

information necessary to determine any sources of benzene and to implement any additional controls or operational modifications to reduce benzene emissions as well as to develop a site-specific monitoring plan. Furthermore, because EPA is given 120-days to review and approve any site-specific monitoring plan, and there may be additional time needed to respond to any inquiries, a Presidential Exemption from this standard is appropriate and necessary.

The technology to appropriately install and implement real-time monitors is not currently available for the Clairton plant. The Final Rule failed to address multiple issues with real-time monitors, including the technical feasibility of locating and installing real-time monitors, the difficulty using real-time benzene monitor data and the 2-week average benzene monitor data at the fence line to determine an appropriate delta c, the complexity of using these monitors at coke facilities, and the cost of installing and operating monitors. U. S. Steel had no opportunity to raise objections to this change or to provide information on the feasibility and reasonableness of requiring real-time monitors for these purposes. These provisions were not proposed and are not a logical outgrowth of the proposed coke RTR rule. Had EPA provided this opportunity, U. S. Steel would have provided information on the cost and infeasibility of real-time monitors, demonstrating that the use of real-time monitoring requirement for the purposes of the Coke RTR Rule is not appropriate or feasible.

B. Unsupported and Arbitrary Revised Standards for Coke Oven Battery Doors, Lids, and Offtakes

The Coke RTR Rule lowered allowable leak limits for coke battery doors, lids, and offtakes and for the first time imposes more stringent leak rate allowables for coke battery doors on a single facility (U. S. Steel – Clairton Plant) based on annual coke production. However, U. S. Steel and industry commenters informed EPA that there have been no improvements or other changes in leak control practices in the industry, which means that facilities cannot consistently meet the revised leak rate allowables without additional time to develop and install controls or measures that would be needed to achieve compliance.

For coke oven doors, more time is needed to perform technical evaluations to identify ways to reduce door leaks to comply with the new limits. This may include replacing door machines, rebuilding or replacing oven doors, and redesigning door-jamb cleaning mechanisms, all of which are means to control leaks around coke oven doors. The time needed to engineer, fabricate, and install two new door machines could take 5-6 years to complete and costs approximately \$20 million. The time to rebuild or replace oven doors on a typical battery with 82 doors is up to three years to engineer, fabricate, and install.

For coke battery lids and offtakes, more time is needed to research and trial ways to reduce leaks to comply with the revised limits. Control methods include redesigning or replacing lids or developing different sealing materials. The time needed to engineer, fabricate, and install replacement lid and offtake components is a minimum of 2-3 years to complete.

In the Coke RTR Rule, EPA removed startup, shutdown and malfunction (SSM) provisions that are important to U. S. Steel's Clairton Plant's ability to meet the existing limits. For example, with the loss of beneficial carbon in the battery during SSM events, stack, charging