

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY DETROIT



SRN: A7809, Wayne County

January 4, 2017

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

Dear Mr. Gray:

VIOLATION NOTICE

On December 22, 2016, December 2, 2016, November 4, 2016, and October 6, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the November, October, September, and August 2016, BOP Shop Roof Monitor and ESP Stack Compliance Demonstration Reports, respectively, for United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. AQD staff reviewed these reports 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	Comments
	Condition Violated	
No. 2 BOP Shop Roof Monitor (EG2BOF-VESSELS)	ROP No. 199600132d, Table E-01.18, Section II.B.2 40 CFR Part 63 Subpart FFFFF, Table 1.12	Four exceedances of the 20%, 3-minute average opacity limit (21.25%, 29.6%, 22.5%, and 22.08%) on November 10 and November 22, 2016.
	Consent Order AQD No. 1- 2005, Paragraph 11.A.3(e)	One exceedance of the 20%, 3-minute average opacity limit (63.3%) on October 24, 2016.
	Rule 336.1364(2)	One exceedance of the 20% 3- minute average opacity limit (24.2%) on September 28, 2016.
		Two exceedances of the 20%, 3-minute average opacity limit (22.08%, 23.33%) on August 19, 2016.

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Note, the facility reported two opacity exceedances on November 10 and one exceedance on November 22 in the December 21, 2016, cover letter for the November 2016 VEO report. However, AQD's review of the visible emissions readings identified three exceedances on November 10, 2016. From 9:27:15 to 9:30:00, the average opacity was 21.25%; from 9:30:15 to 9:33:00, the average opacity was 29.6%, and from 9:33:15 to 9:36:00 the average opacity was 22.5%.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 25, 2016 (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,

Katie Koster

Senior Environmental Engineer

Wilhemina McLemra for

Air Quality Division

313-456-4678

cc: Ms. Alexis Piscitelli, U.S. Steel cc via email: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge, DEQ Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