

Weaver, William (DEP)

From: Gurinder (Gary) Saini <saini@rtpenv.com>
Sent: Friday, December 31, 2021 7:00 AM
To: Weaver, William (DEP)
Cc: Wetzels, Brian; Hanlon, Thomas; Rich Zavoda; Ajalli, Ray
Subject: [External] Plan Approval Application for URM Project at the Cleveland-Cliffs Steelton site Title V Permit number 22-05012
Attachments: 2021 12 31 Application Package Final.pdf

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On behalf of Cleveland-Cliffs Steelton LLC, I am submitting, electronically, the attached Plan Approval application for a project to install a universal rail mill that will replace some of the existing finishing operations at the Steelton site.

A check for the required fee for this plan approval application is also being sent, by courier, to your office early next week.

Please let us know if there are any questions or anything else is needed in this regard.

We are available for a call to discuss the application submittal, project timing and other aspects with your staff.

Regards

Gurinder (Gary) Saini
RTP Environmental Associates Inc.
304A West Millbrook Road
Raleigh, NC 27609
Tel:+1(919)845-1422,42
Tel:+1(919)533-4558

From: Wetzels, Brian <briwetzels@pa.gov>
Sent: Thursday, December 23, 2021 12:42
To: Gurinder (Gary) Saini <saini@rtpenv.com>
Subject: RE: [External] email address for Bill Weaver

That is correct.

From: Gurinder (Gary) Saini <saini@rtpenv.com>
Sent: Thursday, December 23, 2021 10:04 AM
To: Wetzels, Brian <briwetzels@pa.gov>
Subject: [External] email address for Bill Weaver

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Is this the correct email address for Bill Weaver: wiveaver@pa.gov

Regards

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RTP ENVIRONMENTAL ASSOCIATES INC.

AIR · WATER · SOLID WASTE CONSULTANTS

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December 31, 2021

Via Electronic Mail

William Weaver
Air Quality Program Manager
Southcentral Regional Office
Pennsylvania Department of Environmental Protection
909 Elmerton Avenue
Harrisburg, PA 17110
Email: wiveaver@pa.gov

Re: Universal Rail Mill Project – Cleveland-Cliffs Steelton LLC
Plan Approval Application

Dear Mr. Weaver,

On behalf of Cleveland-Cliffs Steelton LLC (“Cleveland-Cliffs”), we are electronically submitting the attached Plan Approval application for a project at the Steelton site. Cleveland-Cliffs owns and operates a steel mini-mill facility in Steelton, Pennsylvania which is an existing major facility. This Plan Approval application to your office is for a proposed project that will involve installation of a new Universal Rail Mill and associated equipment at this facility. This change involves state-of-the-art rail rolling operations that allows Cleveland-Cliffs to continue to meet the customer specifications and improve product quality.

A complete application for a Plan Approval (PDF format) is included in this package for your review and approval. Also enclosed with this letter is a copy of the check No. 3126748 for \$35,000 as requisite application fee for a ‘source requiring approval under Subchapter B and PSD requirements under Subchapter D.’ The check for the application is being sent via FedEx to your office.

We believe that this submittal meets the requirements for plan approval for the proposed project at Steelton. This project is critical for maintaining competitive edge for Cleveland-Cliff’s operations at this plant by improving product quality.

We appreciate PADEP's support in issuance a plan approval for this project. If you need any additional information or if there are any questions, please contact me at (919) 845-1422, 42 or saini@rtpenv.com.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Saini".

Gurinder (Gary) Saini
Senior Environmental Engineer
RTP Environmental Associates Inc

CC: Tom Hanlan, Permitting Chief, PADEP Southcentral, thanlon@pa.gov
Brian Wetzel, PADEP Southcentral, briwetzel@pa.gov
Ray Ajalli, Cleveland-Cliffs, Ray.Ajalli@clevelandcliffs.com
Rich Zavoda, Cleveland-Cliffs, rich.zavoda@clevelandcliffs.com

Attachments

Cleveland-Cliffs Steel LLC
250 W US Hwy 12
Burns Harbor, IN 46304

PAGE: 1 of 1

DATE: December 21, 2021
CHECK NUMBER: 3126748
AMOUNT PAID: \$35,000.00

00018 33919 CKS ND 21354 - 0003126748 NNNNNNNNNNN 3545100006209 XI0FA1 C
COMMONWEALTH OF PA - DEP
SOUTHCENTRAL REGIONAL OFFICE
AIR QUALITY PROGRAM
909 ELMERTON AVENUE
HARRISBURG PA 17110-8200



3545100006209000180000307000020

Vendor No: 082178

Date	Document	Your Document	Description	Gross Amount	Discount	Net Amount
12/01/21	2022AIR PLAN	2022AIR PLAN	Payment for invoice: 2022AIR PLAN	\$35,000.00	\$0.00	\$35,000.00
TOTALS				\$35,000.00	\$0.00	\$35,000.00

PLEASE DETACH BEFORE DEPOSITING CHECK

**** STATEMENT OF EARNINGS, DEDUCTIONS AND TAXES. PLEASE RETAIN FOR YOUR RECORDS ****

Cleveland-Cliffs Steel LLC
250 W US Hwy 12
Burns Harbor, IN 46304

CHECK NUMBER 3126748

70-2332
719

December 21, 2021

PAY TO THE ORDER OF: COMMONWEALTH OF PA - DEP
SOUTHCENTRAL REGIONAL OFFICE
AIR QUALITY PROGRAM
909 ELMERTON AVENUE
HARRISBURG, PA 17110-8200

CHECK AMOUNT
\$35,000.00

EXACTLY *****35,000 DOLLARS AND 00 CENTS



JPMorgan Chase Bank, N.A.
Chicago, IL



Authorized Signature



7006 26000

**Prevention of Significant Deterioration and
Plan Approval Application for
Universal Rail Mill Project
Cleveland-Cliffs Steelton LLC
Steelton Pennsylvania**



Submitted to:

**Pennsylvania Department of Environmental Protection
Bureau of Air Quality
Southcentral Region
909 Elmerton Avenue
Harrisburg, PA 17110**

Prepared by:

**RTP Environmental Associates, Inc.
304-A West Millbrook Rd.
Raleigh, NC 27609**

Submitted by:

**Cleveland-Cliffs Steelton LLC
215 S. Front Street
Steelton, Pennsylvania 17113**

December 2021

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1. Introduction and Summary

Cleveland-Cliffs Steelton LLC (“Cleveland-Cliffs”) owns and operates a steel mini-mill facility in Steelton, near Harrisburg, Pennsylvania. This mini-mill was the first steel plant in the United States to produce steel for railroad rails. To improve quality of product and meet the customer specifications for rail product, Cleveland-Cliffs is proposing a project to replace some of the obsolete rail rolling equipment with a modern Universal Long-length Rail Rolling Operation (“Universal Rail Mill Project” or “URM Project” or “Project”).

The Steelton mini-mill uses an electric arc furnace (“DCEAF”) to melt scrap materials to produce molten steel. The molten steel is either sent to a continuous caster to produce blooms or to the ingot teeming process for ingot production. Blooms are reheated in a reheat furnace for further processing in a blooming mill, a rail rolling mill, and other downstream operations to produce finished rails and other products.

As noted earlier, Cleveland-Cliffs is proposing to install a modern URM operation as part of the proposed URM Project that will also involve the permanent shutdown of several existing product rolling operations at the site. In addition, there will be changes to some of the existing site equipment. The proposed emission unit equipment comprising the URM operation will produce state-of-the-art rail products that will meet the current and future customer specifications.

1.1 Permitting Status

Cleveland-Cliffs Steelton mini-mill is an existing major facility operating in accordance with Title V/State Operating Permit 22-05012, revised on May 5, 2021. This project involves the construction of new air contamination sources; therefore, a plan approval is required in accordance with Title 25, Chapter 127 of the Pennsylvania Code (25 Pa. Code 127) Subchapter B. Project and net emissions increases will be below the applicable significant emission rates for all regulated NSR pollutants except carbon monoxide (“CO”). CO emissions increase for the project exceed the significant emission rate. Therefore, the URM Project constitutes a major modification for CO subject to the prevention of significant deterioration (“PSD”) permitting requirements under 25 Pa. Code 127 Subchapter D.

Requirements of nonattainment major new source review (“NNSR”) ozone under 25 Pa. Code 127 Subchapter E do not apply to this project as the net emissions increases for ozone precursors will be below the applicable significant emission rate. This document and its attachments constitute Cleveland-Cliffs’ application to Pennsylvania Department of Environmental Protection (“PADEP”) for a plan approval authorization for the proposed URM Project.

1.2 Project Schedule

The construction on the Project is expected to commence in the second quarter of 2023. Operation of the modified facility is expected to begin around first quarter of 2025.

1.3 Plan Approval Application

The remainder of this plan approval application is organized as follows.

- Section 2 presents description of the existing Steelton site and the proposed project;
- Section 3 documents the emissions increase calculation methodology and presents an emissions summary for the URM Project;
- Section 4 presents a regulatory analysis, documenting the applicability of Federal and State air quality regulatory requirements to the project;
- Section 5 contains the additional impacts analysis;
- Appendix A contains completed plan approval application forms;
- Appendix B contains detailed emissions calculations for the proposed project; and
- Appendix C contains the copies of the pending municipal notifications.

2. Project Description

This section presents the background site information for the existing Steelton facility and the details of changes under the proposed URM Project scope.

2.1 Site Information

Cleveland Cliffs' Steelton facility is located at 215 S. Front Street in Steelton, Steelton Borough, Dauphin County, Pennsylvania. Dauphin County is designated as attainment or unclassified for all criteria pollutants.¹ Also, this area is part of the Northeast Ozone Transport Region' ("OTR") in the Commonwealth which is treated as 'moderate' non-attainment for ozone (and its precursors).² A site location map of the Steelton Site is presented in Figure 2-1. A plot plan of Steelton identifying existing and proposed new equipment under the URM Project is presented in Figure 2-2.

2.2 Background

The Steelton steel mill facility has existed since 1867 and is one of the oldest rail production operations. Scrap steel and other raw materials are brought to the site using trucks and rail. At the Meltshop, scrap steel materials are charged into a 163 tons per hour DCEAF furnace to produce molten steel using electrical energy. The molten steel is further refined in the ladle refining furnace ("LRF") and a tank vacuum degasser. Thereafter, molten steel is either sent to a three-strand continuous bloom caster to produce blooms or to the ingot teeming process for ingot production.

Blooms are reheated in an existing natural gas-fired walking beam furnace ("WBF") or the natural gas-fired soaking pits for further processing in a blooming mill, a rail rolling mill, and other downstream operations to produce finished rails, specialty blooms, flat bars, and other specialty sections. Natural gas-fired 35" mill reheat furnaces 3 and 4 and other ancillary operations are also used in the finishing operations. Primary rail rolling operations involve 44" blooming mill, 28"/35" hot rolling mills, 100-meter inline head hardening process, controlled cooling, etc. The finished rail sections and other products are then shipped to the customers via truck or rail.

¹ 40 CFR § 81.339 for the nonattainment designation for the State.

² See, *How to Complete a Plan Approval Application to Construct, Modify or Reactivate an Air Contamination Source and/or Install an Air Cleaning Device*, page 16, https://files.dep.state.pa.us/air/AirQuality/AQPortalFiles/Permits/plan/inst_pln.pdf (last accessed on December 18, 2021.)

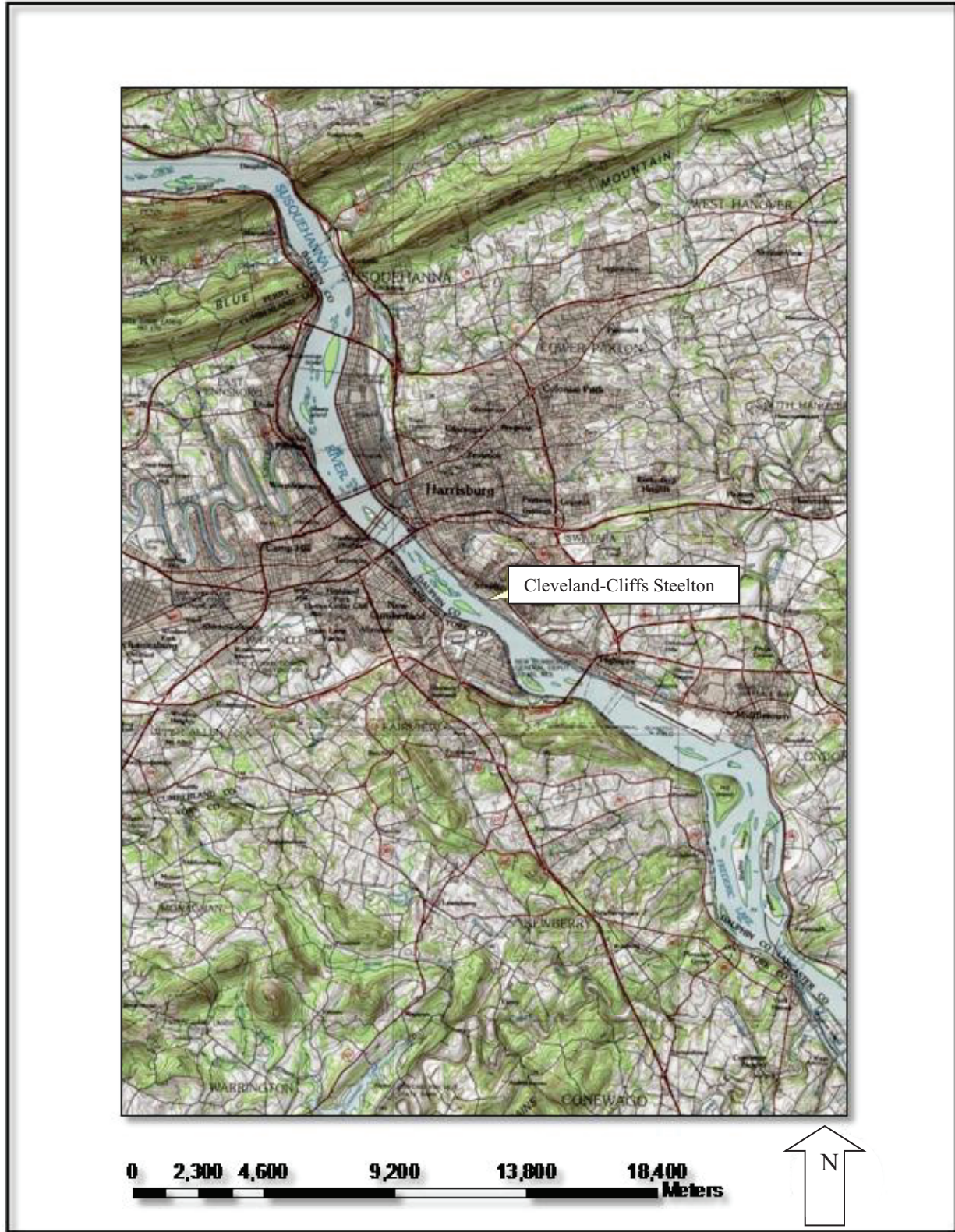


Figure 2-1. Location Map of Cleveland-Cliffs Steelton

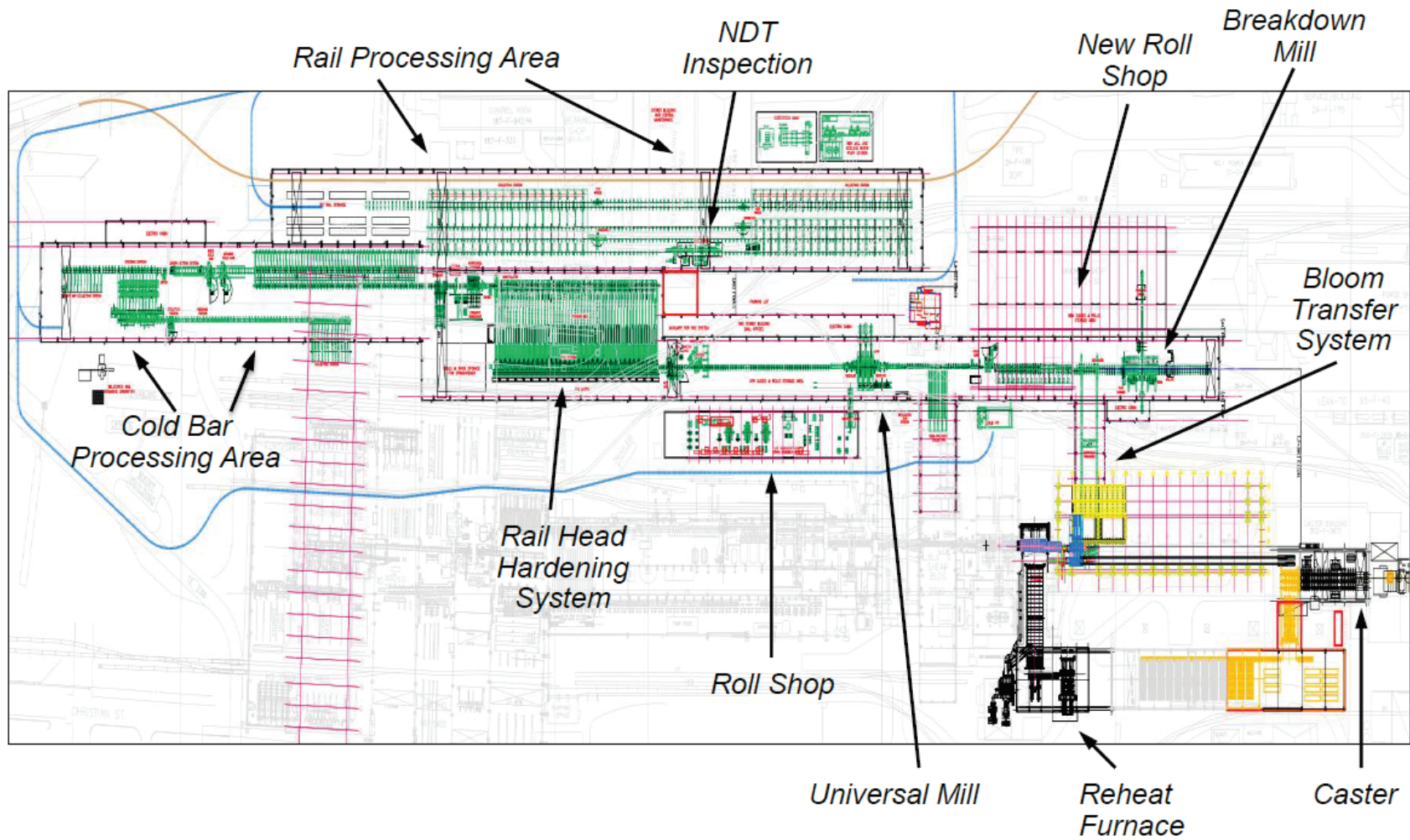


Figure 2-2. Site Layout Plan for the Proposed URM Project

2.3 URM Project Scope

Cleveland-Cliffs Steelton is proposing installation of a new Universal Long-length Rail Rolling operation to modernize product finishing and reduce cost. The proposed URM Project scope at Steelton involves the following:

- (a) Changes to the existing three-strand continuous caster (Source ID 124) including replacement of the existing mold system and foot rolls to provide a caster extension to produce longer blooms, cut-off torches and runout table extension, and bloom collecting system.
- (b) New universal breakdown mill.
- (c) New five strand reversing tandem mill.
- (d) Various new rail product transfers and cooling operations.
- (e) New descaler that will use high pressure water system to remove scale from the rolled rail product.
- (f) New compressed air dryer to blow-off water in the web of the rail.
- (g) New rail marking system that indents/stamps product identification in the rail web.
- (h) New head hardening system for rails using a polymer quench system.

