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Stelco Inc. – Lake Erie Works Environmental Management System and Community Engagement Report January – December 2019

On March 27, 2015, Lake Erie Works received a Site-Specific Standard Approval for suspended particulate matter from the Ministry of Environment, Conservation and Parks (MECP) (Approval No. 204-15-rv0). As a part of this Site-Specific Standard Approval, the MECP issued a related Order (Order No. 204-15-order-rvo) which set visible emission limits for coke plant doors, lids, offtakes and charging.

This Environmental Management System and Community Engagement Report summarizes information as required per Item 3.23.2 of the Order covering the period January 1 to December 31, 2019.

In July 2019, Stelco commenced a voluntary significant capital rehabilitation project for the coke battery. In connection with the rehabilitation work which was expected to be completed in 12 to 18 months, the Company's management is evaluating various alternatives to expedite completion of the project and to completely overhaul the coke battery by replacing all end flues and replacing the refractory brick. A plan setting out operating practices during this project was submitted and approved by the MECP to minimize discharges during battery repairs. During this period, environmental performance results related to the Order are not reflective of typical performance due to on-going significant battery repairs.

A summary of the information required by Item 3.3 with respect to the notice(s) required to be given.

On July 30th the Lake Erie Works battery began to exceed the 30-day rolling average limit for offtake emissions. These emissions were related to ongoing maintenance work at the battery required for sustainable long-term operation of the facility. The MECP District Manager was notified of the exceedances.

A summary of the information required by paragraph 6 of Item 3.9 with respect to the record(s) required to be made.

There were 114 exceedances of the daily thresholds, three for coke battery topside port lids and 111 for offtakes. The topside port lid threshold in 2019 was 2%. The threshold for offtakes in 2019 was 5%. For both lid and off-take exceedances the operational adjustment made was in applying sealant to the affected areas. There were no exceedances with respect to oven door leaks. During this period, environmental performance results are not reflective of typical performance due to on-going significant battery repairs.

A summary of the information required by paragraph 7 of Item 3.14 with respect to the record(s) required to be made.

There were eight incidents in which operational adjustments were required related to pushing emissions. In 2019 the threshold for pushing emission opacity was 40%. Operational adjustments included cleaning the heating flues, adjusting the battery temperature and patching holes in the oven walls.



The minutes of the CLC meetings and any related follow-up actions.

The minutes of the 2019 CLC meetings can be retrieved at Stelco's website:
<https://www.stelco.com/community/environment/lake-erie-works-clc>