



CANADA WATER AGENCY

MECP Enforcement Concerns

Abstract

An emissions event on March 09, 2019 at Algoma Steel Inc. (ASI) that resulted in the discharge of untreated effluent to the St. Mary's River in Sault Ste. Marie Ontario. Concerns regarding enforcement by the Ontario Ministry of the Environment Conservation and Parks (MECP) and the consideration for a Canada Water Agency facility in Sault Ste. Marie.

Selva Rasaiah

Submitted to: M.P. Terry Duguid
House of Commons
Ottawa, ON
Canada

Submitted by: Selva Rasaiah

Date: April 10, 2021

Dear M.P. Duguid,

The protection of our freshwaters in Canada is a very important responsibility that demands strict due diligence by federal and provincial governments, and their agencies. The location of the new Canada Water Agency requires a thoughtful process by a Canadian Government that recognizes a commitment to strict compliance and enforcement of environmental laws. Only through meaningful discussions and participation by all stakeholders, we can ensure the necessary accountability to protect this vital resource.

On March 09, 2019, Algoma Steel Inc. (ASI) discharged untreated water into the St. Mary's River (an Area of Concern). The company failed to report this discharge to City of Sault Ste. Marie, a violation of Part X Section 92(1) (b) of the Ontario Environmental Protection Act. Although the local Ministry of the Environment, Conservation and Parks (MECP) was aware of the event, they did not enforce this requirement or ensure that ASI communicated the incident to the public, First Nations and its Community Liaison Committee (CLC). There is a shared responsibility of protecting this freshwater resource with the United States. Bi-national agreements were established to encourage co-operation in protecting and rehabilitating the St. Mary's River with the understanding of sharing information with our US partners on the progress and the reporting of incidences that have any potential impacts to the river. Mr. Brian Chapman at the City of Sault Ste. Marie Michigan confirmed that the Canadian side did not convey any information regarding a discharge of untreated effluent to the St. Mary's River on March 09.

Despite its critical importance, the political leadership in Sault Ste. Marie has been inadequate in their response and commitment to acknowledge public concerns related to the contamination of the St. Mary's River by local industry. M.P. Terry Sheehan, M.P.P. Ross Romano and Mayor Christian Provenzano have not provided any correspondence or assurance that this matter is being resolved in a manner that ensures transparency and accountability to the public while ensuring that provincial laws and regulations will be strictly enforced in the event of any future incidences.

The Ontario Government is failing to ensure that one of its regulatory agencies, the MECP, is adequately addressing public concerns and enforcing environmental laws in Sault Ste. Marie. It is difficult to ensure public confidence that the Ontario government will protect this precious resource without rationalizing the economic and technical limitations of the industries committing offences. The discretionary authority used by the MECP to not openly acknowledge an incidence, will only serve to undermine the efforts of the agencies and institutions working to protect our freshwater resources. The lack of accountability will also question the enforcement of any potential impacts from capital projects such as mining operations in the wetlands of the Ring of Fire and the Enbridge Line 5 pipeline.

The Ontario Government advertises that it is "open for business", but it is compromising public confidence in environmental protections and reducing the accountability of industry and business. This does not ensure a fair and due process that considers the interests of Ontarians and all potential impacts to their health and the environment. The Federal Government must ensure that all projects and industrial operations that have potential health and environmental impacts, are subject to adequate supervision and strict enforcement of environmental laws and regulations in all jurisdictions.

Thank you,

Selva Rasaiah

Site(s)

Site Details

Algoma Steel Inc. - 105 West Street
 Address: 105 West St, Sault Ste. Marie, City, District of Algoma, P6A 7B4
 District Office: Sault Ste. Marie
 GeoReference: Map Datum: NAD83, Zone: 16, Accuracy Estimate: 1-10 metres eg. Good Quality GPS,
 Method: Survey, UTM Easting: 701613, UTM Northing: 5154576, ,
 LIO GeoReference: Zone: 16, UTM Easting: 702519.25, UTM Northing: 5155183.0, Latitude: 46.519733,
 Longitude: -84.35969
 Sewage Works Number: 0000040006
 Site #: 1754-4NVMP9, NAICS: 331110

Incident Summary:

Algoma Steel: 6500m³ effluent to St Marys River

Initial Incident Description (as reported):

Created: Julian Aristizabal (Spills Action Centre) - 2019/03/09 10:54:38 AM

Caller reports that they had power outage at 09:39 which caused a 36 minute bypass of effluent (TSS, ammonia, Mergoil (circulating oil)) to the St. Mary's River. Exact flow rate unknown but estimated at 12000m³/hour (therefore approximately 6500 m³ discharged). Discharge was to the middle of the river and is about 300m from the US border. Caller believes that there would not be impacts to US side as it is more of a TSS issue that would settle out and the concentration of ammonia would be approx 1.5ppm, and Mergoil is less than 1ppm. At 10:30 Algoma got the power back up which caused the pumps to restart, stopping bypass by reducing the levels. They were not able to collect samples of the effluent but will take a current raw grab sample which they report will be similar to what was bypassing at the time.

Caller reports that there is a lot of ice build up so they don't expect much migration of effluent on the surface. Algoma will have someone check the area for visible impacts from shore. Outlet is approximately 60m from shore. Algoma is currently on the phone with MECP SSM Lori Greco who has advised them that she will be responding to site in about 45 minutes. Caller will have Lori update SAC with findings. Algoma will also be updating SAC.

13:08- Lori Greco (ERP) to SAC (JA): reports that she is at the office and heading to site (see IDS# 1433-BA4LCB) , ETA to site 13:20 and will update SAC later.

Copy emailed to EC

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16:00-Lori Greco to SACbt- Samples were taken from the site and had meetings with Algoma. [REDACTED] will be updating SAC when everything is back to normal. They will be writing up a full report later this week. [REDACTED]

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17:01 SACcb to POEC Duty Officer (416-314-0472):

-Briefed on updated info

17:07 SACcb to Naomi Thibault (SSM Emergency Management Coordinator 705-971-9925):

-Briefed on updated info

See IR 1433-BA4LCB

Not in source water protection zone

SAC Action Class:

Watercourse Spills

Non-Standard Procedure:

No

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- At approximately 2:00PM Lori Greco, [REDACTED] and [REDACTED] visited the MWFP to inspect the area and discuss how a bypass occurs.
- At approximately 2:30PM Lori Greco and [REDACTED] met with the Superintendent of Cokemaking, [REDACTED] to discuss the cause of the flaring, the damage done to the batteries, and the estimated time when the bleeders would be extinguished.
- At approximately 2:45PM Lori Greco and [REDACTED] visited Cokemaking and observed the emissions from the flaring and a fire on 9 battery.
- At approximately 3:00PM Lori Greco and [REDACTED] drove in the neighborhood known as Bayview. Particulate matter was observed on the snow.
- Steam was restored to Cokemaking at approximately 6:00PM allowing the exhausters to be ramped up. [REDACTED] notified SAC at 7:10PM to inform them that the flares were extinguished.

Impact

Main Water Filter Plan

During the power outage, the MWFP could have experienced a bypass discharging untreated effluent to the St. Mary's River. The power outage last from 9:39AM until 10:27AM, a duration of approximately 48 minutes. Based on historical events, the water level of the primary basin raises approximately 1.7% per minute during a power outage until the primary basin reaches 84% at which time a bypass would be initiated. The water level in the basin at the time of power loss was 48.5% and at 9:59AM it is believed the filter plant would have begun to bypass. This bypass would have lasted until 10:27AM for a total bypass time of 28 minutes. Prior to the outage, effluent flow was recorded at 11,520 m³/hour and decreased to 8,820 m³/hour once power was restored. Based on this information, the expected flow rate out of the filter plant during the time of a bypass would be 10,170m³/hour. Combined with the duration of the bypass, the expected volume of untreated effluent would be 4,780 m³.

At 11:15AM, Environment Control collected samples of water from the MWFP wet well. These samples would be representative of effluent quality if a bypass occurred. At the time of sample collection, water levels in the primary basin had returned to normal. The location of a bypass outflow was inspected and appeared to be dry, indicating that a bypass may not have occurred. At 11:30AM, the St. Mary's River was inspected downstream of the MWFP discharge location and there was no visual evidence of a bypass (i.e. water discolouration, sheening etc.).

Water samples collected on the day of the event were sent to Testmark Laboratories for a full MISA analysis on March 11th, 2019. Using the previously calculated effluent volume of 4,780 m³, the loadings for a bypass period are as follows:

Parameter	Concentration (ppm)	Loading (kg)
Phenol	0.003	0.014

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Greco, Lori (MECP)

From: [REDACTED]
Sent: September 17, 2019 3:41 PM
To: Greco, Lori (MECP)
Subject: March 9th Water Results
Attachments: 2019-09-17_15h40_16.png; 2019-09-17_15h40_38.png

Hey Lori,

Here are the concentrations and loadings of the water results from the March 9th power outage.

Parameter	Concentration (ppm)	Loading (kg)
Phenol	0.003	0.014
Oil & Grease	3	14
Ammonia	1.66	8
TSS	3.3	16
Benzene	1.2 ppb	0.0057
Benzo(a)pyrene	<.009 ppb	<0.00043
Naphthalene	0.19 ppb	0.00091
Lead	0.0056	0.027
Zinc	0.126	1
Total Cyanide	0.09	0.4

This first table is the results of the grab sample taken of water exiting the primary basin. The flow used to calculate the loading was 4,780m³.

Parameter	Concentration (ppm)	Loading (kg)
Phenol	0.036	8.3
Oil & Grease	<1	<231
Ammonia	0.19	44
TSS	8.3	1921
Total Cyanide	0.037	8.5

The second table is the results from the composite sample collected on March 9th. The total daily flow was used to calculate these loadings, 230,583 m³.

I have also attached screen shots of the lab reports for the grab and composite sample for March 9th. If you need anything else don't hesitate to let me know.

Thanks,

[REDACTED] | Environment Control Officer | Environment Control |

[REDACTED]

Ontario Environmental Protection Act, R.S.O. 1990, c. E. 19 Part X

Notice of spills

92 (1) Every person having control of a pollutant that is spilled and every person who spills or causes or permits a spill of a pollutant shall forthwith notify the following persons of the spill, of the circumstances thereof, and of the action that the person has taken or intends to take with respect thereto,

- (a) the Ministry;
- (b) any municipality within the boundaries of which the spill occurred or, if the spill occurred within the boundaries of a regional municipality, the regional municipality;
- (c) where the person is not the owner of the pollutant and knows or is able to ascertain readily the identity of the owner of the pollutant, the owner of the pollutant; and
- (d) where the person is not the person having control of the pollutant and knows or is able to ascertain readily the identity of the person having control of the pollutant, the person having control of the pollutant. R.S.O. 1990, c. E.19, s. 92 (1); 2002, c. 17, Sched. F, Table; 2005, c. 12, s. 1 (15).

When duty effective

(2) The duty imposed by subsection (1) comes into force in respect of each of the persons having control of the pollutant and the person who spills or causes or permits the spill of the pollutant immediately when the person knows or ought to know that the pollutant is spilled. R.S.O. 1990, c. E.19, s. 92 (2); 2005, c. 12, s. 1 (16).

Additional information to Director

(3) The person required by subsection (1) to give notice and the owner of the pollutant shall give to the Director such additional information in respect of the pollutant, the source of the pollutant and the spill of the pollutant as may be required by the Director. R.S.O. 1990, c. E.19, s. 92 (3).

Notice to Ministry by person investigating

(4) A member of a police force or an employee of a municipality or other public authority who is informed of or who investigates the spill of a pollutant shall forthwith notify the Ministry of the spill of the pollutant unless he or she has reasonable grounds for believing that such notice has been given to the Ministry by another person. R.S.O. 1990, c. E.19, s. 92 (4).

Note: On a day to be named by proclamation of the Lieutenant Governor, subsection 92 (4) of the Act is amended by striking out "police force" and substituting "police service". (See: 2019, c. 1, Sched. 4, s. 18 (2))

Same

(5) The notices required by subsections (1) and (4) shall be given in accordance with any requirements prescribed by the regulations. 2005, c. 12, s. 1 (17).

Section Amendments with date in force (d/m/y) [+]

Duty to mitigate and restore

93 (1) The owner of a pollutant and the person having control of a pollutant that is spilled and that causes or is likely to cause an adverse effect shall forthwith do everything practicable to prevent, eliminate and ameliorate the adverse effect and to restore the natural environment.

When duty effective

(2) The duty imposed by subsection (1) comes into force in respect of each of the owner of the pollutant and the person having control of the pollutant immediately when the owner or person, as the case may be, knows or ought to know that the pollutant is spilled and is causing or is likely to cause an adverse effect. R.S.O. 1990, c. E.19, s. 93.

RE: March 09, 2019 Confirmation

Mayor Provenzano <mayor.provenzano@cityssm.on.ca>

Mon 22/03/2021 1:26 PM

To: 'Selva Rasaiah' <selvarasaiah@hotmail.com>; Mayor Provenzano <mayor.provenzano@cityssm.on.ca>; Malcolm White <m.white@cityssm.on.ca>
 Cc: Jeffrey King (POA) <j.king3@cityssm.on.ca>; Malcolm White <m.white@cityssm.on.ca>; Donna Hilsinger <d.hilsinger@cityssm.on.ca>; Catherine Taddo <c.taddo@cityssm.on.ca>; gpokflan@gmail.com <gpokflan@gmail.com>; kathie@brosemer.org <kathie@brosemer.org>; dansayers@batchewana.ca <dansayers@batchewana.ca>; Lisa Derickx <lisa.derickx@algomau.ca>; David Trowbridge <dtrowbridge7@gmail.com>; Peter McLarty <pjmclarty@shaw.ca>; ross.romano@pc.ola.org <ross.romano@pc.ola.org>; TERRY.SHEEHAN@PARL.GC.CA <TERRY.SHEEHAN@PARL.GC.CA>; Brian Chapman <bchapman@saultcity.com>; Robin R. Troyer <rtroyer@saultcity.com>; Fred.Post@algoma.com <Fred.Post@algoma.com>; brenda.stenta@algoma.com <brenda.stenta@algoma.com>; Dorscht, Ron (MECP) <Ron.Dorscht@ontario.ca>; Greco, Lori (MECP) <Lori.Greco@ontario.ca>; John OLeary <joleary@ombudsman.on.ca>

Selva:

I have attached the CAO for his response, re: City notification.

