

To: Air Pollution Control Advisory Committee on August 11, 2025, for review and recommendation to Board of Health for adoption.

Proposed

Revision

to

**ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS
ARTICLE XXI, AIR POLLUTION CONTROL**

§2105.21 Coke Ovens and Coke Oven Gas

and

ALLEGHENY COUNTY'S portion of the
PENNSYLVANIA STATE IMPLEMENTATION PLAN
for the
Attainment and Maintenance of the
National Ambient Air Quality Standards

(Revision Tracking No. 106)

(Document date: July 18, 2025)

Table of Contents

1. Proposed Revision

Changes to Article XXI Rules and Regulations:
§2105.21, Coke Ovens and Coke Oven Gas

2. Technical Support Document

3. Documentation of Public Hearing and Certifications

Public hearing notice
Transmittals of hearing notice to EPA & PA DEP
Proof of publication of notice of hearing
Certification of hearing
Summary of comments and responses
Certification of approval and adoption (later)

1. Proposed Revision

Coke Ovens and Coke Oven Gas Regulation Revision

Deletions are shown with strikethroughs.
Additions are shown **bolded, enlarged and underlined**.

§2105.21 COKE OVENS AND COKE OVEN GAS

*{Portions effective August 15, 1997, the remainder effective February 1, 1994; Paragraph e.6 added June 22, 1995, effective July 11, 1995 and amended May 14, 2010 effective May 24, 2010; §2105.21.b, e, and h amended effective August 15, 1997; Subsection f amended February 12, 2007 effective April 1, 2007. Subsection i added August 29, 2013, effective September 23, 2013. Paragraph e.6 amended November 13, 2014, effective January 1, 2015. Subsections a through i amended and Subsection j added October 26, 2022, effective November 5, 2022. **Subsections b, e, and h amended mm/dd/2025, effective mm/dd/2025.**}*

- b. **Door Areas.** No person shall operate, or allow to be operated, any battery of coke ovens in such manner that:
1. For Coke Oven Battery C at the U. S. Steel Corporation Mon Valley Works Clairton Plant, at any time, there are visible emissions from more than three percent (3.0%) of the door areas of the operating coke ovens in such battery, excluding the two door areas of the last oven charged and any door areas obstructed from view as calculated in Subparagraph 8.B of this Subsection;
 2. For any batteries installed, replaced, or reconstructed, or at which a major modification was made between the dates of January 1, 1978, and October 31, 2012, at any time, there are visible emissions from more than five percent (5.0%) of the door areas of the operating coke ovens in such battery, excluding the two door areas of the last oven charged and any door areas obstructed from view;
 3. For ~~any of the following batteries~~ **Coke Oven Battery 19 at the U. S. Steel Corporation Mon Valley Works Clairton Plant**, at any time, there are visible emissions from more than eight percent (8.0%) of the door areas of the operating coke ovens in ~~such~~ **the** battery, excluding the two door areas of the last oven charged and any door areas obstructed from view~~;~~

~~SPECIFIC COKE OVEN BATTERIES~~

Source Name	Location
A. Coke Battery #1	U. S. Steel Corp. Clairton, PA
B. Coke Battery #2	U. S. Steel Corp. Clairton, PA
C. Coke Battery #3	U. S. Steel Corp. Clairton, PA

~~D. Coke Battery #19~~ ~~U. S. Steel Corp. Clairton, PA;~~
or

4. For Coke Oven Battery C at the U. S. Steel Corporation Mon Valley Works Clairton Plant, emissions from the door areas of any coke oven exceed an opacity of 30% at any time 15 or more minutes after such oven has been charged;
5. Any batteries installed, replaced, or reconstructed, or at which a major modification was made on or after the effective date of this paragraph shall be subject to the applicable requirements under either Section 2102.06 (relating to installation permits for major sources locating in or impacting a nonattainment area) or Section 2102.07 (relating to installation permits for major sources locating in an attainment or unclassified area) of this Article;
6. For any batteries, other than those subject to Paragraphs b.4 or b.5 of this Section, emissions from the door areas of any coke oven exceed an opacity of 40% at any time 15 or more minutes after such oven has been charged.
7. Unless for any of the following batteries at the U. S. Steel Corporation Mon Valley Works Clairton Plant, there is installed big plug doors, or better, on the coke side of each oven by January 1, 2000. Any replacement doors on these batteries, replaced after January 1, 2000, will also be big plug doors. A big plug door is a door that, when installed, contains a plug with minimum dimensions as listed below:

