

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY



Detroit

DAN WYANT DIRECTOR

May 5, 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:

VIOLATION NOTICE

On April 20, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a complaint regarding visible emissions from the No.2 BOP Shop Roof Monitor and ESP Stack on April 17, 2015, at United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. AQD staff informed U.S. Steel of the complaint and subsequently requested COMS data from the ESP stack. AQD reviewed this data 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.

During this review, AQD staff noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
No. 2 BOP Shop (FG2BOP-SHOP)	Rule 336.1301(1)(a) ROP No. 199600132d, General Condition 2	On April 17, 2015, COMS data from the ESP indicated two 6-minute average opacity readings were above the 20%, 6-minute average opacity limit (one of which may be excepted per Rule 301(1)(a)).

On April 17, 2015, at 18:36 and 18:42, the 6-minute average opacity, as recorded by the COMS, was 23% and 21%, respectively. Rule 336.1301(1)(a) only allows for one 6-minute average above 20%, but not more than 27%, per hour. Rule 336.1301(1)(a) states: "Except as provided in subrules (2), (3), and (4) of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:

(a) A 6-minute average of 20% opacity, except for 1 6-minute average per hour of not more than 27% opacity."

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 26, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If U.S. Steel believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

KaticKoster

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

cc: Ms. Alexis Piscitelli, U.S. Steel Mr. Bradley Wargnier, U.S. Steel cc via email: Ms. Lynn Fielder, DEQ Ms. Mary Ann Dolehanty, DEQ Mr. Thomas Hess, DEQ Ms. Teresa Seidel, DEQ Ms. Wilhemina McLemore, DEQ Mr. Jeff Korniski, DEQ