

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

**Administrative Order**

March 6, 2019

**CERTIFIED MAIL: 9489 0090 0027 6038 2065 88**

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  
– Administrative Order for Reports and Information**

Dear Mr. Hardin:

During the meeting with the Allegheny County Health Department (ACHD) on October 9, 2018, U.S. Steel indicated that it retained Thyssenkrupp to prepare a report regarding U.S. Steel's ability to comply with the proposed revised coke oven regulations. During the meeting, U.S. Steel agreed to provide to the ACHD a copy of the report from Thyssenkrupp. U.S. Steel also indicated that it would provide additional information regarding the sulfur compounds and their concentrations in the coke oven gas. Further, during the meeting on November 30, 2018, U.S. Steel indicated that it was in the process of preparing its own report pertaining to the proposed revised coke oven regulations and that it would share the report with the ACHD.

It has now been several months, and the ACHD has not received any of the above information. Pursuant to the ACHD's authority under Article XXI, § 2108.01.f, please produce the following reports and information within 30 days of the date of this letter:

- 1. Provide all sampling, analyses and tests of the undiluted coke oven gas produced by the U. S. Steel Corporation Clairton Plant which identify any sulfur compounds and their concentrations as well as where and when the tests were taken.**



KAREN HACKER, MD, MPH, DIRECTOR  
**ALLEGHENY COUNTY HEALTH DEPARTMENT**  
**AIR QUALITY PROGRAM**

301 39<sup>TH</sup> STREET • CLACK HEALTH CENTER • BUILDING 7  
PITTSBURGH, PA 15201-1811

PHONE (412) 578-8103 • FAX (412) 578-8144  
24-HR (412) 687-ACHD (2243) • WWW.ACHD.NET

2. **Provide copies of all reports prepared by U.S. Steel and by third-parties retained by U.S. Steel relating to the proposed revisions to the ACHD's coke oven regulations including, but not limited to, the report prepared by Thyssenkrupp.**
3. **Provide all air (including, but not limited to, Method 303) inspection reports and inspection data submitted to U.S. Steel by Veolia for the prior ten years. Please submit the data in Microsoft Excel or Access electronic format.**

Please be advised that the failure to submit any report or information requested in this Order within the time specified, or submitting false information, or the willful failure to submit a complete report is a violation of Article XXI giving rise to the remedies provided by §2109.02 including civil penalties of up to \$25,000 per violation per day.

Pursuant to Article XI ("Hearings and Appeals") of the Allegheny County Health Department Rules and Regulations, you are notified that if you are aggrieved by this Order you have thirty (30) days in which to file an appeal from the receipt of this Order. Such a Notice of Appeal shall be filed in the Office of the Director at 542 Fourth Avenue, Pittsburgh, PA 15219. This Order is enforceable upon issuance and any appeal of this Order shall not act as a stay unless the Director of the ACHD so orders. In the absence of a timely appeal, the terms of this Order shall become final.

If you have any questions concerning this matter, please call Sandra Etzel, Section Head, Planning & Data Analysis, at 412-578-8116 or by email at Sandra.Etzel@AlleghenyCounty.US. For any legal questions regarding this Order, please call ACHD Assistant Solicitor Jeffrey Bailey, Esq., at 412-578-2658 or by email at Jeff.Bailey@AlleghenyCounty.US. Thank you for your anticipated prompt attention to this matter.

**DONE and ENTERED** this 6<sup>th</sup> day of March, 2019, in Allegheny County, Pennsylvania.

  
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Jayme Graham  
Air Quality Program Manager

3 / 6 / 2019  
Date

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)  
Christopher Hardin (via email: CWHardin@uss.com)  
Tishie Woodwell, Esq., (via email: twoodwell@uss.com)  
Chip Babst, Esq. (via email: cbabst@babstcalland.com)  
David Hacker, Esq. (via email: DWHacker@uss.com)