To my knowledge, my office was not notified.

Sincerely,
 CP

From: Selva Rasaiah [mailto:selvarasaiah@hotmail.com]

Sent: Monday, March 22, 2021 8:40 AM

To: Mayor Provenzano <mayor.provenzano@cityssm.on.ca>

Cc: Jeffrey King (POA) <j.king3@cityssm.on.ca>; Malcolm White <m.white@cityssm.on.ca>; Donna Hilsinger <d.hilsinger@cityssm.on.ca>; Catherine Taddo <c.taddo@cityssm.on.ca>; gpokflan@gmail.com; kathie@brosemer.org; dansayers@batchewana.ca; Lisa Derickx <lisa.derickx@algomau.ca>; David Trowbridge <dtrowbridge7@gmail.com>; Peter McLarty <pjmclarty@shaw.ca>; ross.romano@pc.ola.org; TERRY.SHEEHAN@PARL.GC.CA; Brian Chapman <bchapman@saultcity.com>; Robin R. Troyer <rtroyer@saultcity.com>; Fred.Post@algoma.com; brenda.stenta@algoma.com; Dorscht, Ron (MECP) <Ron.Dorscht@ontario.ca>; Greco, Lori (MECP) <Lori.Greco@ontario.ca>; John OLeary <joleary@ombudsman.on.ca>

Subject: March 09, 2019 Confirmation

This email originated outside of the Corporation of the City of Sault Ste. Marie.

Do not open attachments or click links unless you verify the sender and know the content is safe.

Hello Mayor Provenzano,

I would like to conclude my inquiry into the emissions event at Algoma Steel Inc. (ASI) that occurred on March 09, 2019. This has been a lengthy process and basic information relating to this event have not been currently addressed. I initially provided you with a video and a timeline of this event in May of 2019. You have not addressed any of my concerns regarding this event to date. I understand that Mr. King is currently occupied with other matters and my FOI request is currently delayed. However, I believe at his point, a request to confirm when and if the city was notified about the discharge to the St. Mary's River is reasonable. Mr. Chapman has confirmed that our US neighbours were not notified. Could you please state when and if the city was notified about this discharge? There is no mention of any discharge of untreated effluent to the St. Mary's River in any of the ACLC meeting minutes. Also, no ACLC members have confirmed to me that they were made aware of this by ASI or the MECP. I have attached a document regarding the discharge to the river and related air emissions from March 09. I believe there has been sufficient time to discuss the matter and I would appreciate a reply within the next two weeks.

Thank you,

Selva

RE: March 09, 2019 Confirmation

Malcolm White <m.white@cityssm.on.ca>

Fri 26/03/2021 4:10 PM

To: 'Selva Rasaiah' <selvarasaiah@hotmail.com>

Cc: Mayor Provenzano <mayor.provenzano@cityssm.on.ca>

Dear Selva,

Further to your request I can confirm that the City did not receive notification of this event. I can also confirm that City staff are in discussions with Algoma Steel and the Ministry (MECP) concerning the statutory requirements for this sort of notification and how the process will work moving forward.

Sincerely,

Malcolm

Malcolm White

Chief Administrative Officer

705.759.5347 m.white@cityssm.on.ca

CITY OF SAULT STE. MARIE

99 Foster Drive, Sault Ste. Marie, ON P6A 5X6

saultstemarie.ca



From: Selva Rasaiah <selvarasaiah@hotmail.com>

Sent: Tuesday, March 23, 2021 10:53 AM

To: Mayor Provenzano <mayor.provenzano@cityssm.on.ca>; Malcolm White <m.white@cityssm.on.ca>

Cc: Jeffrey King (POA) <j.king3@cityssm.on.ca>; Donna Hilsinger <d.hilsinger@cityssm.on.ca>; Catherine Taddo <c.taddo@cityssm.on.ca>; gpokfln@gmail.com; kathie@brosemer.org; dansayers@batchewana.ca; Lisa Derickx <lisa.derickx@algomau.ca>; David Trowbridge <dtrowbridge7@gmail.com>; Peter McLarty <pjmclarty@shaw.ca>; ross.romano@pc.ola.org; TERRY.SHEEHAN@PARL.GC.CA; Brian Chapman <bchapman@saultcity.com>; Robin R. Troyer <rtroyer@saultcity.com>; Fred.Post@algoma.com; brenda.stenta@algoma.com; Dorscht, Ron (MECP) <Ron.Dorscht@ontario.ca>; Greco, Lori (MECP) <Lori.Greco@ontario.ca>; John OLeary <joleary@ombudsman.on.ca>

Subject: Re: March 09, 2019 Confirmation

This email originated outside of the Corporation of the City of Sault Ste. Marie.
Do not open attachments or click links unless you verify the sender and know the content is safe.

Hello Mayor Provenzano,

I really appreciate your response and for referring the matter to Mr. White for a response from the city/staff.

Thank you,

Selva

From: Mayor Provenzano <mayor.provenzano@cityssm.on.ca>

Sent: March 22, 2021 1:26 PM

To: 'Selva Rasaiah' <selvarasaiah@hotmail.com>; Mayor Provenzano <mayor.provenzano@cityssm.on.ca>; Malcolm White <m.white@cityssm.on.ca>

Cc: Jeffrey King (POA) <j.king3@cityssm.on.ca>; Malcolm White <m.white@cityssm.on.ca>; Donna Hilsinger <d.hilsinger@cityssm.on.ca>; Catherine Taddo <c.taddo@cityssm.on.ca>; gpokfln@gmail.com <gpokfln@gmail.com>; kathie@brosemer.org <kathie@brosemer.org>; dansayers@batchewana.ca <dansayers@batchewana.ca>; Lisa Derickx <lisa.derickx@algomau.ca>; David Trowbridge <dtrowbridge7@gmail.com>; Peter McLarty <pjmclarty@shaw.ca>; ross.romano@pc.ola.org <ross.romano@pc.ola.org>; TERRY.SHEEHAN@PARL.GC.CA <TERRY.SHEEHAN@PARL.GC.CA>; Brian Chapman <bchapman@saultcity.com>; Robin R. Troyer <rtroyer@saultcity.com>; Fred.Post@algoma.com <Fred.Post@algoma.com>; brenda.stenta@algoma.com <brenda.stenta@algoma.com>; Dorscht, Ron (MECP) <Ron.Dorscht@ontario.ca>; Greco, Lori (MECP) <Lori.Greco@ontario.ca>; John OLeary <joleary@ombudsman.on.ca>

RE: ASI Emissions - Air and Water quality

Brian Chapman <bchapman@saultcity.com>

Thu 04/03/2021 9:27 AM

To: selvarasaiah@hotmail.com <selvarasaiah@hotmail.com>

Cc: Robin R. Troyer <rtroyer@saultcity.com>; Kirk Tews <ktews@saultcity.com>; Brian Masterson <bmasterson@saultcity.com>; Dan Wyers <dwyers@saultcity.com>; David Boyle <dboyle@saultcity.com>; John Riley <jriley@saultcity.com>; Kevin Mohar <kmohar@saultcity.com>; Asmus, Tom (EGLE) <AsmusT@michigan.gov>

Mr. Rasaiah,

Thank you for reaching out to the City. I have discussed your questions with my Staff and our representatives from EGLE, which is Michigan's environmental regulatory agency, and I think I can answer some of your questions.

Regarding how our city deals with communicating with the Canadian side regarding the sharing of information that relates to the St. Mary's River... there is a Transborder Notification Procedure that is mutually agreed upon, however, it is only used when either regulatory agency initiates it and as you might guess, there is subjectivity to that. From the EGLE side, an incident would be reported to MI State Police and then to Ontario Ministry of Environment.

My staff and I were not made aware of any potential discharge from Algoma Steel. As I mentioned above, the transborder agreement has some subjectivity to it in that agencies can determine what and when they need to report something to their counterparts.

From what I understand, the air monitors are maintained by EGLE so we don't have any information on those at the local level.

If you would like, we can schedule a phone call if you have more questions. My contact with EGLE said he would be more than happy to participate in our discussion if needed.

Thanks,

Brian C.
City Manager
Sault Ste Marie
906.632.5705

From: Selva Rasaiah <selvarasaiah@hotmail.com>

Sent: Saturday, February 27, 2021 7:49 AM

To: egordon@saultcity.com

Cc: jnelson@saultcity.com; rtroyer@saultcity.com

Subject: ASI Emissions - Air and Water quality

Hello Erica,

I am a resident in Sault Ste. Marie Ontario who is dealing with ensuring accountability of Algoma Steel Inc. (ASI) to report environmental incidences and our local ministry's responsibility to enforce these violations. I would like to know how your city deals with communicating with the Canadian side regarding the sharing of information that relates to the St. Mary's River. I am of the understanding that any potential release to the St. Mary's River is usually conveyed to the US side due to binational agreements. On March 09, 2019, ASI estimated a release of 4.7 million litres (approx. 1.24 million US gallons) of untreated effluent into the St. Mary's River due to a power failure at their facility. I was wondering if your city was notified and if there is any documentation related to the event. Also, I would like to know where the ambient air monitors were located in the past to determine transboundary pollution from the Canadian side of the border. Please let me know if this requires a right to know request and if a person from Canada can apply for it. I appreciate any assistance.

Thanks,

Selva Rasaiah
(705) 942-9179

Sent from [Mail](#) for Windows 10

Amended Certificate of Approval (Air) Number 3614-82DLFY

15.1 The Company shall maintain the operation of the Community Liaison Committee (CLC). The objectives of the CLC shall include:

- (1) Keeping the community informed about the operations of the Facility in relation to the requirements of this Certificate.
- (2) Keeping the Company informed of any community concerns about the operations of the Facility.
- (3) To serve as a forum for the dissemination, review and exchange of information related to the Facility.

CONTENT COPY OF ORIGINAL

15.2 The CLC shall not exercise any supervisory, regulatory or approval roles with respect to the operation of the Facility.

15.3 The Company shall provide the ongoing administrative costs of the CLC, including the cost of meeting places and clerical services.

15.4 The CLC shall meet once every three (3) months or at a frequency agreed by the CLC members, and be provided with information on an on-going basis and be notified of any significant events, including but not limited to process upsets, failure of any equipment, including failure of any air pollution control equipment, in the Facility. The Company shall hold a Community Open House at least once a year and at times when the CLC warrants that one shall be held, to inform the public on issues that the CLC considers that the public should be informed.

15.5 By May 28, 2010, the Company shall hold one (1) special meeting of the CLC and a Community Open House to update the local community on the following:

- (1) the results of the most recent ambient monitoring data obtained by the Company;
- (2) the status on the following:
 - (i) the date of issuance and the requirements contained in this Certificate;
 - (ii) plan on the Start-up Date of No. 6 blast furnace, and at what stage on the construction and installation of the permanent baghouse;
 - (iii) the progress on the installation of individual oven pressure controls for its No. 9 coke oven battery and door and jamb cleaners on its No. 7 coke oven battery;
 - (iv) the latest results of discussions with the Ministry's Standards Development Branch on the site-wide ESDM Report;
 - (v) the results of the combined monitoring and modelling study conducted by the Company, and the plan of the Company, complete with timelines, on the application for site-specific standards of benzene and benzo(a)pyrene for the Facility;
 - (vi) the details of the Company's plan, including but not limited to the anticipated environmental impacts, on the replacement of its existing No. 7 coke oven battery.

The reasons for the imposition of these terms and conditions are as follows:

- 1. Condition No. 1 is included to provide the minimum performance requirement considered necessary to prevent an adverse effect resulting from the operation of the Equipment.



Notes of Meeting #29 – Algoma Steel Community Liaison Committee

Date: June 4th, 2019

Location: Algoma Steel
Administration Building
Main Conference Room

Time: 11am 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
David Trowbridge - Public
Reg Dunn – United Steelworkers Local 2251
Peter McLarty – Public

Additional attendees:

Scott Grant – Ministry of Environment, Conservation and Parks (MECP)
Bruce Gillies – Ministry of Environment, Conservation and Parks (MECP)

CLC Members not in Attendance

Wayne Hubbard – United Steelworkers Local 2251
Patt Marquis – Public
Jonathon Bouma - Algoma Public Health (alternate)
Dan Sayers Jr. – Batchewana First Nations
Kathie Brosemer – Sault Ste. Marie Tribe of Chippewa Indians
Maggie McAuley – Corporation of the City of Sault Ste. Marie

Meeting Notes

1. Review of the Agenda

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

2. Review of Meeting #26 Notes

There were no comments regarding the minutes of the March 5th CLC meeting. They have been posted on the company website.

3. Membership issues

A re-cap of current membership was provided.



Notes of Meeting #35 – Algoma Steel Community Liaison Committee

Date: December 8th, 2020

Location: Cisco Webex Meeting

Time: 12pm to 3pm

CLC Members in Attendance

Fred Post – Algoma Steel
 Chris Galizia – Algoma Steel
 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)
 David Trowbridge - Public
 Peter McLarty – Public
 Jillian Marquis – Public
 Bruce Gillies – MECP (Guest)

CLC Members not in Attendance

Ron Dorscht – Ministry of Environment, Conservation and Parks (MECP)
 Kathie Brosemer – Sault Ste. Marie Tribe of Chippewa Indians
 Steve Carey – Chippewa County Health Department
 Kara Flannigan – Algoma Public Health
 Chris Spooner – Algoma Public Health
 Wayne Hubbard – United Steel Workers Local 2251
 Jonathon Bouma - Algoma Public Health (alternate)
 Dan Sayers Jr. – Batchewana First Nations
 Maggie McAuley – Corporation of the City of Sault Ste. Marie
 Suzanne Lieurance - Chippewa County Health Department

Meeting Notes

1. Review of the Agenda and Meeting #33 Notes

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

David Trowbridge (Public) requested that the names of members and who they represent to be stated in future meeting minutes to have a record of any discussions. There were no other comments regarding the minutes of the September 15th CLC meeting. They have been posted on the company website.

2. Membership Items and Terms of Reference

Wayne Hubbard has assumed the primary CLC member role for Local 2251 and Denis Gagne has assumed the role of Local 2251 alternate.

