

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

August 1, 2018

VIA EMAIL: CWHardin@uss.com

Christopher W. Hardin
Environmental Affairs
United States Steel Corporation
1350 Penn Ave., Suite 200
Mail Station 26
Pittsburgh, PA 15222

Re: Proposed revisions to Article XXI § 2105.21, Coke Ovens and Coke Oven Gas

Dear Mr. Hardin:

During the Air Quality Program Regulation Subcommittee meeting held on July 10, 2018, a representative of U.S. Steel Corp. requested a meeting with the Allegheny County Health Department (ACHD) to discuss the proposed revisions to the Coke Ovens and Coke Oven Gas regulations. U.S. Steel further requested that the ACHD provide its analysis of the inspection data relating to the proposed revised regulations.

There appears to be some misunderstanding as to the ACHD's reasoning and process for revising the coke oven regulations. It is important to note that one of the primary purposes of Article XXI is to "establish rules and regulations governing air pollution control in order to . . . [p]rotect the health, safety and welfare of the citizens of Allegheny County." Article XXI, § 2101.02.c.1. When the ACHD undertook the process of revising the regulations, the focus was on what standard should coke ovens be required to meet in order to "protect the health, safety and welfare of the citizens of Allegheny County." As part of this process, the ACHD analyzed and reviewed the current coke oven regulations and discussed proposed revisions with individuals with extensive coke oven experience. Based on this analysis, the ACHD determined what requirements that coke ovens in Allegheny County should be required to meet. It was only after this determination was made did the ACHD review and analyze the inspection data to confirm whether U.S. Steel has been able to meet these standards.

During the July Regulation Subcommittee meeting, U.S. Steel agreed with the ACHD that in order for any meeting to be productive, it is necessary for both sides to provide its analysis as to U.S. Steel's compliance with the proposed revised regulations. In response to this request, please find attached the ACHD's compliance analysis. Prior to meeting to discuss the proposed regulations, the ACHD requests that U.S. Steel produce an analysis of why it can or cannot meet



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the proposed standards and to support this position with internal data from its own inspectors, ACHD inspectors, or ACHD's Method 303 contractor showing compliance rates under the proposed standards. If U.S. Steel is unwilling to produce its analysis and basis for being unable to meet the proposed regulations, then the ACHD does not believe that a meeting would be productive.

Please advise by **August 6, 2018** whether U.S. Steel agrees to produce the requested information prior to a meeting with the ACHD. If U.S. Steel is agreeable to this condition, then the ACHD and U.S. Steel can proceed with scheduling a meeting prior to the next Regulation Subcommittee meeting in September. Currently, the ACHD is available to meet on the following dates and times:

Thursday, August 16 at 1:00 PM
Monday, August 20 at 9:00 AM
Monday, August 27 at 9:00 AM and 1:00 PM

Please advise as to which date and time that you are available. Additionally, the ACHD will need U.S. Steel's analysis at least five days prior to the meeting.

Sincerely,



Jayme Graham
Air Quality Manager

cc: Sandra Etzel, Section Head, Planning & Data Analysis (via email)
Dean DeLuca, Enforcement Section Chief (via email)
Jeffrey Bailey, Esq., ACHD Assistant Solicitor (via email)
Tishie Woodwell, Esq., (via email: twoodwell@uss.com)
Chip Babst, Esq. (via email: cbabst@babstcalland.com)

Proposed §2105.21 - Coke Oven Regulations

Unless otherwise noted, the information which was reviewed to determine compliance with the proposed regulations was the 2017 calendar year inspections conducted by Allegheny County Health Department and its Method 303 contractor.

Charging

The below table shows the percentage of inspections analyzed which met the proposed standard of 10 seconds or less per charge in calendar year 2017. Only ACHD's Method 303 contractor's inspection information was used for charging because it was the only information which ACHD had electronically on a per-charge basis.

Charging

Battery	% of inspections for each battery which were 10 seconds or less per charge
all batteries	95.36%
1	96.16%
2	93.59%
3	95.78%
13	93.86%
14	93.21%
15	97.32%
19	98.96%
20	99.23%
B	90.03%
C	95.45%

Doors

The below table shows the cumulative percentage and number of inspections analyzed which had the range of percentage leaks or lower shown in calendar year 2017 by ACHD and its Method 303 contractor. For example, line 33, 2%-2.49% leaking, shows there were 165 inspections in that range and 86.70% of inspections were 2.49% or less leaking.

Doors

% leaking	Inspections	cumulative %
0 or less	2317	57.05%
0-0.49	0	57.05%
0.5-0.99	565	70.97%
1-1.49	187	75.57%
1.5-1.99	287	82.64%
2-2.49	165	86.70%
2.5-2.99	131	89.93%
3-3.49	116	92.79%
3.5 or more	293	100.00%

Lids

The below table shows the percentage of inspections analyzed which met the proposed standard of 0 leaks in calendar year 2017 by ACHD and its Method 303 contractor.

Lids

% leaking	Inspections	% of total
0	3903	96.59%
> 0	138	3.41%

Offtakes

The below table shows the cumulative percentage and number of inspections analyzed which had the range of percentage leaks or lower shown in calendar year 2017 by ACHD and its Method 303 contractor. For example, line 59, 2%-2.49% leaking, shows there were 209 inspections in that range and 97.40% of inspections were 2.49% or less leaking.

Offtakes

% leaking	Inspections	cumulative %
0	1822	45.09%
0.01-0.49	190	49.79%
0.5-0.99	826	70.23%

1-1.49	219	75.65%
1.5-1.99	670	92.23%
2-2.49	209	97.40%
2.5-2.99	35	98.27%
3-3.49	20	98.76%
3.5 or more	50	100.00%

Pushing

The below table shows the percentage of inspections analyzed which met the proposed standard of less than 10% opacity in calendar year 2017. Only ACHD's inspection information was used for pushing because ACHD's Method 303 contractor does not conduct pushing inspections.

Pushing

% opacity	Inspections	% of total
0 or 5	1011	68.31%
10 or more	469	31.69%

Travel (Part of Pushing)

The below table shows the percentage of inspections analyzed which met the proposed standard of less than 10% opacity in calendar year 2017. Only ACHD's inspection information was used for travel because ACHD's Method 303 contractor does not conduct travel inspections. Travel is being proposed to be part of the push and not to be a separate inspection.

Travel

% opacity	Inspections	% of total
0 or 5	1010	76.00%
10 or more	319	24.00%

Soaking

The below tables show the percentage and number of inspections analyzed which met the proposed standard of 0% opacity in calendar year 2017. Only ACHD's inspection information was used for soaking because ACHD's Method 303 contractor does not conduct soaking inspections. This was analyzed both for soaking where a flame was present and soaking where a flame was not present because the proposed regulation will not differentiate.

Soaking without a flame

% opacity	Inspections	% of total
0	1814	88.75%
> 0	230	11.25%

Soaking with a flame

% opacity	Inspections	% of total
0	2003	97.99%
> 0	41	2.01%