

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
) R08-19
NITROGEN OXIDES EMISSIONS FROM) (Rulemaking – Air)
VARIOUS SOURCE CATEGORIES:)
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
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(VIA ELECTRONIC FILING)	(VIA ELECTRONIC MAIL)

(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 **FIRST NOTICE PUBLIC COMMENT SUBMITTED BY ARCELORMITTAL USA, INC.** a copy of which is herewith served upon you.

Respectfully submitted,

By: 
Christina L. Archer

Dated: July 1, 2009

Christina L. Archer
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ARCELORMITTAL USA, INC.
1 South Dearborn, 19th Floor
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(312) 899-3865

CERTIFICATE OF SERVICE

I, Christina L. Archer, the undersigned, hereby certify that I have served the attached

FIRST NOTICE PUBLIC COMMENT SUBMITTED BY ARCELORMITTAL USA, INC.

upon:

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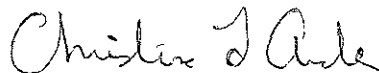
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Christina L. Archer

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
) R08-19
NITROGEN OXIDES EMISSIONS FROM) (Rulemaking – Air)
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FIRST NOTICE PUBLIC COMMENTS FOR THE ILLINOIS POLLUTION CONTROL BOARD SUBMITTED BY ARCELORMITTAL USA, INC.

Pursuant to 35 Ill. Adm. Code 102.108 and 102.604, these First Notice Public Comments for the Illinois Pollution Control Board (Board) are respectfully being submitted by ArcelorMittal USA Inc. on behalf of ArcelorMittal Riverdale Inc. (ArcelorMittal). On May 7, 2009, the Board published its Proposed Rule in this matter. On May 22, 2009, the First Notice of the Proposed Rule was published in the Illinois Register, triggering the forty-five (45) day window for the filing of public comments. ArcelorMittal previously submitted Pre-Filed Comments for the Illinois Environmental Protection Agency (Illinois EPA or Agency) on November 25, 2008, and Post-Hearing Comments for the Illinois EPA on March 23, 2009.

By way of background, ArcelorMittal's Riverdale, Illinois facility has a roller-hearth tunnel furnace equipped with ultra-low NOx burners (ULNBs), which processes thin cast steel slabs. The permitted NOx emission limit for the tunnel furnace is 0.171 lb/mmBTU. In its original filing in this matter on May 9, 2008, the Agency proposed a NOx emission limit for reheat furnaces (recuperative, combusting natural gas) of 0.05 lb/mmBTU and indicated to ArcelorMittal in subsequent conversations that the Agency believed ArcelorMittal's tunnel furnace was subject to this emission limit for reheat furnaces. Since that time, ArcelorMittal has participated in the hearings in this matter and has had many conversations with the Agency regarding the applicable emission limit and/or whether the tunnel furnace is subject to the

rulemaking. In response, in its Post-Hearing Comments and Second Motion to Amend Rulemaking Proposal on March 23, 2009, the Agency revised its proposed NOx emission limit for reheat furnaces to 0.09 lb/mmBTU. However, the Agency failed to provide any further technical or economical justification for the proposed emission limit and also failed to demonstrate the revised emission limit was based on Reasonably Available Control Technology (RACT). In contrast, ArcelorMittal believes it has successfully demonstrated in its previous comments that the initial NOx emission limit proposed by the Agency was arbitrary, technologically infeasible and economically unreasonable. Our comments now respectfully request the Board reconsider the proposed revised arbitrary emission limit (0.09 lb/mmBTU) requested by the Agency based on economic reasonableness, technical feasibility and product quality issues.

1. In support thereof, ArcelorMittal must address a few preliminary issues raised by the Board in its May 7, 2009 Notice of Proposed Rule. Throughout the Notice of Proposed Rule, the Board states that the Agency and ArcelorMittal have reached concurrence on the revised emission limit for reheat furnaces located at proposed section 35 Ill. Adm. Code 217.244(a)(2). *See R08-19, Proposed Rule. First Notice, May 7, 2009, pp. 6, 14, 20.* Unfortunately, that is not the case. Despite numerous conversations with the Agency regarding the applicability of this rulemaking and/or the appropriate emission limit, ArcelorMittal and the Agency have been unable to reach concurrence. Indeed, the next-to-last substantive communication between ArcelorMittal and the Agency was on March 17, 2009, wherein the Agency informed us via voicemail that due to time constraints they could only revise the applicable emission limit to 0.09 lb/mmBTU, but could not provide any justification for such. Then subsequently in its March 23, 2009 Post-Hearing Comments and Second Motion to Amend, the Agency revised its proposed

NOx emission limit for reheat furnaces to 0.09 lb/mmBTU.¹ Specifically, the Agency stated in its Post-Hearing Comments that it was revising the NOx limit for reheat furnaces based on a survey of NOx emission limits for similar furnaces constructed in other states in recent years, which we are assuming was supposed to demonstrate technical feasibility. In preparation for these First Notice Comments, we requested a copy of the summary prepared by the Agency, which is attached as Exhibit A.

