



ArcelorMittal

July 29, 2020

VIA ONLINE SUBMISSION

Policy Office
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Comments on RACT II Case-By-Case Proposed SIP Revision

To Whom It May Concern:

On behalf of ArcelorMittal Plate, LLC (“AM Plate”), I am writing to provide comments on *Proposed State Implementation Plan Revision; Certification of the Commonwealth’s Submittal of All Case-By-Case Reasonably Available Control Technology Determinations and Averaging Plans to the United States Environmental Protection Agency for the 1997 and 2008 8-Hour Ozone*, 50 Pa.B. 3172, June 27, 2020 (Proposed Action). Although not included in the *Pennsylvania Bulletin* notice for this Proposed Action, the Department has published Table 1, an Excel spreadsheet listing the permits that purportedly include the case-by-case Reasonably Available Control Technology (“RACT”) II determinations that the Department proposes to include as part of the State Implementation Plan (“SIP”). ArcelorMittal submits these comments because the Department has included inaccurate information in Table 1 for AM Plate’s Coatesville facility.

In Table 1, the Department identifies Title V Permit No. 15-00010, issued on March 10, 2017, as the RACT II permit that it proposes to submit as a SIP revision. This is the wrong RACT II permit for AM Plate’s Coatesville facility. Following AM Plate’s appeal of Title V Permit No. 15-00010, issued on October 3, 2019, the Department amended the case-by-case RACT II requirements set forth in Title V Permit No. 15-00010 on March 18, 2020. Pursuant to a notice issued in the *Pennsylvania Bulletin* on March 28, 2020, the Department scheduled a public hearing on April 30, 2020, for the purpose of incorporating the RACT II case-by-case determinations in the March 18, 2020 amended Title V Permit No. 15-00010 in the SIP.

Because the Department has listed the wrong version of Title V Permit No. 15-00010 and the *Pennsylvania Bulletin* notices for AM Plate’s Coatesville facility are also incorrect in Table 1, AM Plate objects to the Proposed Action as it relates to the Coatesville facility. Prior to submitting taking final action, the Department must correct Table 1 to list “March 18, 2020” as the “Permit Issuance Date” for Title V Permit No. 15-00010 and ensure that the corresponding *Pennsylvania Bulletin* notices align with the March 18, 2020 version of Title V Permit No. 15-00010.

Thank you for considering and addressing these comments. Please contact me at ray.ajalli@arcelormittal.com or (610) 383-2097 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ray Ajalli'. The signature is stylized with large, overlapping loops and a cursive script.

Reza "Ray" Ajalli, P.E.
Manager - Environmental