USS ENVIRONMENTAL AFFAIRS DEPARTMENT
600 Grant Street, Room 2287
Pittsburgh, PA 15219-2749

FAX: 412-433-5920 (Steelcom 8-723-5920)

TO: JIM HAGEDORN

LOCATION: US EPA

DATE: 8/2/94

FROM: LORRAINE GUEVARA

PHONE: 412/433-5918

NO. OF PAGES TO FOLLOW: 3

MESSAGE:

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

Environmental Affairs Department

August 1, 1994

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

Dear Mr. Hagedorn:

Re: **Notice of Violation Issued to USX Corporation for the Clairton and Edgar Thomson Plant Operations AFS No. 42-003-00032 and No. 42-003-00202**

We appreciated the opportunity to meet with you to address the Notice of Violation (NOV). Per our conference, we are providing the following information:

1. Proposed schedule for engineering, installation, and start-up of Continuous Emission Monitors (CEMs) on Edgar Thomson Boilers No. 1, 2, and 3, Clairton Boilers No. 1 and 2, and Clairton Battery "B."

2. Estimated costs for installation, operation, and maintenance of CEMs on the above-referenced sources.

3. Costs spent to date to develop and implement the alternative monitoring system, which is currently used to monitor NOx from the five boilers.

Schedule

The total time for engineering, installation, and start-up of CEMs is estimated to be 42 weeks for the boilers and 44 weeks for Battery "B," assuming PaDER review and approval of the Phase I application within 30 days. The attached installation schedule provides a breakdown by task (**Attachment 1**).

CEM Installation and Operation Costs

1. **Engineering, Installation and Start-Up.** The total estimated cost for engineering, installation, and start-up of CEMs at Edgar Thomson Boilers No. 1, 2 and 3, Clairton Boilers No. 1 and 2, and Clairton Battery "B" is $960,000, based on current pricing of July 1994.

2. **Operation and Maintenance.** The total annual estimated operation and maintenance cost for all six CEMs is $200,000.

Alternative Monitoring Costs

As discussed, U. S. Steel evaluated and implemented a parametric monitoring system and is currently monitoring NOx emissions utilizing this system. The costs to develop and implement this system include engineering, consultant costs, testing, and data acquisition equipment purchase and installation. The total alternative monitoring cost is $140,514.

Please note that the above total does not include the costs of plant and headquarters man-hours for internal meetings, agency meetings, contractor selection and oversight, preparation of protocol, engineering evaluation, report review and preparation, and contract administration, which are estimated to be in excess of $9,000.

It is U. S. Steel's understanding that your office will review this information and provide us with your comments. Please contact me (412/433-5918) if you require any additional information.

Very truly yours,

Lorraine Guevara

Lorraine E. Guevara
Senior Environmental Engineer

LEG/d/1 044
Attachment

cc. J. Pezze - PaDER, Pgh.

Attachment 1

Installation Schedule
NO_x CEM - Clairton & Edgar Thomson Works

	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May.	Jun.
Pre-authorization Engineering (6 weeks)	x--------x										
Sumbittal Phase I Application		x									
Approval from DER (4 weeks)*			x								
Equipment Delivery (18 weeks)			x----------x								
Installation (8 weeks)						x----------x					
Testing & Checkout (4 weeks)									x--------x		
Certification "boilers" (2 weeks)										x---x	
Cetrification "coke battery" (4 weeks)										x-------x	

*Schedule based on DER approval in 30 days.

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**********-JOURNAL-********** DATE AUG-02-1994 **** TIME 08:36 ********

DATE/TIME = AUG-02 08:33

JOURNAL NO. = 09

COMM.RESULT = OK

PAGES = 05

DURATION = 00:02'13

MODE = XMT

STATION NAME =

TELEPHONE NO. = T 919541 0942

RECEIVED ID = 919 541 0942

RESOLUTION = STANDARD

$345,000

$314000 BEN if subtract para monit costs from $760000 capital cost

$286000 if say one time cost, not recurring

used: 810000 - Cap Costs
200000 - O+M (annual)
11/93 - First non comply
6/95 - Comp date
12/94 - Penalty pay date

-EPA RS EAB -

919 541 1136- **********