Upon completion of shakedown and commissioning the equipment, Cleveland-Cliffs plans to permanently shutdown obsolete and redundant equipment used in the rail finishing operations. Additionally, fuel combustion equipment such as 35” Reheat Furnaces and Soaking Pits will also be permanently shutdown.

This project does not involve any other ‘physical changes in or changes in the methods of operation’ of other existing emissions units at the Steelton facility (such as DCEAF, LMF, vacuum degasser etc.). However, as part of this project, Cleveland-Cliffs also analyzed potential impacts on emissions of regulated NSR pollutants for other non-modified emissions units at the facility.

3. Emissions Calculations

Emissions increases from the proposed URM Project, and the contemporaneous creditable emissions increases and decreases at the stationary source were calculated in accordance with the applicable provisions under 25 Pa. Code 127 Subchapter D and Subchapter E for the prevention of significant deterioration (“PSD”) and the nonattainment new source review (“NNSR”) programs, respectively. The calculation methodology and summary results are presented below. Detailed emissions calculations and supporting documentation are contained in Appendix B.

3.1 Regulated NSR Pollutants Emissions

The regulated NSR pollutants included here are particulate matter equal to or less than an aerodynamic diameter of nominally 10 μm (“PM10”) and 2.5 μm (“PM2.5”), oxides of nitrogen (“NO_x”), carbon monoxide (“CO”), volatile organic compounds (“VOC”), sulfur dioxide (“SO₂”), lead (“Pb”), and greenhouse gases (“GHGs”) as carbon dioxide equivalent (“CO_{2e}”).³ CO_{2e} is calculated in accordance with 40 CFR § 52.21(b)(49)(ii) using the mass emission rates of six GHGs defined in 40 CFR § 52.21(b)(49)(i) and corresponding global warming potential (“GWP”) published in 40 CFR Part 98, Subpart A, Table A-1.⁴ For this application, Table A-1 GWPs from the July 1, 2020, version of the 40 CFR Part 98 is used.

3.2 Calculation Methodology

As noted in Section 2.3, the proposed URM Project involves installation of new emission units comprising the new URM operation, that includes a head hardening system that uses polymer quench for the rail product. In addition, there will be increases in utilization for several existing emissions units. Finally, creditable emissions decreases will be generated from the permanent shutdown of the existing 35” Mill Reheat Furnaces 3 and 4 - Unit 301 as part of the project.

For determining the applicability of major modification under the PSD program, the project emissions increase calculations for PM10, PM2.5 SO₂, NO_x, CO and GHGs are performed in accordance with 40 CFR § 52.21 and 25 Pa. Code 127 Subchapter D. Project emissions increase, and net emissions increase for NO_x and VOC (both ozone precursors) are calculated in accordance with 25 Pa. Code 127 Subchapter E for determining applicability of major modification under the NNSR program. Major modification applicability calculations for this type of project are based on the ‘Hybrid Test,’ since this project will involve construction of new emissions units and also affects certain existing emissions units at the Steelton facility. Under the hybrid test, the emissions increase for a regulated NSR pollutant is calculated as the sum of the increases from the new and the existing affected emissions units. For new emissions units, the regulations require that emissions increase of regulated NSR pollutants be calculated using the actual-to-potential test *i.e.* in general, potential to emit (“PTE”) of the new emission unit. Increases in emissions of regulated NSR pollutants for the existing emissions units are calculated using the actual-to-projected-actual (“ATPA”) test.

³ Since PM10 evaluation is more stringent than PM because it includes filterable and condensable fractions of particulate, we did not include PM for purposes of emissions increase evaluation.

⁴ The aggregate group of six greenhouse gases are: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. (40 CFR § 52.21(b)(49)(i))

The calculation methodologies for new emissions units, affected existing units, and creditable increases and decreases in emissions is described below. Detailed emissions calculations are included in Appendix B.

3.2.1 Universal Rail Mill Head Hardening System Polymer Quench

As previously noted, Cleveland-Cliffs is proposing to replace the existing rail rolling process at the Steelton facility by installing equipment that will comprise a new URM operation to produce long-length rail product. Blooms are currently reheated in the WBF for further processing. As part of the proposed URM operation, a breakdown mill followed by a five-strand reversing tandem mill will be used to form the reheated blooms to long rail sections. Thereafter, rails will be transferred to the rail head hardening system to achieve the required mechanical properties. The rail will be tilted, and the head will be immersed in a polymer quench bath. Key parameters for polymer quench bath are listed below:

(A) Polymer water mixture application rate	1.7 lb/ton of rail produced
(B) Polymer concentration	20%
(C) VOC content of the polymer	88.4 ppm
(D) Projected rail production rate	720,000 tons/year

PTE of VOC from this operation is calculated by conservatively assuming that 100% of organics in the polymer are released in the process to the atmosphere. Based on the annual polymer usage, we rounded up the VOC emission rate from this operation to two (2) tons per year. No other regulated NSR pollutants will be emitted from the new rail head hardening system that is part of the proposed URM operation.

3.2.2 Project Affected Existing Emissions Units

The ATPA emissions calculations for the existing emissions units involve summing the differences between baseline actual emissions (“BAE”) and projected actual emissions (“PAE”) for each project affected emissions unit and accounting for excludable emissions as provided by the definition of PAE.⁵ The following existing emissions units could be affected by the URM Project:

- (A) Scrap preparation (ID 138)
- (B) DC Electric Arc Furnace (“DCEAF”) (ID 501A)
- (C) Ladle Refining Furnace (“LRF”) (ID 501B)
- (D) Tank Vacuum Degasser (“VDG”) at Steelmaking (ID 500)
- (E) 3-Strand Continuous Bloom Caster and Cutting Torches (ID 124, 118)
- (F) Reheat Walking Beam Furnace (“WBF”) (ID 311)
- (G) Ancillary operations in the Meltshop such as Ladle Preheaters, Tundish Preheaters (ID 109, 113, 114&116)
- (H) Unpaved haul road truck traffic (ID 924)

⁵ The NNSR requirements under 25 Pa. Code 127 Subchapter E do not include the term ‘Hybrid Test’ that is applicable to projects involving new and existing emissions units under the Federal PSD rules at 40 CFR § 52.21. However, the essence of the applicability calculations for this type of project remains the same: The sum of PTE for new units and ATPA for existing units.

As previously noted, Cleveland-Cliffs is proposing changes to the components of the existing 3-strand continuous bloom caster to produce longer blooms for further processing in the new URM operation. No other physical changes or changes in the method of operation are planned for the other project affected existing emissions units listed here.

For the project affected existing emissions units' emissions calculations, Cleveland-Cliffs reviewed the project engineering documentation and analyzed historical performance and production information.⁶ Based on this information, the proposed project is not expected to result in any changes in the regulated NSR pollutant emissions factors for the affected existing emissions units. Therefore, the same emission factors are used for the BAE and PAE in these calculations for the existing emissions units.⁷

BAE for all regulated NSR pollutants (both PSD and NNSR) are based on the same 24-month period from January 2017 to December 2018. Actual emissions from the Air Information Management System ("AIMS") reports for the period that were submitted to PADEP are used for as BAE for the project affected existing emissions units. Upon further evaluation, Cleveland-Cliffs concluded that the historical haul road truck traffic emissions in the AIMS reports were an over estimation. Therefore, these emissions were revised based on the more recent information for fugitive PM10 and PM2.5 emissions from the facility unpaved haul roads.⁸

The projected production rates for the project-affected existing emissions units are derived from the relevant information from the company's projected highest business activity for the five-year period after implementation of the URM Project. This information is used along with the ratio of fuel use and emission factors for regulated NSR pollutants to calculate the PAE for the existing emissions units affected by the project. In addition, historical monthly production rates for the existing emissions units were evaluated to identify the peak monthly production rate for the project affected emissions units. February 2017 represented the peak production month for DCEAF and other affected emissions units. Evaluation of the historical operating data indicated that the existing Steelton operations could have accommodated the annualized peak monthly production (for February 2017) within its existing capabilities, and this production rate is also unrelated to the proposed URM Project. We further verified that the peak monthly production annualized rate is within the range of the historical peak annual production rate for the Steelton operations. Therefore, Cleveland-Cliffs used the annualized peak monthly rate to calculate the portion of excludable emissions in calculating project emissions increase for the project.⁹ Key production parameters used in the ATPA test for the existing emissions units affected by the project are provided in Table 3-1 below.

⁶ Historical production information pertained to the amount of steel cast on monthly basis. In addition, Cleveland-Cliffs reviewed documentation regarding existing units' throughput capacities, delay analysis and other historical changes.

⁷ The emission factors for existing emission units are based on historical performance testing, AP-42 or engineering estimate.

⁸ Emission rates for PM10 and PM2.5 from the unpaved haul roads are based on the estimated truck trips and the emission factor equations from U.S. EPA's AP-42 Chapter 13.2.2, November 2006.

⁹ Historical data shows that Steelton operations produced 650,584 tons during the January 2006 to December 2006 period. Further back, even higher production rates were achieved for the existing Steelton operations.

Table 3-1. Summary of Key Production Parameters for ATPA Test

Parameters	Values
Baseline production rate during 1/2017 to 12/2018 (tons/year or TPY)	295,215
Projected production rate for the five-year period after the project (TPY)	768,000
Projected production rate for bloom caster (TPY)	720,000
Projected ingot production rate (unaffected by the project) (TPY)	48,000
Peak monthly production rate for DCEAF for 2/2017 (tons/day)	1,354
Annualized peak monthly production rate that the existing units could accommodate and unrelated to the project (TPY)	494,054
Excludable production rate by subtracting baseline rate from annualized peak monthly production rate (TPY)	198,838

3.3 Summary of URM Project Emissions Increases

Table 3-2 presents the PTE of VOC for the proposed new URM operation. This table also shows the sum of increases in emissions of regulated NSR pollutant calculated using the ATPA test for the existing emissions units that could be affected by the overall URM Project. Table 3-2 also includes a comparison of the project emissions increases (“PEI”) for each regulated NSR pollutant, calculated as sum of the emissions increases for the new and the existing emissions units, with the applicable significant emissions rate. Detailed emissions calculations are provided in Appendix B.

Table 3-2. Summary of URM Project Emissions Increases

Emission Unit or Process	Project Emissions Increase (tons/year)						
	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	CO _{2e} *
Universal Rail Mill					2.00		
DCEAF Furnace	3.24	2.40	9.45	11.12	6.63	156.52	31,245
Ladle Refining Furnace	0.00	0.00	0.00	0.00	0.00	0.00	0
Meltshop Fugitives	0.72	0.72	0.00	0.00	0.00	0.00	0
VDG @ Steelmaking	0.00	0.00	0.00	0.00	0.00	14.37	0
Walking Beam Furnace	1.96	1.96	0.15	21.46	0.28	41.95	30,774
EAF Ladle Preheaters #1-#4	0.16	0.16	0.01	2.10	0.12	1.76	2,504
Burn Off Oven	0.00	0.00	0.00	0.01	0.00	0.01	13
Caster Tundish Preheaters & Dryer	0.07	0.07	0.01	1.32	0.03	0.79	1,127
Caster Cutting Torches #1-#6	0.01	0.01	0.00	0.11	0.01	0.10	136
Caster Vents	0.00	0.00	0.00	0.00	4.61	0.00	0
Scrap Prep	0.31	0.31	0.00	0.00	0.00	0.00	0
Scrap Prep	0.03	0.03	0.00	0.48	0.02	0.29	410
Haul Roads	2.85	0.29	0.00	0.00	0.00	0.00	0
Total	9.34	5.94	9.63	36.60	13.70	215.78	66,209
PSD/NNSR Significant Rate	15	10	40	40	40	100	75,000
Whether Significant?	No	No	No	No	No	Yes	No
*PM analysis is not included here since PM10 represents more conservative calculation of emissions increase.							
**CO _{2e} calculation for determining whether GHGs subject to regulation.							

For the URM Project, PEI for all regulated NSR pollutants except CO are each below the applicable significant emission rates. Since the CO PEI exceeds the PSD significance emission

rate, the proposed URM Project is a major modification for CO, subject to the PSD permitting requirements. As explained in the next section, the proposed project does not result in any physical changes or changes in the method of operation of any emissions units where CO emissions are increasing as a result of the project. In addition, there will not be any increases in the 1-hour and 8-hour emission rates of CO because of this project. Therefore, even though the URM Project is a major modification for CO, under the PSD regulations, it is not subject to several of the substantive requirements under 40 CFR §§ 52.21 (j) through (r)(5). Section 4 details the applicability of substantive requirements under the PSD program.

In accordance with 25 Pa. Code § 127.203a (a)(1) for a proposed project, if NO_x and VOC PEI are less than the applicable significant emission rate, a net emissions increase evaluation under 25 Pa. Code § 127.203a (a)(1)(ii) is not required for major modification determination under the NNSR program. For URM Project, both NO_x and VOC PEI are below the applicable significant emission rates. Thus, the project is a non-major modification under the NNSR program.

For NO_x and VOC, as documented above and in Appendix B, the proposed project will result in ‘de-minimis’ emissions increase as defined in 25 Pa. Code § 121.1. Therefore, in accordance with 25 Pa. Code § 127.203a (a)(2), a de minimis netting analysis is required for NO_x and VOC emissions from the URM Project. Cleveland-Cliffs is submitting this application for the proposed project prior to December 31, 2021.¹⁰ Therefore, time period from January 2012 to December 2021 is selected as the ten-year contemporaneous period for the project. Table 3-3 presents a summary of contemporaneous and creditable emissions increases and decreases.

Table 3-3. Net Emissions Increase for NO_x and VOC

Net Emissions Increase (NEI) (tons/year)	NO_x	VOC
URM Project	36.60	13.70
<i>Creditable Increases</i>		
WBF Project (2015)	58.41	6.54
<i>Creditable Decreases</i>		
Curtailed of soaking pit batteries*	-43.32	-1.51
Shutdown of 35" Mill Reheat Furnaces #3 & #4 (Planned Prior to URM Project Emission Increase)	-87.68	-0.51
Total	(35.99)	18.22
<i>* NO_x and VOC emissions decreases for soaking pit batteries for Jan 2013-Dec 2014 period from the 2016 application for the WBF Project.</i>		

As shown in the table above, net emissions increases of NO_x and VOC are below the applicable significant emission rate. Therefore, the emission offset requirements under 25 Pa. Code § 127.205(3) (relating to special permit requirements) are not applicable to the URM Project. In accordance with 25 Pa. Code § 127.207, Cleveland-Cliffs will submit an application for creditable decreases under the emission reduction credits (“ERC”) provisions from the planned permanent shutdown of the 35” Mill Reheat Furnaces 3 and 4 – Unit 301 prior to the URM Project emission increase.

¹⁰ In accordance with 25 Pa. Code § 127.203a (a)(2)(ii), an increase or decrease is contemporaneous if it occurred within 10 years prior to the date of the Department’s receipt of a complete plan approval application.

4. Regulatory Applicability Review

A review of the potentially applicable federal and Pennsylvania regulations has been conducted for this plan approval application. The following subsections summarize the applicability of these regulations to the proposed URM Project at the Steelton site.

4.1 Commonwealth's Regulations

This analysis is based on the version of the Commonwealth of Pennsylvania Code ("Pa. Code") available on the Commonwealth's website at the time this application was prepared.¹¹

4.1.1 25 Pa. Code Chapter 123, Standards for Contaminants

25 Pa. Code Chapter 123 specifies air contaminant emission standards for fugitive and point PM, SO₂, NO_x, and visible emissions. The proposed URM Project will not result in emissions of any of these air contaminants.