SPECIFIC COKE OVEN BATTERIES			
<u>Source Name</u>		<u>Minimum Width</u>	
<u>Minimum Depth</u>			
A.	Coke Battery #1	18 1/4"	14 1/2"
B.	Coke Battery #2	18 1/4"	14 1/2"
C.	Coke Battery #3	18 1/4"	14 1/2"
D <u>A.</u>	Coke Battery #19	17"	16 1/4"
E <u>B.</u>	Coke Battery #20	17"	16 1/4"

- e. **Pushing.** No person shall operate, or allow to be operated, any battery of coke ovens unless there is installed on such battery a pushing emission control device which is designed to reduce fugitive emissions from pushing to the minimum attainable through the use of BACT.

No person may permit the pushing of coke from a coke oven unless the pushing operation is enclosed during the removal of coke from a coke oven and pushing emissions are contained, except for the fugitive pushing emissions, that are allowed by Paragraphs 4 and 5 of this Subsection, nor shall any person operate or allow to be operated any battery of coke ovens in such manner that:

1. At any time, the particulate mass emission rate from the pushing emission control device, for any battery other than those subject to Paragraph e.2 or e.3 of this

Section, exceeds a rate determined by an outlet concentration of 0.020 grains per dry standard cubic foot, or the rate determined by the following formula, whichever is greater:

per battery,
per battery;
 $A = 0.76W^{0.42}$ where A = allowable mass emission rate in pounds per hour
and W = actual coke pushing rate in tons of coke per hour

2. At any time, the particulate mass emission rate from the pushing emission control device, for **Coke Oven Battery #19 at the U. S. Steel Corporation Mon Valley Works Clairton Plant** ~~any of the following batteries~~ exceeds a rate determined by an outlet concentration of 0.010 grains per dry standard cubic foot;

SPECIFIC COKE OVEN BATTERIES

Source Name	Location
-------------	----------

A. Coke Battery #1	U. S. Steel Corp. Clairton, PA
B. Coke Battery #2	U. S. Steel Corp. Clairton, PA
C. Coke Battery #3	U. S. Steel Corp. Clairton, PA
D. Coke Battery #19	U. S. Steel Corp. Clairton, PA

3. At any time, the particulate mass emission rate from the pushing emission control device for Coke Oven Battery B at the U. S. Steel Corporation Mon Valley Works Clairton Plant exceeds a rate of 0.040 pounds per ton of coke;
4. Fugitive pushing emissions or emissions from the pushing emission control device outlet equal or exceed an opacity of 20% at any time, except if the Department determines in writing, upon written application from the person responsible for the coke ovens setting forth all information needed to make such determination, that such emissions are of only minor significance with respect to causing air pollution and do not prevent or interfere with the attainment or maintenance of any ambient air quality standard (any such determination shall be submitted as a proposed revision to Allegheny County's portion of the SIP);
5. Visible emissions from the transport of hot coke in the open atmosphere exceed ten percent (10%) opacity at any time; or
6. For any of the following batteries, at any time, the hot coke fails to be held under the hood of the pushing emission control (PEC) device for at least 67 seconds immediately after the pusher ram begins to move and the damper to the PEC device is opened or for at least 15 seconds immediately following the fall of the last of the coke into the hot car, whichever is longer:

SPECIFIC COKE OVEN BATTERIES

Source Name	Location
-------------	----------

A. Coke Battery #1	U. S. Steel Corp. Clairton, PA
B. Coke Battery #2	U. S. Steel Corp. Clairton, PA

~~C. Coke Battery #3 U. S. Steel Corp. Clairton, PA~~

~~D~~A. Coke Battery #13 U. S. Steel Corp. Clairton, PA

~~E~~B. Coke Battery #14 U. S. Steel Corp. Clairton, PA

~~F. Coke Battery #15 U. S. Steel Corp. Clairton, PA~~

~~E~~C. Coke Battery #19 U. S. Steel Corp. Clairton, PA

~~H~~D. Coke Battery #20 U. S. Steel Corp. Clairton, PA

except that this Paragraph shall only be effective during the period from 30 days following the issuance of a written notice by the Department to the owner or operator of such battery that EPA has required the implementation of the contingency measures under the portion of the PM-10 SIP for the Liberty Borough/Clairton area, until issuance of a written notice by the Department that such measures are no longer required.