The original Terms Of Reference (TOR) for the CLC were circulated before the meeting as it is desired to update the document to reflect changes that have occurred since its initial development.

re: Algoma Steel Inc emissions

Pelletier, Anne-Marie (EC) <anne-marie.pelletier@canada.ca>

Tue 26/11/2019 4:09 PM

To: 'selvarasaiah@hotmail.com' <selvarasaiah@hotmail.com>

Cc: DGAL Unite de Breffage / EB Briefing Unit (EC) <ec.dgalunitedebreffageebriefingunit.ec@canada.ca>

Selva Rasaiah

162 Cathcart St.

Sault Ste. Marie, ON

P6A 1E4

(705) 942-9179

selvarasaiah@hotmail.com

Dear Selva Rasaiah,

Thank you for your correspondence of October 9, 2019, concerning emission release from Algoma Steel Inc., in Sault Ste. Marie.

Protection of the environment is a shared responsibility between the federal, provincial and municipal governments. For its part, Environment and Climate Change Canada (ECCC) is responsible for enforcing the *Canadian Environmental Protection Act*, 1999 and the pollution prevention provisions of the *Fisheries Act*, and the regulations made pursuant to these acts. These acts and their regulations are enforced in accordance with publically available compliance and enforcement policies, which can be accessed online at <https://www.canada.ca/en/environment-climate-change/services/environmental-enforcement/compliance-policies.html>.

When ECCC enforcement officers become aware of information regarding alleged violations of CEPA or the *Fisheries Act*, they may conduct inspections in order to verify compliance. When there is sufficient evidence of an alleged violation, enforcement officers may take appropriate action in accordance with the compliance and enforcement policies. More information on the acts and regulations enforced by ECCC can be found at <https://www.ec.gc.ca/alef-ewe/default.asp?lang=En&n=2140D763-1>.

Based on available information, it seems like the situation you are describing pertains to alleged non-compliance with requirements that fall under provincial jurisdiction. As such, we encourage you to pursue the issue further with the Ontario Ministry of the Environment, Conservation and Parks.

If you wish to provide information regarding alleged non-compliance with laws or regulations that are administered and enforced by ECCC, we encourage you to do so through our Public Inquiries Centre, at ec.enviroinfo.ec@canada.ca or toll-free at 1-800-668-6767.

Thank you for expressing your concerns. We trust this information will be of use to you.

Sincerely,

Anne-Marie Pelletier

Responsable de la mise en application de la loi | Chief Enforcement Officer

Direction générale de l'application de la loi | Enforcement Branch

Environnement et Changement Climatique Canada | Environment and Climate Change Canada

819-938-5281 | anne-marie.pelletier@canada.ca

Gardi wants city to tap into fed's new Clean Water Agency

Why shouldn't Sault Ste. Marie be the host city for the federal government's new Clean Water Agency? It is at the heart of the Great Lakes, on an International border and has other research centres and academic institutions that could create synergies for such an organization.

Author of the article:

Elaine Della-Mattia

Publishing date:

Sep 25, 2020 • September 25, 2020 • 2 minute read • [Join the conversation](#)



Sault Ste. Marie has great qualities that should be promoted to be home of a new federal government Clean Water Agency.

If the federal government wants to establish a new Canada water research agency, then why not establish it in the centre of the Great Lakes, asks Ward 5 Coun. Corey Gardi.

Gardi was listening to the speech from the throne earlier this week when he heard the Liberal government's plan to establish a new Canada water research agency.

"It would be ideal to set it up here in Sault Ste. Marie," Gardi told The Sault Star. "We're at the centre of the Great Lakes, we're on a major transportation hub and on the International Border."

Sault Ste. Marie is also home to renowned research facilities, including the Invasive Species Centre, Great Lakes Forestry Research Centre and Ontario Forestry Research Institute.

Then there's post-secondary institutions , such as Lake Superior State University, Algoma University and Sault College.

What better chances of collaboration than all those organizations working together to ensure that the Great Lakes, and drinking water, remain clean, he said.

Gardi has put his ideas out on his social media posts.

He has had a brief conversation with Mayor Christian Provenzano and plans to talk to Sault MP Terry Sheehan about the concept.

“It would have been nice to have a council resolution ready for (Monday’s) council meeting, but the agenda deadline has already passed, so maybe at a future meeting I will ask the mayor to express our interest in pursuing this with MP Sheehan and the Minister of Environment and Climate Change,” Gardi said.

“I think we are very well situated for something like this.”

Provenzano said he thinks Gardi’s ideas to raise the profile on clean water and Sault Ste. Marie are on track.

“We are right at the heart of the Great Lakes and we have international partners, we have our First Nations partners and institutions on both sides of the river,” he said.

During his election campaign, Gardi spoke about the importance of clean water at an all-candidates forum at Algoma University. There was some brief mention of a new water agency in 2019, but that had petered off.

The throne speech reiterated the federal government’s commitment to addressing clean water management, improving clean drinking water for remote First Nations communities and addressing climate change.

The speech explained how the government will prioritize the management and protection of Canada’s water supply.

“When the Prairie Farm Rehabilitation Administration was closed by a previous government, Canada lost an important tool to manage its waters,” the speech read. “The government will create a new Canada Water Agency to keep our water safe, clean and well-managed. The government will also identify opportunities to build more resilient water and irrigation infrastructure.”

Gardi said he believes Sault Ste. Marie needs to jump on these opportunities as they arise.

“We have established research centres in our community and I believe an agency about fresh water would fit in here nicely and it would be good for our community,” Gardi said.

Source: <https://www.saultstar.com/news/local-news/gardi-wants-city-to-tap-into-feds-new-clean-water-agency>

Consideration for Canada Water Agency

Selva Rasaiah </O=FIRST ORGANIZATION/OU=EXCHANGE ADMINISTRATIVE GROUP(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=00060000844A097C>

Tue 29/09/2020 3:47 PM

To: Corey Gardi <c.gardi@cityssm.on.ca>

Cc: Lisa Vezeau-Allen <l.vezeauallen@cityssm.on.ca>; Paul Christian <p.christian@cityssm.on.ca>; Sandra Hollingsworth <s.hollingsworth@cityssm.on.ca>; Luke Dufour <l.dufour@cityssm.on.ca>; Donna Hilsinger <d.hilsinger@cityssm.on.ca>; Matthew Shoemaker <m.shoemaker@cityssm.on.ca>; Marchy Bruni <m.bruni@cityssm.on.ca>; Rick Niro <r.niro@cityssm.on.ca>; Matthew Scott <m.scott@cityssm.on.ca>; Mayor Provenzano <mayor.provenzano@cityssm.on.ca>; Catherine Taddo <c.taddo@cityssm.on.ca>; ross.romano@pc.ola.org <ross.romano@pc.ola.org>; TERRY.SHEEHAN@PARL.GC.CA <TERRY.SHEEHAN@PARL.GC.CA>; Lisa Derickx <lisa.derickx@algomau.ca>; pjmcclarty@shaw.ca <pjmcclarty@shaw.ca>; dtrowbridge7@gmail.com <dtrowbridge7@gmail.com>; Dorscht, Ron (MECP) <Ron.Dorscht@ontario.ca>; Greco, Lori (MECP) <Lori.Greco@ontario.ca>; Fred.Post@algoma.com <Fred.Post@algoma.com>

2 attachments (4 MB)

MECPSupportDoc_ASLeissions_City.pdf; Oct18_2019Flare.pdf;

Dear Councillor Gardi,

I appreciate your efforts to bring a new Canada Water Agency to Sault Ste. Marie. However, there needs to be more transparency regarding our responsibility for the protection of our water locally. The city has been advised on the significant emissions event at Algoma Steel Inc. (ASI) on March 09, 2019 that resulted from a total loss of commercial power due to outdated equipment. This loss of power also resulted in an estimated discharge 4,780,000 litres of untreated effluent to enter the St. Mary's River. An FOI request was made to the city to determine if there was any information with respect to that event. The FOI request produced no documentation regarding any event at ASI (it is possible the city does not "own" the information). It appears that this discharge was not fully disclosed by ASI despite an investigation by the MECP that concluded that it was an accident. There was no discussion in the Algoma Community Liaison Committee (ACLC) meeting minutes or presentation regarding any discharge of effluent to the St. Mary's River. The City of Sault Ste. Marie has membership on this committee (Catherine Taddo, Maggie McAuley) as well Ms. Lisa Derickx (St. Mary's River RAP Coordinator).

There was also another emissions event on October 18, 2019. This was a result of a steam line that ruptured in the By-Products plant resulting in the South Raw Liquor Tank and tar decanters to overflow and enter the storm sewers. Despite a Soo Today article and the event being posted on ASI's Process Upset Table, there was no discussion in the ACLC meeting on December 10, 2019 following the event. An FOI request to the MECP earlier this year, and SSM MECP Lori Greco confirmed that the investigation into the event was not completed, and no further details could be provided at the time of the request.

The issues created by a ferrochrome facility will add to concerns regarding the degradation of the water quality of the St. Mary's River. The allowable limits in the effluent they discharge and the large draw of millions of gallons of water for their operations are issues that should be considered. I was interested in environment and health considerations by the city in the proposal submitted to Noront Resources Ltd. for a Ferrochrome Production Facility (FPF). I applied through an FOI for the document entitled, "Noront Ferrochrome Production Facility, The Path Forward in Sault Ste. Marie". I was denied access to this document and the reason included a clause regarding "economic interest". Since the City of Sault Ste. Marie put forth a proposal to have this facility, they are a proponent and should be required to prove that they exercised due diligence by considering the health and environmental impacts of this project in our community while preparing the proposal. The addition of another heavy industrial facility will undoubtedly add to the current level of contamination and issues in the river. Future concerns will include the cumulative impacts associated with its close proximity to ASI and how they may influence current progress in de-listing the river as an "Area of Concern".

It is important that any contamination to the river is fully documented and discussed by all parties to determine the potential impacts from the contamination despite the reason for the occurrence. Having knowledge and details of the event are vital for current and future research since this could have significant impacts to the analysis and parameters used in those research studies. Quality and reliable research also requires objective analysis and interpretation of all relevant data, despite concerns that are not directly relevant to scientific investigations. This allows for robust data and analysis when assessing perceived environmental and health impacts. It should be demonstrated that there is a heightened awareness from all stakeholders for environmental issues in this community that warrant this agency to be situated in Sault Ste. Marie. There should be public confidence that all issues are investigated, properly assessed and not biased by economic influences.

This letter only addresses the physical discharge of untreated water, but aerial deposition from point sources like stacks from industrial facilities close to the river, will also have some impact on the overall water quality.

I understand that ASI is responsible for the level of information disclosed to the public and its CLC. I would encourage you to discuss these concerns with Mr. Fred Post (ASI Environmental Control Manager) and Mr. Ron Dorscht (MECP Area Supervisor).

Please feel free to contact me with any questions or concerns.

Thank you.

Selva Rasaiah

Note: No response has been received from Councillor Gardi or any members of city council to date.

RE: Consideration for Canada Water Agency

Terry.Sheehan@parl.gc.ca <Terry.Sheehan@parl.gc.ca>

Thu 01/10/2020 1:38 PM

To: selvarasaiah@hotmail.com <selvarasaiah@hotmail.com>

Dear Selva,

On behalf of Terry Sheehan, I wish to acknowledge receipt of your letter today regarding locating a new Canada Water Agency in Sault Ste. Marie.

Rest assured your thoughts and comments will be brought to MP Sheehan's attention for further review and consideration.

Thank you.

Kind regards,

Bianca James
Constituency Assistant
Office of Terry Sheehan
Member of Parliament for Sault Ste. Marie
369 Queen Street East
Sault Ste. Marie, ON P6A 1Z4
Telephone: (705) 941-2900
Fax: (705) 941-2903
Email: terry.sheehan@parl.gc.ca

From: Selva Rasaiah [mailto:selvarasaiah@hotmail.com]

Sent: September 29, 2020 3:47 PM

To: Corey Gardi

Cc: Lisa Vezeau-Allen; Paul Christian; Sandra Hollingsworth; Luke Dufour; Donna Hilsinger; Matthew Shoemaker; Marchy Bruni; Rick Niro; Matthew Scott; Mayor Provenzano; Catherine Taddo; ross.romano@pc.ola.org; Sheehan, Terry - M.P.; Lisa Derickx; pjmclarty@shaw.ca; dtrowbridge7@gmail.com; Dorscht, Ron (MECP); Greco, Lori (MECP); Fred.Post@algoma.com; Chris.Galizia@algoma.com

Subject: Consideration for Canada Water Agency

Dear Councillor Gardi,

I appreciate your efforts to bring a new Canada Water Agency to Sault Ste. Marie. However, there needs to be more transparency regarding our responsibility for the protection of our water locally. The city has been advised on the significant emissions event at Algoma Steel Inc. (ASI) on March 09, 2019 that resulted from a total loss of commercial power due to outed equipment. This loss of power also resulted in an estimated discharge 4,780,000 litres of untreated effluent to enter the St. Mary's River. An FOI request was made to the city to determine if there was any information with respect to that event. The FOI request produced no documentation regarding any event at ASI (it is possible the city does not "own" the information). It appears that this discharge was not fully disclosed by ASI despite an investigation by the MECP that concluded that it was an accident. There was no discussion in the Algoma Community Liaison Committee (ACLC) meeting minutes or presentation regarding any discharge of effluent to the St. Mary's River. The City of Sault Ste. Marie has membership on this committee (Catherine Taddo, Maggie McAuley) as well Ms. Lisa Derickx (St. Mary's River RAP Coordinator).

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It is important that any contamination to the river is fully documented and discussed by all parties to determine the potential impacts from the contamination despite the reason for the occurrence. Having knowledge and details of the event are vital for current and future research since

Note: No response has been received from M.P. Terry Sheehan to date.

Councillor continues to pursue Clean Water Agency

The St. Mary's River Bi-National Public Advisory Council has endorsed a city councillor's lobby efforts and that letter came unsolicited.

Author of the article:

Elaine Della-Mattia

Publishing date:

Mar 23, 2021 • March 23, 2021 • 5 minute read • [Join the conversation](#)



Canada's Parliament building

Article content

An unsolicited letter of support to help convince the federal government to establish its new Canada Water Agency facility in Sault Ste. Marie has driven Corey Gardi to seek more, similar letters.

