

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

September 14, 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 meeting on August 27, 2018, U.S. Steel requested that the Allegheny County Health Department (ACHD) provide the data used when preparing the ACHD's compliance analysis that was submitted to U.S. Steel on August 1, 2018. Please find attached Microsoft Excel files containing the requested data. If you require further explanation of the attached files, please contact Dean DeLuca, ACHD Air Quality Enforcement Chief, at (412) 578-8188 or by email at dean.deluca@alleghenycounty.us.

In the August 1, 2018 letter to U.S. Steel, the ACHD indicated that as part of the process for revising the regulations, the ACHD discussed proposed revisions with individuals with extensive coke oven experience. During the August 27, 2018 meeting, U.S. Steel requested that the ACHD identify the names of the individuals noted in the letter. These individuals are James Hagedorn (EPA Region 3) and Brian Harrington (KERAMIDA Inc.). It is important to emphasize that Mr. Hagedorn and Mr. Harrington did not participate in the actual drafting of the proposed regulations and were never provided a copy of the draft regulations. Their involvement was limited to informal oral discussions. **The proposed revisions to the coke oven regulations were based only on analysis and determinations made by ACHD staff.** As you know, the ACHD has multiple individuals with extensive experience and knowledge relating to coke oven emissions and the ACHD relied on their knowledge and experience when drafting these proposed regulations. The ACHD hopes that this will resolve any questions by U.S. Steel and avoid any further mischaracterization of the regulatory revision process undertaken by the ACHD.



KAREN HACKER, MD, MPH, DIRECTOR
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AIR QUALITY PROGRAM

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Finally, during the August 27, 2018 meeting, U.S. Steel requested additional time to analyze the potential regulation changes and consult with an external “expert.” As expressed during the meeting, the ACHD found it disappointing that U.S. Steel had not already started a review of the regulations considering that it had been in possession of the regulations for nearly two months and had the opportunity to discuss the proposed regulations with the ACHD on two previous occasions. However, the ACHD indicated that it would allow U.S. Steel some additional time to complete its review of the proposed regulations. The ACHD would like to meet with U.S. Steel within the next few weeks to discuss U.S. Steel’s progress in reviewing the proposed regulations. Currently, the ACHD is available to meet on the following dates and times:

Monday, September 24 at 10:00 AM
Tuesday, September 25 at 10:00 AM
Monday, October 1 at 10:00 AM

Please advise as to which date and time that you are available. The ACHD believes it would be productive if U.S. Steel’s “expert” also attends 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)
David Hacker (via email: DWHacker@uss.com)