- h. **Coke oven gas.** Except as provided for in this Section, no person shall operate, or allow to be operated, any source in such manner that unburned coke oven gas is emitted into the open air. In addition, no person shall flare, mix, or combust coke oven gas, or allow such gas to be flared, mixed, or combusted, unless the concentration of sulfur compounds, measured as hydrogen sulfide, in such gas is less than or equal to the following concentrations:

1. **For purposes of this Subsection 2105.21.h, “24-hour average” means the arithmetic average of hourly average concentrations of hydrogen sulfide in COG, represented in units of grains per hundred dry standard cubic feet of COG, over a calendar day, where a “calendar day” means the period of elapsed time that begins at midnight on a certain date and ends 24 hours later at midnight of the next day;**

- ~~21.~~ **24.** Where the rated production capacity of the coke plant producing such gas is less than 70 million standard cubic feet of coke oven gas per day, a concentration of ~~70~~ **25** grains per hundred dry standard cubic feet of coke oven gas, **based on a 24-hour average as defined in Paragraph h.1 above,** or the concentration determined by the following formula whichever is less:

$A = 156E^{-0.27}$ where A = allowable hydrogen sulfide content in grains per hundred dry standard cubic feet of coke oven gas, and
E = maximum coke oven gas production rate in millions of cubic feet per day

- ~~32.~~ For all coke batteries installed, replaced, or reconstructed, or at which a major

modification was made on or after January 1, 1978, where the rated production capacity of the coke plant producing such gas is equal to or more than 70 million standard cubic feet of coke oven gas per day, a concentration of ten (10) grains per hundred dry standard cubic feet of coke oven gas;

- 43.** The standard set forth in Paragraph ~~h.2~~ **h.3** of this Section for the following coke oven batteries designated 13, 14, ~~15~~, 20, and B at the U. S. Steel Corporation Mon Valley Works Clairton Plant shall be deemed satisfied for such batteries if the coke oven gas from the following batteries and treated by the Clairton Plant coke oven gas desulfurization system in existence as of June 24, 1993, has a sulfur compound concentration, measured as H₂S, of no greater than ~~35~~ **25** grains per hundred dry standard cubic feet of coke oven gas, **based on a 24-hour average as defined in Paragraph h.1 above**, produced by the Clairton Works, when all sulfur emissions from its Claus Sulfur Recovery Plant and the tail gas cleaning equipment thereon, expressed as equivalent H₂S, are added to the measured H₂S:

SPECIFIC COKE OVEN BATTERIES

Source Name	Location
A. Coke Battery #1	U. S. Steel Corp. Clairton, PA
B. Coke Battery #2	U. S. Steel Corp. Clairton, PA
C. Coke Battery #3	U. S. Steel Corp. Clairton, PA
D. <u>A.</u> Coke Battery #13	U. S. Steel Corp. Clairton, PA
E. <u>B.</u> Coke Battery #14	U. S. Steel Corp. Clairton, PA
F. Coke Battery #15	U. S. Steel Corp. Clairton, PA
G. <u>C.</u> Coke Battery #19	U. S. Steel Corp. Clairton, PA
H. <u>D.</u> Coke Battery #20	U. S. Steel Corp. Clairton, PA
<u>I.</u> <u>E.</u> Coke Battery B	U. S. Steel Corp. Clairton, PA

and

- 54.** For all other coke batteries, where the rated production capacity of the coke plant producing such gas is equal to or more than 70 million standard cubic feet of coke oven gas per day, other than those subject to Paragraph ~~h.2~~ **h.3** of this **Sub**section, a concentration of ~~five~~ **twenty-five** ~~(50)~~ **(25)** grains per hundred dry standard cubic feet of coke oven gas, **based on a 24-hour average as defined in Paragraph h.1 above**.

The concentration of sulfur compounds specified by this Subsection shall include ~~tail gas~~ **tail gas** sulfur, measured as hydrogen sulfide, emitted from sulfur removal equipment.

