

Industrious Labs (Hilary Lewis)

Attached please find the public comments of Sierra Club Ohio Chapter - Miami Group, Ohio Interfaith Collective, Ohio River Valley Institute, Earthjustice - Midwest Regional Office, Industrious Labs, Sierra Club - Industrial Transformation Campaign, and Mighty Earth regarding the Draft Permit-to-Install (PTI) for Cleveland-Cliffs Steel Corporation in Middletown (Permit No. P0139876)



July 18, 2026

DAPC - Ohio EPA
50 West Town Street, Suite 700
Columbus, Ohio 43216-1049

DAPC - Southwest Ohio Air Quality Authority
1701 Patricia McCollum Way
Cincinnati, OH 45237

****Via SMART Comments at <https://ohioepa.commentinput.com?id=AcbrhK3MW>****

Re: Public Comments on the Draft Permit-to-Install (PTI) for Cleveland-Cliffs Steel Corporation in Middletown (Permit No. P0139876)

Dear Division of Air Pollution Control,

We submit these public comments on behalf of the Sierra Club Ohio Chapter - Miami Group, Ohio Interfaith Collective, Ohio River Valley Institute, Earthjustice - Midwest Regional Office, Industrious Labs, Sierra Club - Industrial Transformation Campaign, and Mighty Earth (collectively, "Commenters") regarding the Draft Air Pollution Permit-to-Install No. P0139876 ("Draft PTI" or "Draft Permit") to Cleveland-Cliffs Steel Corporation ("Cleveland-Cliffs") for the Middletown Works, Facility ID No. 1409010006 ("Middletown Works" or "Facility"). The Draft PTI was proposed by the Ohio Environmental Protection Agency and the Southwest Ohio Air Quality Agency (collectively, "Ohio EPA" or "Agency") in early June 2026.¹ Ohio EPA recognized the significant public interest in the Draft PTI and conducted a public hearing on July

¹ Compare Ohio EPA Public Notice, Cleveland-Cliffs Steel Corporation, Identification No. P0139876, <https://notices.epa.ohio.gov/notices-view/222125> (providing an Action Date of June 8, 2026 and a Weekly Review Date of June 14, 2026), and Draft Division of Air Pollution Control Permit-to-Install, Permit No. P0139876, Cleveland-Cliffs Steel Corporation, Facility ID No. 1409010006 (June 9, 2026), <https://edocpub.epa.ohio.gov/publicportal/ViewDocument.aspx?docid=4149011> ("Draft PTI") at PDF page 2 (including a Public Notice with a Date of Action of June 9, 2026).

9th, at which of Commenters’ representatives provided input on the proposed changes at Middletown Works. We also appreciate that in response to a request of many of the Commenters, Ohio EPA provided a one-week extension to July 18, 2026, of the deadline to submit public comment period.²

According to Ohio EPA’s Public Notice, the Draft PTI would authorize Cleveland-Cliffs “to install a Cogeneration Plant to generate steam and electricity at the facility, as well as various changes to the No. 3 Blast Furnace and associated material handling operations” at its existing steel mill operation in Middletown, Ohio.³ While these proposed changes would result in thousands of tons of new pollution from the Facility each year, the Permit Strategy Write-up provided by Ohio EPA determines that “the emissions are below the NSR/PSD significant emissions thresholds. The proposed new source installation project is not a major modification since permittee has ‘netted out’ of [prevention of significant deterioration] review requirements for PM, PM₁₀, PM_{2.5}, NO_x, SO₂, and CO emissions.”⁴ Ohio EPA also states that the Draft Permit contains “[s]ufficient record keeping and quarterly reporting...to determine compliance with emission limitations and associated operational restrictions” necessary to support that conclusion.⁵ These conclusions and the resulting Draft PTI appear to be based entirely on the analysis from the PTI Application and other documentation submitted by Cleveland-Cliffs, as originally submitted in February 2026 and supplemented in April 2026 (collectively, “Application”).⁶

However, as explained in the comments below, Ohio EPA and Cleveland-Cliffs have failed to show that the Draft PTI and the changes to the Facility it authorizes comply with the permitting requirements of the Clean Air Act and the permitting rules contained in the Ohio state implementation plan (“SIP”). The type of “netting” determination utilized in the Application and the Permit Strategy Write-up to avoid the prevention of significant deterioration (“PSD”) major modification air permitting requirements at existing sources requires a thorough analysis with adequate and complete supporting information, as well as PTI conditions that ensure that the proposed changes in emissions at the Facility remain below the PSD permitting thresholds. While two Application packages submitted by Cleveland-Cliffs contain a total of more than 850 pages of information, neither the Application nor the 2-page analysis provided by Ohio EPA in the Permit Strategy Write-up support the emission change conclusions upon which the Draft

² Updated Public Notice at <https://notices.epa.ohio.gov/notices-view/222801> (noting “Comment Period Extension to July 18, 2026: The comment period for this permit has been extended one week.”).

³ *Id.*

⁴ Draft PTI at PDF page 4 (Permit Strategy Write-Up).

⁵ *Id.*

⁶ Signatory Marilyn Wall received Cleveland-Cliffs applications (including supporting documents) in response to open records requests with the Ohio EPA and the Southwest Ohio Air Quality Agency on March 3, 2026 (through Robin Burgess at AltmanNewman Co. LPA), and June 25, 2026. The electronic file provided in response to the March request contained a PTI Application submitted by Cleveland-Cliffs dated “February 2026” (Permit application attachments and supplements_971275.pdf) with 13 additional documents of attachments and associated files. The electronic file provided in response to the June request contained a PTI Application submitted by Cleveland-Cliffs dated “February 2026 *Supplemental Information – April 2026*” (Permit application attachments and supplements_977064.pdf) with 17 additional documents of attachments and associated files. These comments will focus on the later April 2026 Application with Supplemental Information, referred to simply as the “Application.”

Permit is based. Ohio EPA must reject the current PTI Application and direct Cleveland-Cliffs to submit an application that addresses the deficiencies addressed below, including any supplemental analysis required to comply with PSD major modification permitting requirements. In so doing, Commenters encourage Cleveland-Cliffs to recommit to its plan to convert Middletown Works from its current coke-based blast furnace-basic oxygen furnace technology to direct reduced iron (“DRI”) technology. Not only would such a conversion greatly reduce the Facility’s air pollution and its resulting impact on the surrounding community, but it would position Middletown Works for efficient and economically viable steel production well into the future.

In providing these comments, Commenters do not seek to permanently stop steel production at Middletown Works. Instead, we seek to minimize any adverse environmental impacts of the proposed project on the surrounding community and ensure that Ohio EPA is upholding the air permitting purposes of the Clean Air Act – to “protect public health and welfare from any actual or potential adverse effect” of the proposed changes at an air pollution source, to “insure that economic growth will occur” consistent with preserving air quality, and to “assure that any decision to permit increased air pollution...is made only after careful evaluation of all the consequences of such a decision and after adequate procedural opportunities for informed public participation in the decisionmaking process.”⁷ Accordingly, these comments focus on the emission changes resulting from Cleveland-Cliffs’ proposed project at Middletown Works to ensure that any final air permit issued by Ohio EPA will result in a low-emitting steel production that will comply with the Clean Air Act and Ohio’s air permitting rules.

In fact, ensuring that Middletown Works does not release more harmful pollution is critical to the public health of the surrounding community. This Facility is among the top 10 largest industrial emitters in Ohio, releasing significant amounts harmful pollutants, including carbon monoxide, lead, fine particulate matter (PM_{2.5}), nitrogen oxides, and sulfur dioxide. In fact, data from the U.S. EPA’s own COBRA health model shows that emissions from the existing operations at Middletown Works have measurable health impacts, as summarized below:⁸

⁷ 42 U.S.C. § 7470(1), (3), and (5).

⁸ Industrious Labs, *Dirty Steel, Dangerous Air: The Health Harms of Coal-Based Steelmaking* (October 2024), <https://cdn.sanity.io/files/xdjws328/production/71057afa03f9784a6599a762149bd87fe735c06a.pdf>, at 36 (based on information from “EPA’s CO-Benefits Risk Assessment (COBRA) tool, version 5.0, using 2020 EPA National Emissions Inventory data (the most recent year available)”).

Annual Health Impact	Estimated Cases Attributable to Middletown Works
Premature deaths	37–67
Respiratory emergency room visits	44
Asthma symptom cases	21,743
Lost work days	3,091
Lost school days	6,315

Accordingly, Comments provide the following comments to ensure that any final air permit issued by Ohio EPA to Cleveland-Cliffs for the proposed project includes the analysis, conditions, and other requirements necessary to comply with the Clean Air Act and the Ohio SIP.

I. The Proposed PTI and Accompanying Record Do Not Support that Conclusion that Major Modification PSD Permitting Requirements Do Not Apply to the Proposed Changes at Middletown Works.

Cleveland-Cliffs’ PTI application addresses “the proposed project to refurbish the Blast Furnace and to install a Cogeneration Plant as well as other associated changes” at Middletown Works.⁹ Ohio EPA’s Draft PTI summarizes these changes at Middletown Works as:

- (1) refurbishing the No. 3 Blast furnace (BF) (emissions unit P925),
- (2) constructing a new cogeneration energy and steam plant, including installation of two 1,200 MMBtu/hr boilers co-fired with blast furnace gas (“BFG”) and natural gas (“NG”) co-fired boilers with one BFG backup flare (emissions units B011, B012) and a Cooling Tower (emissions units P002), and
- (3) installing additional material handling, including No. 3 BF material unloading (emissions unit F041) and BF Material Transfers and Automated Stockhouse (emissions units F042).¹⁰

Cleveland-Cliffs asserts that these changes at the Middletown Works “will not be a major modification” subject to the PSD permitting requirements of state and federal law, a conclusion Ohio EPA adopts in the proposing the Draft PTI.¹¹

⁹ Application at 1-1.

¹⁰ Draft PTI at PDF page 3 (Permit Strategy Write-Up).

¹¹ Application at 1-1 (emphasis in original); Draft PTI at PDF page 4 (Permit Strategy Write-Up).

In general, under Ohio’s SIP-approved permitting rules and related federal permitting rules addressing proposed changes at existing major sources of air pollution like the Middletown Works, the project emission netting raised in the Application consists of two steps:

Step 1: Determine whether the emission increases for each pollutant from the proposed project, considering all related increases and decreases at the affected emission units, exceed the relevant PSD significance threshold.

Step 2: Determining whether there are any contemporaneous emission decreases at the facility that result in an overall – or “net” – emission change for each pollutant that is below the PSD significance threshold.¹²

If Step 1 results in emissions increases that are below the pollutant-specific PSD significance thresholds in OAC 3745-31-01(S)(5), then the project is not a major modification for that pollutant, and PSD permitting requirements does not apply. However, if any pollutant emissions exceed the PSD significance thresholds at Step 1, the project is a major modification subject to PSD permitting requirements for those pollutants unless the applicant can show in Step 2 that contemporaneous emission changes at the facility result in “net” emissions below the significance thresholds. In this case, Cleveland-Cliffs and Ohio EPA assert that the emissions authorized by the Draft PTI are below the PSD significance thresholds for CO emissions in Step 1 and that net CO, NO_x, PM, PM_{2.5}, PM₁₀, and SO₂ emissions are below those thresholds in Step 2.

