

ALLEGHENY COUNTY HEALTH DEPARTMENT

Air Quality Program

SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES ON THE PROPOSED ISSUANCE OF UNITED STATES STEEL CORPORATION- EDGAR THOMSON INSTALLATION PERMIT NO. 0051-I010

[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette Review on November 13, 2025. The public comment period ended on January 5, 2026]

1. **COMMENT:** Section V.B, Page 20. U.S. Steel requests that the Process P001 “Capacity” of 581,565 tpy slag be revised to “**Permitted Capacity**” since this permitted value is below the maximum design rate of the slag recycler system. (1 Commenter)

RESPONSE: The Department acknowledges and understands that throughput represents the permitted capacity as specified in the installation permit. However, the standardized boilerplate language for this section uses the term “Capacity” as the required terminology. Therefore, to maintain consistency and ensure alignment with the established permit format, the permit language remains unchanged.

2. **COMMENT:** Conditions V.A.1.d, V.A.3.b, Pages 20-2; TSD, Page 4 No. 6. U.S. Steel requests that the condition be removed because these Integrated Iron and Steel MACT requirements pertaining to slag processing and handling (i.e. 40 CFR 63.7823(g)) are not effective per the regulation, and the recently published interim final rule has extended compliance dates to April 3, 2027. In addition, the regulation is currently under reconsideration by EPA and will likely be revised. Any final applicable limits can be added to the permit once EPA completes its reconsideration of the rule and finalizes the MACT regulation. U.S. Steel would still need to comply with any applicable, effective limits even if not in the permit at the time of promulgation.

RESPONSE: The Department acknowledges that the condition is currently not effective and that the interim final rule has extended the compliance date to April 3, 2027, while the regulation remains under EPA reconsideration. However, the section has not been withdrawn, vacated, or rendered inapplicable. The revision only affects the timing of effectiveness and compliance obligations, and since it is expected to become effective in the future, there is no need to remove it from the permit.

3. **COMMENT:** Condition V.A.4.b.1, Page 21. U.S. Steel requests that the condition be revised from “hourly” to “daily” slag throughput records. The maximum hourly design rate of the slag recycler is equal to the hourly throughput limit. Hourly documentation of throughput would impose a disproportionate burden relative to its value.

RESPONSE: The requested changes cannot be implemented because the hourly throughput is part of the permit restriction and was also used to estimate emissions. Maintaining records of hourly throughput is necessary to demonstrate compliance with this restriction.

4. **COMMENT:** Technical Support Document, Page 2. U.S. Steel requests that the Emissions Sources table match TABLE II-1: Emission Unit Identification of the permit.

RESPONSE: The Department made the requested change.

5. **COMMENT:** Section VIII & Technical Support Document, Page 7. U.S. Steel requests that reference to “Limitations” and “Limits” be removed, since this is a summary of emissions from the Slag Recycler System. (1 Commenter)

RESPONSE: The requested changes cannot be made because the current limitations accurately reflect the calculated potential emission limits calculated for the slag recycler process, which shall not be exceeded. And any excursion beyond these specified limits triggers a swift corrective action to restore compliance.

6. **COMMENT:** The commenters offer strong support for the U.S. Steel's Slag Recycler System project, which supports environmental improvement and manufacturing in many ways. (6 Commenters)

RESPONSE: The Department appreciates the commenter's strong support of the Slag Recycler System project and the recognition of its role in promoting environmental improvement and enhancing manufacturing processes. No revisions were deemed necessary in response to this comment.

7. **COMMENT:** U.S. Steel's NSR/PSD analysis raises concerns because it relies on newly introduced emission factors for the Edgar Thomson Plant slag pit that were not previously reported. These factors cover several criteria pollutants, including SO₂, NO_x, CO, VOC, and H₂S, in addition to particulate matter. U.S. Steel acknowledges it has not historically reported these emissions. However, the facility's existing Title V Operating Permit was developed based on this underreporting and requires reporting only particulate matter and certain metallic hazardous air pollutants, not the additional criteria pollutants now included.

The Emission factors for PM, PM₁₀, and PM_{2.5} increased by tens of thousands of percent, implying that U.S. Steel previously underreported these emissions by roughly 27–39 tons per year, and if the factors developed by Ozinga Cement are accurate, the BF Slag Pits have likely produced substantial unpermitted and unreported emissions for years, possibly since construction.

The Department must remand the installation permit and require U.S. Steel to perform a NSR/PSD netting analysis excluding historically unreported emissions from baseline calculations as a revised analysis may indicate that the IP triggers PSD for PM and H₂S and Nonattainment NSR for PM_{2.5}. If the Department still accepts U.S. Steel's baseline emissions, it must provide a thorough explanation and justification for that decision.

RESPONSE: The slag pit emissions reflected in the current Title V Operating Permit (TVOP) are limited to material handling emissions. Emissions from other slag pit activities were not historically included because no slag-pit-specific emission factors existed at the time the permit was developed. As a result, those emissions could not be quantified.

As part of the Installation Permit (IP) application, U.S. Steel presented emission factors developed by Ozinga Cement, Inc. for additional pollutants, including SO₂, NO_x, CO, VOC, H₂S, and PM. These emission factors constitute the best available information for slag-related operations and provide a technically sound and more representative basis for estimating emissions. The revised emissions estimates were calculated using these emission factors in conjunction with the facility's actual slag throughput, as reported in the emissions inventory. Additionally, U.S. Steel reasonably and appropriately applied the Ozinga Cement, Inc. baseline emission factors to estimate its baseline actual emissions (BAE). This approach ensures internal consistency across emission estimates, and U.S. Steel also utilized these same factors in its 2024 emissions inventory submission. The Department will continue to use these emission factors for future emissions calculations in the Title V Operating Permit to ensure consistency, unless updated and improved emission factors become available.

Furthermore, Holcim (US) Inc., located in East Chicago, Indiana, utilized the same Ozinga Cement, Inc. emission factors to establish emission limits for its granulated slag production process, demonstrating that the use of these factors represents an accepted and reasonable industry practice.

After reviewing the potential-to-emit (PTE) values calculated using this methodology, the Department determined that none of the pollutants exceed the applicable NSR or PSD significance thresholds. Therefore, the proposed IP does not trigger PSD or Nonattainment NSR review requirements.

List of Commenters

Name	Affiliation
Christopher Hardin	United States Steel Corporation Mon Valley Works – Edgar Thomson Plant
Charles Ochola PhD., PE., M. ASCE President	National Slag Association
Brian Herbinko Business Manager/Secretary-Treasurer	International Union of Painters & Allied Trades. District Council 57 of Western PA
Chardae' Jones Braddock Councilwoman	Citizen
Lawrence Hafetz, Esq Legal Director	Clean Air Council
Jason Markovich Business manager	Labor Local 373
Tom Platt Business Agent	IBEW Local Number 5
Kurt Barshick Vice President	United States Steel Corporation Mon Valley Works
Matt DeLibero Environmental Reliability and Operational Excellence	United States Steel Corporation Mon Valley Works