

Thank you for the opportunity to provide comments on the MECP proposal to embed requirements for managing coke leaks and pushing opacity into AMD's site wide air ECA. In the process of reviewing the existing S.35 order and proposal to make the requirements an amendment to our air ECA (with LOF), AMD would like to provide feedback to modernize the conditions / requirements, reduce administrative burden, while maintaining the performance limits and environmental benefits that are associated with the existing process.

Before we provide specific feedback on various sections in the existing S. 35 order, it is necessary to draw to your attention that, relative to other Ontario cokemaking facilities, AMD is disadvantaged when it comes to meeting percentage based leak targets due to the unique operational footprint in particular to our #3 Coke plant. #3 Coke Plant is a 6 meter tall battery (most other batteries are 4 m tall). Tall doors are more challenging to seal doors given their taller and narrower geometry, with more sealing perimeter surface. Additionally the #3 Coke Plant has very few operating ovens when compared to other typical batteries (#2 coke plant has 106 total ovens for comparison) and compared to the sets of assets upon which the original US EPA rules were developed. Given #3 Coke Plant has only approximately 30 ovens in service, each door leak has a disproportionately high impact when it comes to assessing compliance against a low percentage limit for doors. In fact at 30 operating ovens, if the battery has 3 or more leaking doors the facility is over the door leak limit, whereas #2 Coke Plant could have up to 10 doors leaking and still be under the limit. To remedy this flaw in percentage based leak limits for batteries with few ovens, AMD proposes that leak limit percentage evaluations be completed for the total number of like-assets at the site combined (e.g. total number of doors at the facility / site). This would correct the inequality where batteries with few ovens are disproportionately impacted with door leaks. It also encourages the facility to operate all assets at as low a leak limit as possible to minimize the leaks and improve overall site-wide performance. In addition to the above, AMD has provided specific feedback on the items currently contained with the S. 35 order.