Ohio EPA’s Permit Strategy Write-up accompanying the Draft PTI adopts the emissions “netting” analysis, in Cleveland-Cliffs’ Application. Ohio EPA provides the following summary of this analysis, which we’ve highlighted to emphasize the actual increases in pollution emissions from the proposed changes at Middletown Works (in red), the emissions excluded by Cleveland-Cliffs based on assorted reductions due to discontinuing use of the existing flares and the No. 2 Boiler House and an assertion that the emissions could have been accommodated at the existing Facility (in yellow), and the emission reductions attributed to the 2021 shutdown of the Wilputte Coke Battery (in green):¹³

¹² See Ohio EPA, Air Permitting for Major Sources (Oct. 3, 2022), <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/41/webinar/Air-Permitting-Major-Sources.pdf>, at 30.

¹³ Draft PTI at PDF pages 3-4 (Permit Strategy Write-Up).

Netting Summary – Project Emissions Increases/Decreases (in TPY)

Action	CO	NO _x	VOC	PM	PM ₁₀	PM _{2.5}	SO ₂
PTE Project Emissions Increase from Installations of B011, B012, F041, F042, P002	895	249	17	67	161	157	1,981
Existing Operations Affected by the Project P925, B007, B008, B009, B010, F002, F010, F008, F005, F012 ATPA Test Emission Increase PAE – BAE - EE (TPY)	-561	-70	-5.2	-6	-73	-78	-1,447
PTE Project Emissions Increase from Installations	334	179	12	61	88	79	534
PSD Thresholds (TPY)	100	40	40	25	15	10	40
Significant Emissions Increase?	Yes	Yes	No	Yes	Yes	Yes	Yes
Emissions Decrease from the shutdown of the Wilputte Coke Battery (BAE from 11/2013 to 10/2015 period)	-247	-570		-275	-206	-170	-1,286
Contemporaneous Emissions Increases or Decreases P004; Waste Heat Boiler, future	0.9	1.0		2.97	2.97	2.97	0.002
Net Emissions Increase, after Contemporaneous Emissions Decreases & Increases	88	-390		-211	-115	-88	-752
PSD Thresholds (TPY)	100	40		25	15	10	40
Significant Net Emissions Increase?	No	No		No	No	No	No

Both the Application and the record for the Draft Permit acknowledge that the proposed project will result in thousands of tons of new air pollution per year, especially SO₂, CO, and NO_x emissions, as shown in red above, but Ohio EPA concludes that the changes requested by Cleveland-Cliffs and authorized by the Draft Permit remain below the PSD significance thresholds and thus avoid PSD major modification permitting requirements.¹⁴ However, as shown below, this conclusion is not supported by the record or consistent with the federal and state air permitting requirements for multiple reasons.

1. Problems in the Step 1 Analysis

a. Use of the wrong baseline period to exclude emissions that the Facility “could have accommodated”

The number in yellow above represents emissions changes at existing units from the proposed project during the Step 1 analysis. Cleveland-Cliffs has relied on emission reductions due to discontinuing use of the existing flares and the No. 2 Boiler House and has also excluded other emission changes by asserting that the “existing emissions unit could have accommodated that level of emissions during the baseline period” under OAC 3745-31-01(P)(28)(c).¹⁵ The

¹⁴ *Id.* at PDF page 4.

¹⁵ *Id.* at 3-5.

Application asserts that historical “peak quarter annualized production rate” for the No. 3 BF and Nos. 15 & 16 BOFs “during the July-August 2014 period” meets the rule criteria and the resulting emissions can be excluded, including more than 2000 tons per year (“TPY”) of CO emissions.¹⁶ However, these reductions do not comply with the requirements of OAC 3745-31-01(P)(28)(c).

OAC 3745-31-01(P)(28)(c) requires that excluded emissions an existing emissions unit could have accommodated must be calculated using “the consecutive twenty-four-month period used to establish the baseline actual emissions under paragraph (B)(1) of this rule.” Under OAC 3745-31-01(B)(1)(b), and consistent with the baseline actual emissions (“BAE”) figure used in the remainder of the Application, the BAE is determined using “any consecutive twenty-four-month period selected by the owner or operator within the ten-year period immediately preceding either the date the owner or operator begins actual construction of the NSR project, or the date a complete permit application is received...whichever is earlier.” In this case, Ohio EPA determined that the Agency received Cleveland-Cliffs’s complete PTI application on February 20, 2026,¹⁷ so the BAE period can only extend back to February 20, 2016. This is consistent with Cleveland-Cliffs’ selection of “January 2018 to December 2019 as the baseline period” used in its Step 1 analysis.¹⁸ Accordingly, neither the Application nor the Draft PTI can exclude the emissions calculated from the July-August 2014 period (as included in the yellow highlighted portion above).

Assuming all other calculations in the project netting analysis summarized above are correct (contrary to our other comments), it is unclear that the CO emission changes resulting from the proposed project at Middletown Works would not result in emissions increases that trigger PSD major modification permitting requirements, since the 88 TPY of CO net emissions increases relied upon by Cleveland-Cliffs and Ohio EPA includes these improper exclusions and is only 12 TPY below the PSD significance threshold of 100 TPY. Accordingly, Ohio EPA must reject the current PTI Application, require Cleveland-Cliffs to submit a new application that applies the correct exclusionary time period under the Ohio permitting rules and also includes PSD permitting requirements for any resulting changes in the pollutant emission increases that exceed the PSD significance thresholds, and notice the resulting new draft permit for public comment.¹⁹

¹⁶ Table D-4e: Excludable Emissions (Blast Furnace and Associated Equipment), contained in the file Calculations_977065.pdf at PDF page 9 (calculating 2,054.76 TPY of excludable CO emission from the No. 3 BF due to 22.18 TPY from the Casthouse baghouse, 0.69 TPY from Casthouse fugitive, 0.22 TPY from the NG Stoves, and 2031.67 TPY from the BFG stoves).

¹⁷ Ex. 1, Letter from Kurt Smith, Southwest Ohio Air Quality Agency, to Michael Bathe, Cleveland-Cliffs Steel Corporation, Re: Butler County, Cleveland-Cliffs Steel Corporation Facility ID # 1409010006, A0081168 received on 02/20/2026 (dated March 3, 2026).

¹⁸ Application at 3-4.

¹⁹ See OAC 3745-31-05(A)(2)(C) (denial of PTI application for failure to comply with PSD requirements) and 3745-31-06(H)(1) (air permit public notice).

b. Failure to show that the excluded emissions truly “could have been accommodated” at the existing Facility

Even if Cleveland-Cliffs had used the correct BAE period to exclude these emissions, the Application fails to show that these emissions truly could have been accommodated at the existing emission units. Cleveland-Cliffs merely asserts that the dates represented the “peak quarterly annualized production rate.”²⁰ However, the state and federal rules require that excluded emissions that an existing emissions unit could have accommodated must be calculated using “the *consecutive* twenty-four-month period used to establish the baseline actual emissions under paragraph (B)(1) of this rule.”²¹ This means that the Application cannot simply rely on the highest month or two of production rates as Cleveland-Cliffs did here. Instead, the Application must show that such a production rate could have been achieved throughout the BAE period. This is consistent with EPA guidance noting that excluding these types of emissions requires more than just an assertion of a short period of increased production. Instead, it requires a showing that the excluded emissions are based on a production rate that the *existing* facility “could *consistently* achieve during the baseline period.”²² The calculations of sustained historical production must consider only what the facility “could have already physically and legally emitted during the baseline period,” including any maintenance, bottlenecks, and other issues that could keep the unit from operating at the peak rate for the duration of the relevant baseline period.²³ While U.S. EPA has recognized that using a high one-month production rate may be appropriate, as asserted in the Application, the guidance has made clear that the applicant seeking the emission exclusions bears the burden of showing, based on “all available information,”²⁴ that the facility could have consistently produced such emission over the baseline period.²⁵

Second, OAC 3745-31-01(P)(28)(c) requires that any excluded emission increases in the Step 1 analysis are “unrelated” to the proposed project. The Application explains that several changes will be made to the blast furnace, including restoring hearth volume.²⁶ The reduction in hearth volume that occurs over time can cause a reduction in capacity, which the proposed project will remedy. It seems very plausible given the information in the Application that the projected increase in blast furnace production following the project is directly related to the

²⁰ Application at 3-4

²¹ OAC 3745-31-01(P)(28)(c) (emphasis added). *See also* 40 CFR § 52.21(b)(41)(ii)(c).

²² Letter from US EPA Region 7 to the Kansas Dept. of Health and Environment (Dec. 17, 2015), https://www.epa.gov/sites/default/files/2016-01/documents/columbian2015_0.pdf, at 2 (emphasis added).

²³ Letter from US EPA Region 3 to Pennsylvania Dept. of Environmental Protection (April 20, 2010), <https://www.epa.gov/sites/default/files/2015-07/documents/psdanalysis.pdf>, at 4.

²⁴ Letter from US EPA Region 4 to Georgia-Pacific Wood Products LLC (March 18, 2010), <https://www.epa.gov/sites/default/files/2015-07/documents/demandgrowth.pdf>, at 2 (noting that these emission exclusions must be based on “all relevant information”).

²⁵ *Compare* Application at 3-5 (“conservatively” using the peak quarterly production rate) with the US EPA guidance in n. 22 and 23, *supra*, and Letter from EPA Region 5 to Illinois EPA (Aug. 27, 2015), <https://www.epa.gov/sites/default/files/2017-05/documents/r5admsoy.pdf>, at 1-3 (noting that these Step 1 emission exclusions require a more specific showing of production and providing examples of the type of specific information needed).

²⁶ Application at 2-7.

changes from the No. 3 BF refurbishment project, including the plan to “restore” hearth volume by replacing refractory bricks (which would result in an *increase* of current volume), reline the furnace (which *could* result in an increase of current volume), and potentially change the furnace top and hearth cooling. Cleveland-Cliffs must show why the proposed changes from the project are unrelated to the increases proposed for exclusion. This type of information is not included in the Application, and thus, the exclusion of these emissions is not supported by the record.²⁷

c. Failure to confirm that other existing units are not affected by the proposed project

The Application asserts that various existing units at the Hot Strip Mill and downstream finishing operations are not impacted by the proposed project to improve overall energy consumption at Middletown Works and will not experience any increase in utilization as a result of the project.²⁸ Thus, these units are not included in the emission change projections in Cleveland-Cliffs’ Step 1 analysis.²⁹ However, the Application fails to provide sufficient information to support these claims. For example, Cleveland-Cliffs states that the “[h]ot metal/steel slab production from the existing Blast Furnace, BOF Shops, and Continuous Casters do not constrain utilization for the downstream existing Hot Strip Mill...due to the fact that Middletown Works currently and historically has imported slabs from domestic and international steel mills for processing in the Hot Strip Mill and downstream finishing operations.”³⁰ However, the Application contains no documentation of this existing practice nor other information to prove that there is currently no unused capacity at the Hot Strip Mill and downstream finishing that could be utilized following the proposed project. In order to confirm that the Draft Permit requirements are “sufficient...to determine compliance with emission limitations and associated operational restrictions established in this permit action,”³¹ Ohio EPA must require Cleveland-Cliffs to provide historic production data for these units and confirmation that there is no unused capacity that could be affected by the proposed project.

