

## Toledo Coke Plant

*Permit review, comments and tentative approvals before the permit was submitted and the public remained uninformed about the 17 million pounds of pollutants proposed for the air.*

1. On November 23, 2003 Robert Hodanbosi, Ohio E.P.A. wrote to the US Coking plant consultant: "I am writing as a follow up on the meeting with my staff concerning the possibility of constructing a new coke plant to be located in Lucas County, Ohio. **I wish to extend our support and assistance in the development of an acceptable permit application.**" The letter goes on to urge the application be filed as soon as possible because Lucas County will be redesignated to attainment for sulfur dioxide. The letter also cautions about the U.S.E.P.A. requirements and makes recommendations on how to get around the new requirements by filing for the permit by April 15, 2004. This letter in support is written before any permit is filed and any public discussion of the environmental impacts occurs.
2. February 12, 2004 Preapplication meeting discussing many issues already reviewed including: the possible need for a CSX separate permit, questions on emissions from loading from barges; cooling towers
3. Feb. 12, 2004 meeting requesting the Mayor of Toledo to sign a letter requesting a NOx waiver. It is unknown if this letter has been sent.
4. February 26, 2004 Toledo Environmental Services approves a 'draft protocol' without all of the areas completed to rush the permit approval process.
5. February 27, 2004 draft letter to U.S.E.P.A. requesting support for the project to be signed by Ohio E.P.A. Director Chris Jones. It is unknown if any letter was sent or call was made.
6. March 12, 2004 memo referencing the Indiana Harbor Coke Company where state inspectors saw visible emissions with controls. It is unknown if the controls are in the Toledo permit and if this problem is corrected.
7. March 12, 2004 memo indicates that the process is from Sun Coke and references 'our' operating plants at Jewell Coal and Coke and Indiana Harbor. References are also made to the Haverhill, Sun Coke, permit in Portsmouth, Ohio. This facility appears to be under construction.
8. March 17 – Batelle works with OEPA on modeling – decide to use Haverhill permit and redline changes
9. March 23 scanned proposed permit documents on calculations – EPA reviewers sent comments and recommendations
10. March 23 permit signature questions – who can sign – who is authorized for US Coking Group LLC – not sure of the company structure
11. March 24 questions regarding which benzene regulations would have to be met
12. **On March 26 US Coke provides a copy of the proposed permit to Toledo Environmental Services and Ohio E.P.A. It is obvious that both had already received and reviewed the proposed permit long before submission.**

Below is an informational flier – for now – that can be passed out - then a hearing flier maybe  
 Still thinking about this – but there is a fact sheet now to help with education



**U.S.Coking Group Oregon/Toledo, Ohio**

*What Pollutants We Will Breathe: 7 million pounds per year (Source: Permit pg. 9)*

What will be added to the air we breathe?(Source – Permit)

<b><u>Pollutants</u></b>	<b><u>Symbol</u></b>	<b><u>Impact (Source American Lung Web Site)</u></b>	<b><u>Pounds Per Year</u></b>
Small Particulates (Same as below but smaller particles)	PE	Lodges in Lungs – cannot escape	1.564 million
Large Particulates – Combination of fine solids such as dirt, dust, pollens, molds, ashes, soot)	PM10	Harmful for those with lung disease such as asthma , bronchitis and emphysema	634,000
Sulfur Dioxide	SO2	Effects on breathing, respiratory, lung defenses, asthmatics, cardiovascular	1.864 million
Nitrogen Oxide (Light brown gas that can be component of urban haze)	NOx	Frequent exposure may cause acute respiratory disease in children	2.078 million
Carbon Monoxide (Colorless odorless)	CO	Most serious for those with cardiovascular disease – can cause visual impairment, reduced dexterity etc	552,000
Lead	Lead	Can adversely effect kidneys, liver, nervous system	272,000
Volatile Organic Compounds	VOC	Toxic and cancer causing chemicals	158,000
HAPs			11,800
		<b>TOTAL</b>	<b>7.134 million</b>

**US Coking – using Sun Coke Technology**

240 coke ovens  
 2.2 million tons of coal to produce 1.5 million tons of coke.  
 Heated to over 2000 degrees Fahrenheit

*There will be a public comment period and a public hearing if requested. Ohio E.P.A. Chief Robert Hodanbosi, Division of Air Pollution Control in a letter dated November 25, 2003, states:*

**I wish to extend our support and assistance in the development of an acceptable permit application.” (referring to the Lucas County Coke Plant)** The letter goes on to urge the application be filed by April 15, 2004 because Lucas County will be redesignated to attainment for sulfur dioxide and therefore more stringent costly requirements would be required. The OEPA Chief of air wrote this support letter before any permit was filed and before he heard any public comment

**US Coking vs. Haverhill**

**(The Toledo permit substantially copies the Haverhill, Portsmouth, Ohio permit approved by Ohio E.P.A. in December 2003)**

	<b>Coal Rec'd/Yr</b>	<b>Coke Produced/Yr</b>	<b>Est. Total Investment.</b>	<b>Estimated Job Creation</b>
Haverhill**	3.5 million tons	2.5 million tons	\$140 million	64
Toledo*	2.1 million tons	1.4 million tona	\$200-250million	Up to 350

(\*Source Toledo Blade,Permit App. \*\* Source Fort Wayne, ODOD)

This coke plant would operate 24 hours per day 365 days per year – Noise levels are unknown – number of trucks unknown – water use and discharge unknown - investors unknown