



March 30, 2016

Ms. Katherine Koster  
State of Michigan, Department of Environmental Quality  
Air Quality Division, Southeast District  
3058 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 March 9, 2016**

Dear Ms. Koster,

On or about March 17, 2016, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated March 9, 2016 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 limitation required by ROP No. 199600132d, Table E-01.18, Section II.2. The Department also alleges such emission were in violation of MI Rule 336.1364(2); 40 CFR Part 63 Subpart FFFFF, and Consent Order AQD No. 1-2005, Paragraph 11.A.3 (d) and (e).

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 January 15, 2016 and February 22, 2016, U. S. Steel submitted the report for all VEOs conducted within the month of December 2015 and January 2016 respectively and self reported four (4) deviations in which the visible emissions observed exceeded the applicable 20% 3-minute average as reported as observed at the BOP Shop roof monitor.

In the report, U. S. Steel identified the following VEOs as deviations:

- 1.) 12/09/2015 – 09:34 to 09:37 – 43%
- 2.) 01/20/2016 – 13:03 to 13:06 – 29%
- 3.) 01/20/2016 – 13:06 to 13:09 – 49%
- 4.) 01/20/2016 – 13:09 to 13:12 – 34%

On December 9, 2015, GLW incurred a 3-minute average opacity reading at the BOP Shop Roof Monitor of 43%. U. S. Steel investigated the incident and discovered the cause of the abnormal emission event was the result of a slopping event which occurred during the heat no. 25-4315 oxygen blow. As the scrap heats up within the vessel and mixes with the molten iron, it liquefies and causes a chemical reaction to occur. Heat no. 25-4315 abnormal chemical reaction caused



the molten metal within the vessel to stop.

On January 20, 2016, GLW incurred three consecutive 3-minute average opacity readings at the BOP Shop Roof Monitor of 29%, 49% and 34%. U. S. Steel investigated the incident and discovered the cause of the abnormal emission event was a boiler door leak on 25 Vessel. The boiler door was being repaired during the time of the observation. The repair was completed on January 20, 2016. Additionally the boiler hood and gas train system were inspected for any other leaks. A small membrane leak was identified and repaired as well on January 20, 2016

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,

A handwritten signature in black ink that reads "James Gray" with a stylized flourish at the end.

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

A handwritten signature in black ink that reads "Alexis Piscitelli" with a stylized flourish at the end.

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

cc: Dave Hacker (USS)