



## Greater Roanoke Valley Asthma and Air Quality Coalition

August 15, 2007  
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Paul R. Jenkins  
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Dear Mr. Jenkins:

### **Comments regarding Roanoke Electric Steel Draft State Operating Permit for Electric Arc Furnace #4 Registration No. 20131**

We are submitting comments on behalf of the steering committee of the Greater Roanoke Valley Asthma and Air Quality Coalition (GRVAAQC), the Board of Directors of the Blue Ridge Environmental Defense League (BREDL), and the Roanoke Group of the Sierra Club.

We are pleased to see the emission reductions and more frequent monitoring as listed in the Draft permit. This is a significant improvement from the September 6, 1973 operating permit.

Draft Conditions 3 & 4 – Monitoring Devices, Observation: To help control particulate pollution, we are pleased with the increased observance of the device, which continuously measures the differential pressure across the fabric filter. The Draft requirement of observing the device at least once a day is an improvement from the current permit, which only requires observing the device at least once a week.

Condition 5 – Production: The 2001 Statement of Basis Attachment A (dated Jan 28, 1998) listed the 1996 throughput for EAF #4 as 142,442 tons per year (tpy) of steel. The 2001 Title V states annual production of molten steel shall not exceed 175,200 tpy. The Draft requirement is that the production of molten steel shall not exceed 50,000 tpy. This huge throughput reduction is very beneficial because it will lessen the use of the old, inefficient EAF #4.

Condition 6 – Emission Limits: We are pleased with the lower emission limits stated in the Draft permit. The reductions in emission limits reflect the lower annual production from EAF #4. The PM-10 Draft limits of 27.3 lbs/hr and 26.3 tpy are an improvement over the limits of 36.38 lbs/hr and 157.7 tpy as listed in the 2001 Title V permit.

Condition 15 – Violation of Ambient Air Quality Standard: We commend the inclusion of this permit condition.

Thank you for this opportunity to comment.

Respectfully submitted,

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The Roanoke Valley Asthma and Air Quality Coalition mission is to improve air quality and respiratory health for the Greater Roanoke Valley through education and partnerships with other organizations with similar goals.

The Blue Ridge Environmental Defense League (BREDL) is a regional, community-based, non-profit environmental organization. Our founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. BREDL has chapters and members throughout the southeastern United States, including the Roanoke Valley.

The Sierra Club, founded in 1892 by the legendary John Muir, is the largest grass-roots environmental organization in the world. We work on local, state, national, and global environmental issues. The Roanoke Group is a unit of the Virginia Chapter of the Sierra Club. Our members, over 700 strong, live in Roanoke, Botetourt, Alleghany, Bath, Rockbridge, Franklin, Henry, and Patrick Counties, and the cities and towns within them.