2. Problems in the Step 2 Analysis

a. Use of the wrong time period in calculating emission reductions from the Wilputte Coke Battery Shutdown

As shown in green above, Cleveland-Cliffs has taken credit for large emissions reductions attributed to the shutdown of the Wilputte Coke Battery. As explained in the Application:³²

²⁷ US EPA guidance in n. 22, *supra*, at 3 (noting that the permittee’s “analysis fails to examine how much of its projected increase would occur even without the proposed [] project, so it fails to address the second requirement of the exclusion in which it seeks safe harbor”).

²⁸ Application at 2-9, Section 2.5.

²⁹ Application at 2-9, Section 2.5.

³⁰ *Id.*

³¹ Draft PTI at PDF page 4.

³² Application at 3-7.

On September 30, 2021, the existing Wilputte coke battery and byproducts plant and the associated operations were idled at Middletown Works. This change is the only emissions decrease in the contemporaneous period and Cleveland-Cliffs is proposing to use creditable emissions reductions from the retirement and permanent shutdown of this operation (note that the Wilputte coke battery is already dismantled; thus, this contemporaneous decrease is inherently enforceable without a permit restriction to shutdown). Emission reductions in the NEI, from shutdown of this operation, are based on the BAE for the Wilputte coke battery and associated operations. As shown in Appendix D, in terms of emissions reductions, as allowed under OAC 3745-31-01(N)(2)(b), different BAE periods were selected for different regulated NSR pollutants.

In determining there is a “net emissions increase” in Step 2 of the analysis, Cleveland-Cliffs can consider contemporaneous emission decreases at Middletown Works, such as these shutdown Wilputte emissions, subject to the requirements of OAC 3745-31-01(N)(2)(b). In this case, Cleveland-Cliffs states that it is basing the emission reductions from the Wilputte Shutdown on the “BAE from 11/2013-10/2015 period.”³³ However, the Application calculates the emission reductions from the Wilputte Shutdown using the wrong time period.

OAC 3745-31-01(N)(2)(b) provides that the “[b]aseline actual emissions for calculating increases and decreases” of these contemporaneous changes “shall be determined as provided in paragraph (B)(1) of this rule.” Under OAC 3745-31-01(B)(1)(b), and consistent with the BAE used in the remainder of the Application, the BAE is determined using “any consecutive twenty-four-month period selected by the owner or operator within the ten-year period immediately preceding either the date the owner or operator begins actual construction of the NSR project, or the date a complete permit application is received...whichever is earlier.” In this case, Ohio EPA determined that Cleveland-Cliffs submitted a complete PTI application on February 20, 2026,³⁴ so the BAE period can only extend back to February 20, 2016, and Cleveland-Cliffs “selected January 2018 to December 2019 as the baseline period” used in its Step 1 analysis.³⁵ Accordingly, Cleveland-Cliffs cannot use a different, November 2013-October 2015 BAE period to calculate the Wilputte emissions reductions. The Application seems to assume that it can choose any 24-month period within 10-years of the Wilputte Shutdown, but that date is not relevant to either the permit application or construction start date as referenced in OAC 3745-31-01(B)(1)(b). Cleveland-Cliffs must use the time frame relevant to the overall emissions calculations – which is February 20, 2016 to February 20, 2026 – to calculate the creditable emission decreases from the Wilputte Shutdown.

Accordingly, neither the Application nor the Draft PTI can exclude the Wilputte Coke Battery Shutdown emissions as calculated from the November 2013-October 2015 time period (as highlighted in green above). Even assuming all other calculations in the project netting analysis summarized above are correct, which is unlikely given our other comments, the current Application does not support the emissions reductions from the Wilputte Shutdown contained in Step 2 of the analysis or the resulting conclusion that the net emission changes from the proposed

³³ *Id.*

³⁴ Ex. 1.

³⁵ Application at 3-4.

project do not exceed the PSD significance thresholds for CO, NO_x, PM, PM₁₀, PM_{2.5}, and SO₂ emissions. Accordingly, Ohio EPA must reject the PTI Application, require Cleveland-Cliffs to submit a new application that applies the correct time period for the Wilputte Shutdown emission reductions under the Ohio permitting rules and includes PSD permitting requirements for any resulting net emission changes that exceed the PSD significance thresholds,³⁶ and notice the resulting new draft permit for public comment.³⁷

b. Use of uncreditable pushing emission reductions from the Wilputte Coke Battery Shutdown

The emission reductions credited to the Wilputte Coke Battery Shutdown in the Application, and adopted by Ohio EPA, include significant reductions for emissions from pushing, especially PM emissions from uncontrolled pushing.³⁸ The Application notes that the pushing emission calculations are based on the an AP-42 emission factors that assumes a 74.1% capture of pushing emissions.³⁹ However, the referenced AP-42 table addresses both uncontrolled and controlled pushing emissions and appears to assume such control efficiency only for estimated controlled emissions.⁴⁰ In addition, the emission factor for the type of uncontrolled pushing emissions addressed in the Application is rated D, which means it is not very accurate.⁴¹ However, even if these AP-42 emission factors accurately reflect the pushing emissions from the Wilputte Coke Battery, the applicable NESHAP CCCCC rules did not allow 25.9% (or more) of uncontrolled pushing emissions; they required such emission to be vented to the baghouses.⁴² Netting calculations do not allow you to use historic emission figures that would violate an applicable emission standard.⁴³ Cleveland-Cliffs must use a more reasonable estimate of pushing emissions (such as 95% capture) or provide details on how the emission factors and related reductions from pushing used in the Application are also in compliance with NESHAP CCCCC and thus creditable for the netting calculations in this permitting action.

³⁶ Commenters note that the five-year contemporaneous period for using the emission reductions from the Wilputte Coke Battery Shutdown under OAC 3745-31-01(N)(2)(c)(1) ends in September 2026 since that Shutdown occurred in September 2021. See Table D-1: PSD Netting Analysis Summary contained in the file Calculations_977065.pdf at PDF page 5.

³⁷ See OAC 3745-31-05(A)(2)(C) (denial of PTI application for failure to comply with PSD requirements) and 3745-31-06(H)(1) (air permit public notice).

³⁸ See Table B918, Sample Cales Nov 2013 - Oct 2015, B918 - Wilputte, Charging, Doors, Topside, & Pushing (SCC 3-03-003-99 as catch-all process code) contained in the file Calculations_977065.pdf at PDF pages 20-21.

³⁹ *Id.* at PDF page 21, note 10 (referencing AP-42 §12.2, Table 12.2-6, footnote "a").

⁴⁰ AP-42 §12.2 (May 2008), 12.2-9, Table 12.2-6, EMISSION FACTORS FOR FILTERABLE PM EMISSIONS FROM COKE OVEN PUSHING a (SCC 3-03-003-03), https://www.epa.gov/sites/default/files/2020-11/documents/c12s02_may08.pdf, at PDF page 19.

⁴¹ *Id.*

⁴² See 68 Fed. Reg. 18008, National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, Final Rule (April 14, 2003).

⁴³ See EPA Memorandum, Crediting of Maximum Achievable Control Technology (MACT) Emission Reductions for New Source Review (NSR) Netting and Offsets (Nov. 12, 1997), <https://www.epa.gov/sites/default/files/2015-07/documents/netnoff.pdf>, (noting only that emission reductions related to *compliance* with a NESHAP would be considered “surplus” for NSR netting purposes).

c. Failure to confirm that the Wilputte Coke Battery Shutdown emissions reductions remain creditable

Neither the Application nor Ohio EPA’s Permit Strategy Write-up provide a recent permitting history for the Middletown Works. Accordingly, Commenters cannot verify that Cleveland-Cliffs has not relied on any emission reductions from the Wilputte Coke Battery Shutdown to address applicability of any other permitted projects at this Facility. As required by OAC 3745-31-01(N)(2)(c)(ii), any emission decrease from the Wilputte Shutdown is only creditable if Ohio EPA can confirm that “the director has not relied on the increase or decrease in issuing a permit for the stationary source under regulations approved pursuant to this rule, which permit is in effect when the increase in actual emissions from the particular change occurs.” Ohio EPA must provide such confirmation before issuing any final air permit that relies on these shutdown-related emission decreases to comply with the Ohio SIP PSD permitting requirements.

d. Failure to address emission reductions from future “zero” emitting units

The project as described in the Application and authorized by the Draft PTI includes various “updates” in which existing emission units will be replaced by new units. While the project netting analyses in the Application asserts that the future actual emissions of these sources will be at or near zero, such as for the #2 Boiler House (B010) and the existing flares, respectively, the Draft Permit does not actually remove these emission units or set their emission limits to the levels assumed in the netting analysis. Accordingly, Ohio EPA’s assertion that the Draft Permit requirements are “sufficient...to determine compliance with emission limitations and associated operational restrictions established in this permit action” is not true for these sources.⁴⁴ In order to confirm that emission changes from the proposed project do not trigger PSD permitting requirements, OAC-3745-31-10(A)(3) requires Cleveland-Cliffs to track emissions from all units with claimed reductions for 5 years following resumption of regular operations after the changes from the project to ensure that emissions do not increase over PSD significant levels. The limits in this permit on the new units do not remove Cleveland-Cliffs’ future obligations regarding these existing units. Ohio EPA must revise the Draft PTI to either remove authorization to emit from these units or require monitoring and reporting of annual emissions from these units for at least 5 years as required in the Ohio SIP.⁴⁵

3. Other Issues with the Draft Permit

a. Failure to address modifications at the Blast Furnace 3

The Application clearly states that the project will include a variety of changes “to refurbish the No. 3 BF,” including “comprehensive changes” to allow for both continued iron production and “anticipated modernization.”⁴⁶ The aspects of the No. 3 BF project described by

⁴⁴ Draft PTI at PDF page 4.

⁴⁵ See at 80 Fed. Reg. 36477 (June 25, 2015) at 36480 (adopting OAC-3745-31-10(A)(3) into the Ohio SIP).

⁴⁶ Application at 2-7.

Cleveland-Cliffs include several physical changes that could be considered modifications: restoring hearth volume, furnace top changes, and hearth cooling improvements.⁴⁷ The Application also describes changes to the casthouse and stoves associated with BF No. 3 that involve physical changes, such as upgrading the stove shells and replacing drills and mud guns with a hydraulic system.⁴⁸

Cleveland-Cliffs acknowledges these “changes are considered a physical change or change in the method of operation to a Project affected emission unit” are thus “included in the applicability determination for major modification per OAC 3745-31-01(M)(3)(a) under PSD.”⁴⁹ But the remaining emissions analysis concludes that the emission increases from these blast furnace and related changes are below the significant emission rates and therefore these aspects of the project are not a modification subject to PTI permit changes.⁵⁰ Likewise, the Draft PTI states that “the changes to [No. 3 BF] P925 do not constitute a ‘modification’ pursuant to the definition in OAC 3745-31-01 (M)(10).”⁵¹ Cleveland-Cliffs submitted a PTI Application for a variety of changes at Middletown Works that are part of one project that must be addressed by the Draft Permit. The project, including the No.3 BF changes, will increase the actual amount of pollutants currently emitted by this Facility and born by the community on a yearly basis, as shown by the red highlight in the netting summary table above.⁵² In addition, Commenters have noted problems with the conclusion that overall project emissions remain below the PSD permitting thresholds, including problems with the assertions that the No. 3 BF could have already accommodated any increased emissions from these changes. Accordingly, before issuing any final air permit for a project that includes the No. 3 BF upgrades and refurbishments, Cleveland-Cliffs must provide a revised Application that thoroughly accounts for all the proposed changes at and emission increases from this unit, and Ohio EPA must address the unit in a revised PTI. At a minimum, similar to the conditions the Agency included in the Draft PTI for emission units related to the materials handling and Cogeneration Plant parts of this project,⁵³ Ohio EPA should include rolling, 12-month emission limits for all regulated pollutant emissions from the No. 3 BF (including enforceable calculation methods that make them practically enforceable, consistent with our comments below) to ensure that any changes from the project do not trigger the PSD significance thresholds.

b. Failure to include enforceable methods for calculating Material Handling emissions

To ensure that any potential emission increases from the material handling changes authorized by the Draft PTI do not trigger PSD permitting requirements, the Draft PTI includes a

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ *Id.* at 2-8.