The Ward 5 councillor has been working with Mayor Christian Provenzano to request and gather letters of support that could bolster the city's effort to get the new Canada Water Agency facility in Sault Ste. Marie.

Sault Ste. Marie is not the only community lobbying to be the home of the Canada Water Agency. Interest has also been sparked by communities in Saskatchewan, but a process to determine the best location has not yet begun.

The St. Mary's River Bi-National Public Advisory Council has endorsed a city councillor's lobby efforts and that letter came unsolicited, Gardi said.

As a result, Gardi has teamed up with Provenzano and both have divided up a list of other stakeholders who might be interested in seeing the project move forward close to home.

The list with letters of support – or those that are expected to arrive in short order – is growing, Gardi said.

And what's even more impressive is support is coming from both sides of the St. Mary's River, where a vision exists that both Canada and the United States can partner on clean water projects to help the St. Mary's River and the Great Lake basin.

Gardi said letters of support have been received by Algoma University's school of environment and life sciences, geography, geology and land stewardship.

The Invasive Species Centre, RAIN and other organizations have also offered support, along with Lake Superior State University's Centre for Freshwater Research and Education, Sault College's National Environment Program, the Sault Ste. Marie Region Conservation Authority and both the Batchewana and Garden River First Nation communities.

Gardi and Provenzano have had several conversations with MP Terry Sheehan on the issue and Sheehan has arranged a meeting next week with MP Terry Duguid, Parliamentary Secretary to the Minister of Environment and Climate Change.

Provenzano said the meeting is designed to get a sense about if a location for the proposed water agency has been selected and, if not, to learn what process will be used to determine how the location will be selected and assess whether Sault Ste. Marie could be considered for it.

Sheehan said he supports the city in its drive to be considered for the agency and was pleased to set up the meeting.

"This is a great chance for Sault Ste. Marie to showcase itself to locate the Clean Water Agency here. I think we have a compelling case to tell, given our location on the Great Lakes, the history of Sault Ste. Marie and the history of our First Nations in this area as a gathering place to fish the white fish," Sheehan said.

In addition, the area has the most PhDs per capita in Canada through its educational and research facilities, he said.

Sheehan said that consultations began in December with ideas being collected on how Canada can improve and manage its freshwater supply better.

"We are still at the beginning of this process and I am pleased to have arranged this meeting to open the door and help Sault Ste. Marie enter the process," Sheehan said. "The research and science going on here is absolutely amazing and this would only add to it."

Gardi said he also hopes the letters of support will be presented to the federal minister to bolster Sault Ste. Marie's efforts and he's passionate on his belief that the city is a great location for the agency with synergies that can be formed among educational institutions and other research agencies already located here.

"I also think that the clean water issue is a big piece to our First Nations and Metis communities and this agency will deal with a number of Indigenous matters around water, and specifically clean drinking water. I think we are well positioned for that, including the work our PUC is doing northwest of Sault Ste. Marie," Gardi said.

He said he also believes that the agency will work well with attempts at reconciliation.

“The best way is to get clean drinking water to these communities, and I anticipate that our friends in Batchewana First Nation and Garden River (First Nation) will be supportive of that,” he said.

The St. Mary’s River Bi-National Public Advisory Council letter reads in part, “The geographic location of Sault Ste. Marie along an international waterway at the junction of two of the Great Lakes and in central Canada makes Sault Ste. Marie an ideal location. In addition, the Agency will be able to coordinate research with existing federal and provincial facilities, two universities, and a provincial college already located here.”

The Bi-National Public Advisory Council represents stakeholders on both sides of the Canada-U.S. border of the St. Mary’s River. It’s mandate is to provide input into the rehabilitation of the river, which was designated an area of concern due to the degradation of the ecosystem from past years of contamination.

“With the Canada Water Agency located on its shore, we hope that they will prioritize research and action contributing to the task of fully rehabilitating and protecting the St. Mary’s River,” the letter states.

Gardi has also turned to social media, asking individual community members to share a post to further spread his lobbying efforts.

The post notes that Sault Ste. Marie “is located at the heart of the Great Lakes, the world’s largest and most critically important body of fresh water. The great Lakes have been historically significant to the community and surrounding area for centuries, and the banks of the St. Mary’s River have been a meeting place for Indigenous peoples for millennia.”

“I think it is important to build as much momentum as we can in the community for something as important as water research,” Gardi said. “I think, as a community, we need to do our best to focus on the environment and the knowledge-based economy. It’s so important around the world and in North America.”

During the fall Speech from the Throne last fall, the federal government announced it wants to establish a new Canada water research agency. Since that time, Gardi has been lobbying for the federal government to set up that agency in Sault Ste. Marie, at the centre of the Great Lakes, on a major transportation hub and on the International Border.

Sault Ste. Marie is also home to renowned research facilities, including the Invasive Species Centre, Great Lakes Forestry Research Centre and Ontario Forestry Research Institute. It can also create synergies with Lake Superior State University, Algoma University and Sault College.

Source: <https://www.saultstar.com/news/councillor-continues-to-pursue-clean-water-agency>



ALGOMA STEEL INC. EMISSIONS EVENT
MARCH 09, 2019

Compliance and Enforcement Concerns

Abstract

An evaluation of Algoma Steel Inc. emissions event on March 09, 2019 with concerns regarding compliance, enforcement and investigation by the Ministry of the Environment Conservation and Parks (MECP).

Selva Rasaiah

Submitted to: Ms. Melissa Evers (Director)
Environmental Investigations
and Enforcement Branch
Ministry of Environment,
Conservation and Parks (MECP)

Submitted by: Selva Rasaiah

Date: October 06, 2020

*Revised: October 07, 2020

INTRODUCTION

“If a company is going to have its hand out, then the public has a reasonable expectation that it should behave in the public interest.” – Gord Miller (Former Ontario Environment Commissioner)

Portion of My Response Letter on September 09, 2019 to MECP Don Earl (with *additions*):

RE: March 09, 2019

In response to your evaluation of the March 09, 2019 event, I appreciate that Algoma Steel took safety measures in response to the power outage but it serves only to exempt them from criminal charges in the event there was bodily harm or death, but it does not negate the discharge to the environment that you acknowledge was significant. Would the government be responsible for the deposition of particulate in the Bayview area? Were all the residents notified by Algoma or the local ministry of the potential impacts? Have the impacted residents been educated as to who to call and what to do in those circumstances?

In a letter to Ron Dorscht (SSM MECP Area Supervisor) dated April 26, 2019, Fred Post (ASI Environmental Control Manager) describes the root cause of the power loss: “The failure resulted from the use of older style technology which deploys mineral oil filled bushings and has shown to be prone to cause leakage current to flow to ground.”

Did the MECP acquire a detailed report indicating who has ownership and responsibility for the equipment that failed? If it was Algoma’s responsibility (assuming not Hydro One) to ensure that updated equipment was in place, then this failure facilitated the necessity to initiate operational procedures to ensure safety which resulted in the extensive emissions being released to the environment. Therefore, Algoma would be guilty of emissions violations due to their failure to ensure their primary power supply was up to date thereby avoiding the possibility of an occurrence. Algoma is fully aware of the importance of maintenance with respect to this system and thereby should assume all liabilities.

A case could be made that Algoma’s response (action/response plan) was deficient considering it was clear by the timeline I provided that the emissions were very extensive, and a call should have been made quickly to the Spills Action Centre (SAC) emphasizing the urgency of the situation. This response includes their late collection and evaluation to determine if a bypass occurred in which contaminants would be discharged into the St. Mary’s River when their pumps stopped due to the total loss of power.

The St. Mary’s River has flow velocity in that area sufficient enough to reasonably assume that most of the contaminants would have dissipated far downstream by the time Algoma investigated (power was restored 48 minutes prior to collection).

In the event that Algoma could not get the emissions under control (possible outcome being an explosion), the late call would have made it more difficult for emergency organizations to organize a response to limit more serious consequences. The ministry’s (SSM MECP Lori Greco) response was also deficient and not well organized since Lori Greco appeared on scene well after most of the extensive emissions were over despite the fact that she should have been fully aware of the severity and possible outcome of this sort of event.

Consider: these events and portions of entries highlighted from the Ministry Report (1433-BA4LCB) dated March 09, 2019 {my own comments/summarization}:

9:32 am – total loss of power {confirmed by Algoma report}

***9:39 am-** *ASI Environmental Control estimates by-pass of untreated effluent into the river at MWFP*

9:55 am – my first observation of the extensive emissions from my house

9:59 am – first confirmed photo of extensive emissions {see my timeline of March 09} *Photo 1*

Highlights of Ministry Report:

***10:27 am** - *ASI Environmental Control estimates by-pass of untreated effluent into river stops. *

10:38 am – call to Spills Action Centre (SAC): caller reports a power outage to entire facility. There will be heavy emissions coal and coke dust which will be impacting the neighbourhood. Started 30 minutes ago. Complaint from resident seeing a lot of black smoke (IR#5767-BA4L9C)

***10:45 am** - *ASI Jerry Suurna (GM Safety/Envir/EmergServices) confirms power restored to coke ovens*

11:05 am - rec'd call from Corey Jackson (cj) @ ASI - had a power outage; 8/9 COB's are on fire, may have had a bypass at the MWFP. Corey indicated that he is on-site with Chris Graham and requested MECP presence. I explained to Corey that I would need to be ERP'd out by SAC if it was deemed necessary by SAC. I contacted my supervisor to explain the situation and I was advised to stay put until I get a call from SAC. ASI would be updating SAC.

11:09 am- Chris Graham - Algoma - to SAC (JA): reports that at power outage, all 3 coke oven batteries lost power and steam and had the inability to process any volatiles coming off the coal. They then had to bypass causing a black plume. There is a constant rolling fire on top of the batteries. Lori Greco who has advised them that she will be responding to site in about 45 minutes. Caller will have Lori update SAC with findings. Algoma will also be updating SAC.

***11:15 am** - *ASI Environmental Control collected samples of water from the MWFP wet well. *

***11:30 am** - *ASI Environmental Control inspects the river downstream of MWFP discharge location. *

11:43 am – Jerry Suurna advises SAC that power has been restored to coke oven batteries at **10:45 am** Emissions are still ongoing, however they have been getting better. *They will advise SAC when there are zero emissions and everything is fully under control*. {see my timeline and watch the 3 videos}*

11:48 am – MECP SSM Lori Greco advises SAC that Algoma has also contacted her and told her about the incident and requested her to attend. SAC: Lori does not believe that her presence will be necessary. They will also be updating her on the situation. {This means that there was no other organization on site assessing the situation and it was solely up to Algoma to evaluate the whole situation. Did Algoma see if any residents needed assistance considering it was impacting the neighbourhood?}

12:09 am – Ron Dorscht (SSM MECP) to SAC: The incident has received a lot of media attention. ERP to be paged. {I am not sure what Mr. Dorscht considers “a lot” of media attention. From what I have seen,

there were two short reports online and a short evening report on CTV News that day. Almost everyone I talked to never knew it happened. Unless he is referring to direct communication to himself and not to the public.}

12:11 am – SAC(ad) to ERP: Lori Greco was briefed. She will call when she gets to the office. *{Why wouldn't Lori Greco just go as soon as possible to the office and wait just in case, considering the circumstances and that she was requested to attend by Corey Jackson (ASI) at 11:05 am?}*

1:08 pm – Lori Greco (ERP) to SAC: reports that she is at the office and heading to site, ETA to site 13:20 and will update SAC later.

1:25 pm – *{Lori Greco meets at Jerry Suurna's office with Algoma Staff for updates and begins her assessment of the situation including ordering Algoma to conduct a plant wide assessment}*

1:44 pm – PEOC {Provincial Emergency Operations Centre} to SAC: requesting the latest update. SAC advised that the ERP has not arrived on site yet. No evacuations have been initiated. It has not been assessed as a high health risk situation. *{Who assessed it as "not a high health risk situation"? (employee or resident health?) This statement may have some validity if the situation was assessed after 11:45am}*

2:14 pm – Naomi Thibault (SSM Emergency Management Coordinator) to SAC: caller was contacted by PEOC and wanted to see if SAC had any further information. The caller requested SAC to keep her up to date when more information becomes available.

3:02 pm – Lori Greco: tour of Bayview area with Chris Galizia, collect particulate sample from snowbank at the corner of Young and Central (180 Central Street) – pics taken *{Why was only one sample taken? She should have taken more than one sample even a couple of feet apart or from another area considering the high variability in the composition of this type of particulate.}*

3:40 pm – Lori Greco: back at office, complete notes, contact SAC

4:15 pm- Lori Greco: leave for home

5:01 pm – SAC to PEOC Duty Officer: Briefed on update info.

5:07 pm – SAC to Naomi Thibault (SSM Emergency Management Coordinator): Briefed on update info.

***7:10 pm** – Jerry Suurna (ASI) notifies SAC that flares have been extinguished*

Also consider, in a meeting with Ron Dorscht and Lori Greco at SSM MCEP local office on July 18, 2019, Lori Greco remarked to me that the ministry has cameras facing the coke oven batteries stacks. She claims that they are watched by her and other MECF staff 24 hours a day. If this is true, who was watching the cameras from 9:00 am to 11:00 am since they would have seen a problem and would have been able to contact ASI to inquire what the issue was (what is the purpose of the cameras)? If the footage was reviewed from these cameras even at the MECF office, you would recognize the urgency and be able to record the event as a major emissions event rather than minor as indicated in her ministry report. What is considered major if that event was minor? If you take into account her time to leave ASI and head back to the MECF office, she was there less than 2 hours to complete her investigation for a significant event.

