U. S. Steel
600 Grant Street
Pittsburgh, PA 15219-2749
412 433 1121

Environmental Affairs
Department

June 27, 1994

Mr. James W. Hagedorn
U. S. EPA
Air Enforcement Branch
Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: Notice of Violation Issued to USX Corporation for the
Clairton and Edgar Thomson Plant Operations
AFS#s 42-003-00032 and 42-003-00202

Dear Mr. Hagedorn:

Per our recent phone conversation, enclosed is a copy of U. S. Steel's June 13, 1994 letter which was sent to Allegheny County Bureau of Environmental Quality and copied to the Pennsylvania Department of Environmental Resources. As discussed, this letter includes NO_X emission data from Clairton Works and the Edgar Thomson Plant. The data were obtained from the Enhanced Monitoring Program, which utilizes parametric monitoring.

U. S. Steel looks forward to reaching an agreeable solution for all parties. Please contact me at (412) 433-5918 if I can provide any further information.

Very truly yours,

Lorraine Guevara

Lorraine E. Guevara
Senior Environmental Engineer

RECEIVED
JUN 30 1994
Enforcement Programs Section
EPA Region III

LEG/sm
Enclosure

c: R. Westman, Ph.D. - Allegheny County BEQ
J. Pezze - Pennsylvania DER

U. S. Steel
600 Grant Street
Pittsburgh, PA 15219-2749
412 433 1121

Environmental Affairs Department

June 13, 1994

Airborne Express Mail

Roger Westman, Ph.D.
Allegheny County Bureau of Environmental Quality
Division of Air Quality
301 Thirty Ninth Street
Pittsburgh, PA 15201

Dear Dr. Westman:

Re: **Title 25 Pennsylvania Code - Sec. 123.51**

U. S. Steel is currently monitoring NOx emissions from Edgar Thomson Plant Boilers No. 1, 2, and 3, and Clairton Works Boilers No. 1 and 2. The monthly NOx emission reports for these sources through May 1994 are enclosed.

Since you have recently become involved in this effort, a brief chronology is presented herein. The BEQ sent written notification to U. S. Steel on March 29, 1993 of the Title 25 Pennsylvania Code Section 123.51 requirement for continuous emission monitoring of NOx on "... all combustion units with a rated heat input of 250 million BTU's (MMBTU/HR) or greater and an annual average capacity factor greater than 30% to install Nitrogen Oxide (NOx) Continuous Emission Monitors (CEMs) ...". On May 4, U. S. Steel submitted a written request for approval of an alternative monitoring method to the BEQ, and subsequently met with them to discuss the proposal. On June 2, BEQ provided a written response that they would consider such an approach as allowed in PA Title 25 Sec. 123.51.

On February 1, 1994, U. S. Steel submitted an Enhanced Monitoring Plan (EMP) to monitor NOx emissions for Edgar Thomson Boilers No. 1, 2 and 3; the EMP for Clairton Works Boilers No. 1 and 2 was submitted March 28, 1994. U. S. Steel maintains that, because Clairton Battery "B" is a process rather than a combustion unit, continuous monitoring is inapplicable; thus an EMP was not submitted for Clairton Battery "B".

The NOx emission monitoring program, as described in the EMP's has been implemented at Edgar Thomson Plant and Clairton Works. The monitoring program accurately predicts NOx emissions by continuously monitoring the parametric variables of exit flue gas oxygen, boiler load, and fuel composition and quantity. Moreover, as indicated by the enclosed monitoring reports, the monitoring system has had 100 percent availability since implementation. Further, U. S. Steel proposes to perform annual NOx emissions stack testing to verify the accuracy of the monitoring program.

It is U. S. Steel's understanding that we are in compliance with PA Title 25 Sec. 123.51, and are in fact exceeding current Allegheny County Bureau of Environmental Quality monitoring requirements. Please contact me if I can provide any further information.

