UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

United States Steel Corporation – Gary Works
One North Broadway
Gary, Indiana 46402-3199

Attention: Kenneth Mentzel, Manager, Environmental Control

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency ("EPA") is requiring United States Steel Corporation (US Steel, you) to submit certain information about your facility in Gary, Indiana (Facility). Appendix B specifies the information that you must submit. Unless explicitly noted in Appendix B, you must send this information to us within thirty (30) calendar days after you receive this request.

We are issuing this information request under section 114(a) of the Clean Air Act (the "Act"), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of the EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

US Steel owns and operates an emission source or sources at its Gary, Indiana, facility. We are requesting this information to determine whether emission sources at the facility are complying with the Indiana State Implementation Plan and the Clean Air Act.

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5

77 West Jackson Boulevard
Chicago, Illinois 60604

with copies to Indiana Department of Environmental Management:

Thomas Easterly, Commissioner
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

You may consider the information confidential that you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information under 40 C.F.R. Part 2, Subpart B. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims.

US Steel must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response to this request for information without staples. Paper clips, binder clips,

and 3-ring binders are acceptable.

Failure to comply fully with this request for information may subject US Steel to an enforcement action under section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Brian Dickens at (312) 886-6073 or Daniel Schaufelberger at (312) 886-6814.

_____
Date

_____
Stephen Rothblatt, Director
Air and Radiation Division

Protecting the environment is everyone's responsibility. Help EPA fight pollution by reporting possible harmful environmental activity.
To do so, visit EPA's website at http://www.epa.gov/compliance/complaints/index.html

Appendix A

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 C.F.R. § 2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamped or typed legend, or other suitable form of notice, should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. Environmental Protection Agency (EPA) only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail

as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, <u>explain with specificity</u> why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.

8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air-

> Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;
>
> Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and
>
> A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

If you receive a request for a substantiation letter from the EPA, <u>you bear the burden of substantiating your confidentiality claim</u>. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Appendix B

1. Provide the date of the most recent reline for each furnace 4, 6, and 8. For each most recent furnace reline, provide a narrative description of the changes made to the furnace, explaining the difference in refractory, controls or any other change that was not an exact replacement in kind. Provide the production from each furnace for the 4 years prior to the most recent reline and 4 years after the most recent reline, in tons of hot metal per hour.

2. Provide the emissions of hydrogen cyanide (HCN) from blast furnace operations for each blast furnace. Provide a narrative description of how US Steel calculated or measured these emissions.

3. Provide a narrative description of how US Steel complies with the VOC reduction requirements stated in 326 IAC 8-7. State if US Steel submitted a RACT plan to IDEM as part of its method of compliance and if so, provide a copy of that plan as it existed on May 14, 2007.

4. Provide instances in which the particulate matter limit found in 326 IAC 6.8-1-2(a) and in Section D.8.3 and D.9.3 of US Steel's Title V permit was not met for the roof monitors of No. 1 BOP Shop and No. 2 Q-BOP Shop in the period January 1, 2002 to the date of receipt of this letter. Provide a narrative description of how US Steel complies with the particulate emission limit stated in 326 IAC 6.8-1-2(a).

5. Provide the number of hours that the pilot flame was not present for each month from January 1, 2005, through the date of receipt of this request. If US Steel is not able to provide this information because the data is not available, provide the number of times in each month since January 1, 2005, that a flare controlling blast furnace gas emissions has lost its pilot flame.

6. Provide the increase in emissions of sulfur dioxide from the blast furnace casthouse and all emission units that burn blast furnace gas as a result of the Pulverized Coal Injection project. Provide a description of the methods US Steel used to arrive at this emission increase.

7. Provide the monthly average sulfur content of the blast furnace gas for blast furnace 13 for the period beginning January 1, 1988, through 1996. If US Steel is not able to provide this information because the data is not available, provide all data that states the sulfur content of the No. 4, 6, 8 and 13 blast furnace gas during this time period.

8. Provide a narrative description of the control equipment operation in the #14 casthouse. Describe how operations personnel position the pollution control dampers prior to, during and after opening a second tap hole while one hole is already tapping. Also provide a

schematic diagram of the pollution control system that indicates the position of the dampers.

9. Provide a copy of all Operation and Maintenance Plans required by the National Emission Standards for Hazardous Air Pollutants, Subpart FFFFF for Integrated Iron and Steel at 40 C.F.R. § 63.7800. Provide a copy of each plan that was in effect on May 14, 2007, and provide the date that each previous and subsequent final version of each plan was generated.