Part / Section / Page	Proposal	Rationale
Part 1: 1.4 and 1.5	Remove references to SPM / TSP	The intent of method 303 & method 9 is to improve BaP and BSO emissions from coke leaks and to a lesser extent opacity from coke pushing. While TSP / SPM from door leaks and opacity are present, they are not generally significant sources contributing to off-site impacts (as compared to BaP), for which this is the dominant source, needing control.
Part 2:	Remove sections / wording that no longer apply: - e.g. "order", - "company" means ArcelorMittal Dofasco GP - "facility" update to mean ArcelorMittal Dofasco GP, - "Request" – remove this entire section / correspondence list (top page 4) - remove reference to SPM	Update out of date references, Name of Company (AMD - AMD GP).
Part 3: Work Ordered	Remove all sections that pre-date the Jan 1 – Dec 31, 2020 limits from tables / limits. - Remove "compliance dates" from the various sections of the remainder of the document ("compliance date"), could mean Jan 1, 2021 onward - This section could be simplified so that AMD provides the DM in writing when items in table 1 are exceeded to mean: - The item exceeded, the value, the oven that exceeded, and corrective actions. - This list could be provided to the DM weekly (as opposed to daily). AMD would still make corrective actions, but there is little benefit to provide the information on a daily basis to the MECP.	Update to focus only on the "moving forward" targets (simpler, clearer document). General simplification to avoid unnecessary documentation, notification.
Item 3.4.2 - Pg. 8	Remove the requirement (or reduce) to do observations on at least 10 Saturday's and 10 Sundays.	Measurements taken on weekends require additional scheduling and overtime to make the readings. Given that Method 303 observations and leak assessments have been ongoing for 5+ years, removing the requirement for 20 weekend readings will have a negligible impact on continued improvement activities. 20 days / year results in a reduction of only 7% of the actual data. As a minimum weekend readings should be reduced to 5 / year total (as compared to 20 total currently). The District Manager / Director still maintains the power to specify additional days at their discretion if needed so the weekend days could be increased under some circumstances.
Item 3.4.5 Pg. 9	Amend to recognize the forthcoming made in Ontario Method 303 certification process.	Formalize the new process to allow Ontario companies to create their own panel for certifying Ontario observers.
Item 3.5.2	Remove the requirement (or reduce) to do at least 10 Saturday's and 10 Sundays.	See above for 3.4.2 - same argument. Negligible impact, no loss of meaningful data.
Item 3.5.8	Remove the requirement to notify the DM if you cannot observe ovens in a 7 day period	Remove the requirement to notify the DM if observations cannot occur due to coking cycle & available daylight hours. E.g. with long coking times 20+ hours and with limited available daylight (October – March), some ovens cannot be observed for many weeks as they are constantly pushed during night-time.
Item 3.6, 3.7, 3.11 and 3.12	Remove	All these have been completed.
Item 3.9	Remove references to leaks prior to Jan 1, 2020.	Previous dates, no longer in effect.
Item 3.14	Remove references to prior to Dec 31, 2020	Update dates
Item 3.16 - 3.20	Ambient monitoring, pollution control monitoring.	Can be removed - these have been completed.
Item 3.23 1a)	Frequency of CLC meetings - amend to 2 x year.	AMD proposes to reduce the frequency of "In person / on-line" or "live" CLC meetings to 2 x / year. The company will provide cokemaking leak performance and pushing information quarterly, by posting to the external web site. Meeting in person is a time-consuming activity for both the community members and MECP. Since the existing SSS is mature, there are fewer changes and less environmental performance data which is subject to change. Quarterly data updates and bi-annual in person or live meetings will meet most stakeholders needs.
3.23 1a)	Amend reference to the reduction of emission of BaP and Benzene (not SPM)	Re-focus the intent of the document to address BaP and benzene.
3.23 2)	Remove the requirement to prepare the "Environmental Management System and Community Engagement report".	These reports are burdensome and don't create value for stakeholders. In the 5 years AMD has been creating these reports we have not received specific feedback about the information that has been published.

In closing we believe all parties (MECP, AMD and Community Stakeholders) have been working together on the goal of improving leak performance and reducing pushing opacity over the past 5 years. We believe improvements made at AMD are reflected in the Hamilton Air Monitoring Network (HAMN) data which shows a decline in BaP, benzene and SPM which can be attributed, in part to lower leaks and better performance (AMD, and Stelco are not the only sources of BaP and benzene in the HAMN network). Given that the community, MECP and AMD have been working together on these issues using the current S.25 Order since 2015, it's time to modernize the requirements to reflect the current state and focus on the related strategic key issues moving forward. HAMN – Annual report trends – BaP and Benzene

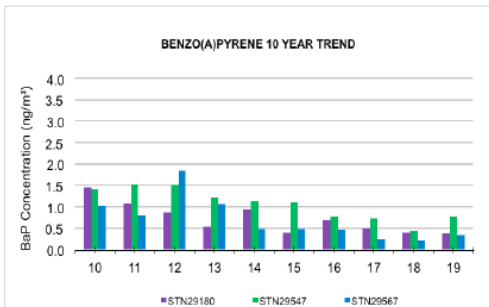


Figure 18

Annual average BaP trends over the past 10 years for STN29180, STN29547, and STN29567.

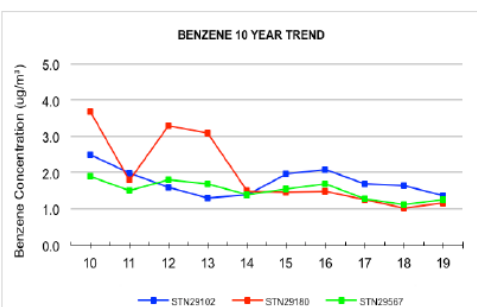


Figure 20

Annual average Benzene trends over the past 10 years for STN29102, STN29180, and STN29567.