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Air Quality Division
Detroit Office**VIA Certified Mail and EMAIL**

February 23, 2021

Ms. April Wendling
Supervisor, Detroit District Office
Michigan Department of Environment, Great Lakes, and Energy
Cadillac Place, Suite 2-300
3058 West Grand Blvd
Detroit, MI 48202

Sue Thelen
Air Quality Division - Permit Section
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30260
Lansing, MI 48909-7760

Subject: **Notification of Name Change for AK Steel Corporation – MI-ROP-8640-2016a**

Dear Ms. Wendling and Ms. Thelen:

We are writing to notify you of a name change impacting the AK Steel Corporation facility located at 4001 Miller Road in Dearborn, Michigan.

On February 2, 2021, AK Steel Corporation changed its name to Cleveland-Cliffs Steel Corporation. Attached for your reference is the Delaware Secretary of State information related to the name change. This transaction will not result in any ownership or operational changes with respect to the facility.

MI-ROP-8640-2016a is currently held by AK Steel Dearborn Works and forms C-001 and M-001 are attached. We respectfully request that the name of the regulated entity on this air permit be updated to reflect the new facility name of Cleveland-Cliffs Steel Corporation Dearborn Works.

Please do not hesitate to contact Jim Earl at (313)-845-2317 with any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "LaDale Combs", written over a white background.

LaDale Combs
General Manager – Dearborn Works

attachments



RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.


This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN A8640
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Stationary Source Name AK Steel Dearborn Works	
City Dearborn	County Wayne

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to <u>1</u>	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal. AI <u>N/A</u>	

CONTACT INFORMATION	
Contact Name James Earl	Title Environmental Affairs Manager
Phone number 313-845-3217	E-mail address jim.earl@aksteel.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name LaDale Combs			Title General Manager	
Mailing address 4001 Miller Road				
City Dearborn	State MI	ZIP Code 48120	County Wayne	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 _____ Signature of Responsible Official			<u>2/23/21</u> _____ Date	



RENEWABLE OPERATING PERMIT M-001: RULE 215 CHANGE NOTIFICATION RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN A8640	2. ROP Number MI-ROP-A8640-2016a	3. County Wayne
4. Stationary Source Name AK Steel Dearborn Works		
5. Location Address 4001 Miller Road	6. City Dearborn	
7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i>		
<input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14 <input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14 <input checked="" type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions. <input type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14 <input type="checkbox"/> Rule 216(3) Significant Modification. Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions. <input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i>	02/02/2021	9. Change in emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i> AK Steel Corporation name has been changed to Cleveland-Cliffs Steel Corporation Facility name is now Cleveland-Cliffs Steel Corporation Dearborn Works		
11. New Source Review Permit(s) to Install (PTI) associated with this application?		<input type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, enter the PTI Number(s) _____ - _____ - _____ - _____ - _____ - _____		
12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i>		
a. Is the change identified above in compliance with the associated applicable requirement(s)?		<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)?		<input type="checkbox"/> Yes <input type="checkbox"/> No
c. If the change includes a future applicable requirement(s), will timely compliance be achieved?		<input type="checkbox"/> Yes <input type="checkbox"/> No
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI
14. Contact Name	Telephone No.	E-mail Address
James Earl	313-845-3217	jim.earl@aksteel.com
15. This submittal also updates the ROP renewal application submitted on ____/____/____		<input type="checkbox"/> Yes <input type="checkbox"/> N/A
<i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		

Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "AK STEEL CORPORATION", CHANGING ITS NAME FROM "AK STEEL CORPORATION" TO "CLEVELAND-CLIFFS STEEL CORPORATION", FILED IN THIS OFFICE ON THE SECOND DAY OF FEBRUARY, A.D. 2021, AT 12:59 O`CLOCK P.M.




Jeffrey W. Bullock, Secretary of State

2190200 8100
SR# 20210302971

Authentication: 202438706
Date: 02-03-21

You may verify this certificate online at corp.delaware.gov/authver.shtml

**CERTIFICATE OF AMENDMENT
OF
CERTIFICATE OF INCORPORATION**

AK Steel Corporation (the "Corporation"), a corporation organized and existing under the Delaware General Corporation Law, as amended, DOES HEREBY CERTIFY:

FIRST: That the board of directors of the Corporation, by the unanimous written consent of its board of directors, adopted resolutions proposing and declaring advisable the following amendment to the Certificate of Incorporation of the Corporation.