10. Provide a narrative description of the methods US Steel uses to control emissions from hot iron transfer railcars (bottle cars) as they move through the plant.

11. Provide a copy of all Title V quarterly deviation reports that US Steel has submitted to IDEM, or its agent as of the date of your receipt of this request.

12. Provide a copy of the blast furnace #14 permit to construct/install.

13. Emissions Testing: US Steel must conduct tests to determine the opacity of particulate matter being emitted to the environment according to the schedule below. Specifically, US Steel must perform the following tests pursuant to 40 C.F.R Part 60, Appendix A, EPA Method 9 for:

- The #4 partial enclosure around the iron spout and bottle car/torpedo car for two consecutive taps, twice per week (four heats per week) for two consecutive weeks.
- The #6 partial enclosure around the iron spout and bottle car/torpedo car for two consecutive taps, twice per week (four heats per week) for two consecutive weeks.
- The #8 partial enclosure around the iron spout and bottle car/torpedo car for two consecutive taps, twice per week (four heats per week) for two consecutive weeks.
- The gas cleaning system stacks at the No. 1 BOP Shop and No. 2 Q-BOP Shop during two consecutive steel-making cycles (scrap charge, hot metal charge, blow, tap, etc.) twice per week (four per week total) for two consecutive weeks.
- The roof monitors at the No. 1 BOP Shop and No. 2 Q-BOP Shop during two consecutive steel-making cycles (scrap charge, hot metal charge, blow, tap, etc.) twice per week (four per week total) for two consecutive weeks.
- Building openings near the No. 2 Q-BOP Shop slag skimming operation for four slag skimming events for two consecutive weeks.

a. US Steel must begin taking these readings within 2 weeks of receipt of this request.

b. The results of these readings and any related information shall be submitted within 60 days of receipt of this request.

c. For the readings taken at the No. 4, 6, and 8 partial enclosures around the iron spouts and No. 2 Q-BOP Shop slag skimming area, the readings must be taken just on the outside of the partial enclosures where particulate, if any, escapes to the atmosphere. Readings shall not be taken at the roof monitor of the respective shops.

d. US Steel must record and submit to EPA any operational practice or parameter that existed during the time of the opacity readings that is different from normal conditions.

e. US Steel must record and submit to EPA the time that the tap hole was open and closed during the period readings were taken at the blast furnaces.

f. US Steel must submit the results of any other emission or opacity tests, emissions characterization, or emissions studies, conducted or attempted between the date of receipt of this request and the date of response to this request.

14. From January 1, 2002 until the date of receipt of this letter, provide all stack tests and engineering tests conducted at coke oven batteries 2, 5 and 7.

15. From January 1, 2002 until the date of receipt of this letter, provide all excess emissions reports for coke oven batteries 2, 5 and 7.

16. From January 1, 2002 until the date of receipt of this letter, provide all stack tests and engineering tests conducted at the No. 1 BOP Shop and No. 2 Q-BOP Shop.

17. From January 1, 2002 until the date of receipt of this letter, provide all excess emissions and deviation reports for the No. 1 BOP Shop and No. 2 Q-BOP Shop. Also include reports that show visible emission exceedances at the No. 1 BOP Shop and No. 2 Q-BOP Shop, as recorded daily in accordance with Section D.8.11 of U.S. Steel's Title V permit.

18. Provide all pickling line performance tests, not including appendices, which have been conducted since June 2005, not including the November 15, 2005 test conducted on the 84" Pickling Line and the November 17, 2005 test conducted on the 80" Pickling Line.

19. From January 1, 2002 until the date of receipt of this letter, provide all performance reports prepared to satisfy requirements of 40 C.F.R 63, Subpart CCC (Steel Pickling NESHAP).

20. Provide all maintenance records for any equipment subject to 40 C.F.R. Part 61 Subpart V from January 2002 to present. Include records for maintenance requests relating to equipment leaks.

CERTIFICATE OF MAILING

I, Shanee Rucker, hereby certify that the attached Request for Information Pursuant to the Clean Air Act was sent by Certified Mail, Return Receipt to:

Kenneth Mentzel, Manager, Environmental Control
United States Steel Corporation – Gary Works
One North Broadway
Gary, Indiana 46402-3199

I also certify that a copy of the Request for Information pursuant to the Clean Air Act was sent by First Class Mail to:

Thomas Easterly, Commissioner
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

on the ____ day of _____ 2007.

_____
Shanee Rucker, Secretary
EPA Region 5, ARD
AECAS (MI/WI)

Certified Mail Receipt Number:

standard bcc's: official file copy w/ attachment(s)

other bcc's: