

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

NOTICE OF DISAPPROVAL AND ORDER FOR COMPLIANCE

CERTIFIED MAIL - 9489 0090 0027 6037 9321 74

January 31, 2022

Kurt A. Barshick
General Manager
U. S. Steel Mon Valley Works – Clairton Plant
400 State Street
Clairton, PA 15025

RE: Notice of Disapproval and Order for Modification of Mon Valley Air Pollution Mitigation Plan (Article XXI § 2106.06)

Dear Mr. Barshick:

As you are aware, in September 2021, the Mon Valley Air Pollution Episode Rule (hereinafter “Episode Rule”), Article XXI § 2106.06, was passed by Allegheny County Council and signed by the County Executive. The Episode Rule requires that subject facilities submit to the Allegheny County Health Department (ACHD) a Mon Valley Air Pollution Mitigation Plan (hereinafter “Episode Mitigation Plan”) to reduce PM_{2.5} and PM₁₀ emissions to be implemented during the Mon Valley Air Pollution Watch and Warning Phases. The Episode Mitigation Plan must include procedures to ensure that the source is operating in a manner consistent with good engineering practice and all air pollution control equipment is maintained in good working condition. The Episode Mitigation Plan is also required to include procedures for record keeping and reporting and procedures to ensure that the source has sufficient staff and resources available to implement the Mon Valley Air Pollution Warning Phase within 24 hours of the ACHD’s notification to the source of a Mon Valley Air Pollution Watch or Warning.

On December 27, 2021, the ACHD received U.S. Steel-Mon Valley Works-Clairton Plant’s Episode Mitigation Plan. The ACHD has determined that the Episode Mitigation Plan is unacceptable for the reasons set forth below. U.S. Steel-Mon Valley Works-Clairton Plant is hereby **ORDERED** to modify and resubmit the Episode Mitigation Plan which shall include the following changes and/or additions:

- a. The submitted plan estimated plantwide reductions of 4.1 lb/day of PM₁₀ and 2.3 lb/day of PM_{2.5}. These reductions were calculated incorrectly as shown in item f. below. Correcting the calculations results in plantwide reductions of 98.9 lb/day of PM₁₀ and 54.7 lb/day of PM_{2.5}. The corrected reductions are still insufficient. The facility reported average actual emissions for 2017 – 2020 of 2,859.4 lb/day of filterable PM₁₀ and 1,905.6 lb/day of filterable PM_{2.5}. The percentage reductions using the corrected reduction amounts are



DEBRA BOGEN, MD, FAAP, FABM, DIRECTOR
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approximately 3% for both PM₁₀ and PM_{2.5}. These calculations do not account for condensable particulate emissions. Source is required to resubmit a plan that will reflect a greater reduction of its actual emissions from the following processes such that said reduction will have an appreciable effect on air quality within the municipalities identified in §2106.06.d. during any air pollution episode:

1. P001-P003 & P050 (Coke Batteries Underfire Stack and PEC)
 2. P007-P009 & P052 (Coke Batteries Underfire Stack & PEC)
 3. P010-P011 & P053 (Coke Batteries Underfire Stack & PEC)
 4. P012 & P054 (Coke Battery B Underfire Stack & PEC)
 5. P046 Coke Battery C (Underfire Stack & PEC)
 6. Battering Charging (for all the batteries)
 7. Battery Door Leaks (for all the batteries)
 8. Battery Lid Leaks (for all the batteries)
 9. Battery Offtake Leaks (for all the batteries)
 10. Soaking (for all the batteries)
 11. PEC Traveling Hot Car (for all the batteries)
 12. PEC Pre-Push (for all the batteries)
 13. PEC Fugitives (for all the batteries)
 14. PEC Uncontrolled Pushing (for all the batteries)
 15. PEC Ball Mill (for all the batteries)
 16. Quench Tower #1
 17. Quench Tower #5
 18. Quench Tower #5a
 19. Quench Tower #7
 20. Quench Tower #7a
 21. Quench Tower #B
 22. Quench Tower #C
 23. Boiler 1
 24. Boiler 2
 25. Boiler R2
 26. Boiler T1
 27. Boiler T2
 28. Cooling Towers
 29. Desulfurization Plant SCOT Stack
 30. Coke By-Product Plant
- b. Source is required to resubmit a plan that lists specific actions it **will** take during the warning phase;
- c. Source is required to submit an estimate of the percentage emissions decrease based on maximum expected daily reductions for all processes considered and not just storage piles and roadways in Microsoft Excel or similar format;
- d. Plan shall include PM-condensable emissions from 2017-2020;
- e. Facility shall correct the emissions calculations spreadsheet. In the reduction tab, column L & M were divided by 8760 hours instead of 365 days to get lb/day, then again divided by 24 hrs/day in column N & O; and

f. Plan shall include procedures for record keeping and reporting as detailed in §2106.06.e.

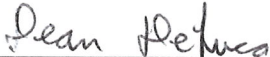
Pursuant to Article XXI, § 2106.06.g.2, U.S. Steel-Mon Valley Works-Clairton Plant shall submit to the ACHD the modified Episode Mitigation Plan within **thirty (30)** days from receipt of this Notice and Order. **Please be aware that U.S. Steel-Mon Valley Works-Clairton Plant's Episode Mitigation Plan submitted on December 27, 2021, shall remain in effect until the modified Plan is received by the ACHD.** The modified Episode Mitigation Plan shall be effective upon submission to the ACHD.

Please be advised that in the event that U.S. Steel-Mon Valley Works-Clairton Plant fails to resubmit a modified Episode Mitigation Plan or fails to resubmit the Plan in accordance with the changes and/or additions specified above, the ACHD has the authority under Article XXI, § 2106.06.g.4, to issue an order to U.S. Steel-Mon Valley Works-Clairton Plant detailing the procedures for a Mon Valley Air Pollution Watch or Warning Phase. Further, the failure to comply with this Order within the times specified herein is a violation of Article XXI giving rise to the remedies provided by Article XXI, § 2109.02, including civil penalties of up to \$25,000 per violation per day.

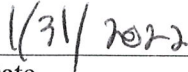
Pursuant to Article XI, § 1104.A ("Hearings and Appeals"), of the ACHD Rules and Regulations, you are notified that if you are aggrieved by this Order, a Notice of Appeal shall be filed no later than thirty (30) days after receipt of written notice or issuance of this Order. Such a Notice of Appeal shall be filed in the Office of the Director at 542 Fourth Avenue, Pittsburgh, PA 15219. This Order is enforceable upon issuance and any appeal of this Order shall not act as a stay unless the Director of the ACHD so orders. In the absence of a timely appeal, the terms of this Order shall become final. A copy of Article XXI and Article XI regulations may be found at <https://www.alleghenycounty.us/HealthDepartment/Health-Department-Regulations.aspx>.

If you have any questions concerning this Order, or if we can be of further assistance, please call Shannon Sandberg at 412-578-7969 or Dean DeLuca at 412-578-8188.

Regards,



Dean DeLuca
Air Quality Program Manager



Date