4.1.2 25 Pa. Code Chapter 127, Construction, Modification, Reactivation and Operation of Sources

25 Pa. Code Chapter 127 contains requirements for Plan Approvals, PSD, NNSR, and operating permits. The applicability of these requirements to the project is documented below.

4.1.2.1 Subchapter B, Plan Approval Requirements

In accordance with 25 Pa. Code 127 Subchapter B, a plan approval is required for the proposed new URM operation to be installed at Steelton facility. This document satisfies the requirement to submit a plan approval application. The primary requirements to obtain a plan approval 25 Pa. Code § 127.12(a) are summarized below with cross-references to application content addressing each requirement (underlined).

- Identify the location of the emission sources and the name, title, address and telephone number of the individual responsible for the operation of the source. This information is presented in Sections 1, 2, and Appendix A.
- Provide information regarding emission rates. This information is presented in Sections 2 and 3.
- Show that the source will be equipped to record emissions, maintain records, and report emissions to the PA DEP as required. This requirement is addressed in the application forms included in Appendix A.
- Show that the source will comply with applicable requirements of PADEP regulations and requirements promulgated by the Administrator of the EPA. This is addressed in Section 4 of the application.
- Demonstration that emissions will be the minimized through the use of the Best Available Technology (BAT). The BAT demonstration is presented later in this section.

¹¹<http://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/025/chapter127/subchapEtoc.html&d=reduce> (last accessed on December 18, 2021).

- Show that the appropriate municipal notifications of the Plan Approval Application have been sent and received. Cleveland-Cliffs will provide the requisite municipal notifications and submit its copies along with the receipts of delivery via UPS/USPS for verification in accordance with DEP Guidance directing that notifications be made at least 30-days prior to the issuance of the Plan Approval for the URM Project.¹² We will keep in touch with PADEP regarding processing of this application for the URM Project to align the timing of the municipal notifications.
- Show that the proposed air cleaning devices are capable of being operated and maintained in accordance with good air pollution control practices. There are no air cleaning devices (add-on controls) associated with the proposed equipment.
- Contain a completed Compliance Review Form. The completed form is contained in Appendix A.

4.1.2.2 Best Available Technology Demonstration for URM Operation

The proposed URM Project at the Steelton site includes a state-of-art Universal Long-length Rail Rolling (URM) operation that includes a new head hardening system. The head hardening system utilizes a polymer quench bath that uses 20% concentration polymer mix to coat the rail head. Small amount of organics may flash-off as the heated rails are quenched in this system. We are not aware of any add-on VOC emissions controls for such a low emission rate and low concentration stream of organics emissions. In addition, we did not identify any alternative product with lower VOC content that could be used in this process to produce the target rail product. Therefore, as part of BAT no additional requirements are feasible for this operation.

4.1.2.3 Subchapter D Prevention of Significant Deterioration Requirements

The federal PSD regulations in 40 CFR § 52.21 are incorporated by reference in 25 Pa. Code 127, Subchapter D. As noted previously, Steelton area is attainment or unclassifiable for all criteria pollutants. However, Commonwealth of Pennsylvania is in the Northeast OTR and treated as ‘moderate’ nonattainment for ozone. Therefore, the PEI for PM/PM10, PM2.5, SO₂, NO_x (as NO₂), CO, and GHGs from the proposed URM Project are evaluated for major modification applicability under the PSD program. PEI for these regulated NSR pollutants are calculated using the procedures in 40 CFR § 52.21(a)(2)(iv)(c) “Actual-to-projected-actual” test for major modification applicability, for projects that only involve existing emissions units.”¹³ As documented in subsection 3.3 and Appendix B, PEI for PM/PM10, PM2.5, SO₂, and NO_x associated with the proposed project are below all applicable significant emission rates under 40 CFR § 52.21(b)(23). In addition, GHG PEI in terms of CO₂e is below the threshold under 40 CFR § 52.21(b)(49)(iii). Only the CO PEI for the proposed URM Project exceeds the significant emission rate. Therefore, the proposed URM Project is a major modification as defined at 40 CFR § 52.21(b)(2) for the CO emission increase and is subject to the requirements of 40 CFR §§

¹² PADEP guidance for “Public Notification” states that “...the written notices shall be received by the municipalities at least thirty (30) days before the Department of Environmental Resources may issue or deny the permit....,” Document Number: 275-2101-011 available at

<http://www.depgreenport.state.pa.us/elibrary/GetDocument?docId=7860&DocName=PUBLIC%20NOTIFICATIO N.PDF%20%20%3Cspan%20style%3D%22color%3Agreen%3B%22%3E%3C%2Fspan%3E%20%3Cspan%20styl e%3D%22color%3Ablue%3B%22%3E%3C%2Fspan%3E> (last accessed on December 20, 2021).

¹³ The ATPA test is applicable here since the new emission unit (URM operation) only emits VOC (ozone precursor).

52.21(j) through (r)(5), to the extent applicable. Applicability of substantive PSD requirements is presented below.

1. *Control Technology Review (40 CFR § 52.21(j))*

For a major modification, best available control technology (“BACT”) requirement applies “... to each proposed emissions unit at which a net emissions increase in the pollutant would occur as a result of a physical change or change in the method of operation in the unit.”¹⁴ The new equipment comprising the proposed new URM operation only emits VOC from the head-hardening system using polymer quench, and does not result in any CO emissions. In addition, the existing emissions units (such as DCEAF, WBF etc.), where CO emissions do increase as a result of the URM Project, will not be undergoing any ‘physical change or change in the method of operation.’ This is because the proposed Project does not involve any changes to the maximum throughput rates and the CO emission factors for the project affected existing emissions units. Therefore, the BACT requirement does not apply to the equipment covered under the proposed URM Project.

2. *Source Impact Analysis (40 CFR § 52.21(k))*

This provision requires an air quality modeling evaluation for a modification to show “... that allowable emission increases from the proposed source or modification...” would not cause or contribute to violation of national ambient air quality standard (“NAAQS”) or PSD increment. There is no increment for CO under the PSD program. In addition, CO NAAQS are based on 1-hour and 8-hour averaging times and there is no annual CO NAAQS.¹⁵ In this case, the proposed URM Project is a major modification for CO. The proposed URM Project will not result in any increase in CO emissions for any of the existing emissions units affected by the project (such as DCEAF, WBF etc.) for either the 1-hour or the 8-hour periods. This is because the proposed Project does not involve any changes to the maximum throughput rates or the CO emission factors for the project affected existing emissions units. Since there are no increases in 1-hour or 8-hour CO emission rates for the URM Project affected existing emissions units, source impact analysis requirements do not apply to this Project.

3. *Air Quality Models (40 CFR § 52.21(l))*

See discussion under item 2 above. Since the URM Project does not increase 1-hour or 8-hour CO emission rates, we have demonstrated no violation of the NAAQS without needing an air quality model. Therefore, we ask that DEP deem this application complete without CO air modeling.

4. *Air Quality Analysis (40 CFR § 52.21(m))*

Under this provision, applicant is required to provide an analysis of ambient air quality. Based on the U.S. EPA guidance, if sufficient data exists to provide representative regional background concentrations, the agency may waive the preconstruction monitoring requirement.¹⁶ PADEP CO monitor NARSTO site located in Arendtsville, PA

¹⁴ 40 CFR § 52.21(j)(3).

¹⁵ See U.S. EPA’s NAAQS Table at <https://www.epa.gov/criteria-air-pollutants/naaqs-table> (last accessed on December 19, 2021).

¹⁶ “Circuit Court Decision on PM2.5 Significant Impact Levels and Significant Monitoring Concentration,” USEPA, March 4, 2013, at <http://epa.gov/nsr/documents/20130304qa.pdf>.

was identified as the nearest regional CO monitor. Ambient CO data for this site was obtained from PADEP website and is presented in Table 4-1 below.¹⁷

Table 4-1. Ambient CO Concentration for NARSTO Site Arendtsville, PA

Site ID 420010001 Averaging Period	2018 Ambient CO (ppm)	2019 Ambient CO (ppm)	2020 Ambient CO (ppm)	CO Standard (ppm)*
8-hour	0.41	0.40	0.44	9
1-hour	1.30	0.70	1.60	35

* *Not to be exceeded more than once per year.*

Based on the above monitored values, CO ambient concentrations in the area are well below the applicable NAAQS for all averaging periods.

5. *Source Information (40 CFR § 52.21(n))*
This application document and its attachments constitute necessary information required under this provision.
6. *Additional Impact Analysis (40 CFR § 52.21(o))*
This information is included Section 5 of this application.
7. *Sources Impacting Federal Class I Areas (40 CFR § 52.21(p))*
The proposed Project is a major modification for CO. There is no CO increment and CO emissions are not a cause for visibility concerns in any areas.
8. *Public Participation (40 CFR § 52.21(q))*
The applicant will comply with any applicable provisions under the PADEP and federal PSD regulations regarding public participation for this application.
9. *Source Obligation (40 CFR § 52.21(r))*
The applicant will comply with the applicable requirements under these provisions.

4.1.2.1 Subchapters E, Non-attainment NSR Requirements

The Pennsylvania NNSR regulations are contained in 25 Pa. Code 127 Subchapter E that apply to ozone precursors as the area is located in the Northeast OTR. As documented in subsection 3.3 and Appendix B, PEI for NO_x and VOC associated with the proposed project are below all applicable significant emission rates under 25 Pa. Code § 121.1. Additionally, the net emissions increases of NO_x and VOC determined in accordance with 25 Pa. Code § 127.203a (a)(2) are below the significant emission rate thresholds. Therefore, the proposed URM Project constitutes a non-major modification under NNSR and none of the requirements of these regulations, including the ‘emission offsets’ requirements of 25 Pa. Code § 127.205(3), are applicable.

Upon implementation of the URM Project, Cleveland-Cliffs plans to permanently shutdown the existing 35” Mill Reheat Furnaces 3 & 4 (ID 301). In accordance with 25 Pa. Code § 127.207, Cleveland-Cliffs is submitting the emission reduction credit (“ERC”) application for the reductions in NO_x emissions from this operation in order to make the decrease creditable prior to the URM Project increase. The ERC application includes emission reductions in excess of what is needed for the URM Project increase.

¹⁷ See: <https://www.epa.gov/outdoor-air-quality-data/monitor-values-report>, https://www.ahs.dep.pa.gov/air_apps/aadata/Default.aspx (last accessed on December 19, 2021).

4.1.2.2 Subchapters F and G, Operating Permit Requirements

Cleveland-Cliffs is submitting this application for issuance of plan approval for the proposed installation of the URM operation emission units. In addition to authorizing the construction of the proposed units, Cleveland-Cliffs requests that the plan approval allow for a reasonable shakedown period of up to 180 days of operation of the new URM operation while the existing 35” Mill Reheat Furnaces continue to operate to supply customer demand. We also understand that the Plan Approval will also authorize operation of the new emissions units and Cleveland-Cliffs will submit an application for a Title V Operating Permit Modification in accordance with 25 Pa 127 Subchapters F and G and as directed by the Department.

4.1.3 25 Pa. Code Chapter 129, Sources of VOCs

25 Pa. Code § 129 establishes standards for several categories of operations that result in VOC emissions. The URM operation with polymer quench does not fall into any of the categories specified under the rule.

4.1.4 25 Pa. Code Chapter 129.91, Control of Major Sources of NO_x and VOCs

25 Pa. Code § 129.91 requires the application of RACT for construction or modification of major NO_x and VOC emitting facilities. The equipment comprising the proposed new URM operation does not meet the definition of major VOC emitting facility under 25 Pa. Code § 121.1. Therefore, this requirement is not applicable to the proposed equipment.

4.1.5 25 Pa. Code Chapter 135, Reporting of Sources

25 Pa. Code Chapter 135 requires the preparation and submittal of emission statements showing actual annual emissions of all criteria pollutants for the facility. Cleveland-Cliffs will continue to comply with the Chapter 135 reporting requirements as applicable.

4.2 Federal Regulations

Applicability of federal regulations for the proposed project is discussed in this subsection.

4.2.1 New Source Performance Standards (NSPS)

NSPS are promulgated in 40 CFR Part 60 and incorporated in 25 Pa. Code Chapter 122. NSPS apply to affected facilities in regulated source categories for which construction, reconstruction, or modification occurs after specified dates. No NSPS are applicable to the proposed new equipment comprising the URM operation at the Steelton facility.

4.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP)

NESHAP for source categories is promulgated in 40 CFR Part 63 and incorporated in 25 Pa. Code Chapter 124. NESHAP are applicable to affected sources at major, and in some cases minor (area) sources of HAP emissions. The Steelton facility is and will remain a minor (area) source of HAP following the project, with potential emissions less than 10 and 25 tons per year of any single HAP and total combined HAP, respectively. No NESHAP are applicable to the proposed new equipment comprising the new URM operation. There is no change to the applicability of NESHAP 40 CFR Part 63 Subpart YYYYYY that is applicable to area sources.

5. Additional Impacts Analyses

An additional impacts analysis is performed consistent with the requirements of 40 CFR § 52.21(o) (Additional Impacts Analysis) to determine potential air emissions impacts on soils, vegetation, visibility, and growth for the proposed URM Project. The Project will emit CO in excess of the PSD significant emission rates and are therefore considered in the analysis.

As explained in subsection 4.1.2.3, there will be no increase in 1-hour or 8-hour CO emission rates as a result of this Project. Since there is no increase in short term emission rates, there will be no change to the ambient CO concentration in the area due to the proposed URM Project. CO emissions, at ambient impact concentrations, are not known to cause any soils or vegetation impacts.¹⁸ However, elevated CO may produce some impacts such as epinasty, chlorosis, and abscission. However, plant injury occurs at concentration over 100 ppm which is well over the CO primary NAAQS.¹⁹ As previously noted there will be no changes to the ambient CO concentration, which are currently well below the CO primary NAAQS. Therefore, no adverse soil and vegetation impacts are expected from the proposed URM Project.

In addition, CO emissions do not contribute to formation of the particulate that causes visibility impairment.²⁰ Finally, Cleveland-Cliffs Steelton is an existing facility and the project is not expected cause any quantifiable growth impacts due to additional industrial, commercial, or residential growth in the area.

¹⁸ Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings [<https://www.epa.gov/criteria-air-pollutants/naaqs-table> (last accessed on November 27, 2019)]. The U.S. EPA revoked the secondary NAAQS for CO in 1985 noting that “[c]arbon monoxide is a normal constituent of the plant environment. Plants can both metabolize and produce CO. This may explain the fact that relatively high levels of CO are necessary before damage occurs to vegetation. The lowest level for which significant effects on vegetation have been reported is 100 ppm for 3 to 35 days. The effect observed in this study was an inhibition of nitrogen fixation in legumes. Since CO concentrations of this magnitude are rarely if ever observed in the ambient air, it is very unlikely that any damage to vegetation will occur from CO air pollution. No other effects on welfare have been associated with CO exposures at or near ambient levels. Because no standards appear to be requisite to protect the public welfare from any known or anticipated adverse effects from ambient CO exposures, EPA is rescinding the existing secondary standards.” 50 Fed. Reg. 37484, September 13, 1985.

¹⁹ “The Effects of Air Pollutants on Vegetation and the Role of Vegetation in Reducing Atmospheric Pollution,” Iuliana Florentina Gheorghe and Barbu Ion, September 26, 2011, <https://www.intechopen.com/books/the-impact-of-air-pollution-on-health-economy-environment-and-agricultural-sources/the-effects-of-air-pollutants-on-vegetation-and-the-role-of-vegetation-in-reducing-atmospheric-pollu> (last accessed on February 26, 2020).

²⁰ <https://www.epa.gov/visibility/basic-information-about-visibility> (last accessed on November 3, 2019).

Appendix A – Plan Approval Application Forms

AIR QUALITY FEES FOR NEW PLAN APPROVAL

Company Information				
Federal Tax ID: 022-05012		Firm Name: Cleveland-Cliffs Steelton LLC		
Permit # (If any): 22-05012		Facility Name: Cleveland-Cliffs Steelton LLC/Steelton		
Municipality: Steelton Borough		County: Dauphin		
Contact Person Name: Ray Ajalli		Telephone Number: (610) 383-2097		
E-mail: ray.ajalli@clevelandcliffs.com				
New Plan Approval (The following fees are cumulative.)				
Line #	Check the appropriate boxes below	Type of review requested	Fee 2021 - 2025	Total Fees
1	Base Fee	Subchapter B	\$2,500	\$2,500
2	<input type="checkbox"/>	New Source Review, Subchapter E	\$7,500	
3	<input type="checkbox"/>	<p style="text-align: center;">NSPS/NESHAP /MACT standard</p> <p>A. # of NSPS: _____</p> <p>B. # of NESHAP/MACT: _____</p> <p>C. Add lines A and B: _____</p> <p>D. Maximum applicable standards: <u> 3 </u></p> <p>E. Enter smaller of line C or line D: _____</p> <p>Multiply line E by \$2,500 and enter the amount in the "Total Fees" column.</p>	\$2,500	
4	<input type="checkbox"/>	Case-by-Case MACT	\$9,500	
5	<input checked="" type="checkbox"/>	Prevention of Significant Deterioration (PSD) requirements. Subchapter D	\$32,500	\$32,500
6	<input type="checkbox"/>	Plantwide Applicability Limit (PAL) for NSR regulated pollutants or PAL for PSD regulated pollutants or both	\$7,500	
7	<input type="checkbox"/>	Risk Assessment Analysis – Inhalation only	\$10,000	
8	<input type="checkbox"/>	Risk Assessment Analysis – Multi-pathway	\$25,000	
Add Lines 1 thru 8 of Total Fees column and write it here. →				\$35,000



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

GENERAL INFORMATION FORM – AUTHORIZATION APPLICATION

Before completing this General Information Form (GIF), read the step-by-step instructions provided in this application package. This form is used by the Department of Environmental Protection (DEP) to inform our programs regarding what other DEP permits or authorizations may be needed for the proposed project or activity. This version of the General Information Form (GIF) must be completed and returned with any program-specific application being submitted to the DEP.

