



Environmental Affairs Department
100 River Road, Brackenridge, PA 15014-1597

July 29, 2020

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

Submitted via email
ecomment@pa.gov

Dear Sir or Madam:

Subject: CTG RACT Certification SIP
ATI Flat Rolled Products Holdings, LLC (ATI)
Installation Permit No. 0059-I009 (IP9)

Allegheny County Health Department (ACHD) published Proposed Permit No. 0059-I009 for the Brackenridge Facility of ATI Flat Rolled Products Holdings, LLC (ATI) on January 12, 2020 with a public comment period open until February 11, 2020. ATI submitted timely comments to ACHD on February 11, 2020. However, ACHD issued IP9 as Final on April 16, 2020 without addressing ATI's comments and correcting numerous errors identified in ATI's February 11, 2020 Comment Letter. Accordingly, ATI filed a Notice of Appeal on May 15, 2020. ACHD and ATI are in the process of working together to address the errors and omissions from IP9.

The Department of Environmental Protection (Department) is proposing to submit a State Implementation Plan (SIP) 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 National Ambient Air Quality Standard.

Since it is our understanding that ACHD and the Department are in the process of making substantive revisions to several IPs, as well as ATI's IP9, DEP should acknowledge that several RACT permits are in the process of being revised based on appeals or requested revisions. The DEP should advise the EPA of this and suggest that, to the extent reasonable, EPA not proceed with SIP approval of any of those permits until DEP or ACHD issues revised RACT Permits. We believe that this action will be the most efficient way to proceed for all involved parties.

If you have any questions or require additional information, please do not hesitate to telephone me at (724) 226-5947 or email me at Deborah.Calderazzo@ATIMetals.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Deborah L. Calderazzo", with a long horizontal line extending to the right.

Deborah L. Calderazzo
Director, Environmental Affairs