Re: Water Samples collected by ASI on March 09, 2019:

Portion of letter dated March 22, 2019 from Chris Galizia (ASI Environmental Control Officer) to Lori Greco (SSM MECP Senior Environmental Officer):

“During the power outage, the MWFP could have experienced a bypass discharging untreated effluent to the St. Mary’s River. The power outage last from 9:39AM until 10:27AM, a duration of approximately 48 minutes. Based on historical events, the water level of the primary basin raises approximately 1.7% per minute during a power outage until the primary basin reaches 84% at which time a bypass would be initiated. The water level in the basin at the time of power loss was 48.5% and at 9:59AM it is believed the filter plant would have begun to bypass. This bypass would have lasted until 10:27AM for a total bypass time of 28 minutes. Prior to the outage, effluent flow was recorded at 11,520 m³/hour and decreased to 8,820 m³/hour once power was restored. Based on this information, the expected flow rate out of the filter plant during the time of a bypass would be 10,170m³/hour. Combined with the duration of the bypass, the expected volume of untreated effluent would be 4,780 m³.”
 {4,780 m³ = 4,780, 000 L}

“At 11:15AM, Environment Control collected samples of water from the MWFP wet well. These samples would be representative of effluent quality if a bypass occurred. At the time of sample collection, water levels in the primary basin had returned to normal. The location of a bypass outflow was inspected and appeared to be dry, indicating that a bypass may not have occurred. At 11:30AM, the St. Mary’s River was inspected downstream of the MWFP discharge location and there was no visual evidence of a bypass (i.e. water discolouration, sheening etc.).”

I am not sure how you can expect accurate results and observations considering Algoma collected water samples 48 minutes after they restored power at 10:27 am. The river was inspected downstream 63 minutes after power was restored (1hr 58 minutes after the total loss of power to the facility). Algoma staff should have recognized the significant probability that this type of spill would occur given the circumstances and should have been prepared to deal with this situation. The late investigation could be the reason for the “appearance” of the bypass outflow being dry as stated by Mr. Galizia. Mr. Galizia acknowledges “At the time of the sample collection, water levels in the primary basin had returned to normal”. Essentially, a lot of contaminated water was allowed to flow out and then be replaced by “new” water before the samples were taken. Just consider how much the effluent flow decreased when power was restored. I will assume Algoma waited because they were too busy avoiding a catastrophic explosion from occurring and therefore contamination to the river was secondary. What does Algoma’s emergency response plan look like? ***end***

DISCUSSION

The MECP investigation was limited by their responsibility to establish if the emissions event was an accident and if emergency procedures were followed. The burden of proof should have been on ASI to demonstrate that the accident was unavoidable and ASI effectively initiated a comprehensive safety plan that accounted for all aspects of the facility and their impacts to residents. It is evident that there was an ineffective evaluation of the situation and timely conveyance of information to SAC and the SSM MECP. The SSM MECP relied on information updates from ASI and did not take sufficient action to

attend the scene despite a request from ASI. The inaction resulted in the consequences of the event remaining unaddressed which included the public concern on the root cause of the emissions.

Power Outage Confirmation

In a letter to Ron Dorscht (SSM MECP Area Supervisor) dated April 26, 2019, Fred Post (ASI Environmental Control Manager) describes the root cause of the power loss: “The failure resulted from the use of older style technology which deploys mineral oil filled bushings and has shown to be prone to cause leakage current to flow to ground.”

There was confusion among Sault residences whether the power outage they experienced the same morning was related to the power outage at ASI. A SaultOnline.com article on March 09, 2019 states, “A power surge, experienced by most of the area around 10:30am Saturday may have triggered a fire in the coke ovens SaultOnline.com was told.”

The PUC stated that they do not provide commercial power to ASI and the power outage was not a result of any fault in the PUC distribution system and occurred from an unrelated incident. Brookfield Renewable advised that they did experience a power outage at the same time as ASI. The fault on the grid at Patrick Street substation would have caused their units to trip in response, resulting in a loss of power at their facility. Hydro One confirmed that they do supply commercial power to ASI, and a fault occurred at the Patrick Street substation (due to confidentiality, Hydro One did not confirm the specific reason for the fault and who was responsible).

Extensive Damages

ASI regularly claims that they use the “best available technology” to reduce emissions and their impacts to the community and their environment. The failure of ASI to not replace outdated technology in a critical system resulted in extensive damages to their facility that will continue to require significant capital investments to maintain current levels of production and profitability. The replacement of many through walls and some charging issues (filling ovens with coal) at ASI’s No. 9 battery is partly due to the damaged caused on March 09, 2019. According to a letter from Chris Galizia (ASI Environmental Control Officer) to Lori Greco (SSM MECP) dated March 22, 2019:

“As a result of the loss of pressure control and flaring, fires started on #9 battery. This resulted in heavy damage to the Individual Oven Pressure Control (IOPC) system. The damage done placed #9 battery in a dangerous position and it was not able to operate safely after the bleeders were extinguished. Individual ovens have been slowly brought back into service and as of March 14th, 2019 only 42 of the 60 ovens are operational, with 10 ovens predicted to be out of service for an extended period of time. As a result of not being able to operate ovens consistently, gas production from #9 battery is reduced and positive pressure needs to be maintained in the collector main while charging so as to not bring in oxygen. Oxygen in the collector main could lead to a fire and explosion. For safety reasons, the limited charging that has occurred has been done with standpipe caps open as this is the only way to return to normal operating conditions. This has resulted in direct discharges of COG to the atmosphere and spill reports have been issued for each charge under this condition. On March 13th, 2019 charging to the atmosphere ceased as enough gas is being generated to allow negative pressure in the collector main to be maintained safely.”

CONCLUSION

An individual cannot directly control the emissions they are exposed to but are entitled to a basic assurance of safety afforded to them by the Ontario Clean Air Act and their basic rights to information that could impact their quality of life and enjoyment of their property.

It is unclear if there was a notice given to affected residents considering a particulate sample was collected in the Bayview neighbourhood. ASI chose to convey minimal information regarding the event and did not present a reasonable opportunity for residents and stakeholders to comment and address their concerns. There was no formal public acknowledgement from ASI or to its ACLC regarding the root cause of the power outage which was specifically caused by their older technology. This omission may have served to alleviate any concerns regarding their operations and the status of their equipment. There were no documented discussions at their CLC meeting following the event referring to a discharge of untreated effluent to the St. Mary's River or of any public complaints regarding the emissions.

Despite the significant emissions and estimated discharge of untreated effluent to the St. Mary's River, the standard of accountability of ASI to the general public was inadequate compared to a bleeder valve opening at ArcelorMittal Dofasco on February 25, 2019, a 2-minute emission that deposited particulate matter into neighbourhoods but no discharge of untreated effluent. The industry standard for environmental responsibility and liability in Sault Ste. Marie appears to be insufficient compared to other comparable areas of the province despite the St. Mary's River being an "Area of Concern".

The MECP determined ASI exercised due diligence. Due diligence also requires prompt assessment and evaluation of a situation in which the necessary authorities are properly notified regarding the urgency of the situation so they are able to effectively perform their duties and responsibilities based on the information made available to them.

It should be recommended that a higher level of transparency is expected from ASI with respect to the information they provide to the public and to their ACLC regarding their emissions and operational upsets. Evidence of concerns from residents and acknowledgement in the local media, should prompt the expectation that ACLC members who represent public interests, inquire further into the issues that are presented to them. Active participation and due diligence of ACLC membership requires that ASI has disclosed to its members all the relevant facts necessary for effective and meaningful discussion. The SSM MECP has knowledge and details surrounding most emissions upsets and therefore should ensure that ASI is not omitting issues and concerns that should be addressed publicly. The current framework of environmental enforcement and compliance requires a more active role from the SSM MECP, ACLC, First Nations, all levels of government, and other groups/agencies in Sault Ste. Marie Ontario and Sault Ste. Marie Michigan to ensure public confidence and community interests are assured.

Although ASI is entitled to certain privacy rights, the current conditions and challenges of the facility are important to the long term environmental and economic considerations for the future in Sault Ste. Marie. Damages to the facility from emissions events should be generally discussed since the capital investments required for repairs and financial burden from the events will require additional support and investment from taxpayers. There should be a reasonable expectation that financial investments from government and concessions made by the municipality (smaller tax payments, delays in environmental upgrades), confirm that essential repairs and upgrades are being completed which protect the employees, residents and the environment for the future generations in Sault Ste. Marie.

MARCH 09, 2019 TIMELINE



Photo 1: Cathcart/Huron @ 9:59 AM



Photo 2: Cathcart Sidewalk/Marconi Hall @ 10:00 AM



Photo 3: Cathcart St./ASI @ 10:16 AM, Video: 7 minutes 56 seconds



Photo 4: Cathcart St./ASI @ 10:29 AM, Video: 5 minutes 54 seconds



Photo 5: Cathcart St./near Spadoni's @ 10:39 AM



Photo 6: Cathcart St./near Marconi Hall @ 10:39 AM (yellow emission is raw coke gas)

SUPPORTING DOCUMENTATION

MEDIA COVERAGE:

Black smoke billowing from steel plant (3 photos)

SooToday is investigating and will have more information as it becomes available

Mar 9, 2019 11:45 AM By: SooToday Staff



Multiple SooToday readers are reporting an apparent fire at the Algoma steel plant in the city's west end on Saturday morning.

SooToday is investigating and will have more information as it becomes available.

If you have any more photos of the fire and would like to share, send to news@sootoday.com.

Soo Today: <https://www.sootoday.com/local-news/black-smoke-billowing-from-steel-plant-3-photos-1313565>

Power outage cited as cause of weekend Steel Plant incident

Coke battery flaring led to billowing black smoke

Mar 11, 2019 11:28 AM By: SooToday Staff



Smoke seen billowing from Algoma Steel March 9, 2019. Photo submitted

SooToday has received word as to the cause of black smoke billowing from Algoma Steel Saturday.

"I can confirm at 9:40 a.m. Saturday, March 9 we had a temporary total loss of power to the steelworks which resulted in a loss of steam to the operation as well. This necessitated flaring on the coke batteries," wrote Brenda Stenta, Algoma Steel communications manager, in an email to SooToday Monday morning.

"Power was fully restored by 10:45 a.m. and the steam supply followed several hours thereafter. No injuries were sustained. The appropriate authorities were notified. An investigation is underway to determine the root cause and corrective measures," Stenta wrote

Soo Today: <https://www.sootoday.com/local-news/power-outage-cited-as-cause-of-weekend-steel-plant-incident-1315510>

Power Surge May Have Triggered Fire at Algoma Steel

By **Craig Huckerby**
March 9, 2019



Flames and thick black smoke could be seen from the stacks at Algoma Steel Saturday morning.

A powersurge, experienced by most of the area around 10:30am Saturday may have a triggered a fire in the coke ovens SaultOnline.com was told.

Many on social media were alarmed by the thick black smoke as it encompassed the steel plant following a power failure leaving the operation in the dark for about an hour.

No reports of injuries or damages at this point. This story will be updated when more information is available.

Sault Online: <https://saultonline.com/2019/03/power-surge-may-have-triggered-fire-at-algoma-steel/>

CTV News Northern Ontario – March 09, 2019



"I can confirm we had a temporary loss of power to the steelworks this morning. Power has now been restored and an orderly ramp up of production is underway. No injuries to report. The necessary authorities have been notified."

BRENDA STENTA, MANAGER OF CORPORATE COMMUNICATIONS

CTV News Northern Ontario: <https://northernontario.ctvnews.ca/video?clipId=1632086>

ADDITIONAL INFORMATION FOLLOWING MARCH 09, 2019 EMISSIONS EVENT:

Public Complaints

There were no public complaints received since the last CLC meeting that related to a matter addressed in the SSS Order.

The following public complaints were received by the company:

- March 9th – Noise at boiler house on start-up after power failure
- May 13th – Odour – Sault Michigan
- May 14th – Odour – Terrance Ave
- May 20th – Odour – International Bridge
- May 29th – Odour – Estelle



Photo 7: Slide #15 from ACLC meeting #29 with no public complaints about air emissions on March 09

March 9th Power Failure

- On March 9th at 9:32am, Algoma Steel experienced a total loss of commercial power for nearly one hour.
- The power outage resulted in the loss of cooling water and steam to the operation, which gave rise to emissions as manufacturing processes were suspended.
- A comprehensive investigation has identified several risk mitigation measures that Algoma Steel is undertaking to prevent a recurrence.

April Blast Furnace Upset

- An unplanned process upset occurred in the blast furnace in April.
- During the Blast Furnace re-start, safety procedures required for pressure relief and the beaching of iron resulted in emissions until the Furnace returned to normal operation.



16

Photo 8: Slide #16 from ACLC meeting #29 on June 04, 2019 following the emissions event.

		to reduced emissions from site. Security Officer to continue their after-hours and weekend observations
March 10 th 2019 from Sault Ste. Marie, Ontario	Noise	Winds were from the West at the time of complaint, at 24.2 kph <ul style="list-style-type: none"> • March 9th – Plant wide power failure causing the Boilers to shut down. • March 10th – superheater vents on restart of one or more boilers at the Boiler house coming out of that major power failure the day before. Best Management Plan (BMP) being followed to reduced emissions from site.
February 24 th , 2019 from Sault Ste. Marie, Ontario (Lennox Ave)	Noise	<ul style="list-style-type: none"> • Emergency Response reported to a loud noise from the Weld and Beam facility. • Upon arriving it was identified that the boiler was making a loud whistling noise. • Utilities were called and attended to the boiler (noise stopped). Best Management Plan (BMP) being followed to reduced emissions from site.

Photo 9: Portion of ASI Monthly Summary Report of Environmental Concerns with no air emissions

<p>topic continues to be an issue and the company is working with the MECF to develop a detailed action plan to reduce opacity.</p> <p>6. Recent Incidents A description of two incidents which occurred in Algoma's operations in the past quarter was provided.</p> <ul style="list-style-type: none"> • On March 9th at 9:32am, Algoma Steel experienced a total loss of commercial power for nearly one hour. The power outage resulted in the loss of cooling water and steam to the operation, which gave rise to emissions as manufacturing processes were suspended. A comprehensive investigation has identified several risk mitigation measures that Algoma Steel is undertaking to prevent a recurrence. • An unplanned process upset occurred in the blast furnace in April. During the Blast Furnace re-start, safety procedures required for pressure relief and the beaching of iron resulted in emissions until the Furnace returned to normal operation. <p>7. Site Specific Standard for Benzene and Particulate An update was provided regarding the site specific standard for benzene. The approved standard requires continued addition to the Benzene Emission Control (BEC) system and on</p>	2
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Photo 10: ACLC Meeting #29 Minutes, June 04, 2019, only information/comments regarding the event


March 10	Cokemaking	Stack emission #9 battery, 5 event	Ovens to be inspected
March 9	Cokemaking	Pushing emission #9 Battery, #22 Oven	Checked next oven and continues pushing
March 9	Cokemaking	Pushing emission #8 Battery, #78 Oven	Checked next oven and continues pushing
<div style="text-align: center;">  Environmental incidents resulting from operations </div>			
March 9	Cokemaking	Stack emission #7 battery, 9 event	Ovens to be inspected
March 9	Cokemaking	Stack emission #8 battery, 17 event	Ovens to be inspected
March 9	Cokemaking	Stack emission #9 battery, 12 event	Ovens to be inspected
March 8	Cokemaking	Charging emission #8 Battery, #100 Oven	Checked next oven and stopped for more coking time
March 8	Cokemaking	Charging emission #8 Battery, #67 Oven	Stopped pushing for more coking time
March 8	Cokemaking	Stack emission #7 battery, 5 event	Ovens to be inspected

Photo 11: ASI Process Upset Table posted August 2019 not showing March 09 emissions event.