Very truly yours,

Lorraine Guevara

Lorraine E. Guevara
Sr. Environmental Engineer
433-5918

LEG/d(noxc.doc)
Attachment

cc: J. Pezze, PaDER

bc: C. G. Carson
C. Corbin
R. Dworek
W. Graeser
K. Mayher
H. R. McCollum
C. Schreiber
G. R. Topping
R. J. Weiskircher

MONTHLY ENERGY REPORT

11/93

FACILITY NUMBER 1046 - ET #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1047 - ET #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1048 - ET #3 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1049 - CLAIRTON #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1050 - CLAIRTON #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1346 - ET #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1347 - ET #2 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1348 - ET #3 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1349 - CLAIRTON #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1350 - CLAIRTON #2 BOILER FLUE GAS NOX LBS LBS

DAY	1046	1047	1048	1049	1050	1346	1347	1348	1349	1350
01	17.1	18.4	17.9	0.0	0.0	334.1	355.8	330.4	0.0	0.0
02	15.5	17.1	16.5	0.0	0.0	270.2	296.0	273.6	0.0	0.0
03	12.8	14.7	14.4	0.0	0.0	235.2	270.9	254.7	0.0	0.0
04	13.7	15.4	15.3	0.0	0.0	245.4	273.6	261.6	0.0	0.0
05	16.0	17.6	18.0	0.0	0.0	266.6	293.9	287.8	0.0	0.0
06	15.4	17.0	16.7	0.0	0.0	285.9	311.6	294.6	0.0	0.0
07	16.4	17.6	17.7	0.0	0.0	318.4	338.7	323.5	0.0	0.0
08	15.4	16.8	16.6	0.0	0.0	287.9	309.9	293.4	0.0	0.0
09	14.0	15.4	15.6	0.0	0.0	256.1	281.6	274.9	0.0	0.0
10	16.4	17.6	17.7	0.0	0.0	266.1	290.5	279.9	0.0	0.0
11	20.7	21.2	23.9	0.0	0.0	218.3	227.4	242.4	0.0	0.0
12	22.7	23.3	23.8	0.0	0.0	308.8	320.4	322.3	0.0	0.0
13	42.8	41.0	38.2	0.0	0.0	460.4	453.5	418.9	0.0	0.0
14	45.9	44.1	40.6	0.0	0.0	448.6	445.0	402.5	0.0	0.0
15	14.5	16.0	15.8	0.0	0.0	264.8	297.7	285.7	0.0	0.0
16	13.9	15.7	16.0	0.0	0.0	249.2	290.6	285.8	0.0	0.0
17	13.6	15.2	16.1	0.0	0.0	252.7	288.0	290.3	0.0	0.0
18	14.4	16.3	17.3	0.0	0.0	185.8	221.0	226.6	0.0	0.0
19	14.8	16.4	17.3	0.0	0.0	264.2	296.0	302.9	0.0	0.0
20	15.5	17.0	17.6	0.0	0.0	287.6	318.7	316.6	0.0	0.0
21	14.6	16.2	17.0	0.0	0.0	252.7	286.0	289.2	0.0	0.0
22	16.1	17.2	18.0	0.0	0.0	288.5	303.8	308.0	0.0	0.0
23	14.1	15.8	17.6	0.0	0.0	258.1	284.8	300.8	0.0	0.0
24	15.7	16.7	19.5	0.0	0.0	286.7	305.8	324.2	0.0	0.0
25	14.7	15.9	17.8	0.0	0.0	278.3	299.6	311.9	0.0	0.0
26	14.4	15.3	18.4	0.0	0.0	276.1	295.3	322.5	0.0	0.0
27	17.1	17.7	21.6	0.0	0.0	325.2	338.3	378.5	0.0	0.0
28	15.9	16.6	20.9	0.0	0.0	312.5	327.5	376.6	0.0	0.0
29	16.7	17.6	22.5	0.0	0.0	322.3	339.9	400.9	0.0	0.0
30	13.9	14.7	17.8	0.0	0.0	260.1	273.1	296.9	0.0	0.0
SUM	524.70	557.35	584.16	0.00	0.00	8566.75	9234.84	9277.70	0.00	0.00
AVG	17.5	18.6	19.5	0.0	0.0	285.6	307.8	309.3	0.0	0.0

10:12 AM WED., 25 MAY., 1994

MONTHLY ENERGY REPORT

12/93

FACILITY NUMBER 1046 - ET #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1047 - ET #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1048 - ET #3 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1049 - CLAIRTON #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1050 - CLAIRTON #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1346 - ET #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1347 - ET #2 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1348 - ET #3 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1349 - CLAIRTON #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1350 - CLAIRTON #2 BOILER FLUE GAS NOX LBS LBS

