

Great Lakes Works Environmental Dept. No. 1 Quality Drive Ecorse, Michigan 48229 SEP 1 8 2017

Air Quality Division Detroit Office

September 8, 2017

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

Violation Notice dated August 18, 2017

Dear Ms. Koster:

On or about August 24, 2017, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated August 18, 2017 from the Michigan Department of Environmental Quality (MDEQ) regarding the No. 5 Pickle Line Fume Scrubber. In the notice, MDEQ alleges U. S. Steel did not operate the No. 5 Pickle Line Fume Scrubber at or above the required minimum recirculation and makeup water flow rates on multiple occasions between February 15, 2017 and June 30, 2017 as required by ROP No. 199600132d, Table E-01.08, Section III.A.2. The MDEQ also alleges that U. S. Steel did not operate the pickle line and acid fume wet scrubber in a satisfactory manner in violation of ROP No. 199600132d, Table E-01.08, Section V.2, and MI Rule 336.1910.

While U. S. Steel takes its obligations under the ROP seriously, we believe the operation of the pickle line was and remains satisfactory and in compliance with the applicable requirements. We also, concede, however, that we failed to update our parametric monitoring parameters to conform to the most recent performance demonstration. This oversight was promptly corrected as noted herein.

As you may recall, U. S. Steel respectfully provided information regarding recirculation and makeup water flow rates at the No. 5 Pickle Line Fume Scrubber to the Department in conformance with the Department's request and direction provided on May 11, 2017. We promptly implemented corrective actions with regards to our parametric monitoring to ensure that acceptable flow rates were properly maintained. Please note that during the time of February 15, 2017 to June 30, 2017, U. S. Steel experienced passing stack test data, implemented timely corrective action, and maintained subsequent compliant operating flow rates.

During the February 14, 2017 stack test, U. S. Steel recorded the makeup and recirculation flows for the fume scrubber as required at 15 minute intervals. In ROP No. 199600132d, Table E-01.08, Section III.A.2 states "Operation of the scrubber shall be with a minimum of scrubber makeup water flow rate and recirculation water flow rate as established during the most recent

Ms. Katherine Koster, Department of Environmental Quality September 8, 2017 Page 2

performance test." U. S. Steel respectfully maintains that the requirement has some ambiguity as to what is meant by "established during the most recent performance test." We note that during the relevant time period, U. S. Steel operated the scrubber at all times above the lowest flow rates observed during the February performance test that demonstrated compliance with the applicable limitations. U. S. Steel's interpretation at the time was that the new minimum operating parameters for the fume scrubber were to be adjusted based the performance test, but not necessarily set to the exact averages. In fact, U. S. Steel did increase both minimums flow rates after evaluating the flow rate data from the stack test and determining the capabilities of the equipment that could be maintained over the long-term without causing a process upset. This is significant to note because the make-up water is supplied by city water with varying pressure, therefore the make-up water flow is highly dependent on the city water pressure. U. S. Steel operated the scrubber based on the new U. S. Steel minimums of 35 gpm and 525 gpm and there were no periods between February 15, 2017 and May 11, 2017 where the scrubber operated below those values.

In any case, after the issue was brought to U. S. Steel's attention, we promptly completed corrective actions as we now acknowledge that the minimum flow rate established during the most recent performance test is not necessarily the lowest individual flow rate during the test, nor is it the average value measured over the entire testing period. Instead, EPA acknowledged that some flexibility in establishing operating parameter compliance values is appropriate; and that the average value during any of the compliant individual runs could be used.

Upon notification by the MDEQ on May 11, 2017 regarding the minimum flow rates we immediately sought to operate at the proper flow rates. Based on the Daily Turn Monitoring forms submitted to the MDEQ in the 2nd Quarter maintenance records, the recirculation flow rate was never under the 564 gpm minimum beginning with the day shift on May 12, 2017. The MDEQ was notified that there may be some restrictions to maintaining consistent make-up water flow during the May 11, 2017 inspection due to the fluctuations of incoming city water pressure. This led to the makeup water flow periodically falling below the minimum of 38 gpm after May 12, 2017. In order to maintain proper makeup water flow, the valve for the makeup flow had to be continually adjusted based on the incoming flow to both remain above the limit, but also to ensure the system would not be overburdened should a major swing in the incoming water pressure occur. Starting with the day shift of May 28, 2017 and continuing through to September 6, 2017 the makeup flow has not fallen below the minimum. The June, July, and August Daily Turn Monitoring Reports are attached at the end of this correspondence. U. S. Steel would also like to note that the spray nozzles for the fume scrubber were replaced with larger nozzles in June 2017 to help continually operate at or above the required operating limits.

