



October 2, 2024

Ministry of the Environment, Conservation and Parks
777 Bay St, College Park 5th Flr
Toronto, ON
M7A 2J3
enviopermissions@ontario.ca

Re: ERO #019-9084: Requests for Further Disclosure

We wrote to the Ministry of Environment, Conservation and Parks on September 19, 2024 to request the following disclosure of information to respond to ERO#019-9084:

- 1- Unredacted copies of all supporting documentation filed by Algoma Steel Inc. for this proposal;
- 2- A copy of the proposed amendments to Algoma Steel's Environmental Compliance Approval;
- 3- Unredacted copies of Ministry of Environment, Conservation and Parks' records to review this application to date;
- 4- Detailed information about the environmental impacts of the proposal, including ongoing emissions during the transition period, emissions from construction activities, expected emissions after the transition to an electric arc furnace, and detailed information on how this proposal relates to outstanding applications for site specific standards for air emissions at the facility.

We have been provided with three PDF documents to date, which include a 1-page executive summary of an Acoustic Assessment Report, an executive summary of the Emission Summary and Dispersion Modelling Report, and a copy of the application checklist for an Environmental Compliance Approval ("ECA"). These documents provide little information about the details of the application for a site-wide ECA for air and noise emissions and are not sufficient for the public to make meaningful comments on the proposal.

We are therefore writing to reiterate our urgent request for the information requested above, and make the following specific disclosure requests:

Air Emissions – Abatement Plan

- 1- A full, unredacted copy of all of Algoma Steel Inc's Abatement Plans for Air Emissions. One version of an Abatement Plan is referred to in its Emission Summary and Dispersion Modelling Executive Summary Report at pages 1-2. We are requesting full, unredacted copies of all Abatement Plans for Air Emissions for the last twenty years (October 1,

2004 – October 1, 2024). This request encompasses draft reports and previous versions of the Abatement Plans.

Emission Summary and Dispersion Modelling (“ESDM”)

- 2- A full, unredacted copy of all Emission Summary and Dispersion Modelling Reports for Algoma Steel Inc.’s application for an Environmental Compliance Approval (ERO #019-9084) at 105 West Street in Sault Ste. Marie. This request encompasses draft reports and previous versions of the ESDM report.
- 3- A full, unredacted copy of all Dispersion Modelling input and output files prepared for Algoma Steel Inc. in accordance with s.26 of O. Reg 419/05 for the application for an Environmental Compliance Approval (ERO #019-9084).

Acoustic Assessment

- 4- A full, unredacted copy of all Acoustic Assessment Reports for Algoma Steel Inc.’s application for an Environmental Compliance Approval (ERO #019-9084) at 105 West Street in Sault Ste. Marie. This request encompasses draft reports and previous versions of the Acoustic Assessment Report.
- 5- We are requesting the full reports including all required information listed on page 2 of the Acoustic Assessment Report Check-List and raw data used to complete the reports.
- 6- A full, unredacted copy of all Noise Abatement Action Plans referenced in the Executive Summary of the Acoustic Assessment Report. This request encompasses draft reports and previous versions of the Noise Abatement Action Plans.

Application Documents

- 7- Detailed project description and process description
- 8- Site Plan(s)
- 9- Scaled area location plan(s) with geo-referencing points identified
- 10- Proof of Consultation/ Notification
- 11- Zoning Map
- 12- Copies of forms requesting O. Reg 419/05 instruments and supporting documentation
- 13- Explanation for Confidentiality

Comment Deadline Must be Extended

The comment deadline, which is currently set for November 4, 2024, must be extended for at least 45 days after the requested supporting documentation and the proposed amendments to the ECA, or the language proposed for a new ECA, are made available to the public.

The proposal should be re-posted on the Environmental Registry with the requested supporting documentation and the details of the proposed amendments to the ECA or the language of the new ECA to be considered.

A decision should not be made on this proposal until at least 45 days after supporting documentation and the details of the proposed amendments to the ECA or the language for the new ECA are provided.

Sincerely,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Jacqueline Wilson
Counsel

cc. Tyler Schulz, Assistant Auditor General, Commissioner of the Environment