DAY	1046	1047	1048	1049	1050	1346	1347	1348	1349	1350
01	19.6	20.1	23.2	0.0	0.0	260.3	275.4	294.7	0.0	0.0
02	64.6	64.0	69.3	0.0	0.0	383.7	394.5	403.4	0.0	0.0
03	14.7	16.1	16.4	0.0	0.0	254.6	283.5	286.4	0.0	0.0
04	14.8	16.6	16.5	0.0	0.0	275.0	309.7	303.4	0.0	0.0
05	32.4	31.3	34.7	0.0	0.0	325.9	338.9	360.8	0.0	0.0
06	17.6	18.6	19.7	0.0	0.0	250.0	268.2	284.2	0.0	0.0
07	13.9	15.6	16.2	0.0	0.0	249.7	279.5	292.0	0.0	0.0
08	16.1	18.1	18.8	0.0	0.0	282.2	318.2	327.6	0.0	0.0
09	13.5	16.7	17.9	0.0	0.0	264.8	318.9	329.7	0.0	0.0
10	15.0	18.6	19.8	0.0	0.0	300.0	360.6	366.7	0.0	0.0
11	16.5	19.2	20.4	0.0	0.0	307.2	349.8	347.3	0.0	0.0
12	16.2	17.9	19.4	0.0	0.0	241.1	267.8	273.3	0.0	0.0
13	12.0	15.9	17.6	0.0	0.0	230.9	293.5	311.5	0.0	0.0
14	43.9	45.6	50.5	0.0	0.0	382.1	426.6	452.3	0.0	0.0
15	31.5	32.2	34.5	0.0	0.0	369.9	389.1	402.2	0.0	0.0
16	15.1	16.2	16.4	0.0	0.0	289.5	312.2	308.6	0.0	0.0
17	18.0	18.8	18.3	0.0	0.0	321.7	338.8	321.1	0.0	0.0
18	15.3	16.4	16.3	0.0	0.0	288.2	311.7	301.4	0.0	0.0
19	37.7	35.3	39.1	0.0	0.0	397.6	384.1	401.3	0.0	0.0
20	23.3	23.9	25.6	0.0	0.0	308.3	334.1	341.9	0.0	0.0
21	16.2	17.2	17.6	0.0	0.0	306.1	335.1	332.0	0.0	0.0
22	61.0	61.4	67.0	0.0	0.0	425.4	461.3	450.5	0.0	0.0
23	17.7	18.7	18.2	0.0	0.0	317.4	341.6	326.1	0.0	0.0
24	18.8	19.6	20.2	0.0	0.0	347.7	371.8	377.2	0.0	0.0
25	17.6	18.0	20.8	0.0	0.0	341.9	350.9	368.9	0.0	0.0
26	28.0	26.9	30.3	0.0	0.0	409.9	409.3	378.8	0.0	0.0
27	17.1	18.6	19.2	188.6	162.0	324.6	361.7	319.7	2665.4	2157.6
28	16.6	18.0	19.1	187.1	153.8	326.0	360.7	331.0	2694.8	1965.0
29	16.8	17.9	19.5	185.2	151.5	314.5	343.1	334.6	2587.3	1853.5
30	16.4	17.9	20.7	185.2	152.9	317.6	356.0	362.1	2517.4	1879.7
31	16.8	18.0	20.7	232.4	182.2	318.1	352.1	360.2	3208.3	2239.8
SUM	694.57	729.41	783.46	978.58	802.45	9731.92	10599.14	10650.96	13673.13	10095.58
AVG	22.4	23.5	25.3	31.6	25.9	313.9	341.9	343.6	441.1	325.7

10:12 AM WED., 25 MAY., 1994

MONTHLY ENERGY REPORT

1/94

FACILITY NUMBER 1046 - ET #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1047 - ET #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1048 - ET #3 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1049 - CLAIRTON #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1050 - CLAIRTON #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1346 - ET #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1347 - ET #2 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1348 - ET #3 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1349 - CLAIRTON #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1350 - CLAIRTON #2 BOILER FLUE GAS NOX LBS LBS

