

COUNTY OF



ALLEGHENY

SARA INNAMORATO  
COUNTY EXECUTIVE

August 26, 2024

Kurt Barshick  
United States Steel Corporation  
Clairton Works  
400 State Street  
Clairton, PA 15025

RE: Notice of Violation #240801 United States Steel Corporation, Edgar Thompson Plant, 13<sup>th</sup> Street and Braddock Avenue, Braddock, PA 15104, Article XXI (“Air Pollution Control”) § 2102.03.c “Permit Conditions,” Title V Operating Permit #0051-OP23 Condition V.B.1.e. and V.D.1.1.

Dear Mr. Barshick:

Allegheny County Health Department (hereinafter “ACHD”) reviewed the results of stack testing performed at United States Steel Corporation’s (hereinafter “U.S. Steel”) Edgar Thompson Plant (“ET”) that documented noncompliance with Carbon Monoxide restrictions of the Blast Furnace #1 Stove and the BOP Primary Collection Scrubber System.

U.S. Steel owns and operates ET, a facility in Braddock, Allegheny County, Pennsylvania. ET is an iron and steel making facility that produces mainly steel slabs. Raw materials such as coke, iron-bearing materials, and fluxes are charged to blast furnaces in the iron making process. Desulfurized hot metal is then introduced into the basic oxygen process (“BOP”), where the hot metal is transformed into molten steel.

Operating Permit #0051-OP23 enumerates restrictions on ET and its processes, including the BOP shop and Blast Furnace Stoves.

On August 31, 2023, U.S. Steel ET submitted a Notice of Appeal, which stated objections and requesting a stay of challenged emission limitation. U.S. Steel and ACHD entered the informal negotiation as part of the appeal process. As part of the negotiation, ACHD agreed not to order corrective actions regarding emission testing of the challenged limitations. ACHD did not agree to a stay of any required emission testing. A stay of emission testing and limits was not granted to U.S. Steel.

### **Blast Furnace Stove #1**

#0051-OP23 Condition V.B.1.e. enumerates emission limitations for No. 1 and No. 3 Blast Furnace Stoves. The short-term hourly emission limitation listed in V.B.1.e. for Carbon Monoxide (“CO”) is 650.65 pounds per hour (lb/hr). On January 23, 2024, ET performed compliance testing on the Blast Furnace stoves. On March 28, 2024, ET submitted the



**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

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PHONE (412) 578-8103 • FAX (412) 578-8144  
24-HR (412) 687-ACHD (2243)  
[WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT](http://WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT)



compliance test report. The results of the three runs were 1,457 lb/hr, 1,223 lb/hr and 680 lb/hr. The average test results for Blast Furnace #1 Stove for CO were 1,120 lb/hr, exceeding the permit limitation of 650.65 lb/hr.

On April 10, 2024, ET retested Blast Furnace Stove #1. On June 7, 2024, ET submitted the compliance retest report. The three runs showed 44.9 lb/hr, 35.7 lb/hr and 47.5 lb/hr. The average test results for Blast Furnace #1 Stove for CO was 42.7 lb/hr, in compliance with the limit of 605.65 lb/hr.

ACHD has calculated a civil penalty of \$3,600.00 for exceeding #0051-OP23 Condition V.B.1.e. However, ACHD is not assessing the civil penalty at this time. The review and assessment of the civil penalty will occur pending the outcome of the permit appeal.

### **BOP Primary Collection Scrubber System**

#0051-OP23 Condition V.D.1.1 enumerates emissions limitations for all points and fugitive emissions from the BOP shop. The short-term hourly emission limitation listed in Condition V.D.1.1., Table V-D-1. for CO is 2,575.44 lb/hr. On January 25, 2024, ET performed compliance testing on the BOP Primary Collection Scrubber System. On March 28, 2024, ET submitted the compliance test report. The three runs showed 4,599 lb/hr, 2,714 lb/hr and 2,723 lb/hr per hour. The average test results for the BOP Primary Collection Scrubber System were 3,346 lb/hr, exceeding the permit limit of 2,575.44 lb/hr.

