



TILDEN MINING COMPANY L.C.
Managed by The Cleveland-Cliffs Iron Company
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April 30, 2021

Sydney Hewson
MDEQ-AQD-UPDO
1504 W. Washington St.
Marquette, MI 49855

Re: Tilden Mining Company L.C.
MI-ROP-B4885-2017a

Dear Ms. Hewson:

This letter is being submitted in response to the January 27, 2021, Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), scheduled onsite inspection activity report for Tilden Mining Company LC (Tilden) located at 1 Tilden Mine Road, Ishpeming, Michigan. The purpose of this inspection was to evaluate compliance with the facility Renewable Operating Permit (MI-ROP-B4885-2017b). The inspection report was received from Nadine Ruokolainen via e-mail on March 12, 2021.

Tilden submits the following clarifications to address inaccuracies presented in the inspection report. Tilden requests the inspection report be amended to reflect these clarifications or, at a minimum, this submittal be attached to the inspection report.

FACILITY DESCRIPTION

Regarding the indurating units, the inspection report incorrectly states Tilden operates two 460 million BTU per hour heat input grate-kiln indurating furnaces. The individual emission unit descriptions for EUKILN1 and EUKILN2 state the correct main burner heat rating of 590 million BTU per hour. Tilden requests narrative related to burner ratings be corrected in the inspection report to avoid any future confusion.

EMISSION UNITS (used oil use information)

The records request asked for the most recent Fuel Oil analysis for each emission unit which is permitted to burn Used Oil; EUOREDRIYER1, EUOREDRIYER2, EUKILN1, EUKILN2, EUBOILER1, and EUBOILER3.

The inspection report suggests each emission unit: EUOREDRIYER1, EUKILN1, EUKILN2, EUBOILER1 and EUBOILER3 last burned used oil in 2010. Tilden's response explained the most recent consumption of used oil was only EUOREDRIYER2 in 2010. Tilden did not clarify that all other used oil permitted emissions units have not burned used oil for many years prior to 2010. Tilden requests the narrative be adjusted in the inspection report to prevent confusion that there should be records of used oil consumption in 2010 where there is none. For example,

EUOREDRIYER1; has not operated on used oil since 2005, EUBOILER 1 and EUBOILER3 have not operated on used oil since 2003, etc.

EUOREDRIYER2; Monitoring/Recordkeeping; Page3

The inspection report states EUOREDRIYER2 has not operated on used oil since December 2010. The most recent used oil analysis was from December 2010, the last time EUOREDRIYER2 operated on used oil was October 2010. Tilden requests the narrative be corrected in the inspection report.

EUKILN1; Emission Limit; NOx; Actual; Page 5

The inspection report presents a single lbs/mmbtu figure using an average of 24, 1 hour readings from December 01, 2020. This data in no way represents the 720-hour rolling average requirement for the eventual emission limit yet to be established by EPA. Tilden requests the narrative be corrected in the inspection report to indicate the 1.46 lbs/mmbtu is an average of a single day's 24 hourly readings, or omitted given the narrative later clearly explains the NOx limits are not yet effective.

EUKILN2; Process/Operational Restrictions and Testing/Sampling Monitoring/Record Keeping; Page7

The inspection report states; Continuous SO2 and NOx emissions from kiln 2 are included in the semiannual report received January 22, 2021. EUKILN2 is not required to have CEMS monitoring and does not operate continuous SO2 or NOx CEMS, therefore no SO2 or NOx CEMS data for EUKILN2 has been provided. Tilden requests this narrative be corrected in the inspection report.

FGTACONITEMACT; Emission Limits/Testing and Sampling; Actual Emission/Compliance; Page 10

The inspection report states; The Facility no longer processes magnetite. Magnetite is produced as required to meet customer needs. Magnetite has not been or anticipated to be processed during the current permit term. If magnetite is not processed during the five year permit term, emission testing is not required. Tilden requests the narrative be corrected in the inspection report.

COMPLIANCE DISCUSSION – EUORDRIYER 1

The inspection report states EUOREDRIYER1 should be tested for particulate matter as soon as possible. As communicated in a 2/8/21 e-mail communication, Tilden has initiated steps to coordinate testing of EUOREDRIYER1. The test will be completed per the requirements set forth in our ROP under Tilden's active stack test protocol.

It should be noted that the last PM testing conducted on the ore dryer units was completed in 2011. That testing was completed while Tilden was operating under the prior issuance of the ROP dated July 1, 2008 which required completion of a single test with no recurring testing obligation.

The current version of the ROP, which was issued on July 10, 2017 and amended on August 14, 2018, contains new language that adds a recurring testing obligation as follows: "*Testing will be*

conducted at least once during the five-year permit term and once every five years thereafter.” Under the terms of the current ROP, the next PM emission testing obligation for the dryers is required by no later than the expiration of the current ROP which is July 2022. The requirements set forth in PTI 148-12A were incorporated into the current ROP at the time of issuance noted above.

Tilden requests that the file be amended to include the information above to more appropriately characterize Tilden’s status with respect to compliance with its current testing obligations.

COMPLIANCE DISCUSSION – FGTAACONITE MACT

The inspection report states that a representative unit for both crushing and handling emission units and finished pellet handling emission units need to be tested for particulate matter during this permit cycle. The current permit, MI-ROP-B4885-2017b, expires in July of 2022. Tilden has completed several particulate matter tests during the active permit cycle and has several more planned to satisfy all FGTAACONITE MACT testing requirements within the permit cycle as allowed. Tilden requests the narrative be corrected to reflect that there is no current noncompliance situation with respect to the testing requirements for FGTAACONITEMACT.

Please contact Brent Ketzenberger at (906) 475-3792 or Tom O’Brien at (906) 475-3302 if you have any questions or require additional information

Sincerely,



Ryan Korpela
General Manager
Cleveland Cliffs Inc.
Tilden Mining Company L.C.

cc: Mr. Ed Lancaster, EGLE
Scott Gischia, Director Environmental Compliance, USIO, Cleveland Cliffs
Brent Ketzenberger, Area Manager Environmental, Tilden, Cleveland Cliffs
Tom O’Brien, Environmental Engineer, Tilden, Cleveland Cliffs