Related ID#s (If Known) Client ID# _____ APS ID# _____ Site ID# _____ Auth ID# _____ Facility ID# _____		DEP USE ONLY Date Received & General Notes
---	--	--

CLIENT INFORMATION

DEP Client ID#	Client Type / Code LLC	Dun & Bradstreet ID#		
Legal Organization Name or Registered Fictitious Name Cleveland-Cliffs Steelton LLC		Employer ID# (EIN) 85-4084783-1	Is the EIN a SSN? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> NO	
State of Incorporation or Registration of Fictitious Name Delaware		<input type="checkbox"/> Corporation <input checked="" type="checkbox"/> LLC <input type="checkbox"/> Partnership <input type="checkbox"/> LLP <input type="checkbox"/> LP <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Association/Organization <input type="checkbox"/> Estate/Trust <input type="checkbox"/> Other		
Individual Last Name	First Name	MI	Suffix	
Additional Individual Last Name	First Name	MI	Suffix	
Mailing Address Line 1 215 S Front St		Mailing Address Line 2		
Address Last Line – City Steelton		State PA	ZIP+4 17113-2538	Country USA
Client Contact Last Name Ajalli	First Name Ray	MI	Suffix P.E.	
Client Contact Title Manager - Environmental		Phone (610) 383-2097	Ext	Cell Phone
Email Address ray.ajalli@clevelandcliffs.com			FAX	

SITE INFORMATION

DEP Site ID#	Site Name Cleveland-Cliffs Steelton LLC				
EPA ID#	Estimated Number of Employees to be Present at Site			700	
Description of Site Steel mini-mill produces high quality rails and specialty ingots					
Tax Parcel ID(s):					
County Name(s)	Municipality(ies)	City	Boro	Twp	State
Dauphin	Steelton	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Site Location Line 1 215 S Front St		Site Location Line 2			
Site Location Last Line – City Steelton		State PA	ZIP+4 17113-2538		
Detailed Written Directions to Site					

Site Contact Last Name Ajalli		First Name Ray		MI	Suffix P.E.
Site Contact Title Manager - Environmental			Site Contact Firm Cleveland-Cliffs Plate LLC		
Mailing Address Line 1 139 Modena Road			Mailing Address Line 2		
Mailing Address Last Line – City Coatesville			State PA	ZIP+4 19320	
Phone (610) 383-2097	Ext	FAX	Email Address ray.ajalli@clevelandcliffs.com		
NAICS Codes (Two- & Three-Digit Codes – List All That Apply) 331				6-Digit Code (Optional) 331111	
Client to Site Relationship OWNOP					

FACILITY INFORMATION

Modification of Existing Facility	Yes	No
1. Will this project modify an existing facility, system, or activity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Will this project involve an addition to an existing facility, system, or activity? <i>If "Yes", check all relevant facility types and provide DEP facility identification numbers below.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Facility Type	DEP Fac ID#	Facility Type	DEP Fac ID#
<input checked="" type="checkbox"/> Air Emission Plant	468809	<input type="checkbox"/> Industrial Minerals Mining Operation	
<input type="checkbox"/> Beneficial Use (water)		<input type="checkbox"/> Laboratory Location	
<input type="checkbox"/> Blasting Operation		<input type="checkbox"/> Land Recycling Cleanup Location	
<input type="checkbox"/> Captive Hazardous Waste Operation		<input type="checkbox"/> Mine Drainage Treatment / Land Recycling Project Location	
<input type="checkbox"/> Coal Ash Beneficial Use Operation		<input type="checkbox"/> Municipal Waste Operation	
<input type="checkbox"/> Coal Mining Operation		<input type="checkbox"/> Oil & Gas Encroachment Location	
<input type="checkbox"/> Coal Pillar Location		<input type="checkbox"/> Oil & Gas Location	
<input type="checkbox"/> Commercial Hazardous Waste Operation		<input type="checkbox"/> Oil & Gas Water Poll Control Facility	
<input type="checkbox"/> Dam Location		<input type="checkbox"/> Public Water Supply System	
<input type="checkbox"/> Deep Mine Safety Operation -Anthracite		<input type="checkbox"/> Radiation Facility	
<input type="checkbox"/> Deep Mine Safety Operation -Bituminous		<input type="checkbox"/> Residual Waste Operation	
<input type="checkbox"/> Deep Mine Safety Operation -Ind Minerals		<input type="checkbox"/> Storage Tank Location	
<input type="checkbox"/> Encroachment Location (water, wetland)		<input type="checkbox"/> Water Pollution Control Facility	
<input type="checkbox"/> Erosion & Sediment Control Facility		<input type="checkbox"/> Water Resource	
<input type="checkbox"/> Explosive Storage Location		<input type="checkbox"/> Other:	

Latitude/Longitude Point of Origin	Latitude			Longitude		
	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
	40	13	59	76	50	13

Horizontal Accuracy Measure	Feet	--or--	Meters
Horizontal Reference Datum Code	<input type="checkbox"/> North American Datum of 1927 <input type="checkbox"/> North American Datum of 1983 <input type="checkbox"/> World Geodetic System of 1984		

Horizontal Collection Method Code			
Reference Point Code			
Altitude	Feet	--or--	Meters
Altitude Datum Name	<input type="checkbox"/> The National Geodetic Vertical Datum of 1929 <input type="checkbox"/> The North American Vertical Datum of 1988 (NAVD88)		

Altitude (Vertical) Location Datum Collection Method Code			
Geometric Type Code			
Data Collection Date			
Source Map Scale Number	Inch(es)	=	Feet
	--or--		Centimeter(s)
		=	Meters

PROJECT INFORMATION

Project Name Universal Rail Mill (URM) Project			
Project Description Replace the existing rail rolling mill equipment with a state-of-the-art Universal Rail Mill operation			
Project Consultant Last Name Saini	First Name Gurinder	MI	Suffix
Project Consultant Title Sr. Environmental Engineer		Consulting Firm RTP Environmental Associates Inc.	
Mailing Address Line 1 304A West Millbrook Road		Mailing Address Line 2	
Address Last Line – City Raleigh		State NC	ZIP+4 27609
Phone (919) 845-1422	Ext 42	FAX	Email Address saini@rtpenv.com
Time Schedules	Project Milestone (Optional)		

1. **Is the project located in or within a 0.5-mile radius of an Environmental Justice community as defined by DEP?** Yes No
- To determine if the project is located in or within a 0.5-mile radius of an environmental justice community, please use the online [Environmental Justice Areas Viewer](#).
-
2. **Have you informed the surrounding community prior to submitting the application to the Department?** Yes No
- Method of notification:** _____
-
3. **Have you addressed community concerns that were identified?** Yes No N/A
- If no, please briefly describe the community concerns that have been expressed and not addressed.
-
4. **Is your project funded by state or federal grants?** Yes No
- Note:** If "Yes", specify what aspect of the project is related to the grant and provide the grant source, contact person and grant expiration date.
- Aspect of Project Related to Grant
Grant Source: _____
Grant Contact Person: _____
Grant Expiration Date: _____
-
5. **Is this application for an authorization on Appendix A of the Land Use Policy? (For referenced list, see Appendix A of the Land Use Policy attached to GIF instructions)** Yes No
- Note:** If "No" to Question 5, the application is not subject to the Land Use Policy.
If "Yes" to Question 5, the application is subject to this policy and the Applicant should answer the additional questions in the **Land Use Information** section.

LAND USE INFORMATION

Note: Applicants should submit copies of local land use approvals or other evidence of compliance with local comprehensive plans and zoning ordinances.

1.	Is there an adopted county or multi-county comprehensive plan?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.	Is there a county stormwater management plan?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.	Is there an adopted municipal or multi-municipal comprehensive plan?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
4.	Is there an adopted county-wide zoning ordinance, municipal zoning ordinance or joint municipal zoning ordinance?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
<p>Note: If the Applicant answers "No" to either Questions 1, 3 or 4, the provisions of the PA MPC are not applicable and the Applicant does not need to respond to questions 5 and 6 below. If the Applicant answers "Yes" to questions 1, 3 and 4, the Applicant should respond to questions 5 and 6 below.</p>					
5.	Does the proposed project meet the provisions of the zoning ordinance or does the proposed project have zoning approval? If zoning approval has been received, attach documentation.	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
6.	Have you attached Municipal and County Land Use Letters for the project?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

COORDINATION INFORMATION

Note: The PA Historical and Museum Commission must be notified of proposed projects in accordance with DEP Technical Guidance Document 012-0700-001 utilizing the [Project Review Form](#).

If the activity will be a mining project (i.e., mining of coal or industrial minerals, coal refuse disposal and/or the operation of a coal or industrial minerals preparation/processing facility), respond to questions 1.0 through 2.5 below.

If the activity will not be a mining project, skip questions 1.0 through 2.5 and begin with question 3.0.

1.0	Is this a coal mining project? If "Yes", respond to 1.1-1.6. If "No", skip to Question 2.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
1.1	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be equal to or greater than 200 tons/day?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.2	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be greater than 50,000 tons/year?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.3	Will this coal mining project involve coal preparation/ processing activities in which thermal coal dryers or pneumatic coal cleaners will be used?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.4	For this coal mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.5	Will this coal mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.6	Will this coal mining project involve underground coal mining to be conducted within 500 feet of an oil or gas well?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.0	Is this a non-coal (industrial minerals) mining project? If "Yes", respond to 2.1-2.6. If "No", skip to Question 3.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
2.1	Will this non-coal (industrial minerals) mining project involve the crushing and screening of non-coal minerals other than sand and gravel?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.2	Will this non-coal (industrial minerals) mining project involve the crushing and/or screening of sand and gravel with the exception of wet sand and gravel operations (screening only) and dry sand and gravel operations with a capacity of less than 150 tons/hour of unconsolidated materials?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

2.3	Will this non-coal (industrial minerals) mining project involve the construction, operation and/or modification of a portable non-metallic (i.e., non-coal) minerals processing plant under the authority of the General Permit for Portable Non-metallic Mineral Processing Plants (i.e., BAQ-PGPA/GP-3)?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.4	For this non-coal (industrial minerals) mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.5	Will this non-coal (industrial minerals) mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.0	Will your project, activity, or authorization have anything to do with a well related to oil or gas production, have construction within 200 feet of, affect an oil or gas well, involve the waste from such a well, or string power lines above an oil or gas well? If "Yes", respond to 3.1-3.3. If "No", skip to Question 4.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
3.1	Does the oil- or gas-related project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water (including wetlands)?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.2	Will the oil- or gas-related project involve discharge of industrial wastewater or stormwater to a dry swale, surface water, ground water or an existing sanitary sewer system or storm water system? If "Yes", discuss in <i>Project Description</i> .	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.3	Will the oil- or gas-related project involve the construction and operation of industrial waste treatment facilities?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
4.0	Will the project involve a construction activity that results in earth disturbance? If "Yes", specify the total disturbed acreage.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
4.0.1	Total Disturbed Acreage 13				
4.0.2	Will the project discharge or drain to a special protection water (EV or HQ) or an EV wetland?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
4.0.3	Will the project involve a construction activity that results in earth disturbance in the area of the earth disturbance that are contaminated at levels exceeding residential or non-residential medium-specific concentrations (MSCs) in 25 Pa. Code Chapter 250 at residential or non-residential construction sites, respectively?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
5.0	Does the project involve any of the following: water obstruction and/or encroachment, wetland impacts, or floodplain project by the Commonwealth/political subdivision or public utility? If "Yes", respond to 5.1-5.7. If "No", skip to Question 6.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
5.1	Water Obstruction and Encroachment Projects – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.2	Wetland Impacts – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a wetland?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.3	Floodplain Projects by the Commonwealth, a Political Subdivision of the Commonwealth or a Public Utility – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a floodplain?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.4	Is your project an interstate transmission natural gas pipeline?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

5.5	Does your project consist of linear construction activities which result in earth disturbance in two or more DEP regions AND three or more counties?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.6	Does your project utilize Floodplain Restoration as a best management practice for Post Construction Stormwater Management?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.7	Does your project utilize Class V Gravity / Injection Wells as a best management practice for Post Construction Stormwater Management?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
6.0	Will the project involve discharge of construction related stormwater to a dry swale, surface water, ground water or separate storm water system?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
6.1	Will the project involve discharge of industrial waste stormwater or wastewater from an industrial activity or sewage to a dry swale, surface water, ground water or an existing sanitary sewer system or separate storm water system?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
7.0	Will the project involve the construction and operation of industrial waste treatment facilities?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
8.0	Will the project involve construction of sewage treatment facilities, sanitary sewers, or sewage pumping stations? If "Yes", indicate estimated proposed flow (gal/day). Also, discuss the sanitary sewer pipe sizes and the number of pumping stations/treatment facilities/name of downstream sewage facilities in the <i>Project Description</i> , where applicable.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	8.0.1 Estimated Proposed Flow (gal/day)				
9.0	Will the project involve the subdivision of land, or the generation of 800 gpd or more of sewage on an existing parcel of land or the generation of an additional 400 gpd of sewage on an already-developed parcel, or the generation of 800 gpd or more of industrial wastewater that would be discharged to an existing sanitary sewer system?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	9.0.1 Was Act 537 sewage facilities planning submitted and approved by DEP? If "Yes" attach the approval letter. Approval required prior to 105/NPDES approval.	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
10.0	Is this project for the beneficial use of biosolids for land application within Pennsylvania? If "Yes" indicate how much (i.e. gallons or dry tons per year).	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	10.0.1 Gallons Per Year (residential septage) _____				
	10.0.2 Dry Tons Per Year (biosolids) _____				
11.0	Does the project involve construction, modification or removal of a dam? If "Yes", identify the dam.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	11.0.1 Dam Name				
12.0	Will the project interfere with the flow from, or otherwise impact, a dam? If "Yes", identify the dam.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	12.0.1 Dam Name				
13.0	Will the project involve operations (excluding during the construction period) that produce air emissions (i.e., NOX, VOC, etc.)?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
	13.0.1 If "Yes", is the operation subject to the agricultural exemption in 35 P.S. § 4004.1?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	13.0.2 If the answer to 13.0.1 is "No", identify each type of emission followed by the estimated amount of that emission. Enter all types & amounts of emissions; separate each set with semicolons. See Plan Approval application				

14.0	Does the project include the construction or modification of a drinking water supply to serve 15 or more connections or 25 or more people, at least 60 days out of the year? If "Yes", check all proposed sub-facilities.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
14.0.1	Number of Persons Served	_____			
14.0.2	Number of Employee/Guests	_____			
14.0.3	Number of Connections	_____			
14.0.4	Sub-Fac: Distribution System	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.5	Sub-Fac: Water Treatment Plant	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.6	Sub-Fac: Source	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.7	Sub-Fac: Pump Station	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.8	Sub Fac: Transmission Main	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.9	Sub-Fac: Storage Facility	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
15.0	Will your project include infiltration of storm water or waste water to ground water within one-half mile of a public water supply well, spring or infiltration gallery?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
16.0	Is your project to be served by an existing public water supply? If "Yes", indicate name of supplier and attach letter from supplier stating that it will serve the project.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
16.0.1	Supplier's Name	_____			
16.0.2	Letter of Approval from Supplier is Attached	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
17.0	Will this project be served by on-lot drinking water wells?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
18.0	Will this project involve a new or increased drinking water withdrawal from a river, stream, spring, lake, well or other water bod(ies)? If "Yes", reference Safe Drinking Water Program.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
18.0.1	Source Name	_____			
19.0	Will the construction or operation of this project involve treatment, storage, reuse, or disposal of waste? If "Yes", indicate what type (i.e., hazardous, municipal (including infectious & chemotherapeutic), residual) and the amount to be treated, stored, re-used or disposed.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
19.0.1	Type & Amount	_____			
20.0	Will your project involve the removal of coal, minerals, contaminated media, or solid waste as part of any earth disturbance activities?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
21.0	Does your project involve installation of a field constructed underground storage tank? If "Yes", list each Substance & its Capacity. <u>Note</u>: Applicant may need a Storage Tank Site Specific Installation Permit.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
21.0.1	Enter all substances & capacity of each; separate each set with semicolons.	_____			
22.0	Does your project involve installation of an aboveground storage tank greater than 21,000 gallons capacity at an existing facility? If "Yes", list each Substance & its Capacity. <u>Note</u>: Applicant may need a Storage Tank Site Specific Installation Permit.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
22.0.1	Enter all substances & capacity of each; separate each set with semicolons.	_____			
23.0	Does your project involve installation of a tank greater than 1,100 gallons which will contain a highly hazardous substance as defined in DEP's Regulated Substances List, 2570-BK-DEP2724? If "Yes", list each Substance & its Capacity. <u>Note</u>: Applicant may need a Storage Tank Site Specific Installation Permit.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
23.0.1	Enter all substances & capacity of each; separate each set with semicolons.	_____			

24.0 Does your project involve installation of a storage tank at a new facility with a total AST capacity greater than 21,000 gallons? Yes No
If "Yes", list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit.