⁵⁰ *Id.* at 3-8.

⁵¹ Draft PTI at 18, Cond. 5.a.

⁵² See also Application at 3-6, Table 3-5.

⁵³ Draft PTI at 24, Cond. 1.b.2.d & e (for materials handling), and at 42-43, Cond. 4.b.1.d, and 46-47, Cond. 4.b.2.e (for the cogeneration boilers).

rolling, 12-month limits on emissions from No. 3 BF Material Unloading.⁵⁴ Similar provisions are included for the BF Material Transfers and Automated Stockhouse.⁵⁵ However, the specific methods for calculating those emissions are not included in the Draft Permit. Instead, the conditions state that calculating these emissions should be consistent with “methods outlined in the equations supplied” in the April Application, as well as “actual material throughput records, EFs from USEPA’s AP-42 compilation, source emission test results and/or any other pertinent information for [material handling related to] the No. 3 BF.”⁵⁶ The Draft DTI further states that compliance with the material handling emission limits “shall be demonstrated by using the recordingkeeping” in these conditions.⁵⁷ However, these emission calculation provisions are so vague and non-specific that they make the emission limits unenforceable as a practical matter. Thus, these emission limits are *not* “sufficient...to determine compliance with emission limitations and associated operational restrictions established in this permit action”⁵⁸ and are insufficient to ensure that these emissions do not trigger the PSD permitting requirements under Ohio law.

First, as noted previously, the Application submitted in April 2026 includes more than 400 pages of information, across multiple documents, so it is not clear which specific “methods outlined in equations” in the Application are being referenced.⁵⁹ Any final PTI must either (1) include the specific calculation equations in these conditions or (2) reference the specific pages of the Application and the equations on them (since many pages include multiple equations) in these conditions and include those pages as an attachment to any final PTI. Such changes are necessary to ensure that these specific emission limits and the Facility’s compliance with them are consistent with the requirements of Ohio law, especially since the Application is only available through a records request to Ohio EPA.⁶⁰

Second, it is unclear exactly *how* total emissions of regulated pollutants from these material handling operations will be determined given the list of calculation methods provided in the Draft Permit, which allows calculation using the Application equations plus other information (“material throughput records, EFs from USEPA’s AP-42 compilation, source emission test results”) and the catch-all “any other pertinent information.”⁶¹ As written, these conditions would allow Cleveland-Cliffs to calculate pollutant emissions from materials handling using any variety of methods or information until they arrive at a number that numerically complies with the limits, which renders such limits meaningless. Likewise, the conditions do not require the use of any consistent computational method over time, which also renders the resulting 12-month rolling calculations meaningless. To ensure that material handling emissions remain below PSD permitting thresholds under OAC 3745-31-01(M)(3), the Draft Permit must

⁵⁴ Draft PTI at 24, Cond. 1.b.2.d & e.

⁵⁵ Draft PTI at 31-32, Cond. 2.b.2.d.

⁵⁶ *Id.* at 24-25, Cond. 1.d.1.a *, and at 32, Cond. 2.d.1.a*.

⁵⁷ *Id.* at 28, Cond. 1.f.1.b, and at 35, Cond. 2.f.1.b..

⁵⁸ Draft PTI at PDF page 4.

⁵⁹ See n. 6, *supra*.

⁶⁰ OAR 3745-31-05(A)(2) (directing that Ohio EPA shall issue a PTI only if it will not result in a violation of any applicable state or federal rules).

⁶¹ Draft PTI at 24-25, Cond. 1.d.1.a *, and at 32, Cond. 2.d.1.a*.

include specific and bounded methods for calculating emissions from the materials handling operations on a monthly and rolling basis. As EPA has noted, the use of 12-month rolling averages to limit emissions is only appropriate where the limit and associated permit conditions “provides an assurance that compliance can be readily determined and verified.”⁶²

Finally, the emissions of particulate matter and other pollutants from materials handling have a significant impact on the surrounding community.⁶³ As the proposed project would allow increased utilization of the Facility and an overall increase in pollution emissions compared to recent years, the Draft Permit must ensure that these limits are practically enforceable.⁶⁴ This means the terms of any final PTI must allow Ohio EPA, US EPA, and the public to determine whether Middletown Works is complying with the limits and take enforcement action for any violations. The provisions of the Draft PTI addressing these emission calculations and related recordkeeping, reporting, and compliance determinations fail to meet this requirement. The Draft Permit must be revised to specify how these emission calculations will be made, otherwise revisions to include the major modification permitting requirements may be necessary.

c. Failure to include enforceable methods for calculating emissions from the Cogeneration Plant Boilers

As acknowledged in the Application, the addition of the two boilers and one back-up flare at the new Cogeneration Plant results in the largest projected emission increase from the proposed project, as summarized below:⁶⁵

⁶² *In the Matter of Orange Recycling and Ethanol Production Facility, Pencor-Masada Oxynol, LLC* (Apr. 8, 2002), https://www.epa.gov/sites/default/files/2015-08/documents/masada-2_decision2001.pdf (“Pencor-Masada Order”), at 6, citing EPA Memo, *Guidance and Enforceability Requirements for Limiting Potential to Emit through SIP and §112 Rules and General Permits* (Jan. 25, 1995).

⁶³ See Ex. 2, Compilation of more than 350 citizen complaints regarding particulates, dust, and odors from Middletown Works between January 1, 2020, and September 12, 2026 (based on copies of complaints, tallies of complaints, and other related information that signatory Marilyn Wall periodically receives from the Ohio EPA and the Southwest Ohio Air Quality Agency). See also Stephen Starr, *A costly plan will keep a steel plant in JD Vance’s hometown running. Locals are aghast: ‘It’s horrible’*, The Guardian (March 29, 2026), <https://www.theguardian.com/us-news/2026/mar/29/jd-vance-middletown-cleveland-coal-investment#:~:text=New%20permitting%20documents%20on%20the,another%2015%20to%2018%20years> (documenting numerous complaints from citizens living near the facility and noting that Cleveland-Cliffs regularly “sends crews out to residents’ properties to pressure wash the soot and chemical dust off their houses”).

⁶⁴ *Pencor-Masada Order* at 5

⁶⁵ Application at 3-3.

Table 3-2. PTE of New Emissions Units under the Project

Emission Units/Operations	Potential to Emit (TPY)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Pb
Cogeneration Plant – Boilers & Flare (combined)	27	128	128	1,981	213	15	864	6.7E-03
Cogeneration Plant – Cooling Tower	7.2	3.3	0.01					
Cogen Space Heaters (aggregate)	0.20	0.82	0.82	0.06	11	0.59	9.0	5.4E-05
Material Handling (including associated gas-fired heating)	33	29	28	0.2	26	1.4	22	1.3E-4
Total	35	134	130	1,981	239	17	889	6.9E-03

While the Application relies on certain emission reductions and exclusions to avoid triggering major modification permitting requirements for the project, as discussed in the comments above, the Draft PTI still includes emission limits to ensure that emissions from the Facility remain below the PSD permitting significance thresholds. Specifically, Condition 4.b.1.d contains “Special Terms and Conditions (Netting) to avoid PSD for CO, NO_x, PM, PM₁₀, PM_{2.5}, and SO₂” with specific pound/MMBtu and rolling, 12-month emission limits for each of these pollutants.⁶⁶ However, emissions for the rolling, 12-month emission limits are calculated based on a condition similar to the material handling conditions discussed above, which allow these emissions to be “calculated according to the methods outlined in equations supplied by the permittee in [the April 2026 Application], using actual fuel usage (input) rates in MMscf/month, actual heat input rates in MM Btu/month, actual fuel heating values in Btu/scf, EFs from USEPA's AP-42 compilation, source emissions test results, and/or any other pertinent information for BFG and NG combustion in the boilers.”⁶⁷ Compliance with the rolling, 12-month limits is also determined using these calculations.⁶⁸

As discussed above, the vagueness and lack of specificity in calculating actual pollution emissions under this condition make the emission limits unenforceable as a practical matter. Thus, the Draft PTI is *not* “sufficient...to determine compliance with emission limitations and associated operational restrictions established in this permit action,”⁶⁹ and is also insufficient to ensure that these emissions do not trigger the PSD permitting requirements under Ohio law. Accordingly, the Draft Permit must be revised to ensure these emission limits are practically enforceable. The conditions regarding calculation of the rolling, 12-month emission limits for the Cogeneration boilers must be revised to specify how emission calculations will be made, either by copying the specific emission equations and calculations methods into the conditions or identifying the specific Application pages and equations in the conditions and including those pages as an attachment to the Draft Permit. If Ohio EPA fails to make these changes, a final PTI cannot be issued under Ohio permitting rules because the Draft Permit will be insufficient to

⁶⁶ *Id.* at 42-43, Cond. 4.b.1.d; *see also id.* at 46-47, Cond. 4.b.2.e (restating the rolling, 12-month limits).

⁶⁷ *Id.* at 47, Cond. 4.d.1.a.*.

⁶⁸ *Id.* at 51, Cond. 4.f.1.b.

⁶⁹ Draft PTI at PDF page 4.

ensure that these emissions do not trigger the PSD permitting requirements and will be unenforceable as required by the Clean Air Act.⁷⁰

d. Failure to assure compliance with NO_x emission limits from the Cogeneration Plant Boilers

The Draft PTI includes variable NO_x emission limits for the new boilers at the proposed Cogeneration Plant depending on whether they are firing with BFG or natural gas (“NG”). For example, Condition 4.b.1. includes NO_x emission limits based on the emission factors used in the Application of 0.012 lb NO_x/MMBtu for BFG and 0.08 lb NO_x/MMBtu for NG.⁷¹ Inclusion of these limits is consistent with the emission factors claimed in the Application, which is consistent with cited authority in OAC 3745-31-05(D) because it limits these new units to emitting at rates that formed the basis of the determination that these project did not exceed PSD permitting thresholds. The Draft PTI also specifies in Condition 4.h that NO_x emissions cannot exceed 0.08 lb NO_x/MMBtu when using either BFG or NG, citing the state RACT rule contained in OAC 3745-110-03(D).⁷² However, both of these limits well below the level of NO_x emissions from the existing boilers, which have emitted over 0.08 lb NO_x/mmbtu of BFG because the baseline period was before the RACT limits applied.

NO_x emissions from blast furnace gas can be variable, and the record does not show that the rates proposed here can actually be achieved by the new boilers across all operations or that they are similar to those required for other BFG combustion sources.⁷³ Accordingly, the Draft PTI must include sufficient source-specific testing to ensure that the new boilers can actually comply with these emissions limits.