Based on the data provided to the MDEQ, the fume scrubber is operating in the same manner as it was during the performance test, and therefore should not have to retest. Additionally, U. S. Steel disagrees that current operating parameters are an indication that a passing performance test is now considered unacceptable. Rule 336.2001(1)(c) says: "The owner or operator of the source has not submitted an acceptable performance test, in accordance with R 336.2003." R336.2003 does not mention operating parameters from after a completed and passing performance test being cause for an unacceptable test.

Ms. Katherine Koster, Department of Environmental Quality September 8, 2017 Page 3

Additionally, 40 CFR Part 63, Subpart CCC, 63.1160(b)(1)(vi) does not consider falling below the minimum operating parameters a violation if corrective action is initiated within 24 hours and completed as soon as practicable. Furthermore, EPA does not consider falling below the flow rates a violation of the emissions limit; and it would be a waste of U. S. Steel and Department resources to retest since U. S. Steel has since changed it operating ranges and has demonstrated that the ranges can be properly maintained.

As mentioned above, the makeup flow valve was continually manually adjusted to attempt to remain above the operating limit. Also, during the June outage, the spray nozzles were adjusted to continually operate above on a consistent basis. Finally, as the June, July, and August monitoring reports show, the corrective action that was implemented was successful and therefore the instances where U. S. Steel fell below the minimums are not considered violations in accordance with 40 CFR Part 63, Subpart CCC, 63.1160(b)(1)(vi).

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.

Ronald Kostyo General Manager

U. S. Steel - Great Lakes Works

cc: Dave Hacker (USS)
Jon Lamb (MDEQ)

Wilhemina McLemore (MEDQ)

Alexis Piscitelli

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

#5 Pickle Line HCI NESHAP Daily Turn Monitoring Records Requirements The Shift Manager is to record readings once per lurn each day as per SOP

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These values represent internal audits. Actual operating parameters can be found in SOP E-5626-05-01

Title: #5 Pickle Line HCI NESHAP Dally Turn Monitoring	ecords Regulrements Page 1 of 1
Document #: GLW-FORM-PK-08	Last Revision Date: : 6/17/2015
Location: Great Lakes Works Hot/Cold Rolling	okle/Cold Mill Mtce

#5 Pickle Line HCI NESHAP Daily Turn Monitoring Records Requirements The Shift Manager is to record readings once per turn each day as per SOP

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*These values represent internal audits. Actual operating parameters can be found in SOP E-5626-05-01

Title: #5 Pickie Line HCI NESHAP Daily Turn Monitoring Records Require	ements Page 1 of 1
Document #: GLW-FORM-PK-08	Last Revision Date: : 6/17/2015
Location: Great Lakes Works Hot/Cold Rolling Pickle/Cold Mill	Mtce

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*These values represent internal audits. Actual operating parameters can be found in SOP E-5626-05-01

Title: #5 Pickle Line HCi NESHAP Daily Turn Monitoring Records Requirements	Page 1 of 1
Document #: GLW-FORM-PK-08	Last Revision Date: : 6/17/2015
Location: Great Lakes Works Hot/Cold Rolling Pickle/Cold Mill Mtce	

#5 Pickle Line HCI NESHAP Daily Turn Monitoring Records Requirements The Shift Manager Is to record readings once per turn each day as per SOP

	.g- 4.155 p-01	1015
Month	Year	4011

Day	Turn	Recirculated Water GPM 564.0 Min*	Make-up Water GPM 38 Min*	3.0 - 10.0 Pressure Drop Inches	
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Day	Turn	Recirculated Water GPM 564.0 Min*	Make-up Water GPM 38 Min*	3.0 – 10.0 Pressure Drop Inches
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*These values represent internal audits. Actual operating parameters can be found in SOP E-5626-05-01

Title: #5 Pickle Line HCI NESHAP Daily Turn Monitoring Records Requirements	Page 1 of 1
Document #: GLW-FORM-PK-08	Last Revision Date: : 6/17/2015
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