RESOLVED, that the Corporation's Certificate of Incorporation be amended so that Article FIRST thereof shall read in its entirety as follows:

FIRST: The name of the Corporation is:

Cleveland-Cliffs Steel Corporation

SECOND: That in lieu of a meeting, the sole stockholder has given its written consent to said amendment in accordance with the provisions of the Delaware General Corporation Law.

THIRD: That the aforesaid amendment was duly adopted in accordance with the applicable provisions of the Delaware General Corporation Law.

IN WITNESS WHEREOF, the Corporation has caused this Certificate of Amendment to be executed by its duly authorized officer effective January 28, 2021.

AK STEEL CORPORATION

By: James D. Graham
James D. Graham
Vice President, General Counsel and
Corporate Secretary

Cleveland-Cliffs Steel LLC
CONSENT TO USE OF NAME

The undersigned, Cleveland-Cliffs Steel LLC, a Delaware limited liability company, hereby consents to the use of the name Cleveland-Cliffs Steel Corporation, a Delaware corporation in the State of Delaware.

Dated: February 2, 2021

CLEVELAND-CLIFFS STEEL LLC

By: 

Name: Adam D. Munson

Title: Assistant Secretary

200 Public Square, Suite 3300

Cleveland, OH 44114



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Air Quality Division
Detroit Office

February 23, 2021

Ms. April Wendling
Supervisor, Detroit District Office
Michigan Department of Environment, Great Lakes, and Energy
Cadillac Place, Suite 2-300
3058 West Grand Blvd
Detroit, MI 48202

Sue Thelen
Air Quality Division - Permit Section
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30260
Lansing, MI 48909-7760

Subject: **Notification of Name Change for AK Steel Corporation – PTI Nos. 120-16, 08-08A, 84-11**

Dear Ms. Wendling and Ms. Thelen:

We are writing to notify you of a name change impacting the AK Steel Corporation facility located at 4001 Miller Road in Dearborn.

On February 2, 2021, AK Steel Corporation changed its name to Cleveland-Cliffs Steel Corporation. Attached for your reference is the Delaware Secretary of State information related to the name change. This transaction will not result in any ownership or operational changes with respect to the facility.

PTI Nos. 120-16, 08-08A and 84-11 are currently held by AK Steel Dearborn Works. We respectfully request that the name of the regulated entity on these air permits be updated to reflect the new facility name of Cleveland-Cliffs Steel Corporation Dearborn Works

Please do not hesitate to contact Jim Earl at (313)-845-2317 with any further questions.

Sincerely,

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LaDale Combs
General Manager – Dearborn Works

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Jeffrey W. Bullock, Secretary of State

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FIRST: That the board of directors of the Corporation, by the unanimous written consent of its board of directors, adopted resolutions proposing and declaring advisable the following amendment to the Certificate of Incorporation of the Corporation.

RESOLVED, that the Corporation's Certificate of Incorporation be amended so that Article FIRST thereof shall read in its entirety as follows:

FIRST: The name of the Corporation is:

Cleveland-Cliffs Steel Corporation

SECOND: That in lieu of a meeting, the sole stockholder has given its written consent to said amendment in accordance with the provisions of the Delaware General Corporation Law.

THIRD: That the aforesaid amendment was duly adopted in accordance with the applicable provisions of the Delaware General Corporation Law.

IN WITNESS WHEREOF, the Corporation has caused this Certificate of Amendment to be executed by its duly authorized officer effective January 28, 2021.

AK STEEL CORPORATION


By: James D. Graham
James D. Graham
Vice President, General Counsel and
Corporate Secretary

Cleveland-Cliffs Steel LLC
CONSENT TO USE OF NAME

The undersigned, Cleveland-Cliffs Steel LLC, a Delaware limited liability company, hereby consents to the use of the name Cleveland-Cliffs Steel Corporation, a Delaware corporation in the State of Delaware.

Dated: February 2, 2021

CLEVELAND-CLIFFS STEEL LLC

By: 
Name: Adam D. Munson
Title: Assistant Secretary
200 Public Square, Suite 3300
Cleveland, OH 44114