DAY	1046	1047	1048	1049	1050	1346	1347	1348	1349	1350
01	16.7	17.2	20.7	265.8	216.0	308.2	328.4	352.9	3654.7	2619.1
02	11.9	13.5	21.8	262.7	218.5	226.2	267.9	203.8	3606.0	2775.6
03	14.0	15.5	1.1	261.6	218.7	231.8	277.4	3.1	3603.0	2773.0
04	11.4	13.0	0.0	273.7	227.4	218.9	263.2	0.0	3918.8	2742.0
05	12.5	13.3	0.0	265.1	218.4	232.0	262.3	0.0	4042.1	2414.9
06	14.0	14.7	0.0	260.9	211.1	248.6	276.3	0.0	3754.8	2366.7
07	13.3	14.3	0.0	260.8	208.2	240.8	272.2	0.0	3638.0	2443.2
08	12.1	13.6	0.0	264.1	208.8	229.6	267.2	0.0	3714.1	2472.7
09	11.4	13.3	29.2	274.0	218.3	204.8	248.0	96.8	3966.5	2732.2
10	12.6	13.8	41.5	277.5	205.3	197.2	220.1	265.5	4287.5	2277.8
11	10.1	11.9	13.8	240.8	209.2	168.0	203.0	243.3	4071.3	2343.5
12	12.1	13.5	13.9	259.6	203.4	210.9	240.1	249.1	4062.9	2326.1
13	11.5	13.0	14.0	254.2	214.7	192.6	223.5	240.4	4358.1	2283.2
14	27.9	30.0	32.6	279.1	218.8	256.8	285.5	285.6	4356.9	2487.0
15	14.3	15.2	15.5	292.2	218.6	239.6	261.6	263.0	4812.9	2565.7
16	13.4	14.3	14.8	283.2	212.0	227.5	250.4	261.6	4697.9	2415.7
17	13.0	14.0	14.5	275.8	214.8	223.2	247.6	262.7	4361.8	2375.3
18	12.3	17.8	14.5	272.9	213.7	210.3	261.7	248.7	4339.2	2350.4
19	19.4	19.8	20.7	245.9	205.2	257.6	258.9	270.3	5382.2	2233.0
20	13.0	14.5	15.5	237.5	212.1	176.2	208.8	225.6	5022.8	2248.0
21	13.4	15.0	15.4	257.4	220.5	200.8	230.9	232.8	4888.0	2368.4
22	11.9	13.5	13.7	236.8	208.4	202.1	235.1	247.9	5313.1	2130.8
23	13.7	14.9	14.1	254.2	214.8	236.2	263.3	262.9	5524.7	2437.0
24	13.3	22.1	17.7	294.1	221.3	134.0	197.7	180.1	4968.4	2704.4
25	16.9	19.2	22.2	286.4	226.4	134.9	169.6	185.8	4499.5	2872.4
26	14.2	16.6	17.6	305.4	216.9	146.6	189.3	196.1	5011.5	2562.4
27	14.5	16.6	20.7	310.5	223.1	180.0	221.9	260.1	5206.6	2734.2
28	14.3	15.1	13.9	295.0	212.0	249.8	270.7	263.9	4732.1	2422.6
29	13.4	14.5	14.1	283.5	227.9	228.7	257.8	254.3	4377.6	2421.8
30	14.1	14.6	14.0	244.9	204.5	248.7	268.2	257.1	3807.0	2050.9
31	13.7	14.3	13.7	226.0	210.1	234.9	256.6	247.4	3930.4	2044.1
SUM	430.20	482.65	461.01	8301.26	6659.20	6697.77	7685.13	6060.74	135910.59	75994.09
AVG	13.9	15.6	14.9	267.8	214.8	216.1	247.9	195.5	4384.2	2451.4

10:11 AM WED., 25 MAY., 1994

MONTHLY ENERGY REPORT

2/94

FACILITY NUMBER 1046 - ET #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1047 - ET #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1048 - ET #3 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1049 - CLAIRTON #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1050 - CLAIRTON #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1346 - ET #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1347 - ET #2 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1348 - ET #3 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1349 - CLAIRTON #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1350 - CLAIRTON #2 BOILER FLUE GAS NOX LBS LBS

