make it more clear what requirements apply if NSI elects to install a COM and what requirements apply if NSI elects to manually record daily opacity readings.**
- Response 155:** See the response to Comment #139.
- Comment 156:** **A.III.7: Delete. This requirement should not be necessary due to the daily VE readings or COM requirements of the NSPS.**
- Response 156:** See the response to Comment #139.
- Comment 157:** **A.IV.1.b.iii: Replace with “the location of the continuous opacity monitor;” See AMPGS permit.**
- Response 157:** The permit terms will be revised to reflect the suggested changes.

- Comment 158:** **A.IV.1.b.iv: Replace with “the exceedance report as detailed in (a) above;” See AMPGS permit.**
- Response 158:** The permit terms will be revised to reflect the suggested changes.
- Comment 159:** **A.V.1: NSI requests that Ohio EPA include the calculations that support all hourly and annual emission limits.**
- Response 159:** Due to time constraints, we have decided not to include this requested change. The language may be added at a later time.
- Comment 160:** **A.V.1.e-h, and k-l: Delete. Delete all references to emission limits for just the LMFs. All emission limits should be expressed as total emissions from the baghouse which includes emissions from one EAF and two LMFs. NSI understands Ohio EPA preference for including hourly emission limits to help establish when a future modification occurs. However, in this case the EAF and LMFs cannot be tested separately therefore compliance with these limits cannot be ascertained. Ohio EPA should also note that some of the pollutants have both combined and individual limits and some do not. NSI is willing to accept an hourly production limit of 330 tons/hr through two LMFs operating in parallel.**
- Response 160:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 161:** **A.V.1.e: The emission limit from just the LMFs should be 11.55 lbs/hr.**
- Response 161:** The permit terms will be revised to reflect the suggested changes.
- Comment 162:** **A.V.1.f: The emission limit from just the LMFs should be 38.58 tons/yr**
- Response 162:** The permit terms will be revised to reflect the suggested changes.
- Comment 163:** **A.V.1.g: The emission limit from just the LMFs should be 3.63 lbs/hr.**

- Response 163:** The permit terms will be revised to reflect the suggested changes.
- Comment 164:** **A.V.1.h: The emission limit from just the LMFs should be 12.13 tons/yr.**
- Response 164:** The permit terms will be revised to reflect the suggested changes.
- Comment 165:** **A.V.1.k: The emission limit from just the LMFs should be 1.57 lbs/hr.**
- Response 165:** The permit terms will be revised to reflect the suggested changes.
- Comment 166:** **A.V.1.l: The emission limit from just the LMFs should be 5.24 tons/yr.**
- Response 166:** The permit terms will be revised to reflect the suggested changes.
- Comment 167:** **A.V.2.a & b: Delete. See comment on A.III.7 above.**
- Response 167:** The terms will be revised to allow the flexibility inherent in 40 CFR Part 60, Subpart AAa.
- Comment 168:** **Regarding P022 – P023 (LMFs): A.I.2.c: BACT for SO<sub>2</sub> should be “Use of an emission factor of 0.17 lbs/ton of steel;” consistent with the EAFs and other 2 LMFs.**
- Response 168:** The permit terms will be revised to reflect the suggested changes.

*P024 (Melt Shop Cooling Towers) Comments*

- Comment 169:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “(3-hour average)”.**
- Response 169:** See the response to Comment #56. The Melt Shop Cooling Tower does not employ CEMS. Therefore, the permit terms will not be revised.
- Comment 170:** **A.III.2: Add the following “The permittee shall continuously monitor the flow rate across the cooling tower and determine the weekly average flow rate.”**

- Response 170:** The suggested language will be added.
- Comment 171:** **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”. As an alternative add “If required, ....” to the beginning of the Applicable Compliance Method.**
- Response 171:** The permit terms will be revised to include “If required” to the beginning of the Applicable Compliance Method term.
- Comment 172:** **A.V.1.b: Replace the Applicable Compliance Method with the following: “Compliance with the hourly emission limitation will be determined based on the following calculation: (weekly average flow rate (gal/min)) x (0.0005%/100) x (Weekly Average Total Dissolved Solids Content (ppm) x 60 min/hr) / 1,000,000”**
- Response 172:** The permit terms will be revised to reflect the suggested changes.

