

ALLEGHENY COUNTY HEALTH DEPARTMENT Air Quality Program

SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES ON THE PROPOSED ISSUANCE OF THE ATI FLAT ROLLED PRODUCTS HOLDINGS, LLC INSTALLATION PERMIT NO. 0059-I006c

[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on March 14, 2024. The public comment period ended on April 18, 2024]

1. **Comment:** The commenter asserts that the annual emission limits for the electric arc furnaces (EAF) do not reflect the EAFs' full potential to emit. Specifically, the commenter states that the annual tons per year are not equivalent to the pounds per hour emissions times the 7,900 hours per year of allowable hours of operation for each furnace.

Response: Regarding PM, PM₁₀, and PM_{2.5}: The tons per year emissions are those of Installation Permit No. 0059-I006. The previous stack test showed compliance with these emissions. ATI chose to accept these emission limits based on previous testing showing compliance. Because steelmaking is a batch process, not a continuous process, there is no direct correlation between the short-term (pounds per hour) and annual limits (tons per year). The short-term limit reflects the highest allowable emission during the cycle of a batch, based on emission testing.

2. **Comment:** The commenter states that the permit's testing, monitoring, and recordkeeping requirements are not sufficient to assure compliance with annual and hourly emission limits.

Response: Testing indicates whether the source was in compliance during the test period. Monitoring during the test indicates the operating conditions under which compliance was demonstrated, including the fan motor amps and damper positions. During the EPA-mandated testing to establish emission factors for this permit, there was little variability in the emissions between the tests, so maintaining the same conditions as those during the test is a reasonable parametric demonstration of compliance. Furthermore, the permit limits the type of scrap that can be processed, so future variability is unlikely. Comparing the operating conditions recorded during the stack test in which compliance limits were established with the operating conditions during daily operations will indicate compliance or noncompliance with emissions limits. Among the parameters being recorded are fan amps, damper position, and production records. Close comparison between stack test operating conditions and daily operating conditions indicates compliance. Variability alerts plant personnel of potential noncompliance and the requirement to address it.

3. **Comment:** A commenter wants an explanation of how and why this draft installation permit differs from the previously proposed draft installation permit.

Response: The draft installation permit subject to comment is the one that was advertised in the March 14, 2024, edition of the *Pittsburgh Post-Gazette*. It stands alone and is not subject to comparison with previous draft installation permits that have been withdrawn, revised, or not proposed for issue. The Department declines to make such comparisons.

4. **Comment:** The commenter states that the NO_x and CO emission limits should not be raised to a 20% safety margin but should be at a 15% safety margin. If raised, ACHD "*must provide a proper justification.*"

Response: The ATI Brackenridge facility dates to before the EPA and the Clean Air Act. Accordingly, some of the stack test points do not meet Appendix A requirements. To address this issue, ATI hired a consultant to find the “best” stack testing locations and to state why these locations were appropriate. The testing conducted by ATI was required by the EPA. The EPA approved the test protocol which included the stack test ports. Because the test ports were the best possible, but not perfect locations, a 20% margin was used.

5. **Comment:** Commenters stated that stack tests once every five years are insufficient to ensure compliance. The stack tests should be more frequent.

Response: The quarterly stack testing, which are the bases for the emissions limits in this installation permit, were negotiated with the EPA. Their purpose was to establish emission limits for the facility. Facility operating parameters were recorded during the stack testing. Monitoring these operating parameters during daily operations and comparing them with operating parameters recorded during stack testing will indicate compliance or noncompliance. Therefore, the Department believes that the permitted stack testing regimen is sufficient to ensure compliance when coupled with the monitoring and recordkeeping requirements of the permit.

6. **Comment:** The commenter states that stack testing is inadequate to demonstrate compliance with hourly emissions limits. The commenter further recommends continuous emissions monitoring systems (CEMS) for NO_x and CO.

Response: See response to Comment No. 2 above.