24.0.1 Enter all substances & capacity of each; separate each set with semicolons.

NOTE: If the project includes the installation of a regulated storage tank system, including diesel emergency generator systems, the project may require the use of a Department Certified Tank Handler. For a full list of regulated storage tanks and substances, please go to www.dep.pa.gov search term storage tanks

25.0 Will the intended activity involve the use of a radiation source? Yes No

CERTIFICATION

I certify that I have the authority to submit this application on behalf of the applicant named herein and that the information provided in this application is true and correct to the best of my knowledge and information.

For applicants supplying an EIN number: I am applying for a permit or authorization from the Pennsylvania Department of Environmental Protection (DEP). As part of this application, I will provide DEP with an accurate EIN number for the applicant entity. By filing this application with DEP, I hereby authorize DEP to confirm the accuracy of the EIN number provided with the Pennsylvania Department of Revenue. As applicant, I further consent to the Department of Revenue discussing the same with DEP prior to issuance of the Commonwealth permit or authorization.

Type or Print Name George Downey

George Downey
Signature

Operations Manager

Title

12/22/2021
Date



Submit in Triplicate

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

PROCESSES

Application for Plan Approval to Construct, Modify or Reactivate an Air Contamination Source and/or Install an Air Cleaning Device

This application must be submitted with the General Information Form (GIF).

Before completing this form, read the instructions provided for the form.

Section A - Facility Name, Checklist And Certification

Organization Name or Registered Fictitious Name/Facility Name: Cleveland-Cliffs Steelton LLC

DEP Client ID# (if known): _____

Type of Review required and Fees:

- Source which is not subject to NSPS, NESHAPs, MACT, NSR and PSD: \$ _____
- Source requiring approval under NSPS or NESHAPS or both: \$ _____
- Source requiring approval under NSR regulations: \$ _____
- Source requiring the establishment of a MACT limitation: \$ _____
- Source requiring approval under PSD: \$ 32,500

Applicant's Checklist

Check the following list to make sure that all the required documents are included.

- General Information Form (GIF)**
- Processes Plan Approval Application**
- Compliance Review Form** or provide reference of most recently submitted compliance review form for facilities submitting on a periodic basis: _____
- Copy and Proof of County and Municipal Notifications**
- Permit Fees**
- Addendum A: Source Applicable Requirements** (only applicable to existing Title V facility)

Certification of Truth, Accuracy and Completeness by a Responsible Official

I, George Downey, certify under penalty of law in 18 Pa. C. S. A. §4904, and 35 P.S. §4009(b) (2) that based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate and complete.

(Signature): *George Downey*
Name (Print): George Downey

Date: 12/22/2021
Title: Operations Manager

OFFICIAL USE ONLY

Application No. _____ Unit ID _____ Site ID _____
DEP Client ID #: _____ APS. ID _____ AUTH. ID _____
Date Received _____ Date Assigned _____ Reviewed By _____
Date of 1st Technical Deficiency _____ Date of 2nd Technical Deficiency _____
Comments: _____

Section B - Processes Information

1. Source Information

Source Description (give type, use, raw materials, product, etc). Attach additional sheets as necessary.

Universal Rail Mill to produce rails from blooms

Manufacturer TBD	Model No. TBD	Number of Sources 1
Source Designation URM1	Maximum Capacity 150 tons/hour	Rated Capacity 150 tons/hour

Type of Material Processed
Blooms

Maximum Operating Schedule

Hours/Day 24	Days/Week 7	Days/Year 365	Hours/Year 8,760
-----------------	----------------	------------------	---------------------

Operational restrictions existing or requested, if any (e.g., bottlenecks or voluntary restrictions to limit PTE)

Capacity (specify units)

Per Hour 150 tons	Per Day	Per Week	Per Year 720,000 tons
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Operating Schedule

Hours/Day	Days/Week	Days/Year	Hours/Year
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Seasonal variations (Months) From _____ to _____

If variations exist, describe them
None

2. Fuel

Type	Quantity Hourly	Annually	Sulfur	% Ash (Weight)	BTU Content
Oil Number _____	GPH @ 60°F	X 10 ³ Gal	% by wt		Btu/Gal. & Lbs./Gal. @ 60 °F
Oil Number _____	GPH @ 60°F	X 10 ³ Gal	% by wt		Btu/Gal. & Lbs./Gal. @ 60 °F
Natural Gas	SCFH	X 10 ⁶ SCF	grain/100 SCF		Btu/SCF
Gas (other) _____	SCFH	X 10 ⁶ SCF	grain/100 SCF		Btu/SCF
Coal	TPH	Tons	% by wt		Btu/lb
Other * _____					

*Note: Describe and furnish information separately for other fuels in Addendum B.

Section B - Processes Information (Continued)

3. Burner

Manufacturer	Type and Model No.	Number of Burners
Description:		
Rated Capacity	Maximum Capacity	

4. Process Storage Vessels

A. For Liquids:

Name of material stored		
Tank I.D. No.	Manufacturer	Date Installed
Maximum Pressure	Capacity (gallons/Meter ³)	
Type of relief device (pressure set vent/conservation vent/emergency vent/open vent)		
Relief valve/vent set pressure (psig)	Vapor press. of liquid at storage temp. (psia/kPa)	
Type of Roof: Describe:		
Total Throughput Per Year	Number of fills per day (fill/day): Filling Rate (gal./min.): Duration of fill hr./fill):	

B. For Solids

Type: <input type="checkbox"/> Silo <input type="checkbox"/> Storage Bin <input type="checkbox"/> Other, Describe	Name of Material Stored	
Silo/Storage Bin I.D. No.	Manufacturer	Date Installed
State whether the material will be stored in loose or bags in silos	Capacity (Tons)	
Turn over per year in tons	Turn over per day in tons	
Describe fugitive dust control system for loading and handling operations		
Describe material handling system		

5. Request for Confidentiality

Do you request any information on this application to be treated as "Confidential"? Yes No
 If yes, include justification for confidentiality. Place such information on separate pages marked "confidential".

Section B - Processes Information (Continued)

6. Miscellaneous Information

Attach flow diagram of process giving all (gaseous, liquid and solid) flow rates. Also, list all raw materials charged to process equipment, and the amounts charged (tons/hour, etc.) at rated capacity (give maximum, minimum and average charges describing fully expected variations in production rates). Indicate (on diagram) all points where contaminants are controlled (location of water sprays, collection hoods, or other pickup points, etc.). Describe collection hoods location, design, airflow and capture efficiency. Describe any restriction requested and how it will be monitored.
 See Plan Approval application. Use of polymer quench for head hardening in the URM operation results in small amount of emissions.

Describe fully the facilities provided to monitor and to record process operating conditions, which may affect the emission of air contaminants. Show that they are reasonable and adequate.
 See Plan Approval application.

Describe each proposed modification to an existing source.

Identify and describe all fugitive emission points, all relief and emergency valves and any by-pass stacks.

Describe how emissions will be minimized especially during start up, shut down, process upsets and/or disruptions.

Anticipated Milestones:

- i. Expected commencement date of construction/reconstruction/installation: _____
- ii. Expected completion date of construction/reconstruction/installation: _____
- iii. Anticipated date of start-up: _____

Section C - Air Cleaning Device

1. Precontrol Emissions*

Pollutant	Maximum Emission Rate			Calculation/ Estimation Method
	Specify Units	Pounds/Hour	Hours/Year	
PM				
PM ₁₀				
SO _x				
CO				
NO _x				
VOC				
Others: (e.g., HAPs)	-----	-----	-----	-----

* These emissions must be calculated based on the requested operating schedule and/or process rate, e.g., operating schedule for maximum limits or restricted hours of operation and/or restricted throughput. Describe how the emission values were determined. Attach calculations.

2. Gas Cooling

Water quenching Yes No Water injection rate _____ GPM

Radiation and convection cooling Yes No Air dilution Yes No
 If yes, _____ CFM

Forced Draft Yes No Water cooled duct work Yes No

Other _____

Inlet Volume _____ ACFM Outlet Volume _____ ACFM
 @ _____ °F _____ % Moisture @ _____ °F _____ % Moisture

Describe the system in detail.

Section C - Air Cleaning Device (Continued)

3. Settling Chambers

Manufacturer		Volume of gas handled _____ACFM @ _____°F	Gas velocity (ft./sec.)	
Length of chamber (ft.)	Width of chamber (ft.)	Height of chamber (ft.)	Number of trays	
Water injection <input type="checkbox"/> Yes <input type="checkbox"/> No		Water injection rate (GPM)		

Emissions Data

Inlet	Outlet	Removal Efficiency (%)

4. Inertial and Cyclone Collectors

Manufacturer		Type	Model No.
Pressure drop (in. of water)	Inlet volume _____ACFM @ _____°F	Outlet volume _____ACFM @ _____°F	
Number of individual cyclone(s)		Outlet straightening vanes used? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Length of Cyclone(s) Cylinder (ft.)	Diameter of Cyclone(s) Cylinder (ft.)	Length of Cyclone(s) cone (ft.)	
Inlet Diameter (ft.) or duct area (ft. ²) of cyclone(s)		Outlet Diameter (ft.) or duct area (ft. ²) of cyclone(s)	

If a multi-clone or multi-tube unit is installed, will any of the individual cyclones or cyclone tubes be blanked or blocked off?

Describe any exhaust gas recirculation loop to be employed.

Attach particle size efficiency curve

Emissions Data

Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)			
5. Fabric Collector			
Equipment Specifications			
Manufacturer _____		Model No. _____	<input type="checkbox"/> Pressurized Design <input type="checkbox"/> Suction Design
Number of Compartments _____	Number of Filters Per Compartment _____	Is Baghouse Insulated? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Can each compartment be isolated for repairs and/or filter replacement?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Are temperature controls provided? (Describe in detail)		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Dew point at maximum moisture _____°F		Design inlet volume _____ SCFM	
Type of Fabric Material _____ <input type="checkbox"/> Felted <input type="checkbox"/> Membrane Weight _____ oz/sq.yd <input type="checkbox"/> Woven <input type="checkbox"/> Others: List: _____ Thickness _____ in <input type="checkbox"/> Felted-Woven			
Fabric permeability (clean) @ ½" water-Δ P _____ CFM/sq.ft.			
Filter dimensions Length _____ Diameter/Width _____			
Effective area per filter _____		Maximum operating temperature (°F) _____	
Effective air to cloth ratio Minimum _____ Maximum _____			
Drawing of Fabric Filter A sketch of the fabric filter showing all access doors, catwalks, ladders and exhaust ductwork, location of each pressure and temperature indicator should be attached.			
Operation and Cleaning			
Volume of gases handled _____ ACFM @ _____°F		Pressure drop across collector (in. of water). Describe the equipment to be used to monitor the pressure drop.	
Type of filter cleaning <input type="checkbox"/> Manual Cleaning <input type="checkbox"/> Bag Collapse <input type="checkbox"/> Reverse Air Jets <input type="checkbox"/> Mechanical Shakers <input type="checkbox"/> Sonic Cleaning <input type="checkbox"/> Other: _____ <input type="checkbox"/> Pneumatic Shakers <input type="checkbox"/> Reverse Air Flow			
Describe the equipment provided if dry oil free air is required for collector operation			
Cleaning Initiated By <input type="checkbox"/> Timer Frequency if timer actuated _____ <input type="checkbox"/> Expected pressure drop range _____ in. of water <input type="checkbox"/> Other Specify _____			
Does air cleaning device employ hopper heaters, hopper vibrators or hopper level detectors? If yes, describe.			
Describe the warning/alarm system that protects against operation when the unit is not meeting design requirements.			
Emissions Data			
Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)			
6. Wet Collection Equipment			
Equipment Specifications			
Manufacturer	Type	Model No.	
Design Inlet Volume (SCFM)		Relative Particulate/Gas Velocity (ejector scrubbers only)	
Describe the internal features (e.g., variable throat, gas/liquid diffusion plates, spray nozzles, liquid redistributors, bed limiters, etc.).			
Describe pH monitoring and pH adjustment systems, if applicable.			
Describe mist eliminator or separator (type, configuration, backflush capability, frequency).			
Attach particulate size efficiency curve.			
Operating Parameters			
Inlet volume of gases handled _____ (ACFM) @ _____ °F		Outlet volume of gases handled _____ (ACFM) @ _____ °F _____ % Moisture	
Liquid flow rates. Describe equipment provided to measure liquid flow rates to scrubber (e.g., quenching section, recirculating solution, makeup water, bleed flow, etc.)			
Describe scrubber liquid supply system (amount of make-up and recirculating liquid, capacity of recirculating liquid system, etc.)			
State pressure drop range (in water) across scrubber (e.g., venturi throat, packed bed, etc.) only. Describe the equipment provide to measure the pressure drop. Do not include duct or de-mister losses.			
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.			
Emissions Data			
Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)			
7. Electrostatic Precipitator			
Equipment Specifications			
Manufacturer	Model No.	<input type="checkbox"/> Wet	<input type="checkbox"/> Dry
		<input type="checkbox"/> Single-Stage	<input type="checkbox"/> Two-Stage
Gas distribution grids <input type="checkbox"/> Yes <input type="checkbox"/> No		Design Inlet Volume (SCFM) _____	
		Maximum operating temperature (°F) _____	
Total collecting surface area _____ sq. ft.		Collector plates size length _____ ft. x width _____ ft.	
Number of fields _____		Number of collector plates/field _____	
Spacing between collector plates _____ inches.			
Maximum gas velocity _____ ft./sec.		Minimum gas treatment time: _____ sec.	
Total discharge electrode length _____ ft.			
Number of discharge electrodes _____		Number of collecting electrode rappers _____	
Rapper control <input type="checkbox"/> Magnetic <input type="checkbox"/> Pneumatic <input type="checkbox"/> Other _____ Describe in detail			
Operating Parameters			
Inlet gas temperature (°F) _____		State pressure drop range (inches water gauge) across collector only _____	
Outlet gas temperature (°F) _____		Describe the equipment	
Volume of gas handled (ACFM) _____		Dust resistivity (ohm-cm). Will resistivity vary?	
Power requirements			
Number and size of Transformer Rectifier sets by electrical field			
Field No.	No. of Sets	Each Transformer KVA	Each Rectifier KV Ave./Peak Ma DC
Current Density _____ Micro amperes/ft ² .		Corona Power _____ Watts/1000 ACFM	Corona Power Density _____ Watts/ft ² .
Will a flue gas conditioning system be employed? If yes, describe it.			
Does air cleaning device employ hopper heaters, hopper vibrators or hopper level detectors? If yes, describe.			
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.			
Emissions Data			
Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)			
8. Adsorption Equipment			
Equipment Specifications			
Manufacturer	Type	Model No.	
Design Inlet Volume (SCFM)		Adsorbent charge per adsorber vessel and number of adsorber vessels	
Length of Mass Transfer Zone (MTZ), supplied by the manufacturer based upon laboratory data.			
Adsorber diameter (ft.) and area ft ² .)		Adsorption bed depth (ft.)	
Adsorbent information			
Adsorbent type and physical properties.			
Working capacity of adsorbent (%)		Heel percent or unrecoverable solvent weight % in the adsorbent after regeneration.	
Operating Parameters			
Inlet volume of gases handled _____ (ACFM) @ _____ °F			
Adsorption time per adsorption bed		Breakthrough capacity: Lbs. of solvent / 100 lbs. of adsorbent = _____	
Vapor pressure of solvents at the inlet temperature		Available steam in pounds to regenerate carbon adsorber (if applicable)	
Percent relative saturation of each solvent at the inlet temperature			
Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment.			
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.			
Emissions Data			
Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)			
9. Absorption Equipment			
Equipment Specifications			
Manufacturer		Type	Model No.
Design Inlet Volume (SCFM)		Tower height (ft.) and inside diameter (ft.)	
Packing type and size (if applicable)		Height of packing (ft.) (if applicable)	
Number of trays (if applicable)		Number of bubble caps (if applicable)	
Configuration <input type="checkbox"/> Counter-current <input type="checkbox"/> Cross flow <input type="checkbox"/> Cocurrent flow			
Describe pH and/or other monitoring and controls.			
Absorbent information			
Absorbent type and concentration.		Retention time (sec.)	
Attach equilibrium data for absorption (if applicable)			
Attach any additional information regarding auxiliary equipment, absorption solution supply system (once through or recirculating, system capacity, etc.) to thoroughly evaluate the control equipment. Indicate the flow rates for makeup, bleed and recirculation.			
Operating Parameters			
Volume of gas handled (ACFM)	Inlet temperature (°F)	Pressure drop (in. of water) and liquid flow rate. Describe the monitoring equipment.	
State operating range for pH and/or absorbent concentration in scrubber liquid.			
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.			
Emissions Data			
Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)

10. Selective Catalytic Reduction (SCR)
 Selective Non-Catalytic Reduction (SNCR)
 Non-Selective Catalytic Reduction (NSCR)

Equipment Specifications

Manufacturer	Type	Model No.
--------------	------	-----------

Design Inlet Volume (SCFM)	Design operating temperature (°F)
----------------------------	-----------------------------------

Is the system equipped with process controls for proper mixing/control of the reducing agent in gas stream? If yes, give details.

Attach efficiency and other pertinent information (e.g., ammonia slip)

Operating Parameters

Volume of gases handled _____ (ACFM) @ _____ °F

Operating temperature range for the SCR/SNCR/NSCR system (°F) From _____ °F To _____ °F

Reducing agent used, if any	Oxidation catalyst used, if any
-----------------------------	---------------------------------

State expected range of usage rate and concentration.

Service life of catalyst	Ammonia slip (ppm)
--------------------------	--------------------

Describe fully with a sketch giving locations of equipment, controls systems, important parameters and method of operation.

Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.