*P025 – P028 (Vacuum Oxygen Degassers) Comments*

- Comment 173:** **A.I.2.c: Delete. This emissions unit is not subject to an NSPS requirement.**
- Response 173:** We do not agree with the suggested change. The language will remain as a BAT requirement.
- Comment 174:** **A.II.1: Replace with the following “The permittee shall operate the flare system with the presence of a flame during oxygen injection only.” The majority of the steel processed through the vacuum degassers will not require oxygen injection to remove carbon. Therefore, the flare will operate intermittently.**
- Response 174:** The permit terms will be revised to reflect the suggested changes.
- Comment 175:** **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”.**

- Response 175:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 176:** **A.V.1.b: Delete the paragraph beginning with “If required”. It is not technically possible to test a flare.**
- Response 176:** The permit will be revised to remove this language.
- Comment 177:** **A.V.2.c: Delete the paragraph beginning with “If required”. It is not technically possible to test a flare.**
- Response 177:** The permit will be revised to remove this language.
- Comment 178:** **A.V.2.d: Delete the paragraph beginning with “If required”. It is not technically possible to test a flare.**
- Response 178:** The permit will be revised to remove this language.
- Comment 179:** **A.V.2: Delete. It is not technically possible to test a flare.**
- Response 179:** The draft permit does not contain this term. Therefore, no revisions are necessary.

*P029 – P030 (Tunnel Furnaces) Comments*

- Comment 180:** **A.I.1: Hourly and annual NOx emission limits should be 13.09 lbs/hr and 57.33 tons/yr.**
- Response 180:** The permit terms will be revised to reflect the suggested changes.
- Comment 181:** **A.V.1: NSI requests that Ohio EPA include the calculations that support all hourly and annual emission limits.**
- Response 181:** Due to time constraints, we have decided not to include this requested change. The language may be added at a later time.
- Comment 182:** **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”.**

**Response 182:** We do not agree with the suggested language. The permit terms will not be revised.

**Comment 183:** **A.V.1.c: Hourly and annual NOx emission limits should be 13.09 lbs/hr and 57.33 tons/yr.**

**Response 183:** The permit terms will be revised to reflect the suggested changes.

*P032 & P033 (PGL Lines) Comments*

**Comment 184:** **A.V.1: NSI requests that Ohio EPA include the calculations that support all hourly and annual emission limits.**

**Response 184:** Due to time constraints, we have decided not to include this requested change. The language may be added at a later time.

**Comment 185:** **A.V.1.h: Replace the Applicable Compliance Method with the following: “Compliance shall be determined through the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV.”**

**Response 185:** We do not agree with the suggested language. The permit terms will not be revised.

*P034 (Hydrogen Annealing Furnaces) Comments*

**Comment 186:** **General: Delete this emissions unit because each furnace has a maximum heat input rating of 4.78125 MMBtu/hr and are therefore exempt under OAC 3745-31-03(A)(1)(a).**

**Response 186:** The permit terms will be revised to remove emissions unit P034.

**Comment 187:** **A.1.a: In the event the unit is not deleted, replace the Applicable Compliance Method with the following: “Compliance shall be determined through the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV.”**

**Response 187:** See the response to Comment #186.

*P035 & P036 (Acid Regen Plants) Comments*

**Comment 188:**      **A.V.1: NSI requests that Ohio EPA include the calculations that support all hourly and annual emission limits.**

**Response 188:**      Due to time constraints, we have decided not to include this requested change. The language may be added at a later time.

**Comment 189:**      **A.V.1.a: Replace the Applicable Compliance Method with the following: “Compliance shall be determined through the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV.”**

**Response 189:**      We do not agree with the suggested language. The permit terms will not be revised.

*P037 (Laminar Cooling Tower) Comments*

**Comment 190:**      **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “(3-hour average)”.**

**Response 190:**      See the response to Comment #56. The Laminar Cooling Tower does not employ CEMS. Therefore, the permit terms will not be revised.

