

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
)  
NITROGEN OXIDES EMISSIONS FROM ) R08-19  
VARIOUS SOURCE CATEGORIES: ) (Rulemaking - Air)  
AMENDMENTS TO 35 ILL. ADM. CODE )  
PARTS 211 and 217 )

**NOTICE OF FILING**

TO: Mr. John T. Therriault	Timothy Fox, Esq.
Assistant Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
100 W. Randolph Street	100 W. Randolph Street
Suite 11-500	Suite 11-500
Chicago, Illinois 60601	Chicago, Illinois 60601
<b>(VIA ELECTRONIC MAIL)</b>	<b>(VIA ELECTRONIC MAIL)</b>

**(SEE PERSONS ON ATTACHED SERVICE LIST)**

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the **POST-HEARING COMMENTS OF UNITED STATES STEEL CORPORATION**, a copy of which is herewith served upon you.

Respectfully submitted,

UNITED STATES STEEL  
CORPORATION,

Dated: March 23, 2009

By: /s/Katherine D. Hodge  
Katherine D. Hodge

Katherine D. Hodge  
Monica T. Rios  
HODGE DWYER & DRIVER  
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USSC:001/Fil/R08-19/NOF-COS -- Post-Hearing Comments

**THIS FILING SUBMITTED ON RECYCLED PAPER**

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**POST-HEARING COMMENTS OF  
UNITED STATES STEEL CORPORATION**

NOW COMES the UNITED STATES STEEL CORPORATION (“U.S. Steel”),  
by and through its attorneys, HODGE DWYER & DRIVER, and submits the following  
POST-HEARING COMMENTS for consideration in the above-referenced matter.

**I. INTRODUCTION**

Over the last several months, U.S. Steel has been actively participating in the  
above-referenced rulemaking, which seeks to establish NOx RACT requirements for a  
variety of affected sources, including U.S. Steel’s Granite City Works (“GCW”) facility  
in Granite City, Illinois. On November 25, 2008, U.S. Steel submitted pre-filed  
testimony by Larry Siebenberger, Manager of Environmental Control at GCW. U.S.  
Steel also submitted pre-filed testimony by Blake Stapper, of URS Corporation, on behalf  
of GCW.

Mr. Siebenberger stated that this proposed rulemaking would impact boilers, slab  
reheat furnaces and galvanizing lines at GCW. Prefiled Testimony of Larry G.  
Siebenberger, *In the Matter of: Nitrogen Oxides Emissions From Various Categories:  
Amendments to 35 Ill. Adm. Code Parts 211 and 217*, R08-19 at 5 (Ill.Pol.Control.Bd.  
Nov. 25, 2008) (hereafter “Siebenberger Testimony”). Mr. Siebenberger set forth the  
primary concerns regarding the effect of the proposed rules upon GCW’s slab reheat

furnaces and Boilers 11 and 12. *Id.* at 5-7. Mr. Siebenberger explained that Boilers 11 and 12, as well as the slab reheat furnaces, have a unique fuel mix. *Id.* at 6-7. Mr. Stapper described how the unique fuel mix for these units impacts NOx emissions and how those considerations, along with the operational and structural characteristics of the units, affect potential control mechanisms. Prefiled Testimony of Blake E. Stapper, *In the Matter of: Nitrogen Oxides Emissions From Various Categories: Amendments to 35 Ill. Adm. Code Parts 211 and 217*, R08-19 at 2-8 (Ill.Pol.Control.Bd. Nov. 25, 2008). Mr. Siebenberger's Pre-Filed Testimony set forth suggested alternative emission limits that would be acceptable to GCW. Siebenberger Testimony at Exhibits A and B.

Both Mr. Siebenberger and Mr. Stapper participated in the hearings on December 10, 2008, in this proceeding. At that time, both witnesses answered questions regarding their testimony. On January 30, 2009, U.S. Steel provided additional materials in response to requests at hearing for additional information concerning fuels, NOx emissions and potential NOx controls. On February 2, 2009, U.S. Steel submitted pre-filed testimony for Mr. Stapper, for the February 3, 2009 hearing. Both Mr. Siebenberger and Mr. Stapper participated in the February 3, 2009 hearing.

U.S. Steel has been working closely with the Illinois Environmental Protection Agency ("Agency") to resolve issues related to the unique circumstances at GCW. After a series of discussions, U.S. Steel and the Agency have reached agreement on how to determine the NOx emission limits for Boilers 11 and 12, as well as slab furnaces 1 through 4, and accordingly, U.S. Steel supports the Agency's proposed amendments to the rule. However, U.S. Steel wishes to provide clarification on the use of desulfurized coke oven gas ("COG"), as follows.

## II. DESULFURIZATION UNIT

As set forth in the Agency's amended proposal at new subsection 217.158(i), calculations for determining NOx limits during the averaging period will not include those periods when the COG desulfurization unit is shut down for maintenance so long as certain conditions are met, including advance notice of the shutdown and the shutdown does not exceed 35 days per ozone season or calendar year, consistent with Condition 2(a)(i) of existing Construction Permit No. 06070022. This provision will work very well for "planned" maintenance. However, it does not address brief unplanned outages and upsets of the COG desulfurization unit. Thus, U.S. Steel requests that the Board include a revision to the averaging provision to accommodate such brief outages and upsets, as well as startups and shutdowns, of the COG desulfurization unit. Such periods of time should be excluded from the averaging calculations since, like planned maintenance shutdowns, the COG desulfurization unit will not be operating. U.S. Steel commits to continuing to discuss this issue with the Agency as well.

Additionally, since construction on the COG desulfurization unit at GCW has not been completed, the proposed emission limitations are based on desulfurized COG having an estimated concentration of hydrogen cyanide or HCN of 130 ppm or less. The limitations associated with the use of desulfurized COG will have to be revisited once construction of the COG desulfurization unit is complete, if the actual concentration of HCN is greater than 130 ppm. U.S. Steel understands that a rule change may be involved at that time.

**III. CONCLUSION**

U.S. Steel appreciates the Agency's willingness to discuss the issues raised for its facility by the proposed rulemaking and thanks the Agency for its continued cooperation. Although U.S. Steel would like to continue discussion with the Agency on proposed Section 217.158(i), U.S. Steel finds the Agency's proposal acceptable for its units at GCW.

U.S. Steel reserves the right to supplement these post-hearing comments.

Respectfully submitted,

UNITED STATES STEEL  
CORPORATION,

Dated: March 23, 2009

By: /s/ Katherine D. Hodge  
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USSC:001/Fil/R08-19/Post Hearing Comments

**CERTIFICATE OF SERVICE**

I, Katherine D. Hodge, the undersigned, hereby certify that I have served the attached **POST-HEARING COMMENTS OF UNITED STATES STEEL**

**CORPORATION**, upon:

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