



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

November 16, 2010

CERTIFIED MAIL

Tony Digiandomenico
U.S. Steel, Lorain Tubular Operations
2199 E. 28th Street
Lorain, OH 44055

RE: U.S. Steel, Lorain Tubular Operations, DAPC Facility ID # 0247080961, Division of Air Pollution Control, Notice of Violation for not submitting a complete and timely NO_x RACT study

Dear Mr. Digiandomenico:

Ohio EPA is issuing a Notice of Violation to U.S. Steel, Lorain Tubular Operations (Lorain Tubular) for not submitting a complete and timely NO_x reasonably available control technology (RACT) study, as required by Ohio Administrative Code (OAC) rule 3745-110-04(A)(2).

In accordance with OAC rule 3745-110-04(A)(2), a complete NO_x RACT study was to be submitted to Ohio EPA (OEPA) by December 22, 2008. OEPA received the initial submittal on July 24, 2009.

In a letter dated November 17, 2009, from Alan Harness, OEPA, to Kelly Cernanec, Lorain Tubular, OEPA had requested additional information in order to complete the NO_x RACT study. This information was to be submitted to OEPA by January 16, 2010.

In an e-mail dated December 9, 2009, from Tony Becker, OEPA, to Kelly Cernanec, he indicated that he had scheduled a meeting in Columbus on January 14, 2010. The meeting was requested by Lorain Tubular to discuss, among other things, items in the November 17, 2009, letter from OEPA.

In an e-mail dated December 11, 2009, from Kelly Cernanec to Alan Harness and Tony Becker, she had requested an extension of the January 16, 2010, deadline to submit information as requested in the November 17, 2009, letter from OEPA. The extension was requested since information obtained from the scheduled January 14, 2010, meeting would be critical in preparing a response. Alan Harness responded, in an e-mail the same day, granting the extension for which a date for the submittal would be decided on or after the January 14, 2010, meeting.

On January 14, 2010, representatives from Lorain Tubular including John Biiz, Kelly Cernanec, Mark Jeffrey and Mike Dzurinko, met in Columbus with representatives from OEPA including Jim Orlemann, Alan Harness and Tony Becker. The discussion was mainly to focus on items that were requested in the November 17, 2009, letter from OEPA and items in the December 11, 2009, e-mail from Kelly Cernanec. At the conclusion of the meeting, OEPA requested an updated analysis of the cost-effectiveness and NO_x emission reduction for the installation of low NO_x burners on #4 rotary furnace. The date agreed upon for submitting information was April 30, 2010.

TONY DIGIANDOMENICO
NOVEMBER 16, 2010
PAGE 2

On February 2, 2010, OEPA received intent-to-test notifications for #3 and #4 rotary furnaces, OEPA emissions unit numbers P035 and P039, respectively. Subsequently, NOx emission testing was performed on March 2, 2010. OEPA witnessed the tests.

On May 3, 2010, OEPA received supplemental information from Lorain Tubular, as was requested in the November 17, 2009, letter and at the January 14, 2010, meeting.

On May 18, 2010, a meeting was attended by Mark Jeffrey, Mike Dzurinko, Kelly Cernanec, Jim Orlemann, Alan Harness and Tony Becker. Lorain Tubular indicated that engineering was evaluating which NOx emission control option (that involved low NOx burners) to use from the NOx RACT study for reducing NOx emissions, possibly even using an alternative approach: oxyburners. OEPA requested Lorain Tubular to supplement the RACT study by evaluating the technical and economic feasibility of installing of low NOx burners throughout the rehear furnace, including the soak zone portion of the rehear furnace.

On August 24, 2010, OEPA received a letter dated August 20, 2010, from Kelly Cernanec. It contained supplemental information as was requested from the May 18, 2010, meeting.

On November 1, 2010, a telephone conference call was attended by Tony Digiandomenico, Mark Jeffrey, Mike Dzurinko, Jim Orlemann, Alan Harness and Tony Becker. Lorain Tubular indicated that they will most likely choose from option 2 or option 4 as provided in the August 24, 2010, supplement to the RACT study to define RACT for the emissions unit P039.

Presently, a referral is being prepared, and, once completed; it will be sent to the Central Office of Ohio EPA for the appropriate enforcement action. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

If you have any questions concerning this letter, please contact me at (330) 963-1187.

Sincerely,



Tony Becker
Environmental Specialist
Division of Air Pollution Control

TB:bo

pc: Tim Fischer, DAPC, NEDO
Tom Kalman, DAPC, CO
Alan Harness, DAPC, CO
Bill MacDowell, U.S. EPA Region 5