7. **Comment:** A commenter asserted that: *“The Department should require Continuous Opacity Monitoring Systems (COMS) for the EAFs rather than relying on visual inspections that are inherently subjective and intrinsically limited to daylight hours.”*

Response: The visual emissions requirements for this permit specify opacity readings be taken by a certified Method 9 visual emissions observer. This permit condition meets the requirements of 40 CFR §60.273a(c) and is acceptable to the Department.

8. **Comment:** A commenter requests clarification as to whether ATI is a major or minor source of SO_x. This question is based on the statement that the facility is a minor source of SO_x in this draft installation permit while it was identified as a major source of SO_x in the withdrawn 2017 draft TVOP.

Response: The facility is currently a minor source for SO_x. See response to Comment No. 3 above.

9. **Comment:** Several commenters expressed concern about the lack of virtual participation for, the location of, and overlapping public notices for the public hearings.

Response: The Department does not concur that virtual participation is necessary for a public hearing. The notice of the public hearing is advertised in both a newspaper of general circulation (as required by Article XXI) and the Allegheny County website as well as sent to recipients of the Air Quality Program’s ‘Interested Parties’ list. Commenters do not have to be present at the public hearing to submit their comments. Comments timely received by e-mail or through the US Postal Service are considered and will receive a response.

The Department endeavors to locate the public hearing at a place that will maximize the participation of all county residents. This usually implies a central location. However, a hearing may be located near the source so that a larger number of affected individuals can attend. In this case there were two permits noticed for this hearing - ATI and Synthomer. Synthomer is a Title V permit while ATI is an Installation permit. A Title V permit has greater significance to the affected population than an Installation permit. Therefore, the public hearing was located in West Elizabeth, PA, which is closer to the Synthomer facility.

A commenter expressed concern for overlapping comment periods. Overlapping comment periods are necessary to avoid delays in the processing of draft permits. Limiting comment periods such that only one public notice is available at any given time would slow the issuance of permits and create a backlog.

10. **Comment:** The commenter opined that the ATI public hearing should have been held in Brackenridge, PA.

Response: See response to Comment No. 9 above.

11. **Comment:** Commenters objected to the permit based on the amount of emissions allowed by the permit.

Response: The allowable emissions are regulated by federal, state, and local statutes and regulations. The Department must and does operate within this regulatory framework. The draft permit is written to conform to these regulatory requirements. The Department cannot arbitrarily deny a permit if the permit meets the legal requirements. This permit meets the regulatory requirements prescribed by the above referenced statutes and regulations including the amount of emissions allowed by the permit.

12. **Comment:** A commenter opposes “...the ATI permit on the grounds they are a major source polluter being given permission to put 800 plus tons per year of pollutants into our air.”

Response: See response to Comment No. 11 above.

13. **Comment:** The commenter asserts that the monitoring and recording requirements of the permit are not sufficient to assure compliance with the hourly and annual limits. Specifically, the commenter states that a once-every-five-year compliance test is insufficient to demonstrate compliance with annual and hourly emission rates. The commenter states that the permittee should “establish operating limits based on parameters developed during the performance test and record and report data regarding those parameters for each heat.” Said data would form the basis of a parametric monitoring system that would be used to assure compliance with the pounds-per-hour and tons-per-year emissions limits.

Response: See response to Comment No. 2 above.

14. **Comment:** The commenter made general statements about the steel industry, as a whole but did not address specifically any elements of the draft permit.

Response: Because language specifically addressing elements of the draft permit was not included in these comments, the Department is unable to respond to these comments.

15. **Comment:** The commenter agreed that the NO_x and CO emissions were correctly based on source-specific data.

Response: ACHD acknowledges and appreciates the comment.

16. **Comment/Response:** In conditions V.A.1.a.2) and 3), added the phrase “in accordance with Method 9” to clarify how opacity is to be measured.

List of Commenters

Name	Affiliation
John K. Baillie	GASP
Alexander Bomstein	Clean Air Council
Jay Ting Walker	Clean Air Council
Benjamin Chiszar	Citizen
Fred Bickerton	Citizen
ACHD	

Michael Dorman
Air Quality Engineer III
June 21, 2024