



January 9, 2015

Mr. Jonathan Lamb
State of Michigan, Department of Environmental Quality
Air Quality Division, Southeast District
2058 W. Grand Blvd, Suite 2-300
Detroit, MI 48202

SENT VIA ELECTRONIC MAIL AND CERTIFIED MAIL

**SUBJECT: United States Steel Corporation – Great Lakes Works
No. 2 BOP Shop Roof Monitor
Violation Notice dated December 12, 2014**

Dear Mr. Lamb,

On or about December 15, 2014, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated December 12, 2014 from the Michigan Department of Environmental Quality (MDEQ) regarding the No. 2 BOP Shop roof monitor. In the notice, MDEQ alleges U. S. Steel exceeded the applicable opacity limit of 20% 3-minute average which would be a violation of MI Rule 336.1364(2) and 40 CFR Part 63 Subpart FFFFF, Table 1.12 as incorporated by reference in Table E-01.18 Section II.2 and Consent Order AQD No. 1-2005, Paragraph 11.A.3(d) and (e). While the Violation Notice requested that U. S. Steel respond to the notice by January 2, 2015, because of the limited availability of personnel, we appreciate that you agreed that a response received on or before January 9, 2015, would be considered timely.

Please note that Paragraph 11.A.3(d) of Consent Order AQD No. 1-2005 states the following, “... *The company shall begin conducting once every two weeks, a Method 9C opacity observation at the roof monitor, for a duration of not less than one full steel cycle (tap to tap), using an independent certified Method 9 observer to verify compliance. The company shall provide, on a monthly basis, to the AQD Southeast Michigan District Supervisor, in writing, a schedule of the date, approximate time and place of the planned Method 9C opacity observations, and who shall conduct them. The date and time will be subject to change based on operating schedules, weather conditions, or other unforeseen conditions. The company shall also submit the results of the method 9C observations to the AQD Southeast Michigan District Supervisor on a monthly basis.*”

U. S. Steel has complied with all requirements established in Paragraph 11.A.3(d) of Consent Order AQD No. 1-2005 and respectfully disagrees that any violation occurred.

As previously mentioned, U. S. Steel is required to submit, on a monthly basis, a report detailing both Electrostatic Precipitator (ESP) and BOP Roof Visible Emission Observations (VEO). On October 21, 2014, U. S. Steel submitted the report for all VEOs conducted within the month of



September, 2014 and self reported four (4) deviations in which the visible emissions observed exceeded the applicable 20% 3-minute average.

The times at which emissions in excess of the 20% 3-minute average were observed were:

- 1.) 9/15/2014 – 8:34 AM – 25%
- 2.) 9/15/2014 – 8:40 AM – 24%
- 3.) 9/15/2014 – 8:46 AM – 25%
- 4.) 9/15/2014 – 8:55 AM – 33%

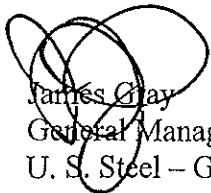
The cause for each reading was immediately investigated. It was determined that the abnormal emissions which occurred at 8:34 AM and 8:40 AM were attributed to a malfunction of vessel 25 thimble steam seal which allowed steam as well as emissions to escape from the vessel and accumulate at the roof monitor. Repairs to the malfunctioning 25 vessel thimble were completed on September 16, 2014 during the #2 BOP down day. The failure of the steam seal was an isolated malfunction and is not likely to reoccur.

Visible emissions at 8:46 AM - 25% resulted from the charging of scrap to 26 vessel and visible emissions at 8:55 AM - 33% resulted from the charging of molten metal to 26 vessel. A skull had built up on the pouring side of the vessel. The resultant condition forces the charge crane operator to charge material from an adjusted position potentially causing some emissions to escape capture by the hood. Removal of the skull was completed on September 16, 2014.

We would be pleased to address any questions or concerns the MDEQ may have. If you have any questions regarding this matter or require additional information, please contact Alexis Piscitelli at 313-749-3900.

I certify that based off information and belief formed after reasonable inquiry, the information provided in this response is true and correct to the best of my knowledge and information.

Sincerely,



James Gray
General Manager
U. S. Steel – Great Lakes Works



Alexis Piscitelli
Director, Environmental Control
U. S. Steel – Great Lakes Works

cc: Dave Hacker (USS)