



United States Steel Corporation
Penn Liberty Plaza

Christopher Hardin
Manager, Environmental - Air

RECEIVED

August 6, 2018

AUG 08 2018

Jayne Graham
Air Quality Program Manager
Allegheny County Health Department
301 39th Street, Building #7
Pittsburgh, PA 15201-1891

**ALLEGHENY COUNTY HEALTH DEPT.
AIR QUALITY PROGRAM**

RE: Proposed Revisions to Article XXI § 2105.21, Coke Ovens and Coke Oven Gas

Dear Ms. Graham,

In response to U. S. Steel's request for the Department's analysis regarding the draft Allegheny County coke oven regulations, U. S. Steel received a letter with a compliance analysis from the Department on August 1, 2018. In the letter, you noted that the Department ran a data analysis only *after* U. S. Steel requested it at the Subcommittee meeting, and that the proposed coke oven regulation revisions were based on discussions with individuals with extensive coke oven experience.

In the letter, the Department requested that U. S. Steel respond by August 6, 2018, if U. S. Steel would be willing to provide its own analysis and, if so, the Department indicated that a meeting would be appropriate. U. S. Steel continues to review the data and is providing this letter to the Department to confirm that we are agreeable to producing the requested information prior to meeting with the Department. Of the times offered by the Department, U. S. Steel is available to meet on Monday, August 27 at either 9:00 AM or 1:00 PM. We also agree to provide the data analysis five days in advance of the meeting; or by August 22, 2018.

Just as you noted in your letter, it appears that there was some miscommunication at the Subcommittee meeting; as we believe to make the meeting most fruitful, we requested more information as to *how the Department derived the limits in the draft regulations*. Such information would be most appropriate. While we appreciate the Department's compliance analysis, the information sought is with regards to the derivation of the limits. In your letter, you indicate that, "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." We respectfully request information regarding this analysis (as to the derivation of the limits as well as the names of the individuals with extensive coke oven experience with whom the Department consulted). Having this information prior to the meeting would streamline the meeting.

We look forward to receiving additional information and meeting with the Department.

Sincerely,

Christopher W. Hardin

Jayne Graham (ACHD)

August 6, 2018

Page 2

cc: Sandra Etzel (ACHD – via email)
Dean DeLuca (ACHD – via email)
Jeffrey Bailey (ACHD – via email)
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