



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



DAN WYANT
DIRECTOR

February 9, 2015

Mr. James Gray, General Manager
United States Steel Great Lakes Works
No. 1 Quality Drive
Ecorse, MI 48229

SRN: A7809, Wayne County

Dear Mr. Gray:

SECOND VIOLATION NOTICE

On October 23, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the September 2014 BOF Roof Monitor and ESP Stack Compliance Demonstration, dated October 21, 2014, for United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. AQD staff reviewed this report on November 26, 2014, to determine U.S. Steel's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of Renewable Operating Permit (ROP) number 199600132d and Consent Order AQD No. 1-2005.

On December 12, 2014, the AQD sent the company a Violation Notice citing violations discovered as a result of the review and requested your written response by January 2, 2015. A copy of that letter is enclosed for your reference.

Your response was received on January 14, 2015. However, the response was insufficient as it failed to provide the steps being taken to prevent a reoccurrence. Also, the response did not include adequate information to demonstrate that a "malfunction" of the thimble steam seal occurred. At a minimum, the nature of the malfunction, inspection and maintenance records, a description of the parametric monitoring in place, and any other information demonstrating that the event was "sudden, infrequent, and not reasonably preventable" should be provided.

Additionally, upon further review of the September 15, 2014 visible emissions readings, AQD has identified two additional violations of the 20% 3-minute average opacity limit that were not reported by U.S. Steel. For your reference, the 3-minute averages in violation of the opacity limit started at the following times: 8:31:30, 8:34:30, 8:39:45, 8:42:45, 8:45:45, and 8:55:00.

Please be advised that failure to respond in writing and identifying actions the company will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide the information requested in our October 23, 2014 letter by February 23, 2015, which corresponds to 14 days from the date of this letter.

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Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring the facility into compliance, please contact me at the number listed below.

Sincerely,



Katie Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc: Ms. Alexis Piscitelli, U.S. Steel
Ms. LaReina Wheeler, City of Detroit
cc/via email: Mr. Mark Palermo, USEPA
Ms. Gina Harrison, USEPA
Mr. Arnold Rosenthal, USDOJ
Mr. Neil Gordon, AG
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Jonathan Lamb, DEQ
Mr. Malcolm Mead-O'Brien, DEQ