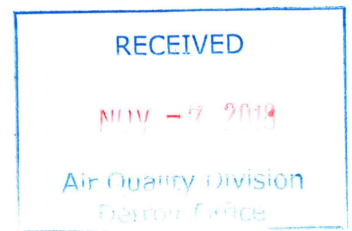




Great Lakes Works
Environmental Dept.
No. 1 Quality Drive
Ecorse, Michigan 48229



November 2, 2018

Ms. Katherine Koster
State of Michigan, Department of Environmental Quality
Air Quality Division, Detroit Office
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
B2 Blast Furnace Backdraft Stack & No. 2 BOP Shop Roof Monitor
Violation Notice dated October 12, 2018**

Dear Ms. Koster:

On or about October 16, 2018, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated October 12, 2018 from the Michigan Department of Environmental Quality (MDEQ) regarding visible emissions observed by MDEQ staff on September 16, 2018 and September 19, 2018 from the B2 Blast Furnace Backdraft Stack and the No. 2 BOP Shop Roof Monitor respectively. In the notice, MDEQ alleges U. S. Steel exceeded the visible emission limitations required by ROP No. 199600132d, General Condition 2.a. three times on September 16, 2018 and exceeded the visible emission limitations required by ROP No. 199600132d, Table E-01.18, Section II.2, MI Rule 336.1364(2), and 40 CFR 63.7790(a) two times on September 19, 2018.

On September 20, 2018 U. S. Steel personnel were informed of two separate visible emission incidents that were observed by MDEQ personnel. The first incident allegedly occurred on September 16, 2018 in the late afternoon/early evening when the B2 Blast Furnace was forced to expeditiously shut down to protect the blast furnace and associated equipment due to an unanticipated issue with the boilers on Zug Island. As per U. S. Steel shutdown procedure, U. S. Steel personnel opened the valve to the backdraft stack to backdraft from the blast furnace. Once it was determined the furnace could safely start up and resume operations, U. S. Steel personnel closed the valve to the backdraft stack and began to put wind on the furnace. However, the valve malfunctioned and signaled it was closed even though it was partially open leading to excess emissions escaping via the backdraft stack during startup. U. S. Steel personnel worked to get the valve closed properly as quickly and safely as possible. On the next scheduled repair turn, U. S. Steel was able to perform a more thorough investigation into the failure of the valve. As a corrective action, U. S. Steel dropped the seat out of the valve and cleaned it thoroughly before replacing it and returning the valve back to service.

In the VN, the Department also alleges that U. S. Steel exceeded the 3-minute average 20% opacity limit for the No. 2 BOP Shop Roof Monitor on September 19, 2018. U. S. Steel is in the middle of an extensive maintenance outage for the Electrostatic Precipitator (ESP) that serves as the primary

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control device for the No. 2 BOP Shop. During this outage, we are replacing many of the internal components of the cells which will improve cleaning of the gas. U. S. Steel has also replaced all three ID fans and their corresponding housings for the ESP system. During this outage, as is typically done during such outages, U. S. Steel is operating the ESP with one lane isolated to complete the maintenance outage. While an ESP lane is isolated, a lowered oxygen blow rate is used to minimize the potential for excess emissions. Normally, this practice has resulted in the ability to maintain compliance with applicable requirements during maintenance outages. On September 19, 2018, in addition to having one of the six lanes isolated, U. S. Steel brought all three ESP fans back into service and was in the process of balancing the primary system draft set point so that it would adequately collect emissions during the time of the observations. Since September 19, 2018, U. S. Steel has conducted three certified observations of the No. 2 BOP Shop Roof Monitor, one on September 27, 2018, one on October 13, 2018, and the last on October 24, 2018 with no exceedances of the 3-minute average 20% opacity limitation.

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 me 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,



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

cc: Dave Hacker (USS)