

Notes of Meeting #31 – Algoma Steel Community Liaison Committee

Date: December 10th, 2019

Location: Algoma Steel

Administration Building Main Conference Room

Time: 12pm to 2:00pm

CLC Members in Attendance

Fred Post – Algoma Steel
Chris Galizia – Algoma Steel
Kara Flannigan – Algoma Public Health
Ron Dorscht – Ministry of Environment, Conservation and Parks (MECP)
Catherine Taddo – Corporation of the City of Sault Ste. Marie
Lisa Derickx – St. Mary's River RAP Coordinator
Lori Greco - Ministry of Environment, Conservation and Parks (MECP)
Steve Carey – Chippewa County Health Department
Wayne Hubbard – United Steelworkers Local 2251
Peter McLarty – Public
David Trowbridge – Public

CLC Members not in Attendance

Reg Dunn – United Steelworkers Local 2251 Jonathon Bouma - Algoma Public Health (alternate) Dan Sayers Jr. – Batchewana First Nations Maggie McAuley – Corporation of the City of Sault Ste. Marie Patt Marquis - Public

Kathie Brosemer – Sault Ste. Marie Tribe of Chippewa Indians

Meeting Notes

1. Review of the Agenda

There were no new items proposed to be added to the agenda.

2. Review of Meeting #30 Notes

There were no comments regarding the minutes of the September 10th CLC meeting. They have been posted on the company website.

3. Membership issues

A re-cap of current membership was provided. Kathie Brosemer mentioned that she knows of a potential candidate to be her alternate. It was recommended to ask Patt Marquis if she had any suggestions for a potential alternate representative could be for her. It was also recommended that Garden River First Nations be re-invited to the CLC since they recently had an election.

4. Site Specific Standard (SSS) for particulate and BaP

Fred re-capped the development process and coke plant rules detailed within the Site Specific Standard (SSS) for particulate that was issued in March 2015. This MECP Standard was based on an emissions model that predicted potential for emissions over the Reg. 419 limit. The Site Specific Standard is an alternate compliance mechanism in which the MECP and the company agree to a plan to reduce emissions over a period of time. The Site Specific Standard came into effect on July 2nd 2015 and includes progressive phases of increasingly strict limits over time.

On July 2nd 2015, Algoma began to monitor coke oven emissions in accordance with the site specific standard. The progressive phase in of limits has occurred on an annual basis. A graphic representation of Algoma's performance was presented along with the new limits taking effect in January 2020. There has been consistent improvement from all emission sources and Algoma is now in compliance with all current and future limits.

Questions were raised about how audits were performed. It was explained that Algoma uses a third party to conduct the audits and the auditors are trained in USEPA Method 303 and Method 9. All audits are performed in accordance to these Methods.

The MECP has begun talks with industry to determine what will be in place after the existing SSS's expire. This is discussed in greater detail in sections 7 and 8 below.

Stack Opacity

A graph was provided showing the coke stack opacity performance for the past year. The graphs show the percent of total opacity in a 30 day rolling average to depict the long term performance trends. There has been significant improvement on both 8 and 9 battery stacks over the course of the year. This topic continues to be an issue and the company is working with the MECP to develop a detailed action plan to reduce opacity.

Questions were asked regarding the causes of stack opacity. It was explained that the primary source of opacity is directly related to oven wall conditions which can result in leakage of coke oven gas. Extra gas in the combustion flue over fuels the combustion process and results in incomplete combustion which is where dark smoke originates. The above mentioned action plan to reduce opacity will include investments to repair and rebuild ovens over multiple years. It was requested that longer term opacity graphs be provided.

5. Public Complaints

Public complaints regarding particulate and odour from the last quarter were discussed. During the last CLC meeting, a question was raised regarding prevailing winds and if there was a need to locate an additional monitoring station east of the facility. Wind rose graphs from the last 5 years were shared illustrating that there is no one predominant wind direction, and that the direction and velocity varies greatly from one year to the next. The potential installation of an additional monitoring station remains a discussion with the MECP through the development of a new Industry Standard summarized in section 8 below.

It was mentioned that Algoma's air quality reports were difficult to find on our webpage. This will be looked at to determine if there is an easier way to locate them. Also, a comment was made regarding siting criteria for Algoma's dust fall sampling stations. An explanation was given that these locations were chosen by the MECP and no other valid sites are available to place sampling jars. It was then agreed that it would be beneficial to explain this on the Ambient Air Quality Monitoring reports.

6. Industry / Technical / Site Specific Standard

The MECP has commenced discussions with the iron and steel sector on new Industry / Technical / Site Specific Standards for multiple air contaminants that will replace the existing Standards when they expire. The potential contaminants could include Particulate, B(a)P, Benzene, SO2, Metals (Iron, Nickel, Manganese and Chromium VI). The process is led by the MECP and is expected to take 3-4 years to develop the new technical standards. The MECP conducted a site visit on May 8 and accepted the monitoring program proposals for benzene and metals which may be used to inform if/or where future controls may be required. The Benzene Air Monitoring Program and the Metals Air Monitoring Program which commenced in August, 2018 are both complete.

The ten week benzene air monitoring program was completed in fall 2018 in the by-product area to look for potential benzene sources not currently controlled. Three sources were identified and control actions are either completed or planned.

The one year ambient air monitoring program commenced in August 2018 and was completed in August 2019 which measured suspended particulate matter and metals (Iron, Chromium VI, Manganese and Nickel). Hexavalent chromium sample results were below precise laboratory detection limits at all locations. Measurements of manganese concentrations were elevated at some locations indicating the likelihood for manganese to be part of the new Industry / Technical Standard as it is developed by the MECP. Iron and nickel results did not indicate any concern. The industry standard aims to further investigate sources of manganese such as onsite roadways, steelmaking and slag management and implement additional control measures.