Emissions Data

Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)			
11. Oxidizer/Afterburners			
Equipment Specifications			
Manufacturer	Type <input type="checkbox"/> Thermal <input type="checkbox"/> Catalytic	Model No.	
Design Inlet Volume (SCFM)	Combustion chamber dimensions (length, cross-sectional area, effective chamber volume, etc.)		
Describe design features, which will ensure mixing in combustion chamber.			
Describe method of preheating incoming gases (if applicable).		Describe heat exchanger system used for heat recovery (if applicable).	
Catalyst used	Life of catalyst	Expected temperature rise across catalyst (°F)	Dimensions of bed (in inches). Height: _____ Diameter or Width: _____ Depth: _____
Are temperature sensing devices being provided to measure the temperature rise across the catalyst? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe.			
Describe any temperature sensing and/or recording devices (including specific location of temperature probe in a drawing or sketch).			
Burner Information			
Burner Manufacturer	Model No.	Fuel Used	
Number and capacity of burners	Rated capacity (each)	Maximum capacity (each)	
Describe the operation of the burner		Attach dimensioned diagram of afterburner	
Operating Parameters			
Inlet flow rate (ACFM) _____ @ _____°F		Outlet flow rate (ACFM) _____ @ _____°F	
State pressure drop range across catalytic bed (in. of water).		Describe the method adopted for regeneration or disposal of the used catalyst.	
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.			
Emissions Data			
Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)

12. Flares

Equipment Specifications

Manufacturer	Type <input type="checkbox"/> Elevated flare <input type="checkbox"/> Ground flare <input type="checkbox"/> Other _____ Describe	Model No.
Design Volume (SCFM)	Dimensions of stack (ft.) Diameter _____ Height _____	
Residence time (sec.) and outlet temperature (°F)	Turn down ratio	Burner details

Describe the flare design (air/steam-assisted or nonassisted), essential auxiliaries including pilot flame monitor of proposed flare with a sketch.

Describe the operation of the flare's ignition system.

Describe the provisions to introduce auxiliary fuel to the flare.

Operation Parameters

Detailed composition of the waste gas	Heat content	Exit velocity
Maximum and average gas flow burned (ACFM)	Operating temperature (°F)	

Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.

Emissions Data

Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)

13. Other Control Equipment

Equipment Specifications

Manufacturer	Type	Model No.
--------------	------	-----------

Design Volume (SCFM)	Capacity
----------------------	----------

Describe pH monitoring and pH adjustment, if any.

Indicate the liquid flow rate and describe equipment provided to measure pressure drop and flow rate, if any.

Attach efficiency curve and/or other efficiency information.

Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment.

Operation Parameters

Volume of gas handled
 _____ ACFM @ _____ °F _____ % Moisture

Describe fully giving important parameters and method of operation.

Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.

Emissions Data

Pollutant	Inlet	Outlet	Removal Efficiency (%)

Section C - Air Cleaning Device (Continued)

14. Costs

Indicate cost associated with air cleaning device and its operating cost (attach documentation if necessary)

NA

Device	Direct Cost	Indirect Cost	Total Cost	Annual Operating Cost

15. Miscellaneous

Describe in detail the removal, handling and disposal of dust, effluent, etc. from the air cleaning device including proposed methods of controlling fugitive emissions.

Attach manufacturer's performance guarantees and/or warranties for each of the major components of the control system (or complete system).

Attach the maintenance schedule for the control equipment and any part of the process equipment that if in disrepair would increase air contaminant emissions.

Section D - Additional Information

Will the construction, modification, etc. of the sources covered by this application increase emissions from other sources at the facility? If so, describe and quantify.

See Plan Approval application.

If this project is subject to any one of the following, attach a demonstration to show compliance with applicable standards.

- a. Prevention of Significant Deterioration permit (PSD), 40 CFR 52? YES NO
- b. New Source Review (NSR), 25 Pa. Code Chapter 127, Subchapter E? YES NO
- c. New Source Performance Standards (NSPS), 40 CFR Part 60?
(If Yes, which subpart) _____ YES NO
- d. National Emissions Standards for Hazardous Air Pollutants (NESHAP),
40 CFR Part 61? (If Yes, which subpart) _____ YES NO
- e. Maximum Achievable Control Technology (MACT) 40 CFR Part 63?
(If Yes, which part) _____ YES NO

Attach a demonstration showing that the emissions from any new sources will be the minimum attainable through the use of best available technology (BAT).

See Plan Approval application.

Provide emission increases and decreases in allowable (or potential) and actual emissions within the last five (5) years for applicable PSD pollutant(s) if the facility is an existing major facility (PSD purposes).

See Plan Approval application.

Section D - Additional Information (Continued)

Indicate emission increases and decreases in tons per year (tpy), for volatile organic compounds (VOCs) and nitrogen oxides (NOx) for NSR applicability since January 1, 1991 or other applicable dates (see other applicable dates in instructions). The emissions increases include all emissions including stack, fugitive, material transfer, other emission generating activities, quantifiable emissions from exempted source(s), etc.

Permit number (if applicable)	Date issued	Indicate Yes or No if emission increases and decreases were used previously for netting	Source I. D. or Name	VOCs		NOx	
				Emission increases in potential to emit (tpy)	Creditable emission decreases in actual emissions (tpy)	Emission increases in potential to emit (tpy)	Creditable emission decreases in actual emissions (tpy)
			See Plan Approval				
			Application				

- If the source is subject to 25 Pa. Code Chapter 127, Subchapter E, New Source Review requirements,
- a. Identify Emission Reduction Credits (ERCs) for emission offsets or demonstrate ability to obtain suitable ERCs for emission offsets. See Plan Approval application.
 - b. Provide a demonstration that the lowest achievable emission rate (LAER) control techniques will be employed (if applicable). NA
 - c. Provide an analysis of alternate sites, sizes, production processes and environmental control techniques demonstrating that the benefits of the proposed source outweigh the environmental and social costs (if applicable). NA

Attach calculations and any additional information necessary to thoroughly evaluate compliance with all the applicable requirements of Article III and applicable requirements of the Clean Air Act adopted thereunder. The Department may request additional information to evaluate the application such as a standby plan, a plan for air pollution emergencies, air quality modeling, etc. See Plan Approval application.

Section E - Compliance Demonstration

Note: Complete this section if source is not a Title V facility. Title V facilities must complete Addendum A.

Method of Compliance Type: Check all that apply and complete all appropriate sections below

- Monitoring Testing Reporting
 Recordkeeping Work Practice Standard

Monitoring:

- a. Monitoring device type (Parameter, CEM, etc):
- b. Monitoring device location:
- c. Describe all parameters being monitored along with the frequency and duration of monitoring each parameter:

Testing:

- a. Reference Test Method: Citation
- b. Reference Test Method: Description

Recordkeeping:

Describe what parameters will be recorded and the recording frequency:

Reporting:

- a. Describe what is to be reported and frequency of reporting:

- b. Reporting start date: _____

Work Practice Standard:

Describe each:

Section F - Flue and Air Contaminant Emission

1. Estimated Atmospheric Emissions*				
Pollutant	Maximum emission rate			Calculation/ Estimation Method
	specify units	lbs/hr	tons/yr.	
PM				
PM ₁₀				
SO _x				
CO				
NO _x				
VOC			2	VOC content of polymer
Others: (e.g., HAPs)	-----	-----	-----	-----

* These emissions must be calculated based on the requested operating schedule and/or process rate e.g., operating schedule for maximum limits or restricted hours of operation and /or restricted throughput. Describe how the emission values were determined. Attach calculations.

2. Stack and Exhauster

Stack Designation/Number _____

List Source(s) or source ID exhausted to this stack: _____	% of flow exhausted to stack: _____
--	-------------------------------------

Stack height above grade (ft.) Grade elevation (ft.) _____	Stack diameter (ft) or Outlet duct area (sq. ft.) _____	f. Weather Cap <input type="checkbox"/> YES <input type="checkbox"/> NO
---	---	--

Distance of discharge to nearest property line (ft.). Locate on topographic map. _____

Does stack height meet Good Engineering Practice (GEP)? _____

If modeling (estimating) of ambient air quality impacts is needed, attach a site plan with buildings and their dimensions and other obstructions.

Location of stack** Latitude/Longitude Point of Origin	Latitude			Longitude		
	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds

Stack exhaust
Volume _____ ACFM Temperature _____ °F Moisture _____ %

Indicate on an attached sheet the location of sampling ports with respect to exhaust fan, breeching, etc. Give all necessary dimensions.

Exhauster (attach fan curves) _____ in. of water _____ HP @ _____ RPM.

** If the data and collection method codes differ from those provided on the General Information Form-Authorization Application, provide the additional detail required by that form on a separate form.

Section G - Attachments

Number and list all attachments submitted with this application below:



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

Addendum 1 Method Of Compliance Worksheet

SECTION 1. APPLICABLE REQUIREMENT

Federal Tax Id: 85-4084783-1 Firm Name: Cleveland-Cliffs Steelton LLC
Plant Code: Plant Name: Cleveland-Cliffs Steelton LLC/Steelton

Applicable Requirement for: (please check only one box below)

- The entire site
- A group of sources, Group ID: _____
- A single source, Unit ID: URM1
- Alternative Scenario, Scenario Name: _____

Citation #: _____

Compliance Method based upon: Applicable Requirement Gap Filling Requirement

Method of Compliance Type: (Check all that applies and complete all appropriate sections below)

- Monitoring Testing Reporting
- Record Keeping Work Practice Standard

Section 2: Monitoring

1. Monitoring device type (stack test, CEM, etc.): _____

2. Monitoring device location: _____

Describe all parameters being monitored along with the frequency and duration of monitoring each parameter:

3. How will data be reported: _____

Section 3: Testing

1. Reference Test Method Description:

2. Reference Test Method Citation:

Section 4: Record Keeping

Describe what parameters will be recorded and the frequency of recording:

Records of polymer use

in the head hardening

system.

Section 5: Reporting

Describe what is to be reported and the frequency of reporting:

1. Reporting start date:

Section 6: Work Practice Standard

Describe any work practice standards:

SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
Steelton	Steelton		85-4084783-1	Applicant

SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"

Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
Cleveland-Cliffs Steelton LLC	200 Public Square, Cleveland, OH 44114	Cuyahoga County and Cleveland	(216) 694-5700	Parent

Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.

Name	Business Address
NA	

List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).

Name	Business Address
George Downey	215 S Front St, Steelton, PA

Plan Approvals or Operating Permits. List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
Multiple	Title V 22-05012	Steelton, PA	11/20/2017	11/30/2022

Compliance Background. (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
11/30/21	Steelton	22-05012	CEMS report corrected and resubmitted as requested	Inspection	Corrected/11/19/21	\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date

CONTINUING OBLIGATION. Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

VERIFICATION STATEMENT

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.

George Downey

Signature

12/22/2021

Date

George Downey

Name (Print or Type)

Operations Manager

Title

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "ARCELORMITTAL STEELTON LLC", CHANGING ITS NAME FROM "ARCELORMITTAL STEELTON LLC" TO "CLEVELAND-CLIFFS STEELTON LLC", FILED IN THIS OFFICE ON THE TWENTY-THIRD DAY OF DECEMBER, A.D. 2020, AT 1:34 O`CLOCK P.M.



Jeffrey W. Bullock, Secretary of State

3644073 8100
SR# 20208745860

Authentication: 202201544
Date: 01-02-21

You may verify this certificate online at corp.delaware.gov/authver.shtml

**CERTIFICATE OF AMENDMENT
OF
CERTIFICATE OF FORMATION**

ArcelorMittal Steelton LLC (the "Company"), a limited liability company organized and existing under the Delaware Limited Liability Company Act, as amended, DOES HEREBY CERTIFY:

FIRST: That the members of the management board of the Company, by the unanimous written consent of its members, adopted resolutions proposing and declaring advisable the following amendment to the Certificate of Formation of the Company.

RESOLVED, that the Company's Certificate of Formation be amended so that Article FIRST thereof shall read in its entirety as follows:

FIRST: The name of the Company is:

Cleveland-Cliffs Steelton LLC

SECOND: That in lieu of a meeting, the sole member has given its written consent to said amendment in accordance with the provisions of the Delaware Limited Liability Company Act.

THIRD: That the aforesaid amendment was duly adopted in accordance with the applicable provisions of the Delaware Limited Liability Company Act.

IN WITNESS WHEREOF, the Company has caused this Certificate of Amendment to be executed by its duly authorized officer this 23rd day of December, 2020.

ARCELORMITTAL STEELTON LLC

By: 

Paul M. Liebenson
Assistant Secretary



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

Emission Reduction Credit (ERC) Registry Application

- This ERC Registry Application may be used by a major or non-major facility.
- ERCs may be created only if the ERC Registry Application is filed within one year of actual emission reductions.
- Read instructions for the ERC Registry Application prior to completing this form.

Section 1 - Identity and Location of Air Contamination Source

1A. Facility/Corporation Information

Facility Name: Cleveland Cliffs Steelton LLC	Facility Address: 215 S Front St, Steelton, PA 17113
Telephone Number: (717) 986-2454	Fax Number: (717)986-2240

1B. Facility Operator Information

(Complete if operator is different from company)

Operator's Name: Same	Company Address:
Federal ID Number:	Fax Number:
Telephone Number:	

1C. Plant/Facility Information

Plant Name: Cleveland Cliffs Steelton LLC/Steelton	Plant Address: 215 S Front St, Steelton, PA 17113
Federal ID Number: 85-4084783-1	Fax Number: (717)986-2240
Telephone Number: (717) 986-2454	
Municipality/Township: Steelton Borough	County: Dauphin

1D. Facility Type

<input checked="" type="checkbox"/> Major Facility <input type="checkbox"/> Non-Major Facility	Permit No. (Title V/RACT/Synthetic Minor): 22-05012
--	---

1E. Contact Person for this Application

Name: Ray Ajalli	Mailing Address: 139 Modena Road, Coatesville, PA 19320
Title: Manager Environmental	Fax Number: _____
Telephone Number: (610) 383-2097	

1F. Certification Statement

I, _____, certify under penalty of law as provided in 18 Pa. C.S.A. § 4904 and 35 P.S. § 4009(b)(2)) that I am authorized to make this Certification on behalf of the facility identified in this application and based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate and complete. I further certify that the emission reductions will be maintained as set forth in this application and that the emission reductions were not previously used in netting transactions, alternative emissions limitations, acid rain allowances or to generate other emission reduction credits.

General Manager

Signature

Title

Date

Section 2 - ERC-Generating Source Information

Provide the following information for the ERC-generating source

2A. Type of Source: 35" Mill Reheat Furnaces 3 & 4	2B. Plan Approval\Permit Number: <u>22-05012C</u> Note: A permit is required for any source that is continuing to operate
2C. Manufacturer of Source: NA	2D. Model Number: NA
2E. Date of Installation of the Source:	2F. Air Cleaning Device NA
2G. Source ID/Designation 301	2H. Hourly Rated Capacity
2I. Annual Throughput:	2J. Other Information:

Section 3 - ERC Generation Techniques

Check appropriate box(es) to identify applicable ERC-generating technique(s)

- Shutdown of a source at an existing facility
 Shutdown of an existing facility
 Permanent curtailment of production or operation hours
 Improved control measures including improved control of fugitive emissions
 Installation of an air pollution control devise beyond regulatory requirements
 Use of lower volatile organic compound (VOC) coatings than required
 New technology and/or materials (not required by applicable law)
 Process equipment modifications (not required by applicable law)
 Incidental emissions reduction of nonhazardous air pollutants
 Economic Incentive Program
 Other: _____

Section 4 - Intended use of ERCs

Check appropriate box(es) to specify intended use of ERCs

- Netting/Offsetting
 Banking/Trading/Selling Purposes

Section 5 –Emissions Reduction Initiation DateActual/Expected Date of Initiation of Emission Reduction: TBD

Section 6 - Baseline Emission Rate Summary

Baseline emission rate (expressed in lbs/hr or tons/yr) is based on the lower of actual or allowable emissions calculated over two (2) calendar years immediately preceding the reduction unless otherwise approved by the Department.

Calendar Year	Hours of Operation	VOC		NOx		Other	
		lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
2019			0.53		96.54		
2020			0.43		78.83		
Average:			0.51		87.68		
Average Actual Emissions corrected with applicable SIP limitations *			0.51		87.68		
*RACT/MACT/LAER/BACT, etc.							
Revised Allowable Emissions after emission reductions:			0		0		
Available ERCs:			0.51		87.68		
Emission rates after reduction:							
VOC: _____ Lbs/Hour _____ Tons/Year NOx: _____ Lbs/Hour _____ Tons/Year Other: _____ Lbs/Hour _____ Tons/Year							

Do the above baseline emission estimates agree with emission statements submitted for PEDS/ AIMS and any fees that have been paid, if applicable?

Yes No If "No", submit request to amend emissions inventory along with this application.

Is the facility subject to any proposed maximum achievable control technology standards for hazardous air pollutants (MACT)? If yes, specify federal citation including Subpart.

Yes Subpart: _____ No

Section 7 - Emission Quantification Methods

Check appropriate box(es) for method(s) used to determine the baseline emission rate. Attach copies of source tests, summaries of records, measurements or calculation methods used to estimate the baseline emissions.

- Performance test data on same unit
- Performance test data on similar unit
- Continuous emission monitoring data
- Equipment vendor emission data and guarantees
- Emission factors from technical reference or article
- AP-42 Emission Factors Table Number: _____
- EPA Test Data Document Document Number: _____
- Other: _____

Section 8 - Emission Characteristics

Provide the following information to determine the ambient impact of the emissions reduction

(a) Hours of Operation:	(b) Hourly Rate (specify unit):
(c) Stack Height (from ground level):	(d) Stack Inside Diameter:
(e) Exhaust Volume:	(f) Exhaust Temperature:
(g) Seasonal Period (months) Operated: _____ to _____	

Is the affected source in compliance with all applicable requirements?