End of Regulation Change

2. Technical Support Document

Coke Ovens and Coke Oven Gas

This submittal affects the Allegheny County Health Department (ACHD) Air Pollution Control Regulations, Article XXI, §2105.21, “Coke Ovens and Coke Oven Gas,” in particular, Subsection “h,” as it addresses the concentration of sulfur compounds measured as hydrogen sulfide in coke oven gas at various coke oven gas production rates and for various coke oven batteries or groupings of batteries.

As part of a 2024 Consent Decree and Order in the case of *PennEnvironment, Inc., and Clean Air Council, and Allegheny County Health Department v. United States Steel Corporation*, Civil Action No. 2:19-cv-00484, in the United States District Court for the Western District of Pennsylvania, the Parties thereto agreed in Section 13 of the Consent Decree and Order, titled “COG Hydrogen Sulfide Limit,” to the following:

- a. As of the effective date of the decree, all COG flared, mixed, or combusted at the Facilities [(defined as the Clairton, Edgar Thomson and Irvin Plants)] shall contain concentrations of sulfur compounds, measured as hydrogen sulfide...of no more than 25 grains of hydrogen sulfide per hundred dscf COG on a 24-Hour Average (the “25 Grains Limit”).
- b. . . . ***ACHD agrees to undertake rulemaking and promulgate revisions to its Article XXI Rules and Regulations to establish the 25 Grains Limit in lieu of higher hydrogen sulfide concentration limits for COG applicable Facilities. {Italics and bold face added.}***

ACHD’s motivation to agree to a reduction to the 25 Grains Limit stemmed from its interests of (1) bringing the standard into better alignment with LAER, and (2) addressing a past error regarding the calculation of the plant-wide coke oven gas standard for the U.S. Steel Corporation Mon Valley Works Clairton Plant. In a recent rulemaking attempt, to address the past error, ACHD had recalculated and sought to reduce the standard under Subsection 2105.21.h. Mutually agreeing in the Consent Decree to reduce the Grains Limit to 25 grains per hundred dry standard cubic feet of coke oven gas is consistent with ACHD’s interests of bringing the standard into better alignment with LAER and addressing the past calculation error.

Given the agreement described above in italics from Section 13.b of the Consent Decree, the ACHD proposes the revisions to Article XXI, §2105.21.h denoted in Part 1 of this SIP Revision submittal. Most notably, a new paragraph “h.1” is being proposed to be added as follows:

1. *For purposes of this Subsection 2105.21.h, “24-hour average” means the arithmetic average of hourly average concentrations of hydrogen sulfide in COG, represented in units of grains per hundred dry standard cubic feet of COG, over a calendar day, where a “calendar day” means the period of elapsed time that begins at midnight on a certain date and ends 24 hours later at midnight of the next day;*

The Department notes that, while this proposed regulatory language is now providing the specific,

written, time frame basis for the H₂S grain limit, it represents the Department’s historical approach to determining the H₂S grain concentration. It does not represent a departure from past practice. Historically, the H₂S grain limit was always determined on a 24-hour calendar day basis for purposes of reporting and compliance.

Although the previous text of Article XXI did not expressly include the calendar day method, the calendar day method is consistent with Article XXI. Specifically, the requirement to comply with the grain limit is expressly contingent on the amount of COG produced “per day” by the coke ovens in Article XXI § 2105.21.h. Calendar day reporting is also consistent with the U. S. Steel Clairton Plant’s operating permit, which requires the reporting of calendar day gr H₂S/100 dcsf averages on a quarterly basis.

In addition to the changes described above, the ACHD Air Quality Program is amending §2105.21 by removing references to coke oven batteries Numbers 1, 2, 3 and 15, because they have been permanently idled. Finally, ACHD is making minor, non-substantive grammatical edits.