The only “testing” currently required in the Draft PTI in conducted three months after initial start-up of reach new boiler.⁷⁴ One time testing at initial start-up for a variable fuel such as BFG is insufficient to ensure compliance with the NO_x emission limits on a continuing basis, especially since these emission limits formed the basis of key NO_x emissions calculations in the Application’s PSD netting analysis which was adopted by Ohio EPA. If testing reveals that an appropriate NO_x emission factor for burning BFG in the boilers is closer to 0.055 lb/MMBtu (a limit well below the state RACT limit), the NO_x emissions from BFG combustion in these units would go from 126 tpy to 578 tpy, which would be an increase of 452 TPY. This would make the proposed project a major modification for NO_x since the net emission decrease calculated in the Application and relied upon by Ohio EPA to avoid the PSD permitting requirements was only 391 TPY.⁷⁵ Ohio EPA must revise the Draft Permit to include additional testing of NO_x and other emissions from the Cogeneration Boilers on a continuing basis with various BFG gas use.

⁷⁰ OAR 3745-31-05(A)(2) (directing that Ohio EPA shall issue a PTI only if it will not result in a violation of any applicable state or federal rules).

⁷¹ Draft PTI at 42.

⁷² *Id.* at 44.

⁷³ See generally Application at 3-2 (not including manufacturer’s guarantees or a review of other permits in the list of data used to develop the boiler emission factors).

⁷⁴ Draft PTI at 52-53, Cond. 4.f.2.

⁷⁵ Application at 3-7; Draft PTI at PDF page 4 (Netting summary stated a 390 TPY net emission decrease of NO_x).

Without such testing, there is no assurance that emission increases from the project remain below PSD permitting thresholds and revisions to include the major modification permitting requirements may be necessary. Ohio EPA could also revise the permit to require continuous emissions monitoring systems at the boilers to address these compliance assurance issues.

e. Air Pollution Nuisance requirements are federally enforceable

The Draft PTI states that the Air Pollution Nuisance provision of Standard Term and Condition A.8. “are enforceable under state law only.”⁷⁶ This is incorrect. Condition A.8 prohibits “air contaminants emitted by the emissions units covered” in the PTI from causing “a public nuisance, in violation of OAC 3745-15-07.”⁷⁷ While US EPA has *proposed* to remove OAC 3745-15-07 from the Ohio SIP, that action is not final.⁷⁸ Thus, the state nuisance law remains part of the federally enforceable SIP. Accordingly, unless EPA finalizes its proposed action with an effective date that is before Ohio EPA issues a final PTI for the proposed project, the nuisance restriction in Condition A.8 remains federally enforceable and Condition 1.a.4 must be removed.⁷⁹

4. Required next steps

Commenters have identified many issues with the Draft PTI and the underlying Application that do not support finalizing the Draft Permit. Instead, the deficiencies in the netting analysis underlying this Draft Permit must be addressed through submission of a revised permit application by Cleveland-Cliffs, production of a new draft permit by Ohio EPA, and notice to the public of a new comment period.⁸⁰ These steps are necessary to ensure that any new or revised PTI complies with all state and federal permitting requirements.⁸¹

⁷⁶ Draft PTI at 11, Cond. 1.a.4.

⁷⁷ *Id.* at 14, Cond. 8..

⁷⁸ See 91 Fed. Reg. 31688 (May 28, 2026).

⁷⁹ Even if US EPA does finalize its proposed SIP action before Ohio EPA issues a final air permit for the proposed Middletown project, the Agency should ensure any such removal is final and effective before addressing it in a final PTI given the history of regulatory and legal actions regarding the inclusion of this provision in the Ohio SIP.

⁸⁰ See OAC 3745-31-05(A)(2)(C) (denial of PTI application for failure to comply with PSD requirements) and 3745-31-06(H)(1) (air permit public notice).

⁸¹ Commenters note that any delays caused by these necessary steps are unlikely to delay the overall project at the Middletown Works since it is unclear that the Facility has the authorizations necessary to begin construction of the cogeneration units that are central to the Draft Permit. See, e.g., OAC 4906.04 (requiring a certificate of environmental compatibility and public need prior to construction of any major utility facility), OAC 4906.01(B)(1) (defining major utility facility as any “Electric generating plant and associated facilities designed for, or capable of, operation at a capacity of fifty megawatts or more”), OAC 4906.05 (not providing any exemption for the certificate requirement applicable to the Cogeneration Plant that is part of the Application and proposed project), and OAC 4906.07 (requiring a public hearing not less than 45 days after receipt of an application for a certificate). Commenters were not able to find any pending application or related public hearing for such a certificate for the new Middletown Cogeneration units.

II. Consideration of DRI

In light of the need for a new application and a revised draft permit to address the deficiencies identified above, Commenters encourage Cleveland-Cliffs to reconsider its decision to abandon the plan to convert Middletown Works from its current coke-based blast furnace-basic oxygen furnace technology to direct reduced iron (“DRI”) technology. The project proposed by the current Application and Draft PTI preserve century-old coal-based ironmaking for another 20-year operating cycle, while increasing health-harming pollution and failing to position Middletown Works – and our community – for long-term efficient and economically viable steel production.⁸²

We acknowledge that conversion to DRI is a significant investment, but it was one that Cleveland-Cliffs was ready to make. In March 2024, Cleveland-Cliffs announced that the U.S. Department of Energy had selected its proposed Middletown DRI project for up to \$500 million in federal funding. According to Cleveland-Cliffs, the \$500 million project would have replaced the blast furnace with a hydrogen-ready DRI plant and electric melting furnaces, reduced carbon emissions by more than 50% immediately (and over 90% with eventual fueling with clean hydrogen), protected approximately 2,500 existing jobs, created 170 new permanent jobs, and added roughly 1,200 construction jobs.⁸³ That planned transformation would have made Middletown Works one of the cleanest and most modern ironmaking facilities in the world.

Instead of continuing with that DRI conversion strategy, Cleveland-Cliffs has pivoted back to business-as-usual steel production using coal-based blast furnaces and doubling-down on that path with the current proposed project. The Application frames these changes as a path to improve overall energy consumption across Middletown Works and potentially enable sustainable steelmaking in the future.⁸⁴ However, improving energy consumption is primarily an economic project and one that Cleveland-Cliffs should have already undertaken. As for requesting these changes to improve future sustainability, there is nothing in the permit requiring such a transition, and Cleveland-Cliffs acknowledges any such changes would be “future separate investments.”⁸⁵ Instead of undertaking a piecemeal approach to environmental and economic sustainability, Cleveland-Cliffs should convert to cleaner steelmaking now by withdrawing its request to increase actual emission impacts on the community that will result

⁸² Cf. Indiana University Environmental Resilience Institute, *Jobs in the Balance: Building Toward a Clean Steel Transition in Indiana* (April 2026), <https://eri.iu.edu/documents/20260402-jobs-in-the-balance-building-toward-a-clean-steel-transition-in-indiana.pdf> (concluding that investing in cleaner steelmaking technologies, including DRI, lowers emissions, improves public health and expands employment throughout the region surrounding a plant, while also sustaining the industrial relevance of the plant for the long-term).

⁸³ Cleveland-Cliffs – News Releases, *Cleveland-Cliffs Selected to Receive \$575 Million in US Department of Energy Investments for Two Projects to Accelerate Industrial Decarbonization Technologies* (March 25, 2024), <https://www.clevelandcliffs.com/news/news-releases/detail/629/cleveland-cliffs-selected-to-receive-575-million-in-us>.

⁸⁴ Application at 1-1.

⁸⁵ *Id.*

from the proposed project and Draft PTI and submitting a new application that recommits to the DRI transition.

Respectfully submitted,

Marilyn Wall
Sierra Club Ohio Chapter - Miami Group
marilynwall@gmail.com

Hilary Lewis
Industrious Labs
hilary@industriouslabs.org

Justine Hackimer
Ohio River Valley Institute
justine@ohiorivervalleyinstitute.org

Thomas Cmar
Earthjustice - Midwest Regional Office
tcmar@earthjustice.org

Rev. Dan Clark
Ohio Interfaith Collective
Founder and Consultant
ohiointerfaithcollective@gmail.com

Matthew Miles Goodrich
Sierra Club - Industrial Transformation
Campaign
miles.goodrich@sierraclub.org

Matthew Groch
Mighty Earth
matthew@mightyearth.org

CC: Michael Bathe, Cleveland-Cliffs, michael.bathe@clevelandcliffs.com

Exhibit 1

03/03/2026

Michael Bathe
Cleveland-Cliffs Steel Corporation
1801 Crawford Street
Middletown, OH 45044

Re: Butler County
Cleveland-Cliffs Steel Corporation Facility ID # 1409010006
A0081168 received on 02/20/2026

Dear Michael Bathe:

This letter is to inform you that the District Office/Local Air Agency (DO/LAA) received your application for a Permit-to-Install or Permit-to-Install and Operate (PTI/PTIO) for an air pollution source(s), and has determined that the application is preliminarily and administratively complete. This determination does not imply that the application is approvable, only that all of the necessary material has been submitted in order to continue the review. This letter informs you of the following:

- **The next steps in the process.**
- **The estimated time for processing the permit application.**
- **The site preparation activities allowed before permit issuance.**
- **The contact for questions about your permit application.**

The next steps in the process.

The technical review is the next step in processing the application in order to reach a final permit approval or denial. During this review, you may be contacted for additional information or clarification. Following the technical review, the permit terms and conditions or application denial will be prepared. If the review indicates a denial, you will be contacted to discuss options. Once prepared, the terms and conditions will be forwarded to the Central Office Ohio EPA, Division of Air Pollution Control (DAPC) for their review and issuance. It is possible they may ask for clarifying information as well before proceeding to issue a draft or final permit, or a denial of the application.

The estimated time for processing the permit application.

Processing times for applications vary considerably depending upon the complexity of the project, the technical completeness and approvability of the application, and the varying workloads of the offices reviewing the applications.

Applications are generally reviewed in the order they are received. For planning purposes, final determinations (issued permit or denial of application) concerning applications that do not involve major new sources, major modifications, or other complex permitting scenarios are typically issued in approximately 60 - 120 days. Final determinations for major new sources, major modifications or other complex permits are advised to expect 120 - 180 days for final determinations. **However, this is only an estimate and caution is urged before committing significant funds based on the assumption that you will obtain a permit within the described time, or in case the application is denied.**

The site preparation activities allowed before permit issuance.

Some site preparation activities can be undertaken prior to obtaining a final PTI or PTIO. The specific types of activities and criteria are listed in Ohio Administrative Code rule 3745-31-33, "Site preparation activities prior to obtaining a final permit-to-install or PTIO." Please note there are risks that the owner/operator of this facility should be aware of prior to proceeding, including additional costs associated with design changes that may become necessary in order to comply with a final issued permit.

The contact for questions about your permit application.

Please be assured that we will do everything possible to process your application in a timely manner. You may contact me with any questions concerning this letter, your application, or site preparation activities prior to permit issuance. I can be reached at [\[DO/LAA permit reviewer phone\]](#) or email [\[DO/LAA permit reviewer email\]](#).