2. We have now reviewed the summary of NOx emission limits for similar furnaces constructed in other states. One of the sources listed by the Agency is Beta Steel in Porter County, Indiana. The Agency provides a NOx emission limit for Beta Steel's natural gas fired reheat furnace slab 2 as 0.0147 lb/mmBTU. Upon subsequent investigation, we were able to determine that the 0.0147 lb/mmBTU limit cited by the Agency was the original permit limit based on manufacturer's estimates, which the source subsequently could not consistently meet. Beta Steel's current emission limit for its reheat furnace is 0.77 lb/mmBTU (more than 5 times greater than the emission limit cited by the Agency) based on a permit issued by the Indiana Department of Environmental Management (IDEM) on August 12, 2004. The applicable pages from Beta Steel's Part 70 Permit are attached as Exhibit B.

The Nucor Steel facility in Tuscaloosa, Alabama and V&M Star facility in Mahoning County, Ohio are also not similar to the Riverdale facility. Nucor has an equalizing furnace and

¹ ArcelorMittal recognizes that it did not file a response to the Agency's Second Motion to Amend pursuant to 35 Ill. Adm. Code 101.500(d) and the Board appears, at least in part, to rely on the fact that no party filed a response to the motion as evidence that all parties were in agreement with the proposal. However, as noted in Section 101.500(d), a waiver of objection does not subsequently bind the Board in its disposition of the motion. In addition, ArcelorMittal was confident that the Board would have recognized our arguments regarding economic reasonableness and technical feasibility contained in our Post-Hearing Comments notwithstanding the Agency's position. Finally, as will be addressed herein supra, the Agency relied on a survey of NOx emission limits from other states to support lowering the emission limit for reheat furnaces, but no documentation was provided. ArcelorMittal required additional time to review and provide comments on the subsequently-obtained documentation of NOx limits and did not wish to waste the Board's resources requesting an extension of time to respond to the Agency's motion, especially in light of the fact the Agency had already requested the Board expedite the rulemaking. Unfortunately, ArcelorMittal is now left trying to defend its position during First Notice period.

V&M Star has a billet furnace, both which operate much differently than the tunnel furnace at Riverdale. In addition, the Nucor facility produces slabs with a thickness of over 5 inches; whereas, as explained in our November 25, 2008 Pre-Filed Comments, the Riverdale facility produces thin slabs with a thickness of only 2 inches. Two of the facilities, New Steel International, Haverhill, Ohio and Minnesota Steel Industries LLC, Itasca County, Minnesota, have not been constructed to date. Finally, the Severstal Columbus, Mississippi facility is similar to the Riverdale facility, except the Severstal facility has two tunnel furnaces (which, as will be explained further herein in paragraph 4, can have an effect on the applicable emission limit), but has not yet been issued a final Title V permit. Therefore, achievement of the emissions limits for these facilities have not been demonstrated. The Agency's reliance on outdated, erroneous or never-applied-in-practice emission limits for "similar sources" certainly calls into question the Agency's arbitrary determination that 0.09 lb/mmBTU is technically feasible and the appropriate RACT-based limit for reheat furnaces.

3. As set forth in our Post-Hearing Comments and as will be briefly reiterated herein, ArcelorMittal believes it has established that the initial emission limit for reheat furnaces was not economically reasonable and the Agency's proposed revised emission limit does not change the analysis. The Illinois EPA's range of cost effectiveness of \$2,500 - \$3,000 per ton of emissions reduced. *See R08-19, Transcript from October 14, 2008 hearing, pp. 165-166, 173-174; Transcript from February 3, 2009 hearing, p. 75.* In addition, the Technical Support Document (TSD) for this rulemaking states that "\$5000/MMBtu/hr is towards the high end of the capital cost of combustion controls, for the levels of NO_x reduction envisioned in most cases, costs in \$/ton of NO_x are typically under \$1000/ton." *TSD, Section 6.4, p. 99.* In the preamble to the 8-hour Ozone implementation rule U.S. EPA states that a cost of \$160 to \$1,300 (in 1994 dollars) per ton of NO_x removed is considered reasonable for purposes of RACT (70 Fed. Reg.