The following portions of Article XXI will be submitted as a SIP Revision:

§2105.21.b, e, and h (“Coke Ovens and Coke Oven Gas”)

The following table provides further explanation for the amendments to Article XXI, §2105.21:

Section	Explanation for Change
§2105.21.b.3.A-D, b.7.A-C; §2105.21.e.2.A-D, e.6.A-C, & F; §2105.21.h.3.A-C, & F	The ACHD is deleting the references to Coke Battery Nos. 1, 2, 3 and 15 because the batteries have been permanently idled.
Proposed new §2105.21.h.1	A proposed new Paragraph h.1. is being added to include the definitions of “24-hour average” and “calendar day” from the January 29, 2024 Consent Decree and Order. The added definitions of “24-hour average” and “calendar day” come from the Consent Decree and Order and apply only to Subsection 2105.21.h.
§2105.21.h.1 (to be changed to §2105.21.h.2)	Per the January 29, 2024 Consent Decree and Order, the coke oven gas concentration is being revised from 70 grains per hundred dry standard cubic feet of coke oven gas to 25 grains with the proviso that it is based on a 24-hour average as defined in Paragraph h.1.
§2105.21.h.3 (to be changed to §2105.21.h.4)	Per the January 29, 2024 Consent Decree and Order, the coke oven gas concentration is being revised from 35 grains per hundred dry standard cubic feet of coke oven gas to 25 grains with the proviso that it is based on a 24-hour average as defined in Paragraph h.1.
§2105.21.h.4 (to be changed to §2105.21.h.5)	Per the January 29, 2024 Consent Decree and Order, the coke oven gas concentration is being revised from 50 grains per hundred dry standard cubic feet of coke oven gas to 25 grains with the proviso that it is based on a 24-hour average as defined in Paragraph h.1.

3.

Documentation of Public Hearing and Certifications

Notice of Public Hearing
Transmittals of hearing notice to EPA & PA DEP
Proof of publication of notice of hearing
Certification of hearing
Summary of Comments and responses
Certification of approval and adoption (later)

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD
FOR PROPOSED AMENDMENTS TO
ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS
ARTICLE XXI, AIR POLLUTION CONTROL

The Allegheny County Board of Health will hold a public hearing on **Wednesday April 23, 2025, at 6:00 PM**, at the office of the Air Quality Program, 836 Fulton Street, Pittsburgh, PA 15233, to take testimony on proposed modifications to Allegheny County Health Department Rules and Regulations, Article XXI §2105.21, “Coke Ovens and Coke Oven Gas” and corresponding County Ordinance 16782.

These changes will be submitted as revisions to Allegheny County’s portion of the Pennsylvania State Implementation Plan as delineated in the associated Technical Support Document.

The proposed SIP revisions are available on the Allegheny County Health Department (ACHD) Air Quality web site at <https://www.alleghenycounty.us/Services/Health-Department/Air-Quality/Enforcement-Regulations-and-Compliance/Regulations-and-SIPs> . Written copies may be obtained by calling 412-578-8115.

- Persons wishing to present testimony at the hearing must register by using ACHD’s Public Hearing Participation Form found at <https://www.alleghenycounty.us/Services/Health-Department/Board-of-Health/Public-Hearing-Participation-Form> . Persons who do not have access to the internet may register by calling 412-578-8115.
- You must register to present testimony no less than 24 hours in advance of the hearing.
- Testimony is limited to 3 minutes. Witnesses are requested to submit written copies of the testimony by email to aqcomments@alleghenycounty.us.

The Board will also accept written comments, beginning on Monday March 24, 2025, and **concluding at 11:59 p.m. on Wednesday April 23, 2025**, by mail to ACHD Air Program, 836 Fulton Street, Pittsburgh, PA 15233, or by email to aqcomments@alleghenycounty.us.

Please call 412-578-8115, if you have any questions or if you have any difficulty registering for the hearing.

COUNTY OF



ALLEGHENY

March 24, 2025

Ms. Christina Fernandez, Director
Air Protection Division
Region III (3AP00)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Fernandez:

Attached is a Notice of Public Hearing for a proposed revision to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, that regards revisions to Section 2105.21, "Coke Ovens and Coke Oven Gas," in particular, Subsection "h," related to the concentration of sulfur compounds measured as hydrogen sulfide in coke oven gas at various gas production rates as well as other informational updates to reflect the status of batteries that are no longer operational.

This revision will be submitted as a change to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) under our Revision Tracking Number 106.

