

245. On each of the dates set forth in ¶¶ 193-241, above, ArcelorMittal violated the CAA by permitting emissions with an opacity equal to or greater than 20% for a period or periods aggregating more than three minutes in any one hour, and/or equal to or greater than 60% at any time.

**COUNT VI: Hydrogen Sulfide Violations**

246. Section C.I. #011(a) of the Plant’s Title V Permit provides: “The owner or operator may not permit the flaring or combustion of a coke oven byproduct gas which contains sulfur compounds, expressed as equivalent hydrogen sulfide, in concentrations greater than 45 grains per 100 dry standard cubic feet. The sulfur compounds, expressed as equivalent hydrogen sulfide, emitted into the outdoor atmosphere from any tail gas sulfur recovery equipment utilized in a coke oven gas desulfurization system approved by the Department shall be included in the determination of these concentrations.”

247. Section C.I. #010(b) of the Plant’s Title V Permit provides: “The owner or operator may not permit the flaring or combustion of a coke oven byproduct gas which contains sulfur compounds, expressed as equivalent hydrogen sulfide, in concentrations greater than 50 grains per 100 dry standard cubic feet. The sulfur compounds, expressed as equivalent hydrogen sulfide, emitted into the outdoor atmosphere from any tail gas sulfur recovery equipment utilized in a coke oven gas desulfurization system approved by the Department shall be included in the determination of these concentrations.”

248. On the dates listed below, the Plant flared or combusted coke oven byproduct gas with equivalent hydrogen sulfide concentrations in the following amounts:

<b>COMPLAINT PARAGRAPH NUMBER</b>	<b>DATE</b>	<b>H<sub>2</sub>S CONCENTRATION (gr. H<sub>2</sub>S/100 dscf COG)</b>
248a	4/14/14	210
248b	4/15/14	215
248c	4/16/14	415

248d	4/17/14	305
248e	4/18/14	115
248f	4/23/14	140
248g	4/25/14	156
248h	4/26/14	148
248i	4/27/14	63
248j	4/29/14	76
248k	5/2/14	68
248l	5/9/14	92
248m	5/14/14	53
248n	5/15/14	81
248o	5/17/14	67
248p	5/19/14	68
248q	5/21/14	71
248r	5/24/14	87
248s	5/29/14	83
248t	5/30/14	68
248u	6/2/14	56
248v	6/3/14	100
248w	6/4/14	81
248x	6/5/14	102
248y	6/6/14	77
248z	6/7/14	69
248aa	6/10/14	81
248bb	6/11/14	130
248cc	6/12/14	142
248dd	6/13/14	133
248ee	6/14/14	118
248ff	6/15/14	143
248gg	6/17/14	51
248hh	6/20/14	330
248ii	6/23/14	148
248jj	6/27/14	63
248kk	6/28/14	107
248ll	6/29/14	78
248mm	6/30/14	115
248nn	7/1/14	53
248oo	7/2/14	90
248pp	7/3/14	87
248qq	7/7/14	107
248rr	7/8/14	105
248ss	7/10/14	98
248tt	7/11/14	130
248uu	7/12/14	117
248vv	7/13/14	120
248ww	7/14/14	147

248xx	7/15/14	148
248yy	7/16/14	120
248zz	7/17/14	92
248aaa	7/18/14	101
248bbb	7/19/14	137
248ccc	7/20/14	150
248ddd	7/21/14	142
248eee	7/22/14	147
248fff	7/23/14	117
248ggg	7/24/14	123
248hhh	7/25/14	68
248iii	7/26/14	97
248jjj	7/29/14	52
248kkk	8/19/14	85
248lll	8/20/14	235
248mmm	8/21/14	275
248nnn	8/22/14	265
248ooo	8/23/14	275
248ppp	8/24/14	235
248qqq	8/25/14	240
248rrr	8/26/14	250
248sss	8/27/14	260
248ttt	8/28/14	260
248uuu	8/29/14	240
248vvv	8/30/14	245
248www	8/31/14	245
248xxx	9/1/14	255
248yyy	9/2/14	260
248zzz	9/3/14	245
248aaaa	9/4/14	235
248bbbb	9/5/14	235
248cccc	9/6/14	245
248dddd	9/7/14	250
248eeee	9/8/14	265
248ffff	9/9/14	240
248gggg	9/10/14	260
248hhhh	9/11/14	105
248iiii	9/12/14	100
248jjjj	9/19/14	150
248kkkk	9/22/14	60
248llll	9/25/14	104
248mmmm	9/29/14	77
248nnnn	5/19/15	154
248oooo	5/22/15	340
248pppp	5/28/15	305
248qqqq	5/29/15	85