Yes No If "No", attach a list of the violation(s), date(s) and location(s) specified in the Notice of Violation.

List all attachments provided to evaluate this ERC Registry Application.

Emissions Calculations in Appendix B

OFFICIAL USE ONLY	
Regional Office: _____	Date Received: _____
Reviewed By: _____	Date Reviewed: _____
Plan Approval Number: _____	Date Submitted: _____
Previous Netting Transaction Date and Plan Approval Number: _____	
Comments:	
Central Office NSR Section:	Entry Date: _____
Reviewed By: _____	
Comments:	

Appendix B – Emissions Calculations

Major NSR Applicability Analysis and Pre-Project Record

Company: **Cleveland-Cliffs Steelton LLC**
 Facility: **Steelton, PA**
 Project: **Steelton Modernization Project**
 Date: **12/21/2021**

1. Pre-Project Record (40 CFR § 52.21 (r)(6), 25 Pa.Code § 127.203a (a)(1))

(A) Description of the Project

The steel mill at Steelton, Pennsylvania was the first plant in the United States to produce steel for railroad rails. Cleveland-Cliffs is proposing a project to install a Universal Rail Mill for rolling rail products. The state-of-the-art Universal Rail Mill process will modernize the product finishing process and reduce cost. This will enable the quality of the rail product to meet the customer demand.

(B) Identification of Affected Emission Units

Existing Affected Emission Units: Steelmaking; WBF
 New Affected Emissions Units: Universal Rail Mill

(C) Description of Applicability Test

Applicability Test: Hybrid Test - Consisting of Actual-to-Projected-Actual Emissions (ATPA) for existing units and PTE for new units

(i) Baseline Actual Emissions (BAE) (40 CFR § 52.21 (b)(48), 25 Pa.Code § 127.203a (a)(4))

BAE Time Period: **Jan-2017 to Dec-2018**
 BAE Production Rate: **295,215 tons per year**

Plan Approval Application Submittal Date: **Jan-2022** Plan Approval application date determines the 5 year lookback period date for the project.
 5 Year Lookback Period: **Jan-2017 to Dec-2021**

Emissions Unit	Baseline Actual Emissions (tons/year)							
	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	
DCEAF Furnace	3.49	2.59		10.19	11.98	7.15	168.67	33,670
Ladle Refining Furnace								
Meltshop Fugitives	0.77	0.77		0.00	0.00	0.00	0.00	0
VDG @ Steelmaking	0.00	0.00		0.00	0.00	0.00	14.09	0
Walking Beam Furnace	2.01	2.01		0.16	22.06	0.29	1.93	31,626
EAF Ladle Preheaters #1-#4	0.17	0.17		0.01	2.26	0.12	1.90	2,698
Burn Off Oven	0.00	0.00		0.00	0.01	0.00	0.01	14
Caster Tundish Preheaters & Dryer	0.08	0.08		0.01	1.42	0.03	0.85	1,215
Caster Cutting Torches #1-#6	0.01	0.01		0.00	0.12	0.01	0.10	146
Caster Vents	0.00	0.00		0.00	0.00	4.21	0.00	0
Scrap Prep	0.33	0.33		0.00	0.00	0.00	0.00	0
Scrap Prep	0.03	0.03		0.00	0.52	0.02	0.31	442
Road Dust Emissions	4.23	0.42		0.00	0.00	0.00	0.00	0

(ii) (a) Potential to Emit (PTE) (40 CFR § 52.21 (b)(4), 25 Pa.Code § 121.1)

Emissions Unit	Potential To Emit (tons/year)							
Universal Rail Mill						VOC	2.00	

(ii) (b) Projected Actual Emissions (PAE) (40 CFR § 52.21 (b)(41), 40 CFR 51 App S.II.A.24, 25 Pa.Code § 127.203a (a)(5))

Future Production Rate for affected emissions units: 768,000 tons of steel/year

Steelmaking - Maximum production rate in the five year period after the implementation of the Project.
 Monitoring for five year period is required because the project will not increase the design capacity of the unit.
 Projected Project Completion Date: **Jan-2024**
 Period for projection: **Jan-2024 to Dec-2028 5 Year Period**

Emissions Unit	Projected Actual Emissions (tons/year)							
	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	
DCEAF Furnace	9.08	6.73		26.51	31.16	18.59	438.79	87,593
Ladle Refining Furnace								
Meltshop Fugitives	2.01	2.01		0.00	0.00	0.00	0.00	0
VDG @ Steelmaking	0.00	0.00		0.00	0.00	0.00	38.40	0
Walking Beam Furnace	4.44	4.44		0.35	48.65	0.64	49.06	69,754
EAF Ladle Preheaters #1-#4	0.45	0.45		0.04	5.88	0.32	4.94	7,020
Burn Off Oven	0.00	0.00		0.00	0.03	0.00	0.03	37
Caster Tundish Preheaters & Dryer	0.20	0.20		0.02	3.70	0.07	2.22	3,160
Caster Cutting Torches #1-#6	0.02	0.02		0.00	0.32	0.02	0.27	381
Caster Vents	0.00	0.00		0.00	0.00	11.90	0.00	0
Scrap Prep	0.87	0.87		0.00	0.00	0.00	0.00	0
Scrap Prep	0.07	0.07		0.01	1.35	0.05	0.81	1,150
Road Dust Emissions	11.01	1.10		0.00	0.00	0.00	0.00	0

(iii) Excludable Emissions (EE) (40 CFR § 52.21 (b)(41)(ii)(c), 25 Pa.Code § 127.203a (a)(5)(i)(C))

Excludable Emissions unrelated to the project

Steelmaking Historical Performance	
Maximum production that is unrelated to the project:	494,054 tons/year
Based on annualized production rate from maximum monthly performance during Feb-2017.	
Additional Production Unit Could have Accommodated:	198,838 tons/year
Period of Jan-2017 - Dec-2018 - 24 Month BAE period.	

Pollutant	Excludable Emissions (tons/year)						
	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e
DCEAF Furnace	2.35	1.74	6.86	8.07	4.81	113.60	22,678
Ladle Refining Furnace							
Meltshop Fugitives	0.52	0.52	0.00	0.00	0.00	0.00	0
VDG @ Steelmaking	0.00	0.00	0.00	0.00	0.00	9.94	0
Walking Beam Furnace	0.47	0.47	0.04	5.13	0.07	5.17	7,354
EAF Ladle Preheaters #1-#4	0.12	0.12	0.01	1.52	0.08	1.28	1,817
Burn Off Oven	0.00	0.00	0.00	0.01	0.00	0.01	10
Caster Tundish Preheaters & Dryer	0.05	0.05	0.00	0.96	0.02	0.58	818
Caster Cutting Torches #1-#6	0.01	0.01	0.00	0.08	0.00	0.07	99
Caster Vents	0.00	0.00	0.00	0.00	3.08	0.00	0
Scrap Prep	0.22	0.22	0.00	0.00	0.00	0.00	0
Scrap Prep	0.02	0.02	0.00	0.35	0.01	0.21	298
Road Dust Emissions	3.93	0.39	0.00	0.00	0.00	0.00	0

Explanation of excludable emissions:

Cleveland-Cliffs analyzed the historical performance for the Meltshop emissions units. This analysis was carried out by reviewing monthly production rates in the time period prior to the proposed date construction is expected to start on the WBF project. Production rate in Feb 2017 represented the peak amount of steel produced in the five-year period preceding the proposed project. At the time, in response to market demand, the Meltshop was operated unconstrained close to its peak capability to ship blooms offsite. In the selected BAE, Cleveland-Cliffs **could have achieved this level of production rate on annual basis because there were no changes made to the units in that timeframe.** Also, this additional amount of steel production in addition to the production rate in the BAE period is unrelated to the proposed project and is only due to market drivers, since the unit achieved the peak production rate for an entire month. Therefore, emission related to this portion are unrelated to the proposed change and unit could have accommodate the same.

(iv) Project Emissions Increase (PEI) = PTE + (PAE - BAE - EE) (Step 1)

Consistent with 25 Pa.Code §127.203a (a)(1)(i)(A) for project affected existing emissions unit only increases in NOx and VOC emissions are included in this step. i.e. no decreases are included here.

Pollutant	Project Emissions Increase (PEI) (tons/year)						
	PM10*	PM2.5	SO2	NOx	VOC	CO	CO2e*
Universal Rail Mill						2.00	
DCEAF Furnace	3.24	2.40	9.45	11.12	6.63	156.52	31,245
Ladle Refining Furnace	0.00	0.00	0.00	0.00	0.00	0.00	0
Meltshop Fugitives	0.72	0.72	0.00	0.00	0.00	0.00	0
VDG @ Steelmaking	0.00	0.00	0.00	0.00	0.00	14.37	0
Walking Beam Furnace	1.96	1.96	0.15	21.46	0.28	41.95	30,774
EAF Ladle Preheaters #1-#4	0.16	0.16	0.01	2.10	0.12	1.76	2,504
Burn Off Oven	0.00	0.00	0.00	0.01	0.00	0.01	13
Caster Tundish Preheaters & Dryer	0.07	0.07	0.01	1.32	0.03	0.79	1,127
Caster Cutting Torches #1-#6	0.01	0.01	0.00	0.11	0.01	0.10	136
Caster Vents	0.00	0.00	0.00	0.00	4.61	0.00	0
Scrap Prep	0.31	0.31	0.00	0.00	0.00	0.00	0
Scrap Prep	0.03	0.03	0.00	0.48	0.02	0.29	410
Road Dust Emissions	2.85	0.29	0.00	0.00	0.00	0.00	0
Total	9.34	5.94	9.63	36.60	13.70	215.78	66,209
PSD/NNSR Significant Rate	15	10	40	40	40	100	75,000
Whether Significant?	No	No	No	No	No	Yes	No

*PM analysis is not included here since PM10 represents more conservative calculation of emissions increase.
 **CO2e calculation for determining whether GHGs subject to regulation.

(v) Net Emissions Increase (NEI) (Step 2)

Since NOx and VOC emissions increases are below the significant rate, net emissions increase calculations consistent with 25 Pa.Code § 127.203a (a)(1)(ii) are not required.

(vi) De minimis Analysis (Step 3)

Consistent with 25 Pa.Code § 127.203a (a)(2)(ii) for NOx and VOC emissions, a de minimis emissions increase calculation is provided below.

Ten year contemporaneous period ->

Jan-12 up to Dec-21

Net Emissions Increase (NEI) (tons/year)	NOx	VOC
URL Project	36.60	13.70
Creditable Increases		
WBF Project (2015)	58.41	6.54
Creditable Decreases		
Curtaiment of soaking pit batteries*	-43.32	-1.51
Shutdown of 35" Mill Reheat Furnaces #3 & #4 (Planned)	-87.68	-0.51
Total	(35.99)	18.22

* NOx and VOC emissions decreases for soaking pit batteries for Jan 2013-Dec 2014 period from the 2016 application for the WBF Project.

Conclusion:

Based on the above analysis, the proposed project will be a major modification for PSD for CO only and a minor modification for Non-attainment NSR requirements.

Cleveland-Cliffs Steelton LLC
Calculation of Emissions from the Universal Rail Mill

URM Operation

Polymer/Water mixture application rate	1.7 lb/ton of rail produced
Polymer concentration	20% by weight
VOC content of polymer	88.4 ppm (ALS - method 8260B)
Projected rail production rate	720,000 tons of rail/year
Polymer/water mixture application	1,224,000 lb/year
Polymer usage	244,800 lb/year
VOC emissions	2.00 ton/year (rounded up)

**Cleveland-Cliffs Steelton LLC
Steelmaking Operations
Calculation of Annual Change in Production/Throughput Rate**

Emission Unit	Emission Location	Annual Production/Throughput Change	Baseline Actual Production	Additional Accommodated Production Ozone	Projected Production	Units	Comments
Steelmaking Operations	DCEAF Furnace	273,946	295,215	198,838	768,000	molten steel	
	Ladle Refining Furnace		267,004	198,838	768,000	molten steel	
	Ingot Teeming (unaffected)				48,000		Assumed ingot teeming rate
	VDG Ingot Teeming (steam degassing) (unaffected)				48,000		Same as ingot teeming rate
	35" Reheat Furnace		175,807			MCF NG	35 Reheat Furnaces to be shutdown. Baseline based on 2019 & 2020 data.
	No.1 Walking Beam Furnace		529,558	123,143	1,168,000	MCF NG	Permit limit or based on historical heat rate
	Hot Bloom Rolling Operation						
	Hot Rail/Bar Rolling Operation						
	VDG @ Steelmaking (tank degassing)	287,324	281,837	198,838	768,000	molten steel	No change in steel production
	Caster Vents	240,590	271,571	207,839	720,000	steel	No Change in steel capacity
	RR Car Ingot Heaters					MCF NG	No Increase
	Rail Stenciling					gallons	No Increase
	Compressed Air Systems					gallons	No Increase
Road Dust Emissions	273,946	295,215	198,838	768,000	molten steel		

24-Month Baseline Throughput (tons/yr) for all regulated NSR pollutants		295,215	Period from Jan-2017 to Dec-2018
For the existing emissions units, peak monthly rate achieved during 1-Month Peak Throughput (tons/yr)	Feb-2017	494,054	is used as what the existing unit could accommodate and is also unrelated to the project. Based on Feb-2017 performance of Steelmaking
Adjustment factor for excludable production for Ozone OTR:		0.402	
Annual rail production after modernization (tons/year)		720,000	Based on the information from Steelton project documents as 60,000 tons/month of molten steel

**Cleveland-Cliffs Steelton LLC
Emission Factors**

Baseline

Emission Location		PM10 EF	PM2.5 EF	SO2 EF	NOx EF	VOC EF	CO EF	CO2e EF	Units	Source of Emission Factor
501A	DCEAF Furnace	0.024	0.018	0.069	0.081	0.048	1.14	228.11	lb/ton	Calculated from the stack test or CEMS based emission rate reported in 2018 AIMS.
501B	Ladle Refining Furnace									
	Meltshop Fugitives	0.005	0.005						lb/ton	2007 data for stack emissions and EAF dust collected shows stack emissions of 5.43 TPY and fugitive emissions of 1.2 TPY. Thus assume fugitive emissions as 22% of stack.
500	VDG @ Steelmaking						0.100			From 2018 AIMS
311	Walking Beam Furnace	7.6	7.6	0.6	83.3	1.1	7.3	119,442	lb/MMcf	From 2018 AIMS
109	EAF Ladle Preheaters #1-#4	7.6	7.6	0.6	100	5.5	84	119,442	lb/MMcf	From 2018 AIMS
113	Burn Off Oven	7.6	7.6	0.6	100	5.5	84	119,442	lb/MMcf	From 2018 AIMS
114 & 116	Caster Tundish Preheaters & Dryer	7.6	7.6	0.6	140	2.8	84	119,442	lb/MMcf	From 2018 AIMS
118	Caster Cutting Torches #1-#6	7.6	7.6	0.6	100	5.5	84	119,442	lb/MMcf	From 2018 AIMS
124	Caster Vents					0.031			lb/ton	From 2018 AIMS
138	Scrap Prep	0.3	0.3						lb/ton	From 2018 AIMS
138	Scrap Prep	7.6	7.6	0.6	140	5.5	84	119,442	lb/MMcf	From 2018 AIMS
924	Road Dust Emissions (controlled)	0.29	0.03						lb/VMT	Emission factors from AP-42 Table 13.2.2-2 for unpaved haul roads with watering application.

Projected

Emission Location		PM10 EF	PM2.5 EF	SO2 EF	NOx EF	VOC EF	CO EF	CO2e EF	Units	Source of Emission Factor
501A	DCEAF Furnace	0.024	0.018	0.069	0.081	0.048	1.143	228.11	lb/ton	Calculated from the stack test or CEMS based emission rate reported in 2018 AIMS
501B	Ladle Refining Furnace									
	Meltshop Fugitives	0.005	0.005						lb/ton	2007 data for stack emissions and EAF dust collected shows stack emissions of 5.43 TPY and fugitive emissions of 1.2 TPY. Thus assume fugitive emissions as 22% of stack.
500	VDG @ Steelmaking						0.100			From 2018 AIMS
311	Walking Beam Furnace	7.6	7.6	0.6	83.3	1.1	84.0	119,442	lb/MMcf	From 2018 AIMS except CO. CO based on AP-42 EF for NG
109	EAF Ladle Preheaters #1-#4	7.6	7.6	0.6	100.0	5.5	84.0	119,442	lb/MMcf	From 2018 AIMS
113	Burn Off Oven	7.6	7.6	0.6	100.0	5.5	84.0	119,442	lb/MMcf	From 2018 AIMS
114 & 116	Caster Tundish Preheaters & Dryer	7.6	7.6	0.6	140.0	2.8	84.0	119,442	lb/MMcf	From 2018 AIMS
118	Caster Cutting Torches #1-#6	7.6	7.6	0.6	100.0	5.5	84.0	119,442	lb/MMcf	From 2018 AIMS
124	Caster Vents					0.031			lb/ton	From 2018 AIMS
138	Scrap Prep	0.3	0.3						lb/ton	From 2018 AIMS
138	Scrap Prep	7.6	7.6	0.6	140.0	5.5	84.0	119,442	lb/MMcf	From 2018 AIMS
924	Road Dust Emissions (controlled)	0.29	0.03						lb/VMT	Emission factors from AP-42 Table 13.2.2-2 for unpaved haul roads with watering application.

