

Notes of Meeting #32 - Algoma Steel Community Liaison Committee

Date: March 10th, 2020

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

Peter McLarty – Public Patt Marquis – Public Jillian Marquis - Public

Kathie Brosemer - Sault Ste. Marie Tribe of Chippewa Indians

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
Davis Trowbridge - Public

Meeting Notes

1. Review of the Agenda

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

2. Review of Meeting #31 Notes

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

3. Membership issues

A re-cap of current membership was provided. Patt Marquis made a recommendation to have Jillian Marquis as her alternate representative. Jillian attended for the first half of the session.

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

Fred re-capped the standards 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 in compliance with all of the 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. This topic continues to be an issue and the company is working with the MECP to develop a detailed action plan to reduce opacity. A commitment has been made to install 6 new oven walls in the first half of 2020.

One member asked if potential end of pipe solutions for stack opacity could be implemented. End of pipe solutions don't currently exist nor are traditional air emission control measures such as bag houses or electrostatic precipitators being implemented elsewhere in the world because they are not technologically feasible for this application. It is generally accepted that the best means of controlling stack opacity is through rigorous oven maintenance and eventually wall replacements. It was explained that the company is continually looking at using the best available technology and utilizing best operating practices to reduce stack opacity.

One member inquired about the relationship between percent opacity and total loading of particulate and inquired whether one metric was more appropriate than the other. This question will be raised with the Standards Development Branch for discussion at a future meeting.

5. Public Complaints

Public complaints regarding particulate and odour from the last quarter were noted. There were 3 public complaints regarding odour on January 10th, January 21st, and February 3rd. None of the complaints were specifically attributed to abnormal operations or particular incidents at Algoma.

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 completed.

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 also did not indicate any concern. The industry standard aims to further investigate sources of manganese such as on-site 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 is 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 2, and indicative action plans for the following four calendar years has been approved by the MECP.

Approximately \$4.55 million in projects are planned for 2020 including the following:

- Expanding the site wide baseline hydrogeological investigation
- Secondary Containment Raw Liquor Tanks (30% complete)
- Legacy Tire Disposal (50% complete)
- Engineering for re-routing blast furnace 30" sewer (60% complete)
- Engineering Base Line Ditch Water Treatment (underway)
- Engineering Tank Clean-outs (#1, #3, #5, #7) Multi-year project
- Refurbish #7 Tank for future Groundwater Collection System
- Design Domtar Site Groundwater Collection System
- Design Coke Byproducts Groundwater Collection System
- Design Anneal Tank Oil Water Separator and Groundwater Collection System
- Design Dirt / Oil / Water Separator for Vac Truck Dumping

9. Climate Change

A brief description was provided of three greenhouse gas reduction projects that are either complete or underway at Algoma (two are now complete). 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.

As a member of the Canadian Steel Producers Association we aspire to achieve net-zero carbon emissions by 2050. We believe that by working with government and other stakeholders to secure the necessary capital and partnerships, that together we can achieve breakthrough technological advancements and enact transformational change. The Canadian Steel Producers Association's Climate Change Call to Action can be viewed at the following link: https://canadiansteel.ca/files/resources/CSPA 2 29 compressed.pdf.

10. Public Open House

The last Public Open House was held on December 10th, 2019 from 4-7pm at the Northern Community Centre. The next open house will be scheduled for the fall of 2020.

11. Next Meeting

The tentative 2020 CLC meeting schedule is as follows:

• June 9th, 2020

The meeting adjourned at 2:30 PM, March 10th, 2020.

Meeting notes prepared by Chris Galizia and Fred Post March 10th, 2020

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	Jillian 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	