The next steps involve participating in MECP led working groups to focus on the following topics:

- Fugitive metal/particulate emissions from on-site roadways; steel-making; slag management;
- Identifying managed sources current emission sources and air pollution controls;
- Expanding Leak Detection And Repair (LDAR) programs in by-product plants for benzene;
- Coke oven gas de-sulphurization (Federally required by January 1, 2026);
- Development of an Ontario-based emission auditor training and certification program;
- Completing a jurisdictional review of best available emission control techniques globally;
- Industry economic overview and economic feasibility assessment (industry led);
- Development of trigger mechanisms to facilitate a review of the appropriateness of the Technical Standard every 7-8 years.

7. Current and planned activities that require Environmental Compliance Approval (ECA) application

Algoma is currently applying for an amendment to an existing ECA for its #2 Ladle Metallurgy Furnace (LMF) to install a larger baghouse than the existing approval to improve capture efficiency at both Ladle Metallurgy treatment stations and the Basic Oxygen Furnaces.

8. Legacy Environmental Action Plan

In fall 2018 upon exiting CCAA, the MECP and Algoma Steel signed an Environmental Framework Agreement which was established to mitigate risk from on-site legacy environmental liabilities. Ontario's Environmental Protection Act allows a person responsible for a source of contaminant to submit a Program to prevent or to reduce and control the discharge into the natural environment of any contaminant. A Program Approval is a document describing the associated abatement activities. A Program Approval has been posted on the EBR for public comment and was issued May 3rd 2019.

The Environmental Framework Agreement and the associated Program Approval are the legal instruments which have initiated the development of the Legacy Environmental Action Plan (LEAP). The LEAP is a risk-based environmental management plan to be maintained and funded by Algoma Steel, with the objectives of identifying, assessing, managing and mitigating off-site adverse environmental effects caused by legacy environmental contamination at the site. Algoma Steel will be responsible for planning, budgeting/funding, implementing, documenting and reporting the activities undertaken as part of the LEAP, while the MECP has oversight, review and approval responsibilities for LEAP budget, plans and activities, including approval (or pre-approval) of eligible LEAP expenses. A formal action and implementation plan for Year 1, and indicative action plans for the following four calendar years has been approved by the MECP.

The 2019 total spent was approximately \$3.4 million on the following projects:

- Site wide baseline investigation (2019 investigation complete) A broad site-wide hydrogeological investigation has commenced with 64 boreholes and the installation of 64 new groundwater monitoring wells to complement the existing monitoring program.
- PCB disposal (complete) All known remaining PCB contaminated materials were removed from the site and sent to an approved destruction facility. These included drums of lighting ballasts and used personal protective equipment, flushing of two transformers containing residual PCB's and the destruction of large storage containers which formerly housed PCB containing transformers.
- Dredge contaminated sediment from Boat Slip (complete) Approximately 6200 cubic meters of contaminated sediment was removed from Algoma's boat slip. A post-dredge sediment core sampling program has been completed to assess residual contamination and plan any future rehabilitation work.
- Secondary Containment Waste Oil Tanks (complete) A large concrete secondary containment structure was designed and installed under a group of seven waste oil storage tanks.
- Secondary Containment Raw Liquor Tanks (underway) Secondary containment structures are being installed under and surrounding two raw liquor storage tanks.
- Legacy Tire Disposal (50% complete) Approximately 454 tonnes of legacy oversize tires were removed from the site and recycled.
- Legacy Coke Oven Gas main cleaning (complete) Approximately 5300 feet of former large diameter coke oven gas mains containing hazardous gas condensates have been cleaned out and the material is being recycled into the cokemaking process.
- Engineering for re-routing blast furnace 30" sewer (underway) Engineering design work is underway to re-route an effluent discharge to the main water treatment facility.
- Engineering Base Line Ditch Water Treatment (underway) Engineering design is underway for a new and approved ground and surface water treatment facility.

9. Climate Change

A brief description was provided of three greenhouse gas reduction projects that are either complete or underway at Algoma. The three projects are anticipated to reduce GHG emissions by approximately 79,000 tonnes annually which is approximately 2% of Algoma's emissions. Further projects are being investigated as the company continues to seek out further incremental reductions. Additionally, as a member of the Canadian Steel Producers Association Climate Change Working Group, Algoma is exploring technological advancements to deliver a step-change improvement in GHG emissions.

10. Public Open House

The last Public Open House was held on December 5th, 2018 from 4-7pm at the Polish Canadian Hall in Bayview. The next open house is scheduled December 10th, 2019 at the Northern Community Centre from 4-7pm.

11. Next Meeting

The tentative 2020 CLC meeting schedule is as follows:

• March 10th, 2020

The meeting adjourned at 2:30 PM, December 10th, 2019.

Meeting notes prepared by Chris Galizia and Fred Post December 18th, 2019

Current Members and Alternates

Representation	Primary Member	Alternate
Algoma Steel	Fred Post	Chris Galizia
Ministry of Environment, Conservation and Parks		
	Lori Greco	Ron Dorscht
Public	David Trowbridge	Peter McLarty
Public	Patt Marquis	
SSM Tribe of Chippewa Indians	Kathie Brosemer	
Algoma Public Health	Kara Flannigan	Chris Spooney
Chippewa County Health Dept.	Steve Carey	Suzanne Lieurance
Batchewana First Nations	Dan Sayers Jr.	
City of Sault Ste. Marie	Catherine Taddo	Maggie McAuley
United Steel Workers Local 2251	Reginald Dunn	Wayne Hubbard
St. Mary's River RAP Coordinator	Lisa Derickx	