Photo 12: Heavy emissions on March 09 @ 10:00 am from Cathcart St. near Marconi Hall

MECP PARTICULATE SAMPLE RELATIVE TO HISTORICAL DEPOSITION

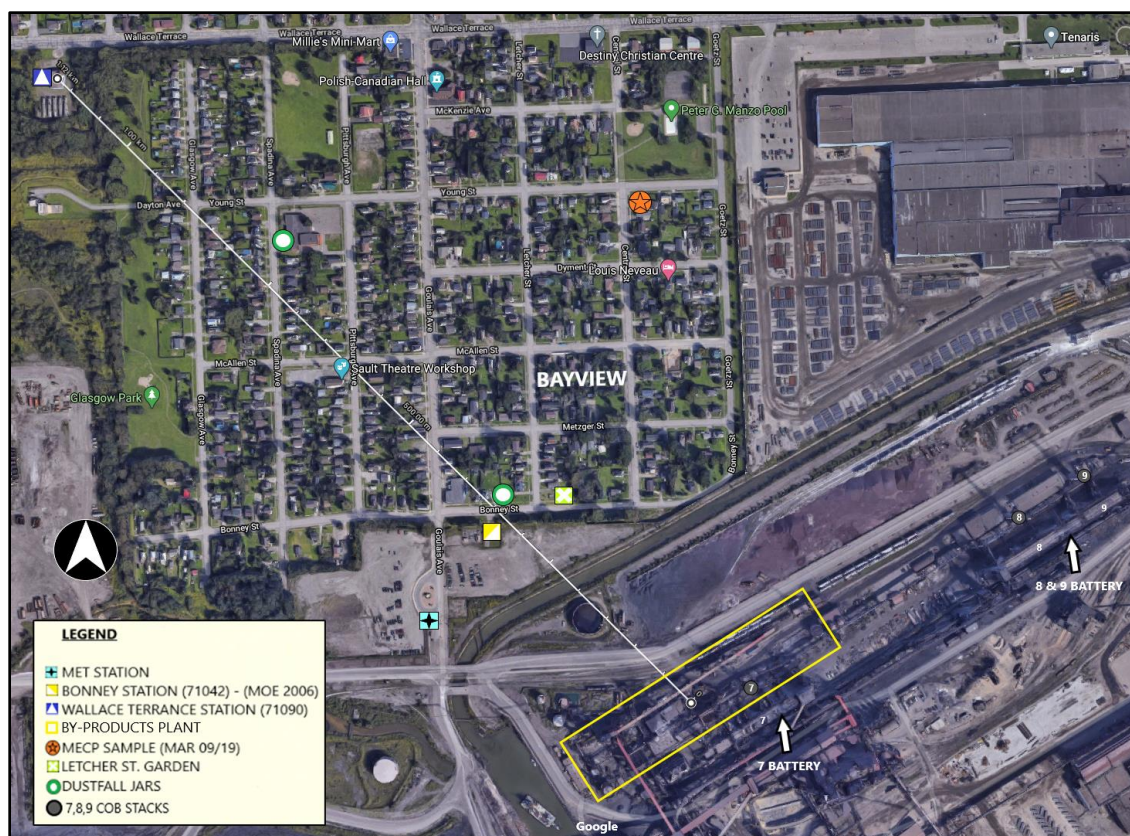


Photo 13: Modified google map showing monitoring devices relative to sources of contaminants

The continuous particulate monitoring illustrated that TSP concentrations quickly decline as one moves away from the ASI property line. The majority of exceedances of the schedule 1 0.5-hr suspended particulate standard and the highest TSP concentrations were measured at the 71042 Bonney St. location which is on the fence-line of ASI. The 71042 Bonney St. data also showed that storage piles and unpaved areas associated with ASI are the most significant contributor to TSP concentrations at this location.

There were over 1000 exceedances measured of the schedule 1 0.5-hr standard at 71042 Bonney St. The other two sites within the Bayview area (71102 Peter Manzo Pool and 71103 Mike Zuke Park) had approximately 6 to 8 times fewer 0.5-hr suspended particulate exceedances: the number of exceedances at these locations was comparable to those measured at locations outside the Bayview area (i.e., 71100 WESTP, 71101 Second Line West Pump House, 71104 Cathcart).

Through averages calculated from the continuous data, 71042 Bonney St. also recorded the highest number of exceedances of the schedule 3 24-hr suspended particulate standard with 33. The only other location at which the 24-hr standard was exceeded was 71101 Second Line West Pump House. 24-hr TSP averages were highest at Bonney St.: averages at the other Bayview monitoring stations were comparable to those outside Bayview.

Photo 14: Portion of the conclusion of MOE particulate study conducted in 2006*

*Report on Sault Ste. Marie 2006 Particulate Monitoring Special Study, pg. 19

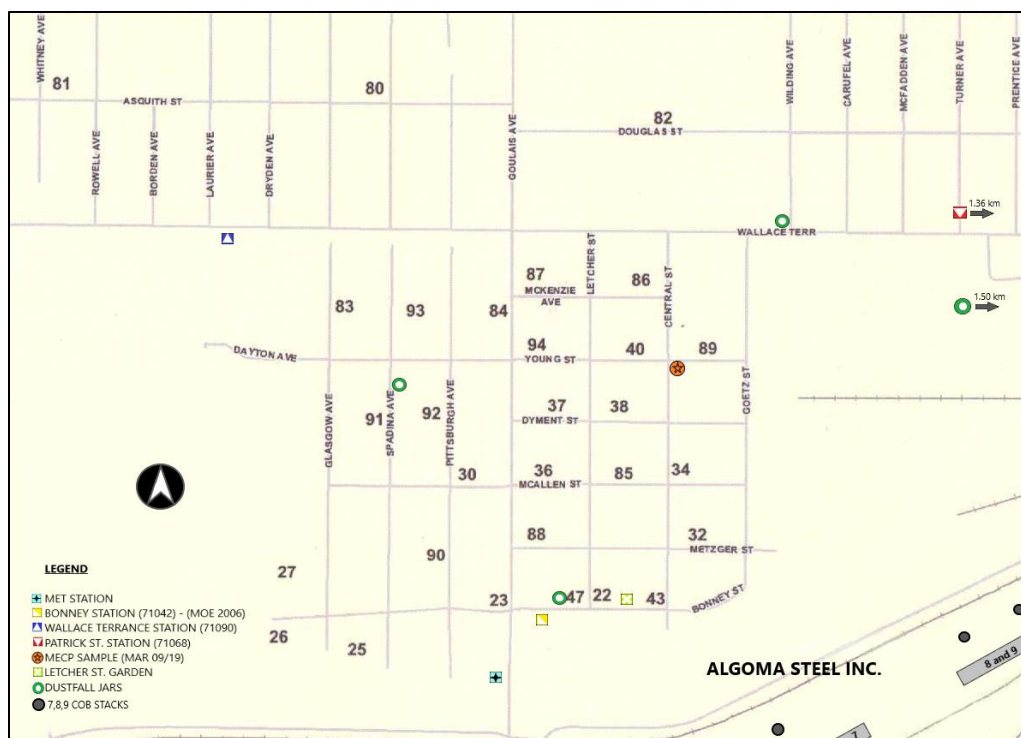


Photo 15: Locations of soil samples taken in MOE soil study* relative to MECP sample (Mar09/19)

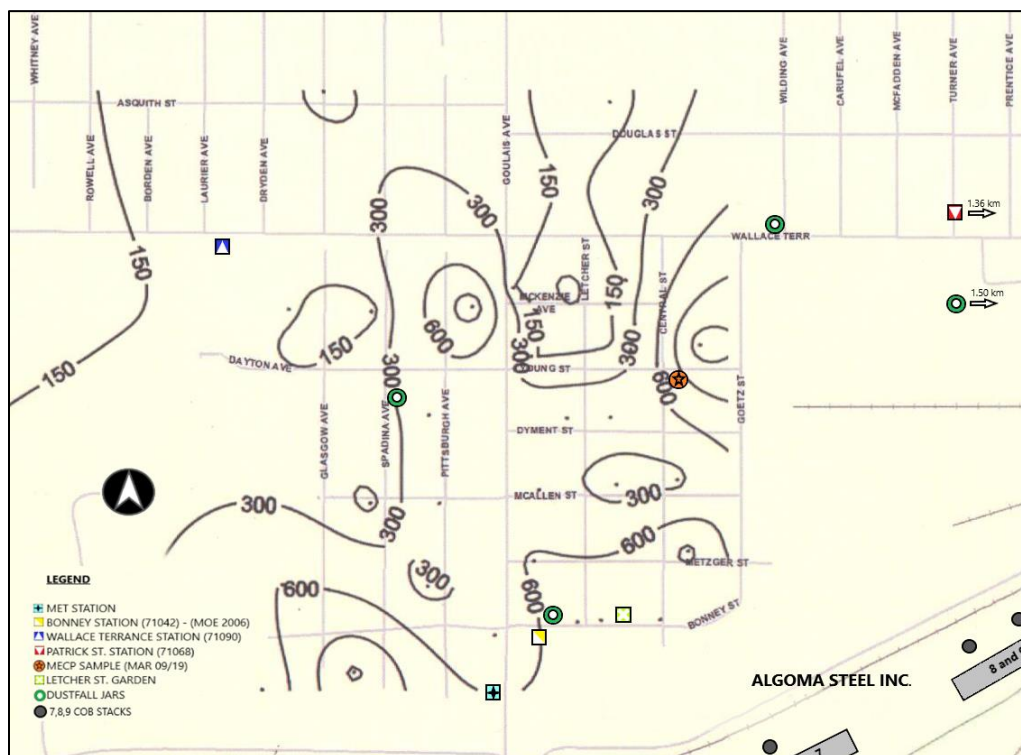


Photo 16: Concentration Contour Map showing pattern of BaP (Benzo-a-pyrene) in surface soil samples

*Soil Survey in the Bayview Neighbourhood Adjacent to Essar Steel Algoma Incorporated, Sault Ste. Marie, Ontario (2012)

MARCH 09 EMISSIONS COMPARED TO TYPICAL EMISSIONS



Photo 17: Heavy emissions from ASI at 10:39 am photographed from Cathcart St. - March 09/19



Photo 18: A view of “normal” or typical emissions from ASI (L to R: 7,8 and 9 battery stacks) - April 24/19


 Environmental incidents resulting from operations			
March 11	Cokemaking	Charging emission #9 Battery, #29 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #27 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #25 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #05 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #03 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #49 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #45 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #47 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Charging emission #9 Battery, #51 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 10	Cokemaking	Stack emission #7 battery, 15 events	Ovens to be inspected
March 10	Cokemaking	Stack emission #8 battery, 19 events	Ovens to be inspected
March 10	Cokemaking	Stack emission #9 battery, 5 events	Ovens to be inspected
March 9	Facility Wide	Plant wide power failure, flares on Coke Batteries ignited, loss of power to baghouses	Dispatched emergency EMTs to repair electrical issue, followed emergency shut down procedures
March 9	Cokemaking	Pushing emission #9 Battery, #22 Oven	Checked next oven and continues pushing

Photo 19: ASI Process Upset Table showing discharges of coking gas to the atmosphere post March 09


 Environmental incidents resulting from operations			
March 14	Cokemaking	Pushing emissions #8 Battery, #71 Oven	Stopped pushing
March 13	Cokemaking	Stack emission #7 battery, 7 events	Ovens to be inspected
March 13	Cokemaking	Stack emission #8 battery, 25 events	Ovens to be inspected
March 13	Cokemaking	Stack emission #9 battery, 15 events	Ovens to be inspected
March 13	Cokemaking	Charging emission #9 Battery, #51 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 13	Cokemaking	Charging emission #9 Battery, #49 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 13	Cokemaking	Charging emission #9 Battery, #47 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 13	Cokemaking	Charging emission #9 Battery, #45 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 13	Cokemaking	Charging emission #9 Battery, #24 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 13	Cokemaking	Charging emission #9 Battery, #26 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 13	Cokemaking	Charging emission #9 Battery, #28 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 12	Cokemaking	Charging emission #9 Battery, #48 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio
March 12	Cokemaking	Charging emission #9 Battery, #50 Oven	Charged oven to atmosphere to reduce risk due to Oxygen/Gas ratio

Photo 20: ASI Process Upset Table showing the end of the discharging of raw COB gas to the atmosphere

No. 9 Coke Oven Battery					
Total Charges to the Atmosphere					
	10-Mar	11-Mar	12-Mar	13-Mar	
Oven #	27	45	48	51	
	25	47	50	49	
	5	51	10	47	
	3	4	14	45	
	49	6	18	24	
	45	24	22	26	
	47	26	13	28	
	51	48	19		
		50	23		
		8	44		
		44	46		
		46	9		
		29	17		
			29		
			27		
			25		
			5		
			49		
			3		
Total	8	13	19	7	47

**Data compiled from ASI Process Upset Table*

Note: Some ovens required more than two charges to the atmosphere (Ex. 47,51) of COB gas (raw coke oven battery gas). Damaged ovens that are not operational result in difficulties in maintaining proper pressure in the collection main, oven temperatures and limit operations needed for charging such as a lack of a by-pass oven. A by-pass oven is an empty oven, the empty space is used to help control the escape of COB gases when the ovens are charged (filled with coal). If there is no available effective by-pass oven, more COB gas will escape resulting in much higher charging times (over the 12 second limit) and a greater discharge to the atmosphere.

