

Air Enforcement/Coke Ovens: Allegheny County Health Department (Pennsylvania) and U.S. Steel Enter into Draft Settlement Agreement



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The Allegheny County Health Department (Pennsylvania) (“ACHD”) announced a draft Settlement Agreement and Order (“Agreement”) with the United States Steel Corporation addressing alleged air violations. See Order #19060.

The Agreement addresses alleged violation at the U.S. Steel Clairton Works facility (“Facility”) in Clairton, Pennsylvania.

The Facility is described as operating 10 coke batteries. Such batteries consist of a series of ovens. The batteries are designated as Batteries 1, 2, 3, 13, 14, 15, 19, 20, B and C.

The Agreement provides a discussion of prior Enforcement Orders between ACHD and U.S. Steel regarding the Facility along with a Consent Judgment addressing certain alleged air related violations. Actions by U.S. Steel to address Enforcement Orders along with the appeal and adjudication of the merits of an Enforcement Order are also described.

Activities such as an increased focus on work practices to reduce visible emissions, PM2.5 and SO2 and an increase of inspections/monitoring are cited as being undertaken by U.S. Steel. Also referenced is the maintenance of two coke oven battery inspectors at the Facility five days per normal week, along with ACHD’s hiring of a third-party Method 303 contractor to monitor visible emissions from every battery on a daily basis.

A discussion is included of U.S. Steel’s use of continuous opacity monitors and continuous parametric monitoring systems.

The Agreement is stated to resolve the various appeals of the ACHD Enforcement Orders. However, U.S. Steel is stated to deny and continue to deny the violations alleged in ACHD Orders.

The Agreement contains a Compliance Plan which references Environmental Improvement Projects that include:

- B Battery Shed Improvement
- Continuing Improvement to the Environment program
- Enhanced Operation and Maintenance
- Environmental Air Compliance Audits
- Pushing Emission Control System Upgrades

- Batteries 1, 2 and 3 Endflue Repair
- Battery 15 Stack Replacement
- Battery 15 Through Wall Repair
- Permitting
- Satisfy Emissions Reduction Requirements of Enforcement Order #180601

A civil penalty of \$2,732,504 is assessed.

ACHD and U.S. Steel also agree that ACHD will pursue a rulemaking to promulgate appropriate test methods for determining compliance with ACHD's coke battery standards in Article XXI.

A copy of the Agreement can be found [here](#).