**Comment 191:**      **A.III.2: Add the following “The permittee shall continuously monitor the flow rate across the cooling tower and determine the weekly average flow rate.”**

**Response 191:**      The suggested language will be added.

**Comment 192:**      **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”. As an alternative add “If required, ...” to the beginning of the Applicable Compliance Method.**

**Response 192:**      The permit terms will be revised to include “If required” to the beginning of the Applicable Compliance Method term.

**Comment 193:**      **A.V.1.b: Replace the Applicable Compliance Method with the following: “Compliance with the hourly emission limitation will be determined based on the**

**following calculation: (weekly average flow rate (gal/min)) x (0.0005%/100) x (Weekly Average Total Dissolved Solids Content (ppm) x 60 min/hr) / 1,000,000”**

**Response 193:** The permit terms will be revised to reflect the suggested changes.

*P038 (Caster ICW Cooling Tower) Comments*

**Comment 194:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “(3-hour average)”.**

**Response 194:** See the response to Comment #57. The Caster ICW Cooling Tower does not employ CEMS. Therefore, the permit terms will not be revised.

**Comment 195:** **A.III.2: Add the following “The permittee shall continuously monitor the flow rate across the cooling tower and determine the weekly average flow rate.”**

**Response 195:** The suggested language will be added.

**Comment 196:** **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”. As an alternative add “If required, ....” to the beginning of the Applicable Compliance Method.**

**Response 196:** The permit terms will be revised to include “If required” to the beginning of the Applicable Compliance Method term.

**Comment 197:** **A.V.1.b: Replace the Applicable Compliance Method with the following: “Compliance with the hourly emission limitation will be determined based on the following calculation: (weekly average flow rate (gal/min)) x (0.0005%/100) x (Weekly Average Total Dissolved Solids Content (ppm) x 60 min/hr) / 1,000,000”**

**Response 197:** The permit terms will be revised to reflect the suggested changes.

*P039 (Caster DCW Cooling Tower ) Comments*

**Comment 198:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “(3-hour average)”.**

**Response 198:** See the response to Comment #57. The Caster DCW Cooling Tower does not employ CEMS. Therefore, the permit terms will not be revised.

**Comment 199:** **A.III.2: Add the following “The permittee shall continuously monitor the flow rate across the cooling tower and determine the weekly average flow rate.”**

**Response 199:** The suggested language will be added.

**Comment 200:** **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”. As an alternative add “If required, ....” to the beginning of the Applicable Compliance Method.**

**Response 200:** The permit terms will be revised to include “If required” to the beginning of the Applicable Compliance Method term.

**Comment 201:** **A.V.1.b: Replace the Applicable Compliance Method with the following: “Compliance with the hourly emission limitation will be determined based on the following calculation: (weekly average flow rate (gal/min)) x (0.0005%/100) x (Weekly Average Total Dissolved Solids Content (ppm) x 60 min/hr) / 1,000,000”**

**Response 201:** The permit terms will be revised to reflect the suggested changes.

*P040 (Pickle Line Cooling Tower ) Comments*

**Comment 202:** **A.I.1: All short term limits (lbs/hr, lbs/MMBtu and gr/dscf) should be expressed as a “(3-hour average)”.**

**Response 202:** See the response to Comment #57. The Pickle Line Cooling Tower does not employ CEMS. Therefore, the permit terms will not be revised.

**Comment 203:** **A.III.2: Add the following “The permittee shall continuously monitor the flow rate across the cooling tower and determine the weekly average flow rate.”**

- Response 203:** The suggested language will be added.
- Comment 204:** **A.V.1.a: Replace Applicable Compliance Method with the following: “Compliance will be determined based on the monitoring, recordkeeping and reporting requirements in sections A.III and A.IV”. As an alternative add “If required, ....” to the beginning of the Applicable Compliance Method.**
- Response 204:** The permit terms will be revised to include “If required” to the beginning of the Applicable Compliance Method term.
- Comment 205:** **A.V.1.b: Replace the Applicable Compliance Method with the following: “Compliance with the hourly emission limitation will be determined based on the following calculation: (weekly average flow rate (gal/min)) x (0.0005%/100) x (Weekly Average Total Dissolved Solids Content (ppm) x 60 min/hr) / 1,000,000”**
- Response 205:** The permit terms will be revised to reflect the suggested changes.