MECP ENVIRONMENTAL ENFORCEMENT AND COMPLIANCE RESPONSE (Don Earl):


**Ministry of the
Environment,
Conservation and Parks**

Environmental Enforcement
and Compliance Office

305 Milner Ave, Suite 1000
Scarborough, ON M1B 3V4
Tel.: 416-314-4278
Fax.: 416-314-4464

**Ministère de l'Environnement,
de la Protection de la nature et
des Parcs**

Bureau de l'application des lois
environnementales et de la conformité

305, avenue Milner, bureau 1000
Scarborough, ON M1B 3V4
Tél.: 416-314-4278
Téléc.: 416-314-4464

Aug 27, 2019

Selva Rasaiah
162 Cathcart St.
Sault Ste. Marie
Ontario P6A 1E4
selvarasaiah@hotmail.com

Dear Mr. Rasaiah,

Thank you for your emails of July 20 and July 30, 2019 to Greg Sones and myself and your email to the Premier on August 17, 2019 regarding the event that occurred on March 9, 2019 and ongoing visible emissions from Algoma Steel Inc. (ASI) in Sault Ste. Marie. I have been asked to provide a direct response on your emails.

The Environmental Enforcement and Compliance Office through the Investigations and Enforcement Branch reviews allegations of non-compliance to determine where prosecution is warranted. We work closely with staff in local area and district offices to follow-up on serious non-compliance and repeated violations.

We have reviewed the allegations included in your letter and discussed the incidents with the Sault Ste. Marie area office to gather additional information and have concluded that an investigation is not warranted at this time.

In response to the March 9 incident, ASI took measures to ensure safety in response to the power outage which affected operation of the Coke Oven Batteries. We acknowledge there were significant visible emissions, however the company followed operational procedures to maintain safety of the site and advised MECP of the emissions as they were occurring.

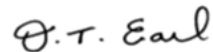
With respect to the other events you've mentioned, we've considered the ongoing efforts that ASI is undertaking to mitigate the visible emissions. As communicated by the Sault Ste. Marie Area Supervisor, Ron Dorscht, in his letter of July 10, 2019, ASI is

in compliance with the site-specific standards and accompanying orders that have been issued for suspended particulate, benzene and benzo-a-pyrene.

I would encourage you to direct specific questions regarding mitigation plans and site-specific standards to the Sault Ste. Marie Area office and /or ASI. Thank you for your interest in the continued protection of Ontario's air.

Should you have additional information or questions, please contact Melissa Evers as of September 3, 2019 at melissa.evers@ontario.ca.

Sincerely,

A handwritten signature in black ink that reads "D. T. Earl". The signature is written in a cursive, slightly stylized font.

Don Earl
A. Director,
Environmental Enforcement and Compliance Office
Ministry of the Environment, Conservation and Parks

MECP ENVIRONMENTAL ENFORCEMENT AND COMPLIANCE RESPONSE (Melissa Evers):


**Ministry of the
Environment,
Conservation and Parks**

Environmental Enforcement
and Compliance Office

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Téléc.: 416-314-4464

December 13, 2019

Selva Rasaiah
162 Cathcart St.
Sault Ste. Marie
Ontario P6A 1E4
selvarasaiah@hotmail.com

Dear Mr. Rasaiah,

Thank you for your letter of September 9, 2019 to Don Earl regarding the event on March 9, 2019 from Algoma Steel Inc. (ASI) in Sault Ste. Marie. As the current director, I'm providing a response to your inquiry.

As you may know, the Environmental Enforcement and Compliance Office (EECO), through our Investigations and Enforcement Branch, reviews incidents of alleged violations of Ontario's environmental laws to determine where prosecution is warranted. Information about environmental incidents is generated from calls to the Spills Action Centre (SAC), calls/submissions from the public and contact from municipalities, as well as the local district office field follow-up. This information is reviewed to make a determination if an investigation into alleged violations and subsequent prosecution is warranted. Initiation of an investigation, or the decision not to proceed with one, is carefully considered to ensure prosecution will improve compliance with requirements and result in deterrence from further violations. We also strive for fair and consistent enforcement across the province.

With respect to the concerns raised in your letter of September 9, 2019, IEB will not be proceeding with investigation into the March 9, 2019 power failure event. Through review of your materials, and the information available through the Sault Ste. Marie Area Office of the MECP, we understand the emissions were related to an emergency situation, during which the company exercised diligence in their response and return to normal operations.

I have shared the information you provided in your submission with the Sault Ste Marie MECP office to ensure they have as much information as possible to continue their work with ASI on their compliance with environmental requirements. The MECP office in Sault Ste. Marie continues to monitor compliance at ASI and ensure appropriate measures are in place to mitigate emissions from the facility. Should you have any specific concerns, I would encourage you to direct them to the Sault Ste. Marie Area office and/ or ASI. Thank you for your interest in the continued protection of Ontario's air.

Sincerely,



Melissa Evers
Director,
Environmental Enforcement and Compliance Office
Ministry of the Environment, Conservation and Parks



No. 7 Coke Oven Battery stack emitting particulate at 100 percent opacity on June 27, 2019

ADDITIONAL DOCUMENTS

From: Home <[REDACTED]> **s.21**
Sent: March-13-19 10:20 AM
To: Lalonde, Rick (MECP) <Rick.Lalonde@ontario.ca>
Subject: Fwd: important emissions breach information

Thanks for you prompt call.
Have a great day,

[REDACTED] **s.21**

Begin forwarded message:

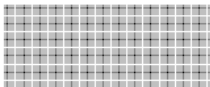
From: [REDACTED] **s.21**
Date: March 13, 2019 at 9:35:55 AM EDT
To: ec.enviroinfo.ec@canada.ca
Subject: Fwd: important emissions breach information

Please find an attached picture of the emissions leak at Essar Steel this past Saturday. [REDACTED]
s.21 [REDACTED] I remain vigilant as the environment is my great concern. I hope the picture is helpful to the investigation. If you have questions please do not hesitate to call. In addition, the river has not frozen along the section by the sand plant (they pour slag on the north section) for the first time since the early 70's. May be coincidence.
Have a great day,

[REDACTED] **s.21**

1

001181



s.21



Greco, Lori (MECP)

From: Dorscht, Ron (MECP)
Sent: March 9, 2019 12:18 PM
To: Greco, Lori (MECP)
Subject: Fwd: Black smoke from Essar algoma

Ron Dorscht
 Supervisor
 Ministry of Environment, Conservation, and Parks
 Sault Ste. Marie
 705-942-6322

From: [REDACTED] s.21
Sent: Saturday, March 9, 2019 10:14:35 AM
To: Dorscht, Ron (MECP)
Subject: Black smoke from Essar algoma

Good morning

This morning there is excessive black smoke blowing from the stacks by Tenaris at Essar. It is pure black. Thankfully for me the wind is blowing it the other direction as [REDACTED] There was a bang prior to this. It's very worrisome, does someone look into this?.

- s.21
 Once again it will be an indoor day for quite a while and hopefully they won't start that venting again. It is so loud it gives [REDACTED] Can there not be public not be public notices about these things either before or at least after the occurrences for our health? It's so frustrating....and [REDACTED]

Sorry for being irritated, I just want it to stop.....

s.21

[REDACTED]

s.21

Site(s)**Site Details**

Algoma Steel Inc. - 105 West Street
 Address: 105 West St, Sault Ste. Marie, City, District of Algoma, P6A 7B4
 District Office: Sault Ste. Marie
 GeoReference: Map Datum: NAD83, Zone: 16, Accuracy Estimate: 1-10 metres eg. Good Quality GPS,
 Method: Survey, UTM Easting: 701613, UTM Northing: 5154576, ,
 LIO GeoReference: Zone: 16, UTM Easting: 702519.25, UTM Northing: 5155183.0, Latitude: 46.519733,
 Longitude: -84.35969
 Sewage Works Number: 0000040006
 Site #: 1754-4NVMP9, NAICS: 3311110

Incident Summary:

PIR: Black Smoke Coming from Algoma Steel

Initial Incident Description (as reported):

Created: Jonathan Tse (Spills Action Centre) - 2019/03/09 10:33:18 AM

Caller reports:

s.21

- A lot of black smoke coming from Algoma Steel
- The caller lives [REDACTED] and it is still visible
- The caller is concerned it may be a fire
- The caller cannot detect any odours and it is not causing her any adverse affects

10:40 SAC(jt) to Algoma Steel Security - [REDACTED]

s.20

- Caller reports they currently are in a power outage
- This is causing flaring and smoke
- The caller states another worker is calling it in now to SAC

SAC Action Class:

Pollution Incident Reports (PIRs) and "Other" calls

Non-Standard Procedure:

No

Incident Description:

Last update: Lori Greco (Sault Ste. Marie Area Office) - 2019/04/18 08:48:22 AM

**See IR #1433-BA4LCB

Incident Description Continuation:

Not Available

Incident Update:

Not Available



Photo 1: Heavy emissions from ASI on March 09, 2019 emissions event due to a total loss of power.


POTENTIAL CONTAMINANTS RELEASED FROM COKE OVEN GAS (COG) EMISSIONS		
	EMISSION TYPE	IMPACTS
	Carbon Dioxide (CO ₂)	GHG
	Carbon Monoxide (CO)	Health/GHG
	Methane (CH ₄)	GHG
	Nitrogen Oxide (as NO ₂)	Health/GHG
	Particulate Matter (PM 44)	Nuisance
	Particulate Matter (PM 2.5, PM 10)	Health
	Trace Metals (Cadmium, Arsenic, Mercury)	Health
	Sulphur Dioxide (SO ₂)	Health/GHG
	Volatile Organic Compounds (VOCs) (Benzene)	Health
	Polyaromatic Hydrocarbons (PAHs) (Benzo-a-pyrene, BaP)	Health
	Tars/Light Oils (as Vapours)	Health

Photo 2: Potential contaminants released from coke oven gas (COG) and their impacts.

From: [Dorscht, Ron \(MECP\)](#)
To: [Greco, Lori \(MECP\)](#); **s.20**
Cc: **s.20**
Subject: Re: Saturday March 9th Spills due to power outage.
Date: March 9, 2019 12:14:45 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[AlgomaSteel_primary_positive_RGB_ef3145cf-b759-4b34-bf68-455dd965f58b.png](#)
[Twitter_db107d30-9ca4-4948-8894-e0361976f375.png](#)
[LinkedIn_20d237f3-8e51-4c62-bdd6-f908a8950784.png](#)

We have initiated a SAC callout...Lori will be attending

Ron Dorscht
 Supervisor
 Ministry of Environment, Conservation, and Parks
 Sault Ste. Marie
 705-942-6322

From: **s.20**
Sent: Saturday, March 9, 2019 12:12:18 PM
To: Dorscht, Ron (MECP); Greco, Lori (MECP)
Cc: **s.20**
Subject: Saturday March 9th Spills due to power outage.

Hi Ron and Lori,

From 9:30Am to 10:30 AM the steelworks lost all power. Please note around this time the entire city experienced a power bump. During this the Main Water Filter Plant saw an approximate 36 Minute bypass to the river. **s.20** and myself arrived at approximately 10:45 AM. When we arrived at the filter plant basin levels were returning to normal. We were unable to grab a sample during the time of the bypass however we did grab a sample of the basin which would be indicative of conditions during the bypass.

Additionally during the outage , cokemaking lost all power and steam to the batteries. This means they lost all suction and all batteries were exhausting to the air.

At 10:53 AM SAC was notified and two reports were filed for the aforementioned spills. Please reference the following:

MWFP bypass to river : [Ref # 7753-BA4LNO](#)

Cokemaking Spill to Air : [Ref # 8850-BA4LXU](#)

At this current time cokemaking is no longer in an emergency situation however they still do not have steam. Due to this, all batteries are currently flaring coke oven gas. Cokemaking is expecting steam back very shortly and will then resume normal operations.

We will be meeting with operations regarding both incidents and will be providing you a detailed report



Photo 3: Raw yellow coking gases being released from No. 8 and 9 coke oven batteries (Mar09/19).



Photo 4: Flaring of coking gases from No. 8 and 9 coke oven batteries (Mar09/19).

Greco, Lori (MECP)

From: Greco, Lori (MECP)
Sent: March 9, 2019 12:32 PM
To: Dorscht, Ron (MECP)
Subject: Re: ALGOMA

K

Get [Outlook for iOS](#)

From: Dorscht, Ron (MECP)
Sent: Saturday, March 9, 2019 12:20:10 PM
To: Greco, Lori (MECP)
Subject: ALGOMA

Check downwind for particulate in neighborhood....and grab samples if you can...Apparently blowing into Bayview

Ron Dorscht
Supervisor
Ministry of Environment, Conservation, and Parks
Sault Ste. Marie
705-942-6322

Greco, Lori (MECP)

From: Greco, Lori (MECP)
Sent: May 9, 2019 12:31 PM
To: Speers, Christina
Subject: RE: March 9, 2019 particulate sample results

Yes, it is.

Lori Greco

Senior Environmental Officer
Ministry of the Environment, Conservation and Parks
 70 Foster Drive, Suite 110
 Sault Ste. Marie, ON, P6A 6V4
 P (705) 942 6318
 F (705) 942 6327

From: Speers, Christina <christina.speers@pc.ola.org>
Sent: May 9, 2019 12:20 PM
To: Greco, Lori (MECP) <Lori.Greco@ontario.ca>
Subject: RE: March 9, 2019 particulate sample results

Lori,

Is this report a matter of public record should anyone request to see it directly?

Thanks!

Christina

From: Greco, Lori (MECP) <Lori.Greco@ontario.ca>
Sent: May 9, 2019 12:15 PM
To: Speers, Christina <christina.speers@pc.ola.org>
Subject: March 9, 2019 particulate sample results

Hi Christina,

As discussed, please see the attached results for the particulate sample collected March 9, 2019. Please feel free to share as needed.

Thanks,
 Lori

Lori Greco

Senior Environmental Officer
Ministry of the Environment, Conservation and Parks
 70 Foster Drive, Suite 110
 Sault Ste. Marie, ON, P6A 6V4
 P (705) 942 6318
 F (705) 942 6327



s.20

Manager
Environment Control

April 26, 2019

Ron Dorscht
Ministry of the Environment, Conservation and Parks
70 Foster Drive, Suite 110
Sault Ste. Marie ON P6A 6V4

Re: March 9th, 2019 Power Failure Summary Report

Dear Mr. Dorscht,

This summary report is being submitted in support of the initial report of the March 9th, 2019 power failure that occurred at Algoma Steel's site. This report summarizes the root cause of the incident as determined by thorough internal investigation and the corrective and preventative actions that are being taken to mitigate risk of recurrence.

