



United States Steel Corporation
Great Lakes Works
Environmental Department
No. 1 Quality Drive
Ecorse, Michigan 48229

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DEC 14 2021

Air Quality Division
Detroit Office

December 10, 2021

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Great Lakes, and Energy
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SENT VIA ELECTRONIC MAIL AND CERTIFIED MAIL

**SUBJECT: United States Steel Corporation – Great Lakes Works
No. 5 Pickle Line Fume Scrubber
Violation Notice dated November 19, 2021**

Dear Ms. Koster:

On or about November 23, 2021, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated November 19, 2021 from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). In the notice, EGLE alleges U. S. Steel failed to develop and implement an Operation and Maintenance Plan (OMP) upon startup of the new secondary fume scrubber servicing the four acid storage vessels for EG5-PICKLE-LINE. The Department alleges this is a requirement of 40 CFR Part 63, Subpart CCC §63.1160(b)(1) and ROP No. 199600132d, Section 1, Table E-01.08, Special Condition V.1.

While U. S. Steel respectfully disagrees with EGLE's assertions and interpretation of the Subpart CCC and the OMP requirements, in good faith to resolve the issue, U. S. Steel promptly responded to EGLE's concerns (which EGLE previously communicated to U. S. Steel verbally) and incorporated the acid storage vessel scrubber into the existing OMP for the No. 5 Pickle Line.

As you are aware, Subpart CCC applies to pickling lines, acid regeneration plants, and hydrochloric acid storage vessels. In Subpart CCC, EPA provides specific requirements that apply to each of the affected facilities – and the requirements are different among the type of affected facility (pickling line, acid regeneration plant, or storage vessel.) While we agree that the regulations could be clearer, when reviewing Subpart CCC holistically along with the rule's

background information and other supporting information, it becomes apparent that EPA never intended that the pickling line scrubber requirements apply to storage vessel devices. In Subpart CCC, EPA distinguishes the requirements for “steel pickling facility” from “hydrochloric acid storage vessel.” For example, in 40 CFR 63.1162(a), EPA provides the monitoring requirements for “steel pickling facility[ies]” and “acid regeneration plant[s],” which are distinguishable from the monitoring requirements for “hydrochloric acid storage vessels.” Instead, the requirements for hydrochloric acid storage vessels are promulgated at 40 CFR 63.1162(c) – noting that hydrochloric acid storage vessel requirements are distinguishable and separate from the steel pickling facility requirements. Thus, the steel pickling facility requirements are not directly applicable or interchangeable with the requirements for hydrochloric acid storage vessels. This makes sense because there are no specific limits that apply to emissions from hydrochloric acid storage vessels. The limited requirements also make sense technically. While there may be some HCl emissions from storage vessels, the fact that the HCl in storage vessels are not agitated and are less than 100 degrees Fahrenheit indicates that the emissions would not be as significant as emissions from units with elevated temperatures and agitation.

Applying the prescriptive, detailed “steel pickling facilities” and “hydrochloric acid regeneration plants” requirements codified at 40 CFR 63.1160(b) to “hydrochloric acid storage vessels” does not comport with a holistic review of Subpart CCC. The requirements of 40 CFR 63.1160(b) do not apply to hydrochloric acid storage vessels because the more specific requirements, promulgated at 40 CFR 63.1162(c) apply to hydrochloric acid storage vessels, i.e., EPA would not have codified the hydrochloric acid storage vessel requirements at 40 CFR 63.1162(c) if 40 CFR 63.1160(b) applied to such storage vessels; as 40 CFR 63.1160(b) encompasses much more detailed, comprehensive requirements that go far beyond those required for storage vessels (that simply require a semi-annual inspection to ensure the device is installed and operating.) This is consistent with the EPA’s Steel Pickling Inspection Checklist, where the requirements for the storage vessels are distinguished from the requirements for steel pickling lines and acid regeneration plants.

This also makes sense since the Pickle MACT allows for less sophisticated devices, such as a bubbler, to be used to limit emissions from acid storage vessels. EPA notes that no specific control device is required for storage vessels. It further notes that “[e]xamples of devices that might be used include systems that bubble emissions through a small tank of water or caustic without the aid of a fan.” Subjecting the vessel storage devices to the very prescriptive requirements of steel pickling line scrubbers would be a deterrent to install scrubbers (which are superior to bubblers) on acid storage vessel facilities.

In any case, as a practical matter, in this instance the ambiguities and inconsistencies in Subpart CCC (and whether or not the acid storage vessel device should be included in the OMP) are moot at this point. There are no further actions required by U. S. Steel as the secondary scrubber is included in the OMP; and the OMP has been fully implemented. As EGLE is already aware, in good faith and to what we believed would be a quick resolution of the matter, U. S. Steel voluntarily chose to include the acid storage vessel secondary scrubber in the revised OMP that was submitted to EGLE on June 18, 2021.

Ms. Katie Koster, Department of Environment, Great Lakes, and Energy
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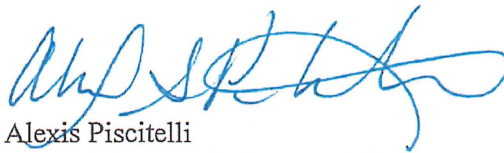
We would be pleased to address any questions or concerns the EGLE may have. If you have any questions regarding this matter or require additional information, please contact Alexis Piscitelli at 219-888-5280.

I certify that based off information and belief formed after reasonable inquiry, the information provided in this response is true and correct to the best of my knowledge and information.

Sincerely,



Harvey Ghuman
Plant Manager
U. S. Steel – Great Lakes Works



Alexis Piscitelli
Senior Director, Environmental
U. S. Steel – North American Flat Roll