Information regarding the proposed regulation change may be found on the ACHD website:

<https://www.alleghenycounty.us/Services/Health-Department/Air-Quality/Enforcement-Regulations-and-Compliance/Regulations-and-SIPs>

<https://www.alleghenycounty.us/Services/Health-Department/Air-Quality/Air-Quality-Permitting/Public-Comment-Notices>

The public comment period begins March 24, 2025, and concludes April 23, 2025, at 11:59 p.m. The public hearing will be held April 23, 2024, at 6:00 p.m. Your comments are welcome.



**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**
836 FULTON STREET
PITTSBURGH, PA 15233
PHONE (412) 578-8103 • FAX (412) 578-8144
24-HR (412) 687-ACHD (2243)
WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT



ACHD SIP106 Hearing Notice Letter
March 24, 2025
Page 2

If you have any questions, please contact Tom Lattner, at 412-578-7986 or tom.lattner@alleghenycounty.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Maranche". The signature is fluid and cursive, with the first name "Jason" and last name "Maranche" clearly distinguishable.

Jason Maranche, Manager
Planning and Data Assessment Program

cc: Geoff Rabinowitz (ACHD)
Michael Gordon (U.S. EPA)
Megan Goold (U.S. EPA)
Phillip McGuire (U.S. EPA)

Email Attachments:

- Public Hearing Notice
- Proposed Article XXI Revision Tracking No. 106

COUNTY OF



ALLEGHENY

SARA INNAMORATO
COUNTY EXECUTIVE

March 24, 2025

Mr. Nick Lazor, Director
Bureau of Air Quality
Department of Environmental Protection
Rachel Carson Building
400 Market Street
P O Box 8468
Harrisburg, PA 17105-8468

Dear Mr. Lazor:

Attached is a Notice of Public Hearing for a proposed revision to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, that regards revisions to Section 2105.21, "Coke Ovens and Coke Oven Gas," in particular, Subsection "h," related to the concentration of sulfur compounds measured as hydrogen sulfide in coke oven gas at various gas production rates as well as other informational updates to reflect the status of batteries that are no longer operational.

This revision will be submitted as a change to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) under our Revision Tracking Number 106.

Information regarding the proposed regulation change may be found on the ACHD website:

<https://www.alleghenycounty.us/Services/Health-Department/Air-Quality/Enforcement-Regulations-and-Compliance/Regulations-and-SIPs>

<https://www.alleghenycounty.us/Services/Health-Department/Air-Quality/Air-Quality-Permitting/Public-Comment-Notices>

The public comment period begins March 24, 2025, and concludes April 23, 2025, at 11:59 p.m. The public hearing will be held April 23, 2024, at 6:00 p.m. Your comments are welcome.



**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**

836 FULTON STREET
PITTSBURGH, PA 15233
PHONE (412) 578-8103 • FAX (412) 578-8144
24HR (412) 687-ACHD (2243)
WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT



ACHD SIP106 Hearing Notice Letter
March 24, 2025
Page 2

If you have any questions, please contact Tom Lattner, at 412-578-7986 or tom.lattner@alleghenycounty.us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jason Maranche".

Jason Maranche, Manager
Planning and Data Assessment Program

cc: Geoff Rabinowitz (ACHD)
Kirit Dalal (PA DEP)
Stephen Hepler (PA DEP)
Susan Hoyle (PA DEP)
Joseph Martini (PA DEP)

Email Attachments:

- Public Hearing Notice
- Proposed Article XXI Revision Tracking No. 106

Proof of Publication

No. _____ Term, _____

Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss D. Rullo, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

23 of March, 2025

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.



PG Publishing Company

Sworn to and subscribed before me this day of:
March 24, 2025



Commonwealth of Pennsylvania - Notary Public
Christian Hoerger, Notary Public
Allegheny County
My commission expires July 18, 2028
Commission number 1447942
Member, Pennsylvania Association of Notaries

STATEMENT OF ADVERTISING COSTS
Allegheny County Health Department
542 4th Avenue
Pittsburgh, PA 15219

To PG Publishing Company

Total----- \$129.00

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office
2201 Sweeney Drive
Clinton, PA 15026
legaladvertising@post-gazette.com
Phone 412-263-1440

PG Publishing Company, a Corporation, Publisher of
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By _____

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

Attorney For

COPY OF NOTICE OR PUBLICATION

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD FOR PROPOSED AMENDMENTS TO ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS

**ARTICLE XXI. AIR
POLLUTION CONTROL**
The Allegheny County Board of Health will hold a public hearing on Wednesday April 23, 2025, at 6:00 PM, at the office of the Air Quality Program, 836 Fulton Street, Pittsburgh, PA 15223, to take testimony on proposed modifications to Allegheny County Health Department Rules and Regulations, Article XII §21523, Coke Ovens and Coke Oven Gas and corresponding County Ordinance 50780. These changes will be submitted as revisions to Allegheny County's portion of the Pennsylvania State Implementation Plan as attached in the associated technical support document. The proposed SP revisions are available on the Allegheny County Health Department (ACHD) Air Quality web site at <https://www.alleghenycountyus.com/Services/Health-Department/Air-Quality-Enforcement-Regulations-and-Compliance-Regulations-and-SIPs>. Written copies may be obtained by calling 412-578-8115.

Persons wishing to present testimony at the hearing must register by using ACHD's Public Hearing Participation Form found at

<https://www.alleghenycountyus.com/Services/Health-Department/Board-of-Health/Public-Hearing-Participation-Form>. Persons who do not have access to the internet may register by calling 412-578-8115.

You must register to present testimony no less than 24 hours in advance of the hearing.

Testimony is limited to 3 minutes. Witnesses are requested to submit written copies of the testimony by email to agcomments@alleghenycountyus.

The Board will also accept written comments, beginning on Monday March 24, 2025, and concluding at 11:59 p.m. on Wednesday April 23, 2025, by mail to ACHD Air Program, 836 Fulton Street, Pittsburgh, PA 15223, or by email to agcomments@alleghenycountyus. Please call 412-578-8115, if you have any questions or if you have difficulty registering for the hearing.

Article XXI §2105.21, Coke Ovens and Coke Oven Gas

Certificate of Hearing

Tom Lattner deposes and says that he is an Air Pollution Control Engineer in the Air Quality Program of Allegheny County Health Department and hereby certifies that a Public Hearing was held on April 23, 2025 on the proposed revisions to Article XXI, "Rules and Regulations of the Allegheny County Health Department for Air Pollution Control, and County Ordinance No. 16782" as it relates to §2105.21, Coke Ovens and Coke Oven Gas.

that these changes are to be incorporated as a change to the Allegheny County portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of National Ambient Air Quality Standards as delineated in the Technical Support Document;

that the opportunity for written comments was given in accordance with the requirements of 40 CFR 51.102; that notice of such hearing was given by publication in a newspaper of general circulation on March 23, 2025; and to the best of his knowledge, belief, and understanding, such proceedings were in full compliance with all applicable State and Federal laws, regulations, and other requirements.

Tom Lattner 6-27-2025
Tom Lattner, Date
Air Pollution Control Engineer
Air Quality Program
Allegheny County Health Department

SUMMARY OF COMMENTS AND RESPONSES
for
Proposed SIP Revision 106

Article XXI, §2105.21, Coke Ovens and Coke Oven Gas

Public Comment Period: March 24 to April 23, 2025

Public Hearing: April 23, 2025

1. **Comment:** We all know that this board, council, and ACHD will do nothing about US Steel's rampant air pollution, particularly the release of Hydrogen Sulfide (H₂S) from Coal Coke ovens and many other poisons into our air.

Response: Thank you for the comment. ACHD is proposing these revisions, and thereby fulfilling a commitment made under the terms of the Consent Decree (as described in the Technical Support Document above). Beyond making the proposed regulation change, the terms of the consent decree require other actions to be taken by the U.S. Steel Clairton Coke Works that will also have beneficial air quality impacts.

2. **Comment:** Why these revisions to the SIP? To clarify what 24 hours means? To identify idled batteries? To reduce to 25 grains per hundred dry standard cubic feet coke oven gas (COG) of H₂S from 70, 35 and 50 respectively. Is this less actual pollution? Isn't this the current standard?

Response: Thank you for the comment. ACHD notes that the Technical Support Document above describes the reason for the revisions. To reiterate, under the terms of the Consent Decree:

- a. . . . ***ACHD agrees to undertake rulemaking and promulgate revisions to its Article XXI Rules and Regulations to establish the 25 Grains Limit in lieu of higher hydrogen sulfide concentration limits for COG applicable Facilities. {Italics and bold face added.}***

3. **Comment:** How are you confirming these 25 grains today? I don't believe that you have the capacity to or intent to monitor these emissions, much less stop steel production over H₂S poison.

