

March 19, 2004

Ms. Deborah Jordan
Director of Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Ms. Jordan:

Re: **USS-POSCO Industries – Facility #A2371**
Minor Revision to Major Facility Review Permit

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for **USS-POSCO Industries**, Facility Number A2371, and is submitting the permit to EPA for review.

MARIN COUNTY
Harold C. Brown, Jr.

The main purpose of this minor revision is to revise permit conditions for one abatement device, correct four minor errors and to raise slightly the minimum temperature to start ammonia flow to an SCR unit.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Willie Brown, Jr.
Chris Daly
Jake McGoldrick

Abatement device A29, Tandem Cold Mill Mist Eliminator, which abates S171, Tandem Cold Mill, erroneously received permit conditions for a wet scrubber, Condition Identification Number 20791. The abatement device is a centrifugal mist eliminator and not a wet scrubber. Since this condition is a common to several sources, the condition will no longer be applied to S171 and a new condition has been created. The parts of the permit condition that mention wet scrubber have been changed to reflect a centrifugal mist eliminator and the parts of the condition that mention water flow have been deleted. Additionally, since A29 is downstream of a fan, A29 emits into the atmosphere and there are no valves or dampers downstream of the fan, the inlet pressure to A29 will be measured rather a pressure drop across the device. The revised permit condition is renumbered 21254.

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY
Liz Kniss
Patrick Kwok
Julia Miller
Dena Mossar

Four minor errors are being corrected. Two Permit Condition Identification Numbers in the Title V permit, Condition Identification Numbers 20790 and 20791, should have been reported as 20780 and 20781, respectively. With A29 now being subject to Condition Identification Number 21254, the general wet scrubber condition, now Condition Identification Number 20781, applies to one less source.

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

One minor error occurred in Permit Condition Identification Number 7216, Part M2a. Although Part M references "POC Source Testing," Part M2a referred to "HCl." The "HCl" has now been replaced with "POC."

Jack P. Broadbent
**EXECUTIVE
OFFICER/APCO**

One minor error occurred in Table VII-L, Applicable Limits and Compliance Monitoring Requirements, S171 – Tandem Cold Mill. An organic compound limit cites BAAQMD

Regulation 8-2-301 and applied a limit of 10 lbs/day VOC as C1 while it should have been 15 lbs/day VOC as C1. "10" has now been replaced with "15."

The last revision is to correct the minimum temperature to start ammonia flow to A32, Selective Catalytic Reduction (SCR) Unit, which abates the NOx emitted from S174, KM Continuous Annealing Furnace. USS-POSCO incorrectly informed the District that ammonia injection was started when the SCR temperature was 375 degrees Fahrenheit and that temperature was included in Permit Condition Identification Number 7216, Part F3. USS-POSCO has informed the District that it incorrectly reported the ammonia injection start temperature and the correct start temperature should be 392 degrees Fahrenheit.

To document the above revisions, we have added Section X Revision History and revised subsequent section numbers.

All proposed changes in the permit are clearly shown in strikeout/underline format.

A copy of the proposed revised Major Facility Review Permit is enclosed for your information. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Very truly yours,

Jack P. Broadbent
Executive Officer/
Air Pollution Control Officer

JPB:BFB:dvb

Enclosures