Root Cause

On Saturday March 9th at 9:32am, a 34.5kV cable termination failed on the 301-1/2 tie line from Bus 301 to Bus 302 causing a total loss of commercial power to Algoma Steel. This termination failure has been confirmed as the root cause of the outage. The failure resulted from the use of older style technology which deploys mineral oil filled bushings and has shown to be prone to cause leakage current to flow to ground, which was the case on March 9th.

To address this issue and prevent a recurrence, all cable terminations on the 34.5kV ring bus at Bus 301 will be changed and replaced with newer technology, namely silicone rubber cable terminations. This work will be completed by May 15, 2019.

Risk Mitigation

When the cable termination failed, a chain of events resulted in the loss of cooling water and steam to the operation and a delayed system recovery. Specifically, the primary differential protection failed to operate and isolate the fault, causing back-up overcurrent protection to operate and isolate power from the utility. Due to the magnitude and duration of the fault, the exciters for #3, #4, and #5 generators tripped due to under voltage. #3 and #4 generators normally feed the pump house during a commercial power outage and their loss resulted in loss of mill cooling water. Boiler House auxiliary power was lost due to #2 Generator tripping out on overcurrent protection.

Algoma Steel Inc. | 105 West Street, Sault Ste. Marie, ON, Canada P6A 7B4 | T: 705-945-2351 F: 705-945-2203 | algoma.com

YOUR PARTNER IN STEEL. SINCE 1901

002131

s.20

Greco, Lori (MECP)

From: Greco, Lori (MECP)
Sent: April 3, 2019 9:48 AM
To: [REDACTED]
Cc: [REDACTED] Dorscht, Ron (MOECC)
Subject: RE: Wind Rose

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Tracking:	Recipient	Delivery
	[REDACTED]	
	Dorscht, Ron (MOECC)	Delivered: 04/03/2019 9:48 AM

Hi [REDACTED]

As previously requested, can you send or have [REDACTED] send me the AAQM data for March 9, 2019? Min/max/average, as well as a breakdown by sample grab, eg. Every minute (not sure what the sampling interval is) for both monitoring stations?

Please send me the information asap. We continue to get questions from the public and local MPP's office, as they are also getting questions from the public.

Do you know when you will be able to provide a final report for the events and follow-up actions from the March 9th, 2019 power outage?

[REDACTED]

As a follow up to my voicemail this morning, if you have any information regarding known/expected emissions from coke oven gas flaring it would be very helpful.

Thanks for your help!

Lori

Lori Greco

Senior Environmental Officer
Ministry of the Environment, Conservation and Parks
 70 Foster Drive, Suite 110
 Sault Ste. Marie, ON, P6A 6V4
 P (705) 942-6318
 F (705) 942-6327

From: [REDACTED]
Sent: March 29, 2019 2:11 PM
To: Greco, Lori (MECP) <Lori.Greco@ontario.ca>; [REDACTED]
Subject: Wind Rose

Hello

Greco, Lori (MECP)**s.20**

From: [REDACTED]
Sent: March 9, 2019 6:38 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Air Monitoring Stations

Hi Lori,

I have been to our monitoring stations at Patrick Street and Wallace Terrace with [REDACTED] of GHD.

At Wallace Terrace we recalibrated the TRS and our confident that is accurate. We have not had any exceedences, however we were noticing values around 9ppb (limit is 10ppb). For the PM10, we were receiving data showing 0. When we investigated we found the units were in milligrams, not micrograms. For example, 0.003mg which was rounding to 0. It should have been 3ug. [REDACTED] will correct this and issue a report. We will have a few PM10 exceedences, but not by much (10 or 11ug).

At Patrick Street the TRS is showing low, which could be correct. However I asked Sarah to recalibrate that as well, even though it was done recently.

So, it looks like we have all the data and a few PM10 exceedences for today.

Regards,

[REDACTED] | Environment Ctrl Officer (Cokemkg) | Environment Control |
[REDACTED]

Algoma Steel Emissions Concerns

Selva Rasaiah <selvarasaiah@hotmail.com>

Sun 11/08/2019 1:37 PM

To: TERRY.SHEEHAN@PARL.GC.CA <TERRY.SHEEHAN@PARL.GC.CA>; ross.romano@pc.ola.org <ross.romano@pc.ola.org>; mayor.provenzano@cityssm.on.ca <mayor.provenzano@cityssm.on.ca>; cspooney@algotmapublichealth.com <cspooney@algotmapublichealth.com>

6 attachments (11 MB)

March09_Timeline.pdf; Iron Emissions of No. 07 Blast Furnace_ACLC.pdf; ASI USA Hazes.pdf; ASI AirMonitoringStation_B 001.jpg; ASI Baghouse 25M 001.jpg; BF7andBaghouse.jpg;

Hello everyone,

I am a concerned resident and former third-party (Pinchin Ltd.) emissions auditor of the coke oven batteries at Algoma Steel Inc. in Sault Ste. Marie. I have many concerns about how the audits are conducted and the enforcement compliance issues regarding their emissions. I was not satisfied with the conduct at the facility and brought those concerns to the environmental staff at Algoma and Pinchin Ltd. SSM. I have been independently monitoring and recording Algoma's emissions for over 90 days since their major emissions event on March 09, 2019. I met with Ron Dorscht and Lori Greco on Thursday July 07, 2019 to discuss my concerns. The meeting was insightful, but I disagree with the local ministry and I believe that Algoma Steel Inc. should be prosecuted for the events on March 09 (Ministry Report 1433-BA4LCB) and their subsequent violations. These are in addition to their consistent coke oven battery stack opacity violations that produce high levels of particulate. I took videos of the event on March 09, 2019 that were supplied to Algoma Steel Inc., City of Sault Ste. Marie, Pinchin Ltd, and SSM MECP. You will see that the emissions were extensive and resulted in particulate being deposited into the surrounding neighborhoods. Also, Algoma's pumps to their Wastewater Treatment Facility failed to operate due to lack of power and they were presumed to have discharged untreated water into the St. Mary's River. I told the local ministry in my last meeting that the time and methodology of the collection of the particulate (in the Bayview Area) and water were insufficient. Also, the fact that Algoma Steel waited over 40 minutes before notifying the Spills Action Centre (SAC) is concerning considering how bad the emissions were even at 9:55 (the call was made at 10:38). According to Algoma, the total power loss was due to a cable termination failure using older style technology prone to leaking current in their power supply.

I have applied through FOI for emissions information and a 2013 soil report (in Bayview Area) since Algoma Steel has not been willing to provide simple information like the actual values for their benzene and benzene(a)pyrene in their latest report. Mr. Fred Post (Environmental Manager) claims the numbers in their report are "worst case scenario" and not the actual numbers. My attempts to acquire the actual numbers from Mr. Post have not been successful.

Mayor Provenzano and city counsellors have not been willing to discuss any concerns regarding Algoma's emissions. I have also tried to obtain the contact information for the other members of the Algoma Community Liaison Committee through the City of Sault Ste. Marie (Catherine Taddo) and Algoma Steel Inc. (Chris Galizia and Fred Post), and no one has been willing to supply it. There appears to be little concern or scrutiny of their emissions.

I was wondering if the local ministry or Algoma gave the CLC further information regarding my concerns as I noticed that their presentation slide (from their latest meeting) doesn't mention public complaints regarding March 09 other than a noise complaint. I also gave the ministry a picture of a very large iron emissions on April 30, 2019. I am very disappointed that I have been dealing with Algoma, the City and the local MECP since March 11, 2019 and no one even mentioned an opportunity to meet or speak with the Algoma CLC. I have attached a few things for everyone to review. I included information regarding the No.07 blast furnace to emphasize that the permanent bag house was either not working or not connected (there are many smaller events but only larger events are presented). It is very clear that the numerous blast furnace emissions were not simple "operational upsets" but deficiencies in their operations. The permanent bag house appears to be fully operational now.

I have spent considerable time and effort to help protect the environment and the health of the citizens of Sault Ste. Marie. A lot of Algoma Steel emissions head in easterly directions from their facility and you should note that the monitors are all on the west side. The air monitoring equipment needs to be addressed in the west as well considering a report in Feb. 2018 by a third-party auditor (GHD) which states regarding all the dust fall jars: "Dust fall jars do not meet MECP siting criteria for locations Bonney Street, Spadina Avenue, Wilding Avenue and Adelaide Street, therefore results may be suspect". The stations are maintained by Algoma Steel and the local MECP says they do periodically inspect them. Algoma Steel and the local MECP have yet to provide the reasons they don't meet the MECP siting criteria and if there will be some resolution to this issue.

As of July 29, 2019, Mr. Don Earl of the Environmental Enforcement and Compliance branch is now reviewing these concerns. He has been advised that the US EPA will also be contacted in a few weeks for a response (requested by concerned Sault Michigan residents). I feel that the lack of environmental due diligence and willingness to address public concerns in Sault Ste. Marie is very concerning. I hope you will give serious thought and acknowledgment to my concerns. Please share this information with the members of the Algoma CLC not included on this email so they can be properly informed.

Thank you
Have good day.

Selva Rasaiah

Note: No response has been received from M.P. Terry Sheehan to date.

Why is Algoma Steel lighting the west end with flared coke oven gas?

The problem should be fixed by early next week, the company says

about 14 hours ago By: [David Helwig](#)



SooToday reader Janice Anderson snapped this photo of huge flames over Algoma Steel early in the morning of Friday, Oct. 18, 2019. Photo used by permission.

A tiny, ruptured steam line at Algoma Steel is responsible for the spectacular gas flares that have periodically lit up the Sault's west end over the past week.

Brenda Stenta, the steelmaker's manager of communications and branding, says the flaring should stop early next week.

"On Friday, Oct. 18, 2019, we had a one-inch steam line rupture in the by-products plant which resulted in a loss of power to some related processes," Stenta tells SooToday.

"As per protocol, the cokemaking battery flares were lit – two per battery."

"We have three batteries. The flares are a necessary safety mechanism for the safe combustion of surplus fuel when the process is unable to recycle the fuel in normal course through the boilers and the cogeneration plant. Once power was restored the battery flares were extinguished," she said.

"The coke oven gas stack is flared periodically when coke oven gas exceeds operating demand as is the case currently while the booster that distributes coke oven gas to the boilers gets repaired."

Stenta added: "When the booster comes back online early next week, the flare will not be required."

The Ontario government's [hourly air quality measurements](#) for Sault Ste. Marie show spikes in fine particulate matter (PM2.5) corresponding to major flares reported by our readers on Friday, Oct. 18 and Sunday, Oct. 20, but Stenta insists particulate levels aren't related to the coke oven flares.

"While particulate matter emissions were somewhat elevated on Friday during the outage (particulate matter - PM10 24-hour rate at our Wallace Terrace air monitoring station measured 12 micrograms per cubic metre that day, and peaked at 44), they have since returned to normal levels."

"Today the total PM10 24 hour rate is measuring at 0 micrograms per cubic metre. The Ministry of Environment, Conservation, and Parks ambient air quality criterion for PM10 is 50 micrograms per cubic metre for a 24-hour period, which is based on a Canada-wide standard," Stenta said.

Source: <https://www.sootoday.com/local-news/why-is-algoma-steel-lighting-the-west-end-with-flared-coke-oven-gas-1763598#:~:text=The%20flares%20are%20a%20necessary,boilers%20and%20the%20cogeneration%20plant.>


<div style="text-align: center;">  <p>Environmental incidents resulting from operations</p> </div>			
October 19	Cokemaking	Stack emission #7 battery, 20 events	Ovens to be inspected
October 19	Cokemaking	Stack emission #8 battery, 25 events	Ovens to be inspected
October 19	Cokemaking	Stack emission #9 battery, 15 events	Ovens to be inspected
October 18	By-Products	400 lb steam line rupture caused a power loss in the BP resulting in the south raw liquor tank and tar decanters to overflow and entered storm sewers.	Area was cleaned up, storm sewer was bermed to prevent further inflow and power was restored.
October 18	By-Products	400 lbs steam line rupture, power loss cause loss of suction, battery flares lit. SAC Number 0008-BH3DGT	Repairs on-going, power restored, suction re-established.
October 18	Cokemaking	Stack emission #7 battery, 4 events	Ovens to be inspected
October 18	Cokemaking	Stack emission #8 battery, 4 events	Ovens to be inspected
October 18	Cokemaking	Stack emission #9 battery, 4 events	Ovens to be inspected
October 17	Cokemaking	Stack emission #7 battery, 28 events	Ovens to be inspected
October 17	Cokemaking	Stack emission #8 battery, 25 events	Ovens to be inspected
October 17	Cokemaking	Stack emission #9 battery, 16 events	Ovens to be inspected
October 16	Cokemaking	Stack emission #7 battery, 23 events	Ovens to be inspected
October 16	Cokemaking	Stack emission #8 battery, 23 events	Ovens to be inspected

Photo 5: Portion of ASI's Process Upset Table showing the event of October 18, 2019

Note: There was no acknowledgement by ASI and the MECP or any records in ACLC Meeting Minutes regarding public complaints, air emissions or contamination to water from this event.



Photo 6: Heavy emissions and flaring from ASI on October 18, 2019 due to a pipe burst (Soo Today)


POTENTIAL CONTAMINANTS RELEASED FROM FLARING RAW COKE GAS		
	EMISSION TYPE	IMPACTS
	Carbon Dioxide (CO ₂)	GHG
	Carbon Monoxide (CO)	Health/GHG
	Methane (CH ₄)	GHG
	Nitrogen Oxide (as NO ₂)	Health/GHG
	Particulate Matter (PM 44)	Nuisance
	Particulate Matter (PM 10)	Health
	Particulate Matter (PM 2.5)	Health
	Sulphur Dioxide (SO ₂)	Health/GHG
	Volatile Organic Compounds (VOCs) (Benzene)	Health
	*VOCs include many compounds including benzene	

Photo 7: Potential contaminants released from the flaring of raw coke oven gas and their impacts.



Osprey eating a local fish from the St. Mary's River near Algoma Steel Inc. on June 04, 2020.