Response: Thank you for the comment. Health Department Title V Operating Permit #0052-OP22a, Section V.N.3.b, "Emission Unit Level Terms and Conditions, Desulfurization Plant, Monitoring Requirements," provides the following requirements regarding monitoring H₂S emissions:

b. In order to demonstrate compliance with the concentration of sulfur compounds in the clean coke oven gas as specified in §2105.21.h, the permittee shall continuously monitor the concentration of sulfur compounds, measured as H₂S, in the desulfurized coke oven gas according to the continuous Method approved by the Department. [§2103.12.i; SO₂ SIP IP 0052-I017, Condition V.B.1.c]

Also, Installation Permit, "SO₂ SIP IP #0052-I017," Section V.A.3, "Monitoring Requirements," addresses the monitoring of H₂S concentration of the coke oven gas.

4. **Comment:** Do you know what the impacts H₂S are? Immediate high concentrations can lead to unconsciousness, pulmonary edema, coma and death. Low exposure over a long time can lead to issues with balance, attention, coordination, neurological problems, loss of smell and respiratory ailments

especially for asthmatics.

Response: Thank you for the comment. The Health Department recognized the impacts of H₂S in its own study issued March 3, 2022, “Analysis and Attribution of Hydrogen Sulfide (H₂S) Exceedances at the Liberty Monitoring Site from January 1, 2020 through March 1, 2022”

https://www.alleghenycounty.us/files/assets/county/v/1/government/health/documents/air-quality/h2s_report_updated_08052022.pdf. Section 2, “Background,” notes:

People can smell H₂S in the air at concentrations as low as 0.0005 ppm. Health outcomes from long-term exposure to lower concentrations of H₂S are uncertain, but evidence suggests that chronic exposure to lower concentrations of H₂S can cause eye irritation, headaches, and fatigue (ATSDR Hydrogen Sulfide Fact Sheet, 2017).

The Department notes also that its SO₂ Redesignation Request and Maintenance Plan, submitted November 14, 2023 was approved by the U.S. EPA (90 FR 17556, April 28, 2025). In the federal register, EPA stated:

The EPA is approving the redesignation of the Allegheny County Area from nonattainment to attainment in accordance with Pennsylvania’s November 14, 2023, request. The criteria under CAA section 107(d)(3)(E) as specific to the 2010 SO₂ NAAQS have been met. The EPA is determining that the Allegheny County Area is attaining the 2010 SO₂ NAAQS...

5. **Comment:** If you want to revise the SIP, let me suggest a ban on Coal based Coke ovens. Why are we still using Coal Coke? It is a choice. A choice by County Government that is wholly owned and controlled by corrupt special interests. A choice to make shiny thin steel for car exteriors and toaster ovens. There are alternatives. We use Coal Coke as powerful fuel and to reduce oxygen (iron oxide) in the iron ore. We don't have to. Many places utilize cleaner electric arc furnaces or recycled steel. The Swedes have developed a new method utilizing hydrogen from renewables to reduce oxygen...Ban Coal Coke furnaces in Allegheny.

Response: Thank you for the comment. ACHD acts within the regulatory boundaries established by Article XXI. Article XXI, §2101.02.a.1 states that it is the policy of the County of Allegheny to protect the air resources of the County by pollution prevention and pollution control to the degree necessary for the: (1) Protection of the health, safety and welfare of all its citizens;...(4) Development, attraction and expansion of industry, commerce and agriculture." The Health Department notes that it regulates air pollution sources. It does not own or operate any coal based coke ovens, and as a result it does not “choose” to use “coal coke.”

6. **Comment:** Moving the word “or” from the end of §2105.21.b.3 to the end of §2105.21.b.6 is unnecessary.

Response: During the public comment period, the Health Department realized that it was unnecessary to make that change. The “or” will remain at the end of paragraph §2105.21.b.3.

Commenters:

- Benjamin J. Chiszar, MPA, MS (comments 1 through 5)
- ACHD Air Program (comment 6)

Certification of Approval and Adoption (Later)