DAY	1046	1047	1048	1049	1050	1346	1347	1348	1349	1350
01	13.0	14.0	14.2	241.2	202.0	205.0	230.5	227.9	4175.3	2014.1
02	12.6	12.8	13.3	247.8	203.1	211.5	227.2	237.3	4291.3	2040.7
03	12.5	13.8	14.1	270.7	200.3	198.5	228.3	229.0	4027.6	2076.3
04	15.3	14.7	13.8	259.7	203.2	255.7	258.7	248.2	4274.0	2038.4
05	16.1	15.6	13.7	277.5	206.0	287.0	295.2	266.9	4246.5	2143.0
06	15.7	15.2	13.7	291.4	208.7	276.5	281.0	262.3	4628.4	2305.6
07	15.1	15.1	14.0	289.7	210.9	253.2	266.2	255.7	4527.8	2241.2
08	15.1	15.3	14.7	275.9	204.8	238.2	255.7	249.8	4207.7	2142.4
09	12.6	14.1	13.8	287.3	215.3	192.3	232.3	227.7	4470.1	2368.5
10	23.3	23.7	23.0	280.5	206.6	203.9	227.5	202.0	4223.4	2170.8
11	12.6	13.8	14.8	264.9	191.6	185.6	212.9	219.4	3792.8	1801.6
12	16.0	15.9	15.7	258.5	194.3	301.2	308.3	300.6	3707.3	1901.3
13	16.7	16.2	15.3	259.8	196.1	314.3	316.1	292.3	3786.3	1917.1
14	16.2	15.8	15.0	259.0	193.5	298.5	303.6	282.0	3731.7	1874.6
15	16.7	14.6	14.3	261.1	191.5	275.8	282.8	275.0	3809.5	1865.1
16	14.9	14.4	14.7	264.1	192.2	269.1	268.6	276.6	3838.7	1841.1
17	15.6	15.0	15.4	269.5	191.3	288.0	285.7	294.0	4004.9	1854.8
18	17.6	14.3	17.2	271.0	188.1	261.4	256.8	283.6	4045.2	1818.5
19	14.2	15.4	14.8	269.5	189.5	265.5	292.4	286.7	3985.6	1792.9
20	16.7	17.7	16.9	270.7	195.9	328.4	351.1	340.4	3970.6	1936.5
21	14.9	16.2	15.5	269.5	200.0	273.4	300.2	288.9	3952.4	2080.1
22	12.9	14.6	14.3	269.0	206.9	229.1	263.8	262.2	3917.0	2314.3
23	13.0	14.4	14.0	264.6	202.2	234.6	263.9	263.8	3876.4	2234.1
24	14.0	15.5	15.5	267.3	192.1	234.2	264.4	269.8	3877.1	1933.2
25	13.9	15.4	14.6	268.1	191.4	262.7	293.1	280.4	3908.4	1931.9
26	12.9	14.6	14.3	262.3	190.3	237.7	273.6	267.6	3764.3	1875.7
27	15.6	16.7	16.3	271.5	196.6	302.6	323.1	309.7	3901.0	1929.2
28	8.1	15.4	14.9	272.6	196.5	119.3	305.0	290.5	3910.1	1932.7
SUM	413.88	430.18	421.94	7514.50	5560.65	7003.27	7668.17	7490.13	112851.45	56375.67
AVG	14.8	15.4	15.1	268.4	198.6	250.1	273.9	267.5	4030.4	2013.4

10:10 AM WED., 25 MAY., 1994

MONTHLY ENERGY REPORT

3/94

FACILITY NUMBER 1046 - ET #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1047 - ET #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1048 - ET #3 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1049 - CLAIRTON #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1050 - CLAIRTON #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1346 - ET #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1347 - ET #2 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1348 - ET #3 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1349 - CLAIRTON #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1350 - CLAIRTON #2 BOILER FLUE GAS NOX LBS LBS