Sincerely,

Kurt Smith
Southwest Ohio Air Quality Agency

Exhibit 2

	COMP	Date1	Time1	FACILITY	POLLUTANT	locality
1	0001	1/1/2020	03:55 PM	AK Steel	Particulate	Middletown
2	0350	1/4/2020	01:11 pm	AK Steel	Particulate	Middletown
3	0007	1/7/2020	02:46 PM	AK Steel	Odor	Middletown
4	0009	1/8/2020	02:23 pm	AK Steel	Particulate	Middletown
5	0011	1/10/2020	10:50 am	AK Steel Corporation	Particulate	Middletown
6	0012	1/12/2020	03:23 PM	AK Steel	Particulate	Middletown
7	0015	1/13/2020	02:28 pm	AK Steel Corporation	Particulate	Middletown
8	0016	1/15/2020	10:27 am	AK Steel Corporation	Odor/Px	Middletown
9	0017	1/16/2020	03:05 pm	AK Steel Corporation	Particulate	Middletown
10	0021	1/22/2020	12:35 PM	AK Steel conveyor	Particulate	Middletown
11	0023	1/23/2020	01:15 pm	AK Steel Corporation	Particulate	Middletown
12	0026	2/1/2020	06:14 PM	AK Steel	Particulate	Middletown
13	0027	2/2/2020	12:40 PM	AK Steel	Particulate	Middletown
14	0028	2/2/2020	04:59 PM	AK Steel	Particulate	Middletown
15	0029	2/3/2020	11:59 am	AK Steel	Odor/Px	Middletown
16	0034	2/5/2020	05:59 AM	AK Steel / Sun Coke	Particulate	Middletown
17	0030	2/5/2020	10:39 am	AK Steel	Particulate	Middletown
18	0037	2/18/2020	02:31 pm	AK Steel Corporation	Particulate	Middletown
19	0040	2/24/2020	11:50 am	AK Steel	Particulate	Middletown
20	0044	3/3/2020	01:43 PM	AK/ Stein	Particulate	Middletown
21	0045	3/5/2020	12:36 pm	AK Steel	Particulate	Middletown
22	0046	3/7/2020	11:52 am	AK Steel	Fugitive Dust	Middletown
23	0047	3/8/2020	12:41 pm	AK Steel	Fugitive Dust	Middletown
24	0048	3/9/2020	09:45 AM	AK/ Stein	Particulate	Middletown
25	0055	3/11/2020	11:00 AM	Stein/ AK	Particulate	Middletown
26	0056	3/11/2020	01:21 pm	AK Steel Corporation	Particulate	Middletown
27	0057	3/12/2020	09:39 am	AK Steel Corporation	Particulate	Middletown
28	0064	3/18/2020	04:56 PM	AK Steel	Particulate	Middletown
29	0067	3/24/2020	01:43 PM	AK Steel	Particulate	Middletown
30	0069	3/25/2020	12:55 PM	AK Steel	Particulate	Middletown
31	0070	3/25/2020	04:04 PM	AK Steel	Particulate	Middletown
32	0073	3/28/2020	11:31 AM	AK Steel	Particulate	Middletown
33	0074	3/30/2020	11:17 AM	AK Steel	Particulate	Middletown
34	0076	4/3/2020	12:30 PM	AK Steel	Particulate	Middletown
35	0079	4/6/2020	12:30 PM	AK Steel	Particulate	Middletown
36	0080	4/7/2020	01:04 PM	AK Steel	Odor	Middletown

37	0083	4/12/2020	10:22 AM	AK Steel	Particulate	Middletown
38	0088	4/15/2020	03:28 PM	AK Steel	Particulate	Middletown
39	0090	4/17/2020	12:30 PM	AK Steel	Particulate	Middletown
40	0091	4/19/2020	02:28 PM	AK Steel	Particulate	Middletown
41	0092	4/20/2020	10:40 AM	AK Steel	Particulate	Middletown
42	0093	4/20/2020	02:58 PM	AK Steel	Particulate	Middletown
43	0097	4/22/2020	04:25 PM	AK Steel	Particulate	Middletown
44	0098	4/23/2020	03:20 PM	AK Steel	Particulate	Middletown
45	0099	4/24/2020	12:35 PM	AK Steel	Particulate	Middletown
46	0100	4/24/2020	09:29 pm	AK Steel	Odor	Middletown
47	0101	4/25/2020	12:34 pm	AK Steel	Particulate	Middletown
48	0102	4/27/2020	10:15 AM	AK Steel	Odor	Middletown
49	0104	4/28/2020	10:20 AM	AK Steel	Particulate	Middletown
50	0108	5/2/2020	01:13 PM	AK Steel	Particulate	Middletown
51	0113	5/11/2020	12:35 PM	AK Steel	Particulate	Middletown
52	0116	5/13/2020	04:08 PM	AK Steel	Particulate	Middletown
53	0117	5/14/2020	12:37 PM	AK Steel	Particulate	Middletown
54	0118	5/14/2020	02:07 PM	AK Steel	Particulate	Middletown
55	0119	5/16/2020	02:41 PM	AK Steel	Particulate	Middletown
56	0120	5/17/2020	09:38 AM	AK Steel	Particulate	Middletown
57	0121	5/18/2020	01:45 PM	AK Steel	Particulate	Middletown
58	0122	5/18/2020	03:20 pm	AK Steel	Particulate	Middletown
59	0123	5/22/2020	05:22 20	AK Steel	Particulate	Middletown
60	0126	5/28/2020	10:30 AM	AK Steel	Particulate	Middletown
61	0132	6/5/2020	10:24 am	AK Steel Corporation	Particulate	Middletown
62	0133	6/7/2020	05:37 PM	AK Steel	Particulate	Middletown
63	0135	6/9/2020	10:29 AM	AK Steel	Particulate	Middletown
64	0136	6/9/2020	03:36 PM	AK Steel	Odor	Middletown
65	0137	6/9/2020	03:43 PM	AK Steel	Odor	Middletown
66	0141	6/12/2020	10:00 AM	AK Steel	Particulate	Middletown
67	0146	6/14/2020	08:06 PM	AK Steel	Particulate	Middletown
68	0152	6/17/2020	10:25 AM	AK Steel	Particulate	Middletown
69	0153	6/18/2020	09:21 am	AK Steel	Particulate	Middletown
70	0156	6/19/2020	03:17 pm	AK Steel	Particulate	Middletown
71	0157	6/20/2020	05:08 pm	AK Steel	Particulate	Middletown
72	0159	6/22/2020	12:27 pm	AK Steel	Particulate	Middletown
73	0161	6/25/2020	02:31 pm	AK Steel Corporation	Particulate	Middletown
74	0164	6/26/2020	12:24 pm	AK Steel Corporation	Particulate	Middletown
75	0163	6/26/2020		AK Steel	Particulate	Middletown
76	0166	6/29/2020	11:04 am	AK Steel Corporation	Particulate	Middletown
77	0167	6/30/2020	01:03 PM	AK Steel Corporation	Odor	Middletown

78	0168	7/1/2020	10:40 am	AK Steel Corporation	Particulate	Middletown
79	0169	7/2/2020	10:41 AM	AK Steel	Particulate	Middletown
80	0171	7/6/2020	10:00 AM	AK Steel	Particulate	Middletown
81	0176	7/7/2020	12:32 PM	AK Steel	Particulate	Middletown
82	0179	7/9/2020	10:05 am	AK Steel Corporation	Particulate	Middletown
83	0181	7/10/2020	1:20 PM	AK Steel	Particulate	Middletown
84	0182	7/11/2020	01:14 PM	AK Steel	Particulate	Middletown
85	0183	7/14/2020	10:04 am	AK Steel Corporation	Particulate	Middletown
86	0186	7/15/2020	11:22 am	AK Steel	Particulate	Middletown
87	0187	7/16/2020	11:00 am	AK Steel Corporation	Particulate	Middletown
88	0190	7/17/2020	11:45 AM	AK Steel	Particulate	Middletown
89	0193	7/20/2020	11:03 am	AK Steel	Particulate	Middletown
90	0197	7/27/2020	10:08 am	AK Steel	Particulate	Middletown
91	0203	7/30/2020	10:02 am	AK Steel	Particulate	Middletown
92	0204	7/31/2020	09:56 am	AK Steel	Particulate	Middletown
93	0207	8/3/2020	11:24 AM	AK Steel	Particulate	Middletown
94	0208	8/6/2020	11:28 AM	AK Steel	Particulate	Middletown
95	0209	8/7/2020	11:06 am	AK Steel	Particulate	Middletown
96	0210	8/8/2020	11:10 AM	AK Steel	Particulate	Middletown
97	0213	8/10/2020	10:21 am	AK Steel	Particulate	Middletown
98	0215	8/11/2020	11:40 AM	AK Steel	Particulate	Middletown
99	0216	8/11/2020	01:25 PM	AK Steel	Particulate	Middletown
100	0218	8/12/2020	11:06 am	AK Steel	Particulate	Middletown
101	0219	8/13/2020	11:05 am	AK Steel	Particulate	Middletown
102	0221	8/14/2020	11:55 am	AK Steel	Particulate	Middletown
103	0222	8/16/2020	11:34 AM	AK Steel	Particulate	Middletown
104	0225	8/19/2020	10:40 AM	AK Steel	Particulate	Middletown
105	0227	8/20/2020	11:09 AM	AK Steel	Particulate	Middletown
106	0228	8/20/2020	11:31 am	AK Steel	Particulate	Middletown
107	0231	8/21/2020	02:29 PM	AK Steel	Odor	Middletown
108	0232	8/21/2020	02:36 pm	AK Steel	Particulate	Middletown
109	0233	8/21/2020		AK Steel	Particulate	Middletown
110	0236	8/22/2020	08:29 AM	AK Steel	Smoke	Middletown
111	0235	8/22/2020	11:31 am	AK Steel	Particulate	Middletown
112	0240	8/26/2020	09:57 AM	AK Steel	Particulate	Middletown
113	0238	8/26/2020	11:20 am	AK Steel	Particulate	Middletown
114	0239	8/27/2020	09:55 AM	AK Steel	Particulate	Middletown
115	0241	8/30/2020	10:51 AM	AK Steel	Particulate	Middletown
116	0245	8/31/2020	10:50 AM	AK Steel	Particulate	Middletown
117	0246	8/31/2020	12:12 PM	AK Steel	Particulate	Middletown
118	0247	9/1/2020	09:38 AM	AK Steel	Particulate	Middletown
119	0250	9/2/2020	10:36 am	AK Steel	Particulate	Middletown