248rrrr	5/30/15	60
248ssss	5/31/15	75
248tttt	6/1/15	60
248uuuu	6/2/15	67
248vvvv	6/3/15	79
248wwww	6/4/15	160
248xxxx	6/5/15	125
248yyyy	6/6/15	215
248zzzz	6/7/15	235
248aaaa	6/8/15	135
248bbbb	6/9/15	185
248cccc	6/10/15	330
248dddd	6/11/15	125
248eeee	6/12/15	160
248ffff	6/13/15	315
248gggg	6/14/15	320
248hhhh	6/15/15	455
248iiii	6/16/15	365
248jjjj	6/17/15	265
248kkkk	6/18/15	340
248llll	6/19/15	365
248mmmm	6/20/15	320
248nnnn	6/21/15	305
248oooo	6/22/15	335
248pppp	6/23/15	345
248qqqq	6/24/15	345
248rrrr	6/25/15	355
248ssss	6/26/15	325
248tttt	6/27/15	200
248uuuu	6/28/15	310
248vvvv	6/29/15	340
248wwww	6/30/15	335

249. On each of the dates listed in ¶¶ 248a-248wwwww, above, ArcelorMittal violated the 45 gr/dscf limit in Section C.I. #011(a) of the Plant's Title V Permit.

250. On each of the dates listed in ¶¶ 248a-248wwwww, above, ArcelorMittal violated the 50 gr/dscf limit in Section C.I. #010(b) of the Plant's Title V Permit.

251. On the dates listed below, the Plant flared or combusted coke oven byproduct gas with equivalent hydrogen sulfide concentrations in the following amounts:

<b>COMPLAINT PARAGRAPH NUMBER</b>	<b>DATE</b>	<b>H<sub>2</sub>S CONCENTRATION (gr. H<sub>2</sub>S/100 dscf COG)</b>
251a	4/19/14	50
251b	5/16/14	49
251c	6/25/14	47
251d	6/26/14	47

252. On each of the dates listed in ¶¶ 251a-251d, above, ArcelorMittal violated the 45 gr/dscf limit in Section C.I. #011(a) of the Plant's Title V Permit.

253. ArcelorMittal violated the CAA on each date listed in ¶¶ 248a-248www and 251a-251d, above, by exceeding the H<sub>2</sub>S limits in the Plant's Title V Permit.

**COUNT VII: Hydrogen Sulfide Monitoring Violations**

254. Section C.III. #015(a) of the Title V Permit requires ArcelorMittal “to install, operate, and maintain a Continuous H<sub>2</sub>S Monitoring Device to measure and quantify sulfur compound concentrations, expressed as equivalent hydrogen sulfide (H<sub>2</sub>S), in the desulfurization byproduct coke oven gas (COG)” at the Plant.

255. The Plant does not have a Continuous H<sub>2</sub>S Monitoring Device of the type described in Section C.III. #015(a) of the Title V Permit. The Plant has not had a Continuous H<sub>2</sub>S Monitoring Device of the type described in Section C.III. #015 of the Title V Permit since the Plant re-started on April 10, 2014.

256. ArcelorMittal has been in continuous violation of Section C.III. #015(a) of the Title V Permit from the date of the Plant's re-start on April 10, 2014, by failing to install, operate, and maintain a Continuous H<sub>2</sub>S Monitoring Device of the type described in Section C.III. #015(a) of the Title V Permit.

257. Section C.VI. #022 of the Plant's Title V Permit provides: “A person may not cause or permit the operation of a source subject to this article unless the source and air cleaning devices identified in the application for the plan approval and operating permit