DAY	1046	1047	1048	1049	1050	1346	1347	1348	1349	1350
01	0.0	16.7	16.2	263.2	201.3	0.0	320.2	323.2	3780.3	2078.4
02	0.5	37.6	38.1	265.3	202.9	0.8	391.4	373.7	3849.2	2203.5
03	0.0	15.4	16.0	258.0	202.0	0.0	311.7	318.5	4242.4	2209.4
04	0.0	15.3	15.0	268.9	195.0	0.0	306.7	302.9	4207.9	2086.3
05	0.0	14.7	14.1	276.2	194.7	0.0	289.0	277.4	4265.6	1911.9
06	1.5	17.2	16.3	280.8	208.8	0.1	310.6	293.3	4396.3	2356.2
07	22.7	16.4	16.3	279.6	210.6	145.9	259.2	259.6	4232.2	2299.2
08	17.5	20.2	19.2	280.8	214.0	160.3	188.9	190.4	4286.7	2538.6
09	15.8	15.1	15.8	274.1	203.0	224.8	233.8	253.1	4215.4	2131.3
10	11.5	16.1	16.3	267.9	195.8	202.6	293.1	310.1	4138.4	2101.5
11	13.9	17.8	17.4	268.9	189.3	228.9	304.0	308.4	3986.8	1859.8
12	11.4	17.3	16.7	272.5	190.1	202.3	303.8	310.4	4058.5	1906.8
13	11.9	19.2	18.0	263.2	216.7	218.4	339.0	334.0	3806.7	2525.9
14	11.8	18.6	17.2	272.1	204.3	191.1	305.7	297.0	4133.9	2283.5
15	10.2	18.9	17.1	276.9	199.7	194.7	335.5	322.7	4330.9	2237.5
16	13.9	20.4	18.9	270.3	186.1	229.6	330.1	316.6	4108.8	1821.4
17	13.7	18.9	17.3	271.4	193.5	228.9	302.8	283.7	4097.6	2004.4
18	98.6	73.6	95.5	263.4	191.2	578.2	468.3	607.5	3833.1	1852.5
19	51.0	83.5	49.0	273.8	204.3	347.4	502.8	357.0	4069.8	2181.9
20	88.5	86.1	87.7	286.1	214.4	566.7	569.3	612.9	4442.7	2487.9
21	82.5	90.6	79.4	272.2	201.0	417.3	489.4	460.1	4020.5	2101.7
22	101.4	89.4	96.0	285.3	205.6	615.1	513.5	623.0	4442.6	2272.1
23	91.7	81.4	80.8	290.8	202.1	857.6	683.8	794.2	4644.6	2204.7
24	116.1	83.7	103.1	289.2	202.0	996.0	692.5	926.4	4632.4	2233.8
25	99.4	78.9	93.4	284.5	210.5	915.5	663.5	882.4	4339.2	2294.5
26	103.5	78.6	106.8	287.6	206.9	899.7	652.3	978.6	4531.9	2273.6
27	89.2	78.2	93.1	283.0	211.6	793.2	643.3	863.8	4444.1	2306.9
28	88.3	79.8	92.9	281.8	214.0	785.3	660.2	864.3	4373.7	2270.0
29	59.3	71.0	63.0	288.5	218.5	575.4	602.5	632.8	4563.8	2573.3
30	33.3	31.4	35.0	298.6	215.3	422.0	399.6	454.5	4791.5	2446.8
31	28.9	28.0	29.4	293.1	217.5	406.9	399.9	425.5	4637.6	2503.1
SUM	1288.04	1350.15	1411.08	8587.90	6322.64	11404.93	13066.58	14557.94	131905.09	68558.42
AVG	41.5	43.6	45.5	277.0	204.0	367.9	421.5	469.6	4255.0	2211.6

10:10 AM WED., 25 MAY., 1994

MONTHLY ENERGY REPORT

4/94

FACILITY NUMBER 1046 - ET #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1047 - ET #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1048 - ET #3 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1049 - CLAIRTON #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1050 - CLAIRTON #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1346 - ET #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1347 - ET #2 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1348 - ET #3 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1349 - CLAIRTON #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1350 - CLAIRTON #2 BOILER FLUE GAS NOX LBS LBS

