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**Submitted via email to ecomments@pa.gov and
 via the eComment Tool at www.ahs.dep.pa.gov/eComment**

July 30, 2020

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

Dear Policy Office Representative:

**Re: “CTG RACT Certification SIP”
 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 National
 Ambient Air Quality Standard (50 Pa.B. 3172, June 27, 2020)**

Pursuant to the Pennsylvania Department of Environmental Protection’s (PADEP’s) notice of proposal to submit a State Implementation Plan (SIP) revision to the United States Environmental Protection Agency (EPA), as published in the June 27, 2020 *Pennsylvania Bulletin*, U. S. Steel is providing comments regarding the inclusion of certain permits in the proposed SIP revision.

While U. S. Steel acknowledges that the PADEP has an obligation to fulfill its RACT and SIP obligations, including the requirement of the conditional SIP approval of PADEP’s RACT program to issue final RACT determinations by May 9, 2020, we believe that PADEP should acknowledge as part of its submittal, that several of the specific permits identified in the proposed SIP revision should not be immediately pursued for inclusion as a SIP revision. The specific permits listed below are subject to consolidated notice of appeal proceedings and that the Allegheny County Health Department (ACHD) and U. S. Steel have been actively engaged in productive settlement discussions that we anticipate will result in the issuance of revised permits:

Facility	Permit No.	Issuance Date
U. S. Steel – Irvin Plant	0050-OP16B	April 16, 2020
U. S. Steel – Edgar Thomson Plant	0051-I008	April 21, 2020
U. S. Steel – Clairton Plant	0052-I020	April 24, 2020

Policy Office
Pennsylvania Department of Environmental Protection
July 30, 2020
Page 2

As provided in the notice in the *Pennsylvania Bulletin*, the ACHD is a separate delegated air pollution control agency under section 12 of the Air Pollution Control Act. Pursuant to this delegation authority, ACHD makes its own RACT case-by-case determinations, which the above referenced permits include.

U. S. Steel respectfully requests that PADEP advise the EPA that certain RACT permits identified in the submittal are under appeal and will most likely be revised. Because the permits are subject to change, ACHD and U. S. Steel are diligently working toward resolving the appeals of the permits, and, as U. S. Steel understands, ACHD permitting staff have been communicating regularly with EPA regarding considerations for possible revisions to the permits, U. S. Steel respectfully requests that PADEP clearly state as part of the submittal, that the EPA should await the resolution of the pending appeals before proceeding with case-by-case SIP approval of these specific permits. U. S. Steel does not expect that this would result in significant delays in the SIP process

While PADEP and ACHD have satisfied the obligation to complete RACT case-by-case determinations, the certification to EPA should include a statement that the three permits above are subject to revision. In addition, we respectfully note that submitting a proposed SIP revision and having EPA take action on the proposed SIP revision at this time is not appropriate and could lead to further inefficiencies during the SIP revision process.

U. S. Steel remains committed to working with ACHD, PADEP and EPA in expediting the issuance of revised permits to resolve the appeals, and thereafter, proceed with SIP approval of the revised RACT determinations.

Thank you for your careful consideration of these comments. Please contact me with any questions regarding this letter.

Regards,

A handwritten signature in blue ink, appearing to read "M. Winek", with a long horizontal flourish extending to the right.

cc: Chris Hardin (USS)
Mark Jeffrey (USS)
Jason Willis, Esq. (ACHD)
Mike Winek, Esq. (Babst Calland)