

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

A780962718

FACILITY: U S STEEL GREAT LAKES WORKS		SRN / ID: A7809
LOCATION: 1 QUALITY DR, ECORSE		DISTRICT: Detroit
CITY: ECORSE		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 04/28/2022
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: Section 2 - Transtar/Delray Connecting Railroad		
RESOLVED COMPLAINTS:		

COMPANY NAME: Transtar (owner of Delray Connecting Railroad); formerly owned by United States Steel
 REASON FOR INSPECTION: Targeted Inspection
 INSPECTED BY: Katie Koster, AQD
 PERSONNEL PRESENT: Joe Campau (Plant Manager, DCRR); Steve Wood Hudspeth (Corporate Transtar)

FACILITY BACKGROUND

Delray Connecting Railroad Company is one of the support facilities for US Steel – Great Lakes Works (USS-GLW). It is Section 2 of the USS ROP (199600132d). Historically, the company was a subsidiary of U.S. Steel Corporation under the umbrella of Transtar. Nationally, Transtar is made up of Union Railroad – Gary Railway – Delray Connecting Railroad – Lake Terminal Railroad – Texas & Northern Railway – Fairfield Southern Company – Lorain Northern Company.

Delray Connecting Railroad is the name used at the Great Lakes Works operations and is located on Zug Island. It operates the coke screening and handling facility consisting of screening machines, conveyors, and coke handling and storage. It is also responsible for maintaining and operating the locomotives that transport molten iron from the blast furnaces on Zug Island to the basic oxygen furnaces at the Main Plant in Ecorse and railcars that transport finished coils off site to various places.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received for this facility.

OUTSTANDING CONSENT ORDERS

Facility is operating under the fugitive dust SIP CO 8-1993.

OUTSTANDING LOVs

None

INSPECTION NARRATIVE

On April 28, 2022, I arrived at Delray Connecting Railroad Company (DCRR) on Zug Island and met with Joe Campeau, Plant Manager for Transtar, formerly US Steel, and Steve Wood Hudspeth, Transtar Corporate. They explained the current operations to me. With the idling of all of U.S. Steel blast furnaces on Zug Island as of March 31, 2020, Delray no longer screens coke for the furnaces. Also, they no longer screen coke for EES Coke as all their needs are fulfilled through Dynamic Railroad. Transtar is now owned by Fortress Investment Group and have been advised not to communicate with US Steel.

Currently on site are the permanent screener and two temporary screens. All are for sale. Company claims there is no other material left to screen. The permanent screen is in place and fully intact but it is locked out while the facility searches for a buyer. Temporary screens are not in use. The company requested that their operations be removed from the US Steel ROP and that their permit (PTI 29-19) be voided. The PTI has not been rolled into the ROP. I asked if the equipment was permanently idled. Based on the information I received, there is no way to lock out the portable screens and the lock out of the fixed screen could be easily reversed.

Also, we discussed the criteria to determine whether facilities are part of the same stationary source in case the permits were voided but the facility continued to operate and may need. At this time, Delray maintains railcars for US Steel for transportation of steel coils from Gary Works to the Main Plant for finishing (such as pickling and/or galvanizing). However, it is a little unique that Transtar owns the property that they use on Zug Island.

Finally, Transtar asked about fugitive dust requirements. I explained that they were subject to a fugitive dust SIP consent order which was in effect regardless of whether there was a permit in place. Each CO allows for some modifications within the confines of the order, and the process for submitting a request for a change. I also reviewed the fugitive dust records while on site. Records of asphalt emulsion application and sweeping were well organized and presented.

US Ecology – weekly sweeping; monthly flushing

Kleenway – monthly asphalt emulsion

We walked around the property. None of the equipment was operating. Piles had all been removed except for one small pile. Also, Mr. Campeau noted that they had scrapped 62 railcars which included torch cutting the cars. I inquired whether there were more to scrap and he stated that project was complete.

We called the company consultant, Mike, to discuss how to demonstrate that they are a separate stationary source as well as what needs to be demonstrated to void a permit.

I received an email on May 2, 2022 which read in part: “(1) US Steel sold its equity ownership of the company (Transtar) as of July 28, 2021, and (2) Delray has ceased coke screening operations for US Steel, and will cease coke handling operations for US Steel once the existing stockpile is completely worked down.

I sent an email to company contact and consultant (attached). However, I did not receive any response or any further information requesting to separate sources or void equipment.

APPLICABLE RULES/PERMIT CONDITIONS

Fixed screen did not operate in 2021. It did operate in 2020. This is a new screen that was installed in 2019. Screen in the ROP was replaced with this one.

Portable Warrior Screens 1 & 2 did not operate in 2021 according to the MAERS report. They did operate in 2020. As of this inspection, all screens have been shut down and locked out where possible.

Only fugitive dust requirements are in place right now. Records were presented during the inspection and appear to be meeting requirements.

NSPS: They are exempt from OOO because they do not have any crushers or grinding mills.

NESHAP: There are none.

FINAL COMPLIANCE DETERMINATION

At the time of this inspection, facility is not operating and is in the process of selling the screening equipment. Fugitive dust measures appear to be in place and as such, compliance was chosen at this time.

NAME KATHERINE KOSTER

DATE 10/28/2022

SUPERVISOR APRIL WENDLING 11/07/2022