

However, after excluding periods of malfunction and looking at the daily average pressure drop instead of instantaneous readings, the data showed that the daily average pressure drop for each scrubber fell within a narrow range. The difference between the lowest daily average pressure drop and the highest daily average pressure drop was only about 2 or 3 inches of pressure drop. Based on these data, the commenter stated that they were confident that they could maintain a pressure drop at or above the operating limit based on a daily average.

The other commenter provided daily average pressure drop for their venturi-rod deck scrubbers. The data showed that on a daily average basis, the pressure drop for each venturi-rod deck scrubber varied by 1 to 3.6 inches over a period of 2 months. The commenter requested that they be allowed to use historical pressure drop data to establish the pressure drop operating limit for venturi-rod deck scrubbers on indurating furnaces. In addition, the commenter requested that compliance with the pressure drop operating limit for venturi-rod deck scrubbers on indurating furnaces be determined on a daily average basis.

To address the technical issues raised by the commenters, we have written the final rule to allow the use of pressure drop data from PM tests conducted on or after December 18, 2002 (the proposal date) to establish the operating limit for venturi-rod deck scrubbers controlling emissions from indurating furnaces. The historical pressure drop data must be from a certified test for which the PM emission concentration was at or below the applicable indurating furnace limit in Table 1 to the final rule. In addition, the basis for compliance with the pressure drop operating limit for venturi-rod deck scrubbers on indurating furnaces has been written as an hourly average not a daily average.

COMS

Comment: Two commenters stated that there should not be any requirement to install or operate a COMS. The commenters do not support setting an opacity limit on a case-by-case and site-by-site basis. In addition, the commenters asserted that the opacity will be low enough to be outside of the range of error for the test method (the COMS), and sources could create a reportable deviation without truly exceeding the actual opacity limit. Instead, the commenters stated that there should be a requirement for a visible emission check, as is required in the Portland Cement NESHAP.

Response: We have verified with equipment vendors that COMS are available that will provide accurate readings at low opacity conditions. Certain models of COMS can measure opacity as low as 0.1 percent with an accuracy of ± 0.3 percent. In addition, the COMS vendors indicated that the COMS will provide accurate readings under the moisture conditions present at taconite facilities (typically 9 percent moisture). However, we understand that currently there are no COMS in operation at taconite plants (one facility has scheduled a trial installation for later this year) and that due to equipment and installation costs or site-specific operating conditions, a COMS may not be the best option for each plant. Therefore, in the final rule we have provided two options for the operating limits for dry ESP: the 6-minute average opacity, as monitored using a COMS; or the daily average secondary voltage and the daily average secondary current for each field, as monitored using a CPMS.

During our dry ESP discussions with industry, it was requested that we add specific monitoring requirements for wet ESP. After discussion with the industry and State agencies, we established the following monitoring parameters for wet ESP:

- Daily average secondary voltage for each field;
- Daily average stack outlet temperature; and
- Daily average water flow rate.

Therefore, the final rule contains requirements to establish operating limits for these parameters during the initial performance test. Plants must also monitor these parameters such that they are maintained at or above the operating limits (for secondary voltage and water flow rate), or below the operating limits (for stack outlet temperature).

E. How Did We Revise the Baseline Emissions?

Comment: Two commenters stated that the HAP emission values in the preamble need to be updated to accurately reflect what is currently being emitted. Specifically, one of the commenters stated that U.S. Steel has more recent testing data that can be used to update the estimates. Another one of the commenters asserted that HAP emissions from taconite ore plants are inaccurately characterized. The commenter stated that several companies have more recent test data and EPA can revise the HAP emissions accordingly. The commenter stated that a more accurate depiction of the

emissions will alter the economic analysis.

Response: In follow-up discussions with the industry, we asked them to submit any test data that were not reflected in the proposal analyses. We received the following additional emission tests:

- Engineering Emissions Test Report for Tilden conducted the week of November 4, 1999. Tested PM, nitrogen oxides (NO_x), HCl, HF, benzene, hexane, toluene, formaldehyde, metals, and asbestos.
- Particulate and Metals Emission Study for Tilden conducted May 7 to 11, 2002. Tested total PM and metals.
- MPCA spreadsheet incorporating Minntac emissions tests for December 2002 and August 2001. Tested formaldehyde, HCl, HF, chlorine, and fluorine.
- Northshore formaldehyde emissions tests conducted on March 6, 2003. We have reviewed the test data listed above and have revised the baseline HAP emissions as appropriate. The baseline HAP emissions have been modified as follows:
 - Baseline formaldehyde emissions were updated for Minntac, Northshore, and Tilden. The baseline formaldehyde emissions for EVTAC and Inland were also updated, since their formaldehyde emission factors were based on Northshore estimates. This resulted in a decrease in baseline formaldehyde emissions from 180.7 to 30.1 tpy. This had no effect on the HAP emission reduction estimate since we assumed that there would be no formaldehyde emission reductions.
 - Baseline HCl and HF emissions were updated for Minntac and Tilden. This resulted in a decrease in baseline HCl emissions from 349.1 to 274 tpy and a decrease in baseline HF emissions from 308 to 229 tpy. As a result, the emission reduction from acid gases decreased from 356.1 to 256 tpy.

F. How Did We Select the Pollutants?

Mercury

Comment: Seventeen commenters stated that EPA has a statutory obligation to set emission standards for mercury. Several commenters specifically cited *National Lime*. One commenter stated that the fact that no specific type of control technology has yet proven effective and affordable for taconite processing cannot legally excuse the industry from regulation. Thirteen commenters asserted that EPA's practice of not setting standards for industries that do not yet control their emissions is illegal and encourages the industry to do as little as possible to control mercury.