*P904 (Iron Ore Conveying and Storage) Comments*

- Comment 206:** **A.I.1: PM fugitive emission limit should be 1.72 tons/yr.**
- Response 206:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 207:** **A.I.1: PM10 fugitive emission limit should be 0.72 tons/yr**
- Response 207:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 208:** **A.I.1.c: PM fugitive emission limit should be 1.72 tons/yr.**
- Response 208:** We do not agree with the suggested language. The permit terms will not be revised.
- Comment 209:** **A.I.1.d: PM10 fugitive emission limit should be 0.72 tons/yr**
- Response 209:** We do not agree with the suggested language. The permit terms will not be revised.

*P905 – P910 (Coal Grinding and Handling Lines) Comments*

**Comment 210:**      **A.III.4: Delete the phrase “for any visible particulate emissions from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 210:**      We do not agree with the suggested language. The permit terms will not be revised.

**Comment 211:**      **A.IV.4: Delete the phrase “any visible particulate emissions were observed from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 211:**      We do not agree with the suggested language. The permit terms will not be revised.

*P911 – P916 (Iron Ore Grinding and Handling Lines) Comments*

**Comment 212:**      **A.III.4: Delete the phrase “for any visible particulate emissions from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 212:**      We do not agree with the suggested language. The permit terms will not be revised.

**Comment 213:**      **A.IV.3: Delete the phrase “any visible particulate emissions were observed from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 213:**      We do not agree with the suggested language. The permit terms will not be revised.

*P917 (RHF Charge Mixers) Comments*

**Comment 214:**      **A.III.4: Delete the phrase “for any visible particulate emissions from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 214:**      We do not agree with the suggested language. The permit terms will not be revised.

**Comment 215:** **A.IV.2: Delete the phrase “any visible particulate emissions were observed from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 215:** We do not agree with the suggested language. The permit terms will not be revised.

**Comment 216:** **A.V.1.a: Add “If required, ....” to the beginning of the Applicable Compliance Method. See P905 and P911.**

**Response 216:** The permit terms will be revised to reflect the suggested change.

*P918 & P919 (RHF Feed Lines) Comments*

**Comment 217:** **A.III.4: Delete the phrase “for any visible particulate emissions from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 217:** We do not agree with the suggested language. The permit terms will not be revised.

**Comment 218:** **A.IV.2: Delete the phrase “any visible particulate emissions were observed from the stack serving this emissions unit and/or”. This requirement is redundant with the continuous pressure drop readings.**

**Response 218:** We do not agree with the suggested language. The permit terms will not be revised.

*P920 (DRI Material Handling) Comments*

**Comment 219:** **A.III.4: Delete the phrase “for any visible particulate emissions from the stack serving this emissions unit”. This requirement is redundant with the continuous pressure drop readings.**

**Response 219:** We do not agree with the suggested language. The permit terms will not be revised.

**Comment 220:** **A.IV.2: Delete the phrase “any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which”. This**

**requirement is redundant with the continuous pressure drop readings.**

**Response 220:** We do not agree with the suggested language. The permit terms will not be revised.

*P921 (Alloy, Flux and Carbon Material Handling) Comments*

**Comment 221:** **A.III.4: Delete the phrase “for any visible particulate emissions from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 221:** We do not agree with the suggested language. The permit terms will not be revised.

**Comment 222:** **A.IV.2: Delete the phrase “any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which”. This requirement is redundant with the continuous pressure drop readings.**

**Response 222:** We do not agree with the suggested language. The permit terms will not be revised.

*P922 (Limestone and Coke Material Handling) Comments*

**Comment 223:** **A.III.4: Delete the phrase “for any visible particulate emissions from the stack serving this emissions unit and”. This requirement is redundant with the continuous pressure drop readings.**

**Response 223:** We do not agree with the suggested language. The permit terms will not be revised.

**Comment 224:** **A.IV.2: Delete the phrase “any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which”. This requirement is redundant with the continuous pressure drop readings.**

**Response 224:** We do not agree with the suggested language. The permit terms will not be revised.

**End of Response to Comments**