71652, November 29, 2005). Furthermore, U.S EPA states that in the 1998 NOx SIP Call Rule they reviewed all major NOx source categories, and the NOx SIP Call controls cost less than \$2,000 per ton (Id. at 71654). In light of these control cost determinations, ArcelorMittal prepared an economic analysis for the Agency to review, which provided the estimated cost effectiveness for burner change based on the "next-generation" ULNBs currently available. The analysis was previously submitted to the Board in our Post-Hearing Comments. The cost effectiveness ranged from \$22,895 - \$39,472 per ton of NOx removed, well in excess of the Agency's established range of \$2,500 - \$3,000 per ton of emission reduction, U.S. EPA's determination of less than \$2,000 per ton and the TSD's reference of \$1,000 per ton. Furthermore, the emission guarantees for the burner changes submitted with our Post-Hearing Comments were 0.068 lb/mmBTU and 0.054 lb/mmBTU. While the Agency's proposed revised emission limit is 0.09 lb/mmBTU, this does not change the analysis that ArcelorMittal would have to install one of the two next-generation burners to meet the proposed revised limit, to which the cost effectiveness argument is still applicable. These cost estimates also assumed that rigid customer product quality specifications could be met and, conservatively, did not include yield cost impacts and the associated cost of production downtime to convert the furnace, both which would be substantial. ArcelorMittal continues to believe that an expenditure of over \$22,000 per ton of NOx controlled is economically unreasonable for a point source that contributes a meager 0.016% of the total Chicago area NOx inventory on a daily basis of 812 tons NOx/day for 2006.

4. The effect of changing burners on the operation of the tunnel furnace is also of great concern. Steel tunnel furnace burner designs are very particular to the furnace structure and slab type, so altering the burners or heat system can have significant effect on the slab quality. Burners, gas orifice plates and potentially primary air cycle valves would need to be

replaced. Additionally, air and gas piping modifications would need to be made at all of the burner connections and modifications would need to be made to shell plate and insulation to accommodate new block sizes and shapes.

Due to the continuous nature of the steel-making process and the lack of redundancy in the operation, the tunnel furnace must operate optimally at all times. Unlike other facilities that operate tunnel furnaces, the Riverdale facility does not have a second tunnel furnace or shuttle furnace that can be used to divert product between furnaces; nor does the Riverdale facility have any downstream finishing operations (such as pickling) to remove scale.

ArcelorMittal's Riverdale facility produces both high and low carbon grades and carbon alloy grade steel. Many of these grades (including high carbon grades with up to 0.95% carbon; carbon alloy grades with specific additions of chromium, nickel, molybdenum, and vanadium; and carbon grade steels with boron additions) are not typically produced at other facilities. ArcelorMittal has invested a great deal of time and effort in order to produce a unique product mix that is either breakout sensitive or ultra-light gauge. These two niches differentiate our facility from other steel-making facilities throughout the country.

5. In summary, these First Notice Comments are intended as a supplement to the information previously provided in our Pre-Filed Comments dated November 25, 2008, our Post-Hearing Comments dated March 23, 2009 as well as follow-up to the several rounds of hearings in this matter and informal discussions with the Agency. ArcelorMittal asserts that operationally and functionally, it is inappropriate to compare the Riverdale tunnel furnace to other reheat furnaces and/or attempt to utilize inappropriate, outdated or never-applied-in-practice emission limits for those reheat furnaces to extrapolate the emission limit for ArcelorMittal's tunnel furnace. ArcelorMittal remains committed to working with the Board throughout this rulemaking proceeding; however, we request that the Board revisit its Proposed Rule and for

Second Notice allow a source to be exempt from the proposed NOx emission limits upon an adequate demonstration that additional NOx controls would be economically unreasonable. ArcelorMittal believes it has met this burden and requests the utilization of the emission limit currently applicable and permitted for the tunnel furnace at ArcelorMittal's Riverdale, Illinois facility

Respectfully submitted,
ARCELORMITTAL USA, INC.