**Cleveland-Cliffs Steelton LLC
Baseline Actual Emissions (BAE)**

		Baseline Time Period Baseline production rate:	Jan-17 295,215	to tons/year	Dec-18					
Emission Location	Annual Production/ Throughput	Units	PM10 (TPY)	PM2.5 (TPY)	SO2 (TPY)	NOx (TPY)	VOC (TPY)	CO (TPY)	CO2e (TPY)	
501A	DCEAF Furnace	295,215	Tons	3.49	2.59	10.19	11.98	7.15	168.67	33,670
501B	Ladle Refining Furnace									
	Meltshop Fugitives	295,215	Tons	0.77	0.77	0.00	0.00	0.00	0.00	0
500	VDG @ Steelmaking	281,837	Tons	0.00	0.00	0.00	0.00	0.00	14.09	0
311	Walking Beam Furnace	529,558	MCF	2.01	2.01	0.16	22.06	0.29	1.93	31,626
109	EAF Ladle Preheaters #1-#4	45,183	MCF	0.17	0.17	0.01	2.26	0.12	1.90	2,698
113	Burn Off Oven	240	MCF	0.00	0.00	0.00	0.01	0.00	0.01	14
114 & 116	Caster Tundish Preheaters & Dryer	20,337	MCF	0.08	0.08	0.01	1.42	0.03	0.85	1,215
118	Caster Cutting Torches #1-#6	2,451	MCF	0.01	0.01	0.00	0.12	0.01	0.10	146
124	Caster Vents	271,571	Tons					4.21		
138	Scrap Prep	2,220	Tons	0.33	0.33					
138	Scrap Prep	7,401	MCF	0.03	0.03	0.00	0.52	0.02	0.31	442
924	Road Dust Emissions	295,215	Tons	4.23	0.42					

**Cleveland-Cliffs Steelton LLC
Projected Actual Emissions (PAE)**

Time Period
Projected production rate: 768,000 tons/year
Maximum emissions in any one 12-month period in five year period starting on the date unit resumes regular operation

Emission Location		Annual Production/Throughput	Units	PM10 (TPY)	PM2.5 (TPY)	SO2 (TPY)	NOx (TPY)	VOC (TPY)	CO (TPY)	CO2e (TPY)
501A	DCEAF Furnace	768,000	Tons	9.08	6.73	26.51	31.16	18.59	438.79	87,593
501B	Ladle Refining Furnace									
	Meltshop Fugitives	768,000	Tons	2.01	2.01	0.00	0.00	0.00	0.00	0
500	VDG @ Steelmaking	768,000	Tons	0.00	0.00	0.00	0.00	0.00	38.40	0
311	Walking Beam Furnace	1,168,000	MCF	4.44	4.44	0.35	48.65	0.64	49.06	69,754
109	EAF Ladle Preheaters #1-#4	117,542	MCF	0.45	0.45	0.04	5.88	0.32	4.94	7,020
113	Burn Off Oven	624	MCF	0.00	0.00	0.00	0.03	0.00	0.03	37
114 & 116	Caster Tundish Preheaters & Dryer	52,908	MCF	0.20	0.20	0.02	3.70	0.07	2.22	3,160
118	Caster Cutting Torches #1-#6	6,376	MCF	0.02	0.02	0.00	0.32	0.02	0.27	381
124	Caster Vents	768,000	Tons					11.90		
138	Scrap Prep	5,775	Tons	0.87	0.87					
138	Scrap Prep	19,253	MCF	0.07	0.07	0.01	1.35	0.05	0.81	1,150
924	Road Dust Emissions	768,000	Tons	11.01	1.10					

**Cleveland-Cliffs Steelton LLC
Excludable Emissions (EE)**

Excludable production rate: **198,838** tons/year **Calculated by subtracting baseline production from the annualized monthly rate for Feb-2017**
Production rate that the existing units could have accommodated and unrelated to the proposed changes under the project.

	Emission Location	Annual Production/Throughput	Units	PM10 (TPY)	PM2.5 (TPY)	SO2 (TPY)	NOx (TPY)	VOC (TPY)	CO (TPY)	CO2e (TPY)
501A	DCEAF Furnace	198,838	Tons	2.35	1.74	6.86	8.07	4.81	113.60	22,678
501B	Ladle Refining Furnace									
	Meltshop Fugitives	198,838	Tons	0.52	0.52	0.00	0.00	0.00	0.00	0
500	VDG @ Steelmaking	198,838	Tons	0.00	0.00	0.00	0.00	0.00	9.94	0
311	Walking Beam Furnace	123,143	MCF	0.47	0.47	0.04	5.13	0.07	5.17	7,354
109	EAF Ladle Preheaters #1-#4	30,432	MCF	0.12	0.12	0.01	1.52	0.08	1.28	1,817
113	Burn Off Oven	162	MCF	0.00	0.00	0.00	0.01	0.00	0.01	10
114 & 116	Caster Tundish Preheaters & Dryer	13,698	MCF	0.05	0.05	0.00	0.96	0.02	0.58	818
118	Caster Cutting Torches #1-#6	1,651	MCF	0.01	0.01	0.00	0.08	0.00	0.07	99
124	Caster Vents	198,838	Tons					3.08		
138	Scrap Prep	1,495	Tons	0.22	0.22					
138	Scrap Prep	4,985	MCF	0.02	0.02	0.00	0.35	0.01	0.21	298
924	Road Dust Emissions	198,838	Tons	3.93	0.39					

**Cleveland-Cliffs Steelton LLC
Steelmaking
Actual Emissions for Reductions Per Creditability Requirements in 2 Years Prior to Shutdown**

Actual Emissions Time Period

Jan-19 to Dec-20

For creditable decreases from 35" Mill Reheat Furnace (25 Pa.Code § 127.207 (4)(i)(A)) use calendar years immediately preceding the emissions reductions. *i.e.* 2019-20.

NOx

Emission Unit	Emission Location	Annual Production/Throughput	Units (tons)	Emission Factor	Units			Control Efficiency	Controlled Emission Factor	Annual Emissions		Source of Emission Factor
										(tons/yr)		
	35" Mill Reheat Furnace #3 & #4	175,807	MCF	997.5	lb/mmcf					87.68		Stack Test Data & TV Permit

VOC

Emission Unit	Emission Location	Annual Production/Throughput	Units (tons)	Emission Factor	Units			Control Efficiency	Controlled Emission Factor	Annual Emissions		Source of Emission Factor
										(tons/yr)		
	35" Mill Reheat Furnace #3 & #4	175,807	MCF	5.775	lb/mmcf					0.51		FIRE

Emission Location	2017	2018	2019	2020
35" Mill Reheat Furnace #3 & #4 (MCF)			193,568	158,046
NOx (TPY)	0.00	0.00	96.54	78.83
VOC (TPY)	0.00	0.00	0.56	0.46

Cleveland-Cliffs Steelton LLC**Unpaved haul road truck traffic fugitive emissions summary**

	PM10 (TPY)	PM2.5(TPY)
<i>Baseline</i>		
Raw material transfers	3.05	0.30
Product transfers	1.06	0.11
Industrial gases transfers	0.13	0.01
BAE Haul Roads	4.23	0.42
<i>Projection</i>		
Raw material transfers	7.93	0.79
Product transfers	2.76	0.28
Industrial gases transfers	0.33	0.03
PAE Haul Roads	11.01	1.10
<i>Excludable</i>		
Raw material transfers	2.05	0.21
Product transfers	0.71	0.07
Industrial gases transfers	0.08	0.01
EE Haul Roads	2.85	0.29
PEI	3.93	0.39

Cleveland-Cliffs Steelton LLC

Trucks for Raw Material Transport on Unpaved Road (Fugitives)

Parameter	Baseline	Projection	Excludable	Units	Source / Basis
Number of truck trips	20,665	53,760	13,919	trip/year	From Truck Analysis sheet
Truck travel distance round trip	1.00	1.00	1.00	miles	Plant data 1/2 mile one way
Empty Truck Weight	17	17	17	tons	Plant data
Loaded Truck Weight	39	39	39	tons	Plant data
Mean Vehicle Weight (W)	28.0	28	28	tons	Plant data
Average hourly daytime traffic	7	18	5	trip/hour	Calculated assuming 5-day week and 12 hour shifts
Miles per year	20,665	53,760	13,919	VMT/yr	
Silt Content (s)	6.0	6.0	6.0	wt. %	AP-42; Table 13.2.2-1; 11/06 - For Iron and Steel Production
PM particle size factor (k)	4.9	4.9	4.9	lb/VMT	AP-42; Table 13.2.2-2; 11/06
PM10 particle size factor (k)	1.5	1.5	1.5	lb/VMT	AP-42; Table 13.2.2-2; 11/06
PM2.5 particle size factor (k)	0.15	0.2	0.2	lb/VMT	AP-42; Table 13.2.2-2; 11/06
Days with > 0.01" of precipitation (N)	120	120.0	120.0	days/yr	AP-42; Figure 13.2.2-1; 11/06 - NW Indiana
Annual Uncontrolled PM Emission Factor	5.53	5.53	5.53	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual Uncontrolled PM10 Emission Factor	1.47	1.47	1.47	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual Uncontrolled PM2.5 Emission Factor	0.15	0.15	0.15	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual PM Emissions	57.16	148.69	38.50	tons/yr	
Annual PM10 Emissions	15.23	39.63	10.26	tons/yr	
Annual PM2.5 Emissions	1.52	3.96	1.03	tons/yr	
Control Measure Efficiency	80%	80%	80%		Conservative value based on the watering application
Controlled Annual PM Emissions	11.43	29.74	7.70	tons/yr	
Controlled Annual PM10 Emissions	3.05	7.93	2.05	tons/yr	
Controlled Annual PM2.5 Emissions	0.30	0.79	0.21	tons/yr	

1. Control of Open Fugitive Dust Sources, EPA-450/3-88-008, September 1988.

Cleveland-Cliffs Steelton LLC

Trucks for Product Transport on Unpaved Road (Fugitives)

Parameter	Baseline	Projection	Excludable	Units	Source / Basis
Number of truck trips	4,723	12,288	3,181	trip/year	From Truck Analysis sheet
Truck travel distance round trip	1.50	1.50	1.50	miles	Plant data 0.75 mile one way
Empty Truck Weight	18	18	18	tons	Plant data
Loaded Truck Weight	40	40	40	tons	Plant data
Mean Vehicle Weight (W)	29.0	29	29	tons	Plant data
Average hourly daytime traffic	2	4	2	trip/hour	Calculated assuming 5-day week and 12 hour shifts
Miles per year	7,085	18,432	4,772	VMT/yr	
Silt Content (s)	6.0	6.0	6.0	wt. %	AP-42; Table 13.2.2-1; 11/06 - For Iron and Steel Production
PM particle size factor (k)	4.9	4.9	4.9	lb/VMT	AP-42; Table 13.2.2-2; 11/06
PM10 particle size factor (k)	1.5	1.5	1.5	lb/VMT	AP-42; Table 13.2.2-2; 11/06
PM2.5 particle size factor (k)	0.15	0.2	0.2	lb/VMT	AP-42; Table 13.2.2-2; 11/06
Days with > 0.01" of precipitation (N)	120	120.0	120.0	days/yr	AP-42; Figure 13.2.2-1; 11/06 - NW Indiana
Annual Uncontrolled PM Emission Factor	5.62	5.62	5.62	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual Uncontrolled PM10 Emission Factor	1.50	1.50	1.50	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual Uncontrolled PM2.5 Emission Factor	0.15	0.15	0.15	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual PM Emissions	19.91	51.79	13.41	tons/yr	
Annual PM10 Emissions	5.31	13.80	3.57	tons/yr	
Annual PM2.5 Emissions	0.53	1.38	0.36	tons/yr	
Control Measure Efficiency	80%	80%	80%		Conservative value based on the watering application
Controlled Annual PM Emissions	3.98	10.36	2.68	tons/yr	
Controlled Annual PM10 Emissions	1.06	2.76	0.71	tons/yr	
Controlled Annual PM2.5 Emissions	0.11	0.28	0.07	tons/yr	

1. Control of Open Fugitive Dust Sources, EPA-450/3-88-008, September 1988.

Cleveland-Cliffs Steelton LLC

Trucks for Industrial Gases Transport on Unpaved Road (Fugitives)

Parameter	Baseline	Projection	Excludable	Units	Source / Basis
Number of truck trips	886	2,304	597	trip/year	From Truck Analysis sheet
Truck travel distance round trip	1.00	1.00	1.00	miles	Plant data 1/2 mile one way
Empty Truck Weight	14	14	14	tons	Plant data
Loaded Truck Weight	38	38	38	tons	Plant data
Mean Vehicle Weight (W)	25.9	26	26	tons	Plant data
Average hourly daytime traffic	1	1	1	trip/hour	Calculated assuming 5-day week and 12 hour shifts
Miles per year	886	2,304	597	VMT/yr	
Silt Content (s)	6.0	6.0	6.0	wt. %	AP-42; Table 13.2.2-1; 11/06 - For Iron and Steel Production
PM particle size factor (k)	4.9	4.9	4.9	lb/VMT	AP-42; Table 13.2.2-2; 11/06
PM10 particle size factor (k)	1.5	1.5	1.5	lb/VMT	AP-42; Table 13.2.2-2; 11/06
PM2.5 particle size factor (k)	0.15	0.2	0.2	lb/VMT	AP-42; Table 13.2.2-2; 11/06
Days with > 0.01" of precipitation (N)	120	120.0	120.0	days/yr	AP-42; Figure 13.2.2-1; 11/06 - NW Indiana
Annual Uncontrolled PM Emission Factor	5.34	5.34	5.34	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual Uncontrolled PM10 Emission Factor	1.42	1.42	1.42	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual Uncontrolled PM2.5 Emission Factor	0.14	0.14	0.14	lb/VMT	AP-42, Ch. 13.2.2, Eqn. 1a and 2; 11/06
Annual PM Emissions	2.37	6.15	1.59	tons/yr	
Annual PM10 Emissions	0.63	1.64	0.42	tons/yr	
Annual PM2.5 Emissions	0.06	0.16	0.04	tons/yr	
Control Measure Efficiency	80%	80%	80%		Conservative value based on the watering application
Controlled Annual PM Emissions	0.47	1.23	0.32	tons/yr	
Controlled Annual PM10 Emissions	0.13	0.33	0.08	tons/yr	
Controlled Annual PM2.5 Emissions	0.01	0.03	0.01	tons/yr	

1. Control of Open Fugitive Dust Sources, EPA-450/3-88-008, September 1988.

Appendix C – Copies of Pending Municipal Notifications

County and Municipal Notification Submittal

In this Appendix, we are providing copies of the planned County and municipal notifications. Pursuant to PADEP guidance (Document Number 275-2101-011), these County and municipal notification must be submitted at least 30 days prior to PADEP issuance of the Plan Approval. The Project is still undergoing internal approvals making public notifications misleading at this time. Therefore, Cleveland-Cliffs Steelton LLC seeks to rely on this attached PADEP guidance and submit the County and municipal notifications after achieving internal approvals and no later than 30 days prior to PADEP's issuance of the Plan Approval. We ask that the Plan Approval application be deemed complete contingent upon submission of proof of the required notifications and that PADEP process this application without delay.

Date

Rose Paul
Steelton Borough Secretary
123 North Front Street
Steelton, PA 17113
Phone: (XXX) XXX-XXXX

*Re: Notification – Plan Approval Application to Construct and Operate
New Universal Rail Mill, Steelton, PA
Cleveland-Cliffs Steelton, LLC*

Dear Madam:

In accordance with the provisions of 25 Pa. Code § 127.413, we are required to notify you of our planned submittal to the Pennsylvania Department of Environmental Protection of a Plan Approval application to construct and operate a new Universal Rail Mill at Cleveland-Cliffs Steelton Facility. This project will also result in shutdown of existing 35” Mill Reheat Furnaces. We are also required to demonstrate that this notification provision has been met. Therefore, this letter is being sent to you by certified mail.

Cleveland-Cliffs Steelton, LLC owns and operates Steelton Facility located in Steelton Borough, Dauphin County, Pennsylvania. This facility is a steel mini-mill producing high-quality rails, specialty ingots and blooms to bars for the railroad, forging and machinery markets. The proposed changes to the facility consist of constructing and operating a new Universal Rail Mill operation equipped with state-of-the-art rolling mill and other operations. The new units will replace existing units that are less efficient and reliable. We are required to inform you that you have 30 days from the receipt of this notice to submit comments to the Department of Environmental Protection at 909 Elmerton Avenue, Harrisburg, PA 17113.

If you have any questions, please call me at (610) 383-2097. Thank you in advance for your cooperation in working with us on this matter.

Sincerely,

Ray Ajalli P.E.
Manager Environmental
Cleveland-Cliffs Plate LLC

Date

Dauphin County Board of Commissioners
Dauphin County Administration Building
Fourth Floor
2 South Second Street
Harrisburg, PA 17101

*Re: Notification – Plan Approval Application to Construct and Operate
New Universal Rail Mill, Steelton, PA
Cleveland-Cliffs Steelton, LLC*

Dear Sirs:

In accordance with the provisions of 25 Pa. Code § 127.413, we are required to notify you of our planned submittal to the Pennsylvania Department of Environmental Protection of a Plan Approval application to construct and operate a new Universal Rail Mill at Cleveland-Cliffs Steelton Facility. This project will also result in shutdown of existing 35” Mill Reheat Furnaces. We are also required to demonstrate that this notification provision has been met. Therefore, this letter is being sent to you by certified mail.

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If you have any questions, please call me at (610) 383-2097. Thank you in advance for your cooperation in working with us on this matter.

Sincerely,

Ray Ajalli P.E.
Manager Environmental
Cleveland-Cliffs Plate LLC