

Steel Industry Recent Multi-Media Environmental Successes & Future Challenges

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Environmental Successes

◆ Implementation of the Iron and Steel MACT and Coke MACT Rules – Integrated Mills

◆ New MACT Issues:

- Multi-million dollar capital expenditures
- Daily, weekly, monthly, and quarterly specific baghouse/capture system inspections
- Preventative maintenance for venturi scrubbers and ESP's
- Operating limits for certain capture systems
- Corrective action procedures for bag leak detectors



Environmental Successes, cont.

◆ New MACT Issues, cont.

- Corrective action procedures for venturi scrubbers equipped with CPMS (continuous parameter monitoring systems)
- Corrective action procedures for ESP's equipped with COM's
- Preparation of Operation & Maintenance (O & M) Plans
- Preparation of Startup, Shutdown and Malfunction Plans
- Preparation of Site Specific Monitoring Plans
- Completion of semiannual compliance reports



Future Steel Challenges

- ◆ Ongoing Implementation of the Iron and Steel and Coke MACT rules
 - Particularly the ongoing inspections, recordkeeping, and corrective actions documentation
 - Completion of semiannual compliance reports

- ◆ Reduction in environmental personnel and the expanded use of consultants
 - Managing more requirements with less people (manhours/ton)
 - Method 9 and other VE readings
 - Stack testing and permitting assistance



Future Steel Challenges, etc.

- ◆ Ongoing cooperation and communication between environmental and management
 - Significant management turnover and personnel reductions
 - Awareness that certain projects may require a PTI



Future Steel Challenges, etc.

- ◆ For Minimills, the upcoming area source NESHAP rulemaking or MACT rule (if major source)
 - Avoidance of mercury, chlorinated plastics, free liquid organics in scrap
 - NSPS –type limits for sources not currently covered under NSPS (e.g., 6% shop opacity, 0.0052 gr/dscf)