DAY	1046	1047	1048	1049	1050	1346	1347	1348	1349	1350
01	23.3	24.2	24.5	298.1	208.0	371.3	405.8	406.0	4840.7	2256.4
02	18.1	20.5	19.0	292.2	220.0	339.9	377.7	367.4	4622.5	2631.1
03	17.3	19.5	18.1	291.5	212.3	320.4	353.5	345.3	4445.0	2288.8
04	16.9	19.7	18.9	288.7	202.2	281.6	319.0	322.6	4536.5	2146.3
05	14.8	16.8	16.1	284.3	197.5	275.4	305.5	310.5	4391.3	2038.7
06	15.4	17.3	16.0	277.4	199.6	286.3	319.1	311.1	4267.6	2084.0
07	14.3	16.3	15.7	296.9	211.1	258.3	291.6	293.7	4883.1	2445.9
08	14.6	17.0	16.7	300.8	206.5	263.6	307.3	304.2	4973.7	2299.0
09	15.2	16.8	15.9	296.6	213.3	282.2	316.7	309.2	4757.2	2430.1
10	14.5	15.7	15.7	295.7	213.7	275.1	302.3	310.6	4758.6	2373.2
11	18.0	19.6	19.0	57.6	232.9	322.3	351.6	353.2	843.3	2996.3
12	16.4	17.5	17.0	0.3	234.5	310.4	335.9	333.0	0.0	3195.6
13	17.5	19.3	18.8	0.8	228.8	313.3	350.3	348.5	0.0	3201.1
14	16.0	17.0	16.9	137.2	203.1	290.2	313.0	318.3	1842.2	2425.1
15	16.6	16.3	17.5	290.3	198.2	322.0	322.7	349.5	4748.8	2255.5
16	15.3	15.5	16.4	288.4	197.8	288.4	296.2	319.6	4666.1	2145.3
17	16.7	17.1	17.9	291.1	212.0	313.2	321.3	344.7	4707.2	2431.3
18	16.2	17.7	18.0	288.7	213.5	272.9	294.8	315.1	4648.8	2400.5
19	19.2	20.9	22.0	279.6	192.8	276.5	304.1	325.9	4352.5	1925.3
20	15.7	15.9	16.8	259.9	199.0	293.8	302.4	322.4	3703.5	2194.3
21	36.2	35.4	37.8	276.3	201.7	319.4	344.3	375.4	4214.6	2265.3
22	16.5	18.0	18.1	296.2	212.1	288.6	312.8	333.9	4826.4	2546.1
23	19.1	20.8	21.3	281.9	208.5	308.9	332.2	358.9	4341.8	2356.2
24	17.8	18.0	18.4	290.6	217.2	340.9	350.0	371.6	4613.6	2529.0
25	16.6	16.2	17.5	258.2	222.6	317.3	313.6	353.9	3367.8	2906.3
26	15.7	15.1	17.0	240.8	220.3	296.5	287.6	341.2	2906.4	2934.1
27	16.2	16.3	18.9	239.4	223.5	280.8	284.6	343.9	2880.9	3033.4
28	16.3	15.1	16.3	243.4	223.8	308.7	299.5	333.3	2908.9	2984.2
29	17.0	16.0	17.2	235.9	220.2	313.9	306.9	341.7	2744.4	2873.9
30	17.3	15.1	17.2	233.2	222.7	330.0	305.1	347.9	2709.4	2910.8
SUM	520.55	546.51	556.88	7411.85	6369.47	9062.18	9627.05	10112.56	111503.00	75503.33
AVG	17.4	18.2	18.6	247.1	212.3	302.1	320.9	337.1	3716.8	2516.8

9:53 AM WED., 25 MAY., 1994

MONTHLY ENERGY REPORT

5/94

FACILITY NUMBER 1046 - ET #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1047 - ET #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1048 - ET #3 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1049 - CLAIRTON #1 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1050 - CLAIRTON #2 BOILER FLUE GAS NOX PPM PPM
FACILITY NUMBER 1346 - ET #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1347 - ET #2 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1348 - ET #3 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1349 - CLAIRTON #1 BOILER FLUE GAS NOX LBS LBS
FACILITY NUMBER 1350 - CLAIRTON #2 BOILER FLUE GAS NOX LBS LBS