120	0253	9/3/2020	10:47 am	AK Steel	Particulate	Middletown
121	0255	9/4/2020	10:42 am	AK Steel	Particulate	Middletown
122	0257	9/5/2020	11:08 AM	AK Steel	Particulate	Middletown
123	0258	9/5/2020	12:42 PM	AK Steel	Particulate	Middletown
124	0259	9/7/2020	10:37 AM	AK Steel	Particulate	Middletown
125	0261	9/8/2020	10:15 AM	AK Steel	Particulate	Middletown
126	0262	9/9/2020	10:44 am	AK Steel	Particulate	Middletown
127	0264	9/10/2020	10:03 am	AK Steel	Particulate	Middletown
128	0265	9/11/2020	11:09 am	AK Steel	Particulate	Middletown
129	0266	9/11/2020	11:55 am	AK Steel	Fugitive Dust	Middletown
130	0267	9/12/2020	09:09 AM	AK Steel	Particulate	Middletown
131	0268	9/14/2020	10:28 am	AK Steel	Particulate	Middletown
132	0269	9/15/2020	10:20 AM	AK Steel	Particulate	Middletown
133	0270	9/16/2020	09:38 am	AK Steel	Particulate	Middletown
134	0273	9/17/2020	11:06 AM	AK Steel	Particulate	Middletown
135	0278	9/18/2020	02:32 pm	AK Steel	Particulate	Middletown
136	0279	9/18/2020	03:06 pm	AK Steel	Fugitive Dust	Middletown
137	0283	9/20/2020	11:27 AM	AK Steel	Particulate	Middletown
138	0280	9/20/2020	03:41 PM	AK Steel	Particulate	Middletown
139	0286	9/21/2020	09:58 AM	AK Steel	Particulate	Middletown
140	0281	9/21/2020	10:21 am	AK Steel	Particulate	Middletown
141	0288	9/22/2020	09:46 AM	AK Steel	Particulate	Middletown
142	0289	9/22/2020	10:40 AM	AK Steel	Particulate	Middletown
143	0292	9/23/2020	02:30 pm	AK Steel	Particulate	Middletown
144	0294	9/24/2020	09:37 am	AK Steel	Particulate	Middletown
145	0297	9/24/2020	11:34 am	AK Steel	Particulate	Middletown
146	0302	9/28/2020	09:00 AM	AK Steel and Sun Coke	Particulate	Middletown
147	0303	9/28/2020	09:57 am	AK Steel	Particulate	Middletown
148	0306	9/29/2020	02:08 PM	AK Steel	Particulate	Middletown
149	0307	10/1/2020	12:20 pm	AK Steel	Particulate	Middletown
150	0299	10/2/2020	11:06 am	AK Steel	Odor	Middletown
151	0300	10/2/2020	11:11 am	AK Steel	Particulate	Middletown
152	0311	10/3/2020	12:06 pm	AK Steel	Particulate	Middletown
153	0312	10/5/2020	09:38 am	AK Steel	Particulate	Middletown
154	0313	10/5/2020	11:45 am	AK Steel Or SunCoke	Fugitive Dust	Middletown
155	0315	10/6/2020	02:39 PM	AK Steel/ Stein	Particulate	Middletown
156	0317	10/7/2020	10:47 am	AK Steel	Particulate	Middletown
157	0321	10/7/2020	01:47 pm	AK Steel	Particulate	Middletown
158	0325	10/10/2020	10:40 AM	AK Steel	Particulate	Middletown
159	0326	10/10/2020	01:04 PM	AK Steel	Particulate	Middletown
160	0333	10/20/2020	10:27 AM	AK Steel	Particulate	Middletown
161	0335	10/21/2020	11:17 am	AK Steel	Particulate	Middletown
162	0336	10/22/2020	10:30 am	AK Steel	Particulate	Middletown

163	0339	10/23/2020	10:47 am	AK Steel	Particulate	Middletown
164	0343	10/24/2020	03:56 PM	AK Steel	Particulate	Middletown
165	0340	10/24/2020	03:59 pm	AK Steel	Particulate	Middletown
166	0341	10/24/2020	07:44 pm	Sun Coke or AK Steel	Odor	Middletown
167	0342	10/26/2020	11:46 am	AK Steel	Particulate	Middletown
168	0344	10/27/2020	10:44 AM	AK Steel	Particulate	Middletown
169	0345	10/28/2020	10:38 AM	AK Steel	Particulate	Middletown
170	0346	10/30/2020	10:36 am	AK Steel	Particulate	Middletown
171	0347	10/31/2020	11:00 AM	AK Steel	Particulate	Middletown
172	0348	11/2/2020	02:42 pm	AK Steel	Particulate	Middletown
173	0350	11/4/2020	01:11 pm	AK Steel	Particulate	Middletown
174	0352	11/5/2020	10:29 am	AK Steel	Particulate	Middletown
175	0354	11/7/2020	11:50 AM	AK Steel	Particulate	Middletown
176	0355	11/8/2020	02:13 PM	AK Steel	Particulate	Middletown
177	0360	11/9/2020	10:24 am	AK Steel	Particulate	Middletown
178	0362	11/10/2020	11:14 am	AK Steel	Particulate	Middletown
179	0368	11/12/2020	02:07 PM	AK STEEL	Particulate	Middletown
180	0372	11/13/2020	11:37 am	AK Steel	Particulate	Middletown
181	0373	11/14/2020	03:57 pm	AK Steel	Particulate	Middletown
182	0377	11/18/2020	10:58 am	AK Steel	Particulate	Middletown
183	0378	11/19/2020	10:22 am	AK Steel	Particulate	Middletown
184	0380	11/20/2020	11:03 am	AK Steel	Particulate	Middletown
185	0385	11/27/2020	11:51 AM	AK Steel	Particulate	Middletown
186	0387	12/1/2020	2:00 PM	AK Steel	Particulate	Middletown
187	0403	12/6/2020	09:00 am	AK Steel	Particulate	Middletown
188	0399	12/6/2020	03:50 pm	AK Steel	Particulate	Middletown
189	0401	12/8/2020	12:37 pm	AK Steel	Particulate	Middletown
190	0402	12/9/2020	01:43 pm	AK Steel	Particulate	Middletown
191	0404	12/10/2020	12:13 pm	AK Steel	Particulate	Middletown
192	0405	12/11/2020	11:34 am	AK Steel	Particulate	Middletown
193	0406	12/14/2020	10:15 AM	AK Steel	Particulate	Middletown
194	0408	12/15/2020	01:37 PM	AK Steel	Particulate	Middletown
195	0410	12/19/2020	01:12 PM	AK Steel	Particulate	Middletown
196	0414	12/23/2020	03:46 pm	AK Steel	Particulate	Middletown
197	0419	12/29/2020	02:40 PM	AK Steel	Particulate	Middletown
198	0420	12/30/2020	09:20 AM	AK Steel	Particulate	Middletown
199	0173	1/1/2021	01:30 PM	AK Steel	Particulate	Middletown
200	0002	1/4/2021	02:09 pm	AK Steel	Particulate	Middletown
201	0003	1/5/2021	10:49 AM	AK Steel	Particulate	Middletown
202	0007	1/8/2021	02:04 pm	AK Steel	Particulate	Middletown
203	0011	1/22/2021	11:05 am	AK Steel	Particulate	Middletown
204	0012	1/26/2021	01:53 PM	AK Steel	Particulate	Middletown
205	0013	1/27/2021	01:40 PM	AK Steel	Particulate	Middletown
206	0017	2/8/2021	10:30 am	AK Steel	Particulate	Middletown

207	0019	2/22/2021	11:43 am	AK Steel	Particulate	Middletown
208	0022	2/26/2021	12:47 pm	AK Steel	Particulate	Middletown
209	0029	3/8/2021	11:06 AM	AK Steel	Particulate	Middletown
210	0027	3/8/2021	11:17 AM	AK Steel	Odor	Middletown
211	0036	3/10/2021	10:13 PM	Unknown / AK Steel	Odor	Middletown
212	0040	3/16/2021	12:11 PM	AK Steel	Particulate	Middletown
213	0047	3/17/2021	01:38 PM	AK Steel/ Stein	Particulate	Middletown
214	0044	3/17/2021	01:40 pm	AK Steel	Particulate	Middletown
215	0045	3/19/2021	11:35 am	AK Steel	Odor	Middletown
216	0048	3/22/2021	08:26 PM	AK Steel	Odor	Middletown
217	0049	3/23/2021	09:45 AM	AK Steel	Particulate	Middletown
218	0050	3/23/2021	04:32 PM	AK Steel	Particulate	Middletown
219	0057	3/26/2021	11:19 AM	AK/ Cleveland Cliffs	Particulate	Middletown
220	0064	4/5/2021	11:02 am	AK Steel/Cleveland Cliffs	Particulate	Middletown
221	0068	4/6/2021	12:53 pm	AK/Cleveland Cliffs/Sun Coke	Odor	Middletown
222	0073	4/7/2021	8:50 AM	AK Steel/SunCoke	Odor	Middletown
223	0072	4/8/2021	10:33 AM	AK Steel	Particulate	Middletown
224	0080	4/14/2021	04:06 PM	AK Steel/ Cleveland Cliffs	Particulate	Middletown
225	0079	4/14/2021	10:42 pm	AK Steel/ Cleveland Cliffs	Particulate	Middletown
226	0083	4/16/2021	12:01 pm	AK Steel	Particulate	Middletown
227	0091	4/25/2021	03:49 pm	AK Steel/ Cleveland-Cliff	Particulate	Middletown
228	0093	4/26/2021	02:26 pm	AK Steel / Cleveland Cliffs	Particulate	Middletown
229	0097	4/28/2021	12:01 pm	AK Steel	Particulate	Middletown
230	0105	5/12/2021	10:37 AM	AK Steel / Cleveland Cliffs	Particulate	Middletown
231	0109	5/13/2021	12:23 PM	AK/ Cleveland Cliffs	Particulate	Middletown
232	0111	5/14/2021	10:37 AM	AK Steel / Cleveland Cliffs	Particulate	Middletown
233	0115	5/15/2021	11:41 am	AK Steel / Cleveland Cliffs	Particulate	Middletown
234	0122	5/21/2021	10:03 am	Cleveland-Cliffs / AK Steel	Particulate	Middletown
235	0126	5/22/2021	09:45 am	AK Steel/ Cliffs Steel	Particulate	Middletown
236	0125	5/24/2021	11:29 AM	AK Steel/ Cliffs Steel	Particulate	Middletown
237	0127	5/25/2021	12:56 pm	AK Steel/ Cliffs Steel	Particulate	Middletown

238	0134	6/1/2021	12:40 pm	AK/ Cleveland Cliffs Steel	Particulate	Middletown
239	0141	6/10/2021	08:50 AM	Cleveland-Cliffs/ AK Steel	Particulate	Middletown
240	0145	6/14/2021	11:54 am	Cleveland-Cliffs AK Steel	Particulate	Middletown
241	0150	6/23/2021	11:38 am	Cleveland Cliffs/AK Steel	Particulate	Middletown
242	0151	6/25/2021	11:32 AM	AK Steel	Particulate	Middletown
243	0156	7/5/2021	12:53 pm	Cleveland Cliffs/AK Steel	Particulate	Middletown
244	0157	7/6/2021		Cleveland Cliff/ AK Steel	Particulate	Middletown
245	0162	7/7/2021	12:00 pm	AK Steel	Particulate	Middletown
246	0163	7/8/2021	12:15 PM	Cleveland Cliffs/AK Steel	Particulate	Middletown
247	0169	7/19/2021	02:15 PM	Cleveland Cliff/ AK Steel	Particulate	Middletown
248	0176	7/28/2021	11:50 AM	AK Steel / Cleveland Cliffs	Particulate	Middletown
249	0177	7/31/2021	11:05 AM	AK Steel / Cleveland Cliffs	Particulate	Middletown
250	0180	8/2/2021	02:39 pm	AK Steel	Particulate	Middletown
251	0183	8/3/2021		Cleveland-Cliff (AK) Steel	Particulate	Middletown
252	0185	8/5/2021	08:18 am	AK Steel	Particulate	Middletown
253	0186	8/5/2021	09:37 AM	AK Steel	Particulate	Middletown
254	0193	8/11/2021	01:15 pm	AK Steel/Cleveland Cliffs	Particulate	Middletown
255	0205	8/20/2021	10:19 am	AK Steel	Particulate	Middletown
256	0206	8/22/2021	11:02 am	Cleveland Cliffs/AK Steel	Particulate	Middletown
257	0210	8/23/2021	11:35 am	AK Steel	Particulate	Middletown
258	0216	8/26/2021	11:28 am	AK Steel	Particulate	Middletown
259	0217	8/27/2021	10:57 am	AK Steel	Particulate	Middletown
260	0229	9/10/2021	12:18 PM	Suncoke/ Cliffs (AK)	Odor	Middletown
261	0232	9/14/2021	01:19 PM	AK Steel / Cleveland Cliffs	Particulate	Middletown
262	0235	9/17/2021	10:45 am	AK Steel	Particulate	Middletown
263	0240	9/23/2021	02:08 pm	AK Steel	Particulate	Middletown
264	0242	9/30/2021	08:30 AM	Cleveland Cliffs (AK Steel)	Particulate	Middletown
265	0267	10/15/2021	10:00 am	Cleveland Cliffs/ AK Steel	Particulate	Middletown
266	0276	10/27/2021	10:00 am	Cleveland Cliffs/AK Steel	Odor	Middletown
267	0046	3/4/2022	01:00 PM	Cliffs (AK) Steel	Other	Middletown

