



386 Wilcox Street
Hamilton, Ontario
L8L 8K5
905.528.2511
stelco.com

December 18, 2020

Ontario Ministry of the Environment, Conservation and Parks
Client Services and Permissions Branch
135 St Clair Ave West
1st Floor
Toronto, ON
M4V 1P5

Dear Sir or Madame:

Re: Stelco Inc. Comments on ERO Posting # 019-2671 (Ministry Reference # 3494-BUVKRU) for Proposal to Impose New Terms and Conditions to Coke Oven Battery Environmental Compliance Approvals for Hamilton Works

Stelco Inc. (Stelco) appreciates the opportunity to provide comments on the Ministry of the Environment, Conservation and Parks (MECP) proposal to impose new terms and conditions to coke battery Environmental Compliance Approvals (ECA) at the Hamilton facility.

Currently, the emission reduction requirements are set out in Orders issued pursuant to s.35(14) of O. Reg. 419/05 ("Orders"). Stelco understands from the MECP that it is the regulator's intent to transfer these current requirements from the Orders into ECAs. From an administrative efficiency perspective, Stelco would have preferred for the existing Orders to be extended.

Recognizing that the MECP has expressed intentions to insert the same requirements in the existing Orders into the coke battery ECAs, Stelco has the following comments:

Firstly, if the MECP intends to consolidate existing multiple coke battery ECAs into one ECA for the coke plant, there should be no additional modifications made to the ECA apart from the addition of the Order requirements.

Stelco continues to work with MECP and other stakeholders to develop an integrated steel sector technical standard for a suite of parameters, including suspended particulate matter and benzene. It is anticipated that current emission reduction requirements will be a part of a technical standard for this sector.

Stelco requests that the current emission reduction requirements set out in an Order issued under s. 35(14) of O. Reg. 419/05 ("the current emission reduction requirements") be inserted as a separate, standalone component (such as an Appendix) in the ECA. This would ensure that these requirements continue to be in place and not intermingled with other existing parts of the ECA that are not associated with the Order. It is imperative that the current emission requirements are not duplicated in both a future technical standard, should a facility choose to apply for the technical standard, as well as the ECA. One way to prevent this from occurring, is to insert text in the terms and conditions of the ECA stating that the current emission reduction requirements will automatically be removed upon the issuance of a technical standard by MECP for suspended particulate matter and/or benzene. This would maintain on-going environmental requirements without duplicating the same requirements in more than one regulatory document.



Lastly, Item 3.10 of the Order currently requires the company to notify the MECP in writing if two or more operational adjustments are required to be made under Item 3.9 (daily thresholds) in any seven-day period, and that this notification is to be submitted as soon as practicable following the last day of the seven-day period. Stelco requests for the MECP to consider maintaining this written notification requirement, but allow the facility to submit the notification in a monthly report. This would help reduce administrative burden, without compromising the environmental outcomes.

Thank you for considering these comments.

Sincerely,

Katie Chan

Katie Chan

Director – Environmental Affairs

cc: Andrew Sebestyen (Stelco Inc.)
Stephen Burt (MECP)