On June 26, 2024, ACHD contacted ET regarding the date or scheduling of a retest of the BOP Scrubber. On June 28, 2024, an ET representative responded with the following, but did not indicate that a retest was scheduled:

*“As you are aware, the CO limit (that is currently under appeal) was based on insufficient data – even if ACHD had the authority to impose such a limit which USS contends it does not. That being said, we continue to investigate CO emissions from the BOP scrubber stack. At this time we have no basis to suggest that there were any anomalies in our operations and are uncertain as to why the results are higher than some prior results but not all, except to note that we do not ‘control’ CO from the BOP scrubber stack. We will notify ACHD when any future testing scheduled.”*

As of the date of this Notice, ACHD has not received any information as to any corrective action taken, results of investigations, or the date of a retest. ET has been and continues to operate out of compliance with #0051-OP23 Condition V.D.1.1.

ACHD has calculated a civil penalty of \$8,700.00 for exceeding #0051-OP23 Condition V.1.D.1. However, ACHD is not assessing the civil penalty at this time. The review and assessment of the civil penalty will occur pending the results of the permit appeal.

Please allow this correspondence to serve as notice to U.S. Steel, Edgar Thompson Works that the above exceedances of the conditions of #0051-OP23 are violations of the following Allegheny County Health Department Rules and Regulations, Article XXI (“Air Pollution Control”), and Title V Operating Permit Restrictions:

### **Article XXI § 2102.03.c**

- c. Conditions. It shall be a violation of this Article giving rise to the remedies provided by Part I of this Article for any person to fail to comply with any terms or conditions set forth in any permit issued pursuant to this Part.

**Title V Operating Permit #0051-OP23 Condition V.B.1.e:**

- e. Emissions from the No. 1 or No. 3 Blast Furnace Stoves shall not exceed the emission limitations in Table V-B-1 below: [§2104.03.a.2.B, §2104.02.b, §2103.12.a.2.B; RACT IP 0051-I008a, Condition V.B.1.b]

**TABLE V-B-1**  
**Emission Limitations for the No. 1 or No. 3 Blast Furnace Stoves**

Pollutant	Hourly Emission Limit For each set of Stoves (lb/hr)	Annual Emission Limit For each set of Stoves (tons/year)*
Particulate Matter (filterable)	24.75	108.41
PM <sub>10</sub> (filterable)	24.75	108.41
PM <sub>2.5</sub> (filterable)	24.75	108.41
PM-condensable	3.25	14.24
Nitrogen Oxide (NO <sub>x</sub> )	14.85	65.04
Carbon Monoxide (CO)	650.65	2,849.86
Volatile Organic Compound	3.24	14.21

\*A year is defined as any consecutive 12-month

**Title V Operating Permit #0051-OP23 Condition V.D.1.1:**

- 1. Emissions from the BOP Shop, including all point (stacks S007 & S008) and fugitive emissions, shall not exceed the emission limitations in Table V-D-1 below. Fugitive emissions shall be included in accordance with Article XXI, §2104.02.c. [§2103.12.a.2.B, §2104.02.c.9.B]

**TABLE V-D-1**  
**BOP Shop Emission Limitations**

POLLUTANT	Hourly Emission Limit (lb/hr)	Annual Emission Limit (tons/year)*
Particulate Matter (filterable)*	44.12	193.24
PM <sub>10</sub> (filterable)*	44.12	193.24
PM <sub>2.5</sub> (filterable)	44.12	193.24
Nitrogen Oxides (NO <sub>x</sub> )	41.45	181.55
Carbon Monoxide (CO)	2,575.44	11,280.42
Sulfur Dioxide (SO <sub>2</sub> )	2.71	11.88
Volatile Organic Compounds (VOC)	3.80	16.63

\*A year is defined as any consecutive 12-month period.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any law. When ACHD determines that an enforcement action is appropriate, you will be notified of the action. Please be aware that any violation of Article XXI subjects a person to a variety of enforcement actions, including a civil penalty of up to \$25,000 per violation per day.

Please contact the ACHD within 14 days of receipt of this notice to schedule a meeting to discuss this Notice of Violation. A meeting may be scheduled by contacting Allason Holt at (412) 578-8122 or via email at [allason.holt@alleghenycounty.us](mailto:allason.holt@alleghenycounty.us).

If you believe any of the facts in this Notice of Violation are in error, you may submit information to ACHD via email or at the address shown at the bottom of the first page of this

Notice. The ACHD will consider new information you submit and take appropriate action. Thank you for your anticipated prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Allason Holt". The signature is fluid and cursive, with a large initial "A" and "H".

Allason Holt  
Air Quality Manager, Compliance and Enforcement Program

CC: File  
Matt DeLibero  
Jonelle Scheetz  
Bill Rausch  
Nick Caito