268	0072	4/11/2022	10:13 am	Cleveland Cliffs (AK)	Odor	Middletown
269	0083	4/22/2022	09:16 AM	Cleveland Cliffs (AK Steel)	Odor	Middletown
270	0147	6/8/2022	10:22 am	Cleveland Cliffs Steel	Fugitive Dust	Middletown
271	0166	6/24/2022	12:33 pm	Cleveland Cliffs/AK Steel	Particulate	Middletown
272	0167	6/25/2022	11:15 AM	Cleveland Cliffs/AK Steel	Particulate	Middletown
273	0182	7/9/2022	09:06 am	Cleveland Cliffs/AK Steel	Particulate	Middletown
274	0187	7/14/2022	12:10 PM	Cleveland Cliffs (AK Steel)	Odor	Middletown
275	0188	7/15/2022	11:35 AM	Cleveland Cliffs (AK Steel)	Particulate	Middletown
276	0204	8/12/2022	10:50 AM	Cleveland Cliffs (AK Steel)	Particulate	Middletown
277	0207	8/13/2022	08:57 AM	Cleveland Cliffs	Particulate	Middletown
278	0213	8/18/2022	10:15 AM	Cleveland Cliffs (AK Steel)	Particulate	Middletown
279	0236	9/9/2022	12:49 PM	Cleveland Cliffs	Particulate	Middletown
280	0252	9/29/2022	01:04 pm	Cleveland Cliffs	Particulate	Middletown
281	0259	10/5/2022	12:45 pm	AK Steel/Cleveland Cliffs	Particulate	Middletown
282	0264	10/11/2022	10:30 am	Cleveland Cliffs	Particulate	Middletown
283	0273	10/24/2022	10:51 am	Cleveland Cliffs Steel	Odor	Middletown
284	0282	10/28/2022	08:07 pm	Cliffs	Odor	Middletown
285	0302	11/9/2022		Cleveland Cliffs Steel	Odor	Middletown
286	0325	12/14/2022	09:39 am	Cleveland Cliffs	Particulate	Middletown
287	0005	1/10/2023	11:30 am	Stein / Cleveland Cliffs	Fugitive Dust	Middletown
288	0012	1/19/2023	10:55 am	Stein / Cleveland Cliffs	Fugitive Dust	Middletown
289	0052	3/1/2023	06:05 PM	Stein / Cliffs	Fugitive Dust	Middletown
290	0054	3/9/2023	02:48 PM	Stein/Cliffs	Fugitive Dust	Middletown
291	0087	4/12/2023	03:09 PM	Cliffs	Odor	Middletown
292	0125	5/9/2023	02:45 PM	Cleveland Cliffs	Particulate	Middletown
293	0153	5/12/2023	05:38 PM	Cliffs	Particulate	Middletown
294	0151	5/24/2023	03:18 PM	Cleveland Cliffs	Odor	Middletown
295	0166	6/2/2023	09:08 PM	Cleveland Cliffs	Particulate	Middletown
296	0168	6/3/2023	09:17 am	Cleveland Cliffs	Particulate	Middletown
297	0169	6/5/2023	11:40 am	Cleveland Cliffs	Particulate	Middletown
298	0174	6/7/2023	11:09 AM	Cleveland Cliffs	Particulate	Middletown

299	0179	6/7/2023	07:50 PM	Cleveland Cliffs/Enterprise Pr	Odor	Middletown
300	0192	6/15/2023	12:45 PM	Cleveland Cliffs	Particulate	Middletown
301	0196	6/17/2023	08:40 AM	Cleveland Cliffs	Particulate	Middletown
302	0239	8/4/2023	11:06 AM	Cleveland Cliffs	Particulate	Middletown
303	0245	8/8/2023	02:02 pm	Cleveland Cliffs	Odor	Middletown
304	0281	9/11/2023	10:02 am	Cleveland Cliffs	Particulate	Middletown
305	0283	9/14/2023	11:29 am	Cleveland Cliffs	Particulate	Middletown
306	0289	9/16/2023	08:09 am	Cleveland Cliffs	Particulate	Middletown
307	0297	9/21/2023	02:34 PM	Cleveland Cliffs	Odor	Middletown
308	0316	9/30/2023	10:28 am	Cleveland Cliffs/AK	Particulate	Middletown
309	0323	10/2/2023	04:10 pm	Cleveland Cliffs	Particulate	Middletown
310	0389	11/27/2023	04:20 pm	Cliffs	Particulate	Middletown
311	0395	12/1/2023	03:43 pm	Barrett Paving	Odor	Middletown
312	0399	12/13/2023	11:57 am	Cleveland Cliffs	Particulate	Middletown
313	0038	1/18/2024	08:47 PM	Cliffs	Odor	Middletown
314	0024	1/19/2024	06:30 AM	Cliffs	Odor	Middletown
315	0039	2/4/2024	08:24 am	Cleveland Cliffs	Particulate	Middletown
316	0044	2/6/2024	03:36 PM	Cliffs	Particulate	Middletown
317	0072	3/6/2024	08:18 pm	Suncoke/Cliffs	Odor	Middletown
318	0073	3/6/2024	08:45 pm	Suncoke/Cliffs	Odor	Middletown
319	0074	3/6/2024	09:12 pm	Suncoke/Cliffs	Odor	Middletown
320	0132	5/1/2024	01:00 pm	Cliffs	Fugitive Dust	Middletown
321	0131	5/2/2024	02:40 pm	Cliffs	Particulate	Middletown
322	0138	5/13/2024	01:00 PM	Cleveland Cliffs	Particulate	Middletown
323	0147	5/15/2024	02:30 pm	Cleveland Cliffs	Particulate	Middletown
324	0179	6/14/2024	01:40 pm	Cliffs	Particulate	Middletown
325	0220	7/19/2024	02:05 PM	Cliffs	Particulate	Middletown
326	0234	8/9/2024	01:13 PM	Cleveland Cliffs	Particulate	Middletown
327	0240	8/13/2024	12:56 PM	Cleveland Cliffs	Particulate	Middletown
328	0258	8/22/2024	12:53 pm	Cleveland Cliffs	Particulate	Middletown
329	0261	8/23/2024	01:30 PM	Cleveland Cliffs	Particulate	Middletown
330	0264	8/26/2024	11:30 AM	Cleveland Cliffs	Particulate	Middletown
331	0269	8/27/2024	01:01 pm	Cleveland Cliffs	Particulate	Middletown
332	0273	8/29/2024	01:49 PM	Cliffs	Particulate	Middletown
333	0279	9/6/2024	04:05 PM	Cleveland Cliffs	Particulate	Middletown
334	0280	9/7/2024	07:34 PM	Cleveland Cliffs	Particulate	Middletown
335	0293	9/12/2024	01:02 PM	Cliffs	Particulate	Middletown
336	0297	9/16/2024	01:15 PM	Cliffs	Particulate	Middletown
337	0304	9/18/2024	12:00 pm	Cliffs	Particulate	Middletown
338	0312	9/26/2024	01:13 PM	Cleveland Cliffs	Particulate	Middletown
339	0317	10/1/2024	13:03	Cleveland Cliffs	Particulate	Middletown
340	0322	10/7/2024	02:05 PM	Cleveland-Cliffs	Particulate	Middletown

341	0328	10/9/2024	01:56 PM	Cleveland-Cliffs	Particulate	Middletown
342	0334	10/10/2024	01:33 PM	Cleveland Cliffs	Particulate	Middletown
343	0341	10/14/2024	01:00 PM	Cliffs/ Middletown Coke	Particulate	Middletown
344	0348	10/19/2024	01:34 pm	Cleveland Cliffs	Particulate	Middletown
345	0361	10/28/2024	13:19	Cleveland Cliffs	Particulate	Middletown
346	0364	10/29/2024	08:22	Cleveland Cliffs	Particulate	Middletown
347	0392	11/5/2024	09:44 AM	Cleveland Cliffs Steel	Particulate	Middletown
348	0416	11/6/2024	09:48	Sun Coke or Cliffs	Odor	Middletown
349	0433	12/23/2024	01:03 PM	Cleveland Cliffs	Particulate	Middletown
350	0015	1/23/2025	12:19	Cleveland Cliffs	Odor	Middletown
351	0020	2/5/2025	09:57 AM	Cliffs	Particulate	Middletown
352	0021	2/5/2025	10:49 AM	Cliffs	Particulate	Middletown
353	0019	2/6/2025	11:08 AM	Cleveland Cliffs	Odor	Middletown
354	0099	4/11/2025	11:39 AM	Cleveland Cliffs	Other	Middletown
355	0098	4/11/2025	01:20 PM	Cliffs	Particulate	Middletown
356	0146	5/8/2025	02:19 pm	Cleveland Cliffs or MCC	Odor	Middletown
357	0197	5/30/2025	11:15 AM	Cleveland Cliffs	Odor	Middletown
358	0254	7/10/2025	09:17 AM	Cleveland Cliffs	Particulate	Middletown
359	0268	7/29/2025	12:23 pm	Cleveland Cliffs	Particulate	Middletown
360	0287	8/1/2025	02:57 PM	Cleveland Cliffs	Odor	Middletown
361	0291	8/3/2025	05:03 PM	Cleveland Cliffs	Odor	Middletown
362	0302	8/8/2025	01:00 PM	Cliffs/Middletown Coke	Particulate	Middletown
363	0309	8/13/2025	10:35 AM	Cliffs/Middletown Coke	Fugitive Dust	Middletown
364	0310	8/14/2025	10:40 AM	Cliffs/Middletown Coke	Fugitive Dust	Middletown
365	0312	8/15/2025	10:43 AM	Cleveland Cliffs	Odor	Middletown
366	0317	8/19/2025	11:45 am	Cleveland Cliffs	Particulate	Middletown
367	0315	8/20/2025	01:20 PM	Cleveland Cliffs	Odor	Middletown
368	0318	8/20/2025	10:36 pm	Cleveland Cliffs/MCC	Odor	Middletown
369	0334	8/28/2025	13:03	Cliffs and Stein	Fugitive Dust	Middletown
370	0336	8/29/2025	01:30 PM	Cleveland Cliffs	Odor	Middletown
371	0338	8/30/2025	08:44 AM	Cleveland Cliffs	Particulate	Middletown
372	0339	8/31/2025	08:55 AM	Cleveland Cliffs	Particulate	Middletown
373	0340	9/1/2025	09:22 AM	Cleveland Cliffs	Particulate	Middletown
374	0365	9/12/2025	14:42	Cleveland Cliffs	Particulate	Middletown