DAY	1046	1047	1048	1049	1050	1346	1347	1348	1349	1350
01	17.6	15.1	18.0	234.6	222.5	330.1	298.6	353.7	2741.3	2917.7
02	25.4	24.0	27.3	240.9	223.0	366.3	353.2	413.9	2843.2	3004.8
03	17.1	16.5	17.2	242.8	217.0	317.2	315.0	334.8	3053.2	2833.5
04	27.8	26.0	28.9	271.3	200.1	372.3	353.1	401.5	4170.9	2196.3
05	85.5	83.6	89.3	279.3	193.3	479.5	542.6	576.4	4280.5	1982.3
06	54.9	19.7	20.5	281.2	198.9	581.7	317.2	341.5	4315.1	2086.4
07	44.9	15.2	14.9	289.8	209.0	576.7	303.0	308.5	4246.1	2235.1
08	45.7	23.7	26.6	287.1	202.5	555.1	363.6	416.7	4303.6	2062.0
09	34.1	15.8	17.6	287.8	198.6	428.7	270.3	316.8	4324.9	1981.2
10	15.4	18.3	17.8	292.6	211.2	260.7	309.4	311.3	4488.1	2295.3
11	15.4	17.7	17.3	293.4	213.6	266.2	300.0	309.3	4478.0	2393.3
12	15.2	17.7	17.3	276.5	202.9	263.2	296.6	308.6	4090.4	2130.1
13	14.5	17.4	16.9	264.6	198.2	261.9	304.5	313.7	3760.3	2067.5
14	14.6	17.4	16.7	303.8	211.6	261.9	298.7	308.2	4883.5	2352.7
15	18.1	21.4	20.3	291.2	214.2	309.2	352.3	349.7	4509.6	2472.0
16	15.3	18.5	26.6	263.7	200.6	232.8	270.7	349.7	3469.0	2062.6
17	15.5	18.3	17.6	260.4	198.0	274.1	315.0	321.0	3323.1	1973.1
18	22.8	18.2	17.7	275.4	208.1	346.9	319.9	328.0	3965.3	2270.6
19	19.6	24.2	24.2	256.0	192.4	281.5	339.3	348.6	3373.8	1816.2
20	16.3	19.0	18.2	256.8	203.7	305.4	343.6	347.9	3324.0	2008.9
21	12.7	10.0	16.0	293.9	220.3	242.0	130.3	319.1	4619.6	2546.4
22	11.3	0.3	14.8	308.2	220.9	220.1	0.1	300.2	5103.0	2562.7
23	15.4	1.0	19.6	282.5	214.2	248.3	0.4	323.1	4340.9	2416.6
24	10.6	0.6	14.2	279.5	208.4	200.0	1.1	275.8	4226.0	2304.7
25	14.8	0.0	18.2	263.6	198.0	240.2	0.0	306.5	3730.4	2011.0
26	11.3	0.0	14.1	264.8	204.1	219.3	0.0	287.9	3756.7	2243.5
27	11.0	0.0	13.9	270.5	205.0	212.0	0.0	282.6	3825.5	2232.1
28	11.0	0.0	14.4	270.8	208.8	213.4	0.0	292.1	3853.6	2353.4
29	11.2	0.0	14.5	286.6	205.0	216.3	0.0	292.7	4358.6	2270.1
30	11.0	0.7	14.4	279.8	204.6	210.7	1.0	285.3	4155.1	2234.4
31	14.3	0.0	16.8	288.6	206.4	259.4	0.0	316.0	4388.1	2321.0
SUM	670.37	460.02	641.67	8537.96	6414.93	9553.07	6699.41	10341.06	124301.42	70637.41
AVG	21.6	14.8	20.7	275.4	206.9	308.2	216.1	333.6	4009.7	2278.6

4:57 PM THU., 2 JUN., 1994

The NOx emission monitoring program, as described in the EMP's has been implemented at Edgar Thomson Plant and Clairton Works. The monitoring program accurately predicts NOx emissions by continuously monitoring the parametric variables of exit flue gas oxygen, boiler load, and fuel composition and quantity. Moreover, as indicated by the enclosed monitoring reports, the monitoring system has had 100 percent availability since implementation. Further, U. S. Steel proposes to perform annual NOx emissions stack testing to verify the accuracy of the monitoring program.

It is U. S. Steel's understanding that we are in compliance with PA Title 25 Sec. 123.51, and are in fact exceeding current Allegheny County Bureau of Environmental Quality monitoring requirements. Please contact me if I can provide any further information.

Very truly yours,

Lorraine Guevara

Lorraine E. Guevara
Sr. Environmental Engineer
433-5918

LEG/d(noxc.doc)
Attachment

cc: J. Pezze, PaDER