By: Christina L. Archer

Christina L. Archer

Dated: July 1, 2009

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Table: Summary of NOx Emissions from Reheat Furnaces

Note: Some data was taken directly from state contact

RBLC, Company Name, Location, Permit #	Furnace ID and Size	Permit Issuance Date	Permit Limits: lb/million Btu or lb/hr or gas usage rate or Hours/yr	Applicability
RBLC ID# AL-0218 Nucor Steel Tuscaloosa, Inc. Tuscaloosa, AL 35404 Permit # 413-0033	EQF-01 Equalizing Furnace 400 mmBtu/hr (replaces original) Originally Installed: 1996 Burners Replaced: 2008. ULNB (new Burners)	RBLC: Permit Date: June 6, 2006 Permit Issuance Date: Aug. 13, 2008 , N Gas-Fired	NOx=0.075 lb/mmBtu (NOx=30 lb/hr NOx) 8760 hrs/yr	Rule 335-3-24-.04(9) PSD/BACT
RBLC ID#: OH-0315 New Steel International, Haverhill, OH 45005 Permit #: 07-00587	2 Tunnel Furnaces P029-#1, P030-#2 187 mmBtu/hr N G. Fired tunnel furnaces	Permit Issuance Date: May 6, 2008 N Gas-Fired Furnaces and Heaters	NOx =0.07 lb/mmBtu , NOx=13.09 lb/hr each, 57.33 tpy 12 month rolling average. 8760 hrs/yr	OAC 3745-31-05(A)(3) PSD/BACT
RBLC ID#: Gallatin Steel, Ghent, KY Permit #: V03-031-R2 State Contact: Hossein Rukhshan	OR-1 , 124 mmBtu/hr Construction started in April 1993, Data from state contact ULNB	Jan. 15, 2009, N Gas-fired	NOx=0.09 lb/mmBtu, 7.26 lb/hr NOx 8760 hrs/yr N Gas use limitation: 1086 mmscf/yr	401 KAR 51:017
RBLC ID# Severstal Columbus, Columbus, MS State Contact: Bonnie Morgan 601-961-5784 Formerly: SeverCorr	Tunnel Furnace (1), 160 mmBtu/hr Data from state contact Tunnel Furnace (2), 130 mmbtu/hr 338 tons/hour steel	2005/August 2007	NOx = 0.10 lb/mmBtu	PSD/BACT
RBLC ID#: IN-0040, Beta Steel , Porter County , IN 46368 Permit #: CP 127-2326	Reheat Furnace Slab 2 , 264.6 mmBtu/hr LNB+SCR	Date Entered: 10/20/1992 Date Modified: 10/28/2002	NOx: 0.0147 lb/mmBtu, NOx: 14.7 lb/mmscf, 3.13 lb/hr (13.7 tpy) N Gas-fired	BACT/PSD
RBLC ID#: OH-0316, V & M Star (Mahoning County), OH 44510 Permit #: P0103660	Billet Reheat Furnace, Th'put: 0.18 mmscf/hr ULNB	9/23/2008	NOx = 0.07 lb/mm Btu NOx: 12.6 lb/hr NOx = 30.4 tons/yr (12 months Rolling)	PSD/BACT
RBLC ID#:MN-0070 Minnesota Steel Industries, LLC , Itasca County, MN 55769 (Essar SteelLtd.) Permit # 06100067-001	Tunnel Furnace, (165 mmbtu/hour) 205 tons steel/hr	9/7/2007	NOx: 0.03 lb/mmbtu, (4.9 lb NOx/hr) 0.0240 LB/T	PSD/BACT



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Beta Steel Corporation
6500 South Boundary Road
Portage, Indiana 46368**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T127-9691-00036	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 12, 2004 Expiration Date: August 12, 2009

1 st Administrative Amendment No.: T127-24021-00036	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Branch Chief Office of Air Quality	Issuance Date: January 30, 2007 Expiration Date: August 12, 2009

Beta Steel Corp.
Portage, Indiana
Permit Reviewer: Gail McGarrity

1st Administrative Amendment: 127-24021-00036
Amended by Pam K. Way

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SECTION D.2**FACILITY OPERATION CONDITIONS****Facility Description [326 IAC 2-7-5(15)]:**

Hot Strip Mill Operations with a maximum capacity of 1.16 MM ton per year steel production, comprised of the following:

- (a) One (1) 264.6 MMBtu/hour natural gas fired Reheat Furnace identified as unit 10, constructed in 1992, equipped with low NOx burners and a Selective Catalytic Reduction (SCR) Unit (CE-1), exhausting to Reheat Furnace Stack (S-1).
- (b) One (1) 60-inch Hot Strip Mill consisting of unit 11 (Hot Rolling Mill), unit 12 (Strip Cooling Line) and unit 13 (Coiler), constructed in 1991, having a maximum capacity of 170 tons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.2.1 Particulate Matter (PM/PM10) - Best Available Control Technology [326 IAC 2-2-3]**

- (a) Pursuant to CP 127-2326-0003, issued February 24, 1992, (as amended in A127-9642-00036, issued May 30, 2003) and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the PM/PM10 (where PM10 includes filterable and condensable components) emissions from the Slab Reheat Furnace shall not exceed 16.3 pounds per MMscf of natural gas burned and 4.2 pounds per hour (18.5 tons per year).
- (b) Pursuant to CP 127-2326-00036 issued February 24, 1992, (as amended in A127-9642-00036, May 30, 2003) and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements) the PM and PM-10 from the hot strip mill shall be limited by using recirculated high pressure water descalers and water cooling sprays. Any particulate matter, in solid or liquid form shall be collected in flumes and transported to the scale pit.

D.2.2 Nitrogen Oxides (NOx) Best Available Control Technology [326 IAC 2-2-3]

- (a) Pursuant to A127-9642-00036, issued May 30, 2003 (an amendment to CP 127-2326-00036, issued February 24, 1992) and 326 IAC2-2-3(2), Best Available Control Technology (BACT), only natural gas shall be burned in the slab reheat furnace and the
- (b) Pursuant to A127-9642-00036, issued May 30, 2003 (an amendment of CP 127-2326-00036 issued February 24, 1992) and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements) the NOx emissions from Slab Reheat Furnace shall be controlled by NOx control technology consisting of low NOx burners and a Selective Catalytic Reduction (SCR) Unit (CE-1).
- (c) NOx emissions shall not exceed 77.06 lbs/MMscf (0.077 lb/ MMBtu) of natural gas burned and 18.88 pounds per hour on a three (3) operating hour average basis except during periods of startup and shutdown.(82.69 tons/year)
- (d) The following shall apply during periods of startup and shutdown:
 - (1) Startup is defined as the duration from the first firing of burners in the Reheat Furnace to the time when the exhaust gas temperature is within the optimum ranges of the operation of the control device for NOx emissions.

Beta Steel Corp.
Portage, Indiana
Permit Reviewer: Gail McGarrity

1st Administrative Amendment: 127-24021-00036
Amended by Pam K. Way

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- (2) Shutdown is defined as the duration from first curtailment of fuel input to the Reheat Furnace burners with the intent of full shutdown to the final complete stop of fuel input and complete cessation of combustion in the Reheat Furnace.
- (3) The Reheat Furnace shall be operated in a manner consistent with good air pollution control and work practices to minimize emissions during startup and shutdown by operating in accordance with written procedures developed and maintained by the Permittee, which shall include at a minimum the following measures:
 - (A) Review of operating parameters of the unit during startup, or shutdown as necessary to make adjustments to reduce or eliminate excess emissions;
 - (B) Operate emission control equipment as soon as the Reheat Furnace exhaust gas temperature reaches the lower value of the optimum temperature range for the control equipment. This operation shall continue until the time the Reheat Furnace shutdown sequence is initiated with the intention of shutdown of the unit; and
 - (C) Implementation of inspection and repair procedures for the Reheat Furnace and the emissions control equipment prior to attempting startup to ensure proper operation.

D.2.3 Carbon Monoxide (CO) Best Available Control Technology [326 IAC 2-2-3]

Pursuant to A127-9642-00036 (an amendment of CP 127-2326-00036 issued February 24, 1992) and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the CO emissions from the Reheat Furnace shall not exceed 40 lb/MMscf of natural gas burned and 8.5 pounds per hour (37.2 tons/year).

D.2.4 Volatile Organic Compounds (VOC) Best Available Control Technology [326 IAC 2-2-3]

Pursuant to CP 127-2326-00036 issued February 24, 1992 (as amended in A127-9642-00036) and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the VOC emissions from the Reheat Furnace shall not exceed 1.7 lb/MMscf of natural gas burned and 0.4 pounds per hour (1.6 tons/year).

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Reheat Furnace (unit 10) and the SCR unit (CE-1).

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) Within a period of one (1) year from the date of the latest valid compliance demonstration, the Permittee shall perform PM/PM10 testing on the Reheat Furnace Stack (S-1), utilizing methods as approved by the Commissioner, in accordance with Section C - Performance Testing. PM10 includes filterable and condensable PM10. This test shall be repeated annually from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.