

RECEIVED APR 2 8 2021 Air Quality Division Detroit Office

9300 Dix Avenue, Dearborn, Michigan 48120, (313) 843-7200

April 23, 2021

Ms. Katie Koster Sr. Environmental Engineer EGLE Detroit, AQD Detroit Field Office, Cadillac Place 3058 W. Grand Blvd., Suite 2-300 Detroit, MI 48202-6058

Subject: April 2, 2021 Violation Notice Response Edw. C. Levy Co., Plant 6 SRN: A8640-Section 2, Wayne County

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of the subject Violation Notice (VN) dated April 2, 2021, alleging violation of Rule 336.1901 (b) and ROP No. MI-ROP-A8640-2016a, Section 2, General Clause 12(b).

The alleged violation was for Level 3 and 4 nuisance odors allegedly observed in residential areas downwind of the blast furnace slag pits and occurring at the following times:

• Friday March 26, 2020 from approximately 1810 to 1930 hours

Levy was alerted via email at 0927 hours on Monday, March 29 by Mr. Jonathan Lamb, EGLE, that three odor complaints were received at the following times on Friday:

- 1740 hours from a residence near Holly Street and Dix Avenue
- 1837 and 1842 hours from residences in the neighborhood bordered by Industrial Street, Riverside Drive, and Dix Avenue

Based upon our investigation, there was minimal activity at the blast furnace slag pits during the timeframe of the complaints. There was no truck loading or pit digging during the timeframe of the complaints. The only activity occurring was the quenching of the air-cooled blast furnace slag, which utilizes an odor control reagent (potassium permanganate) to minimize emission of sulfur compounds. The odor control system operated without interruption or upset during the timeframe of the complaints.

At this time, we have not identified a source for the alleged odors. We will continue to evaluate our systems for opportunities to reduce potential odors. Thank you again for the timely notification of a complaint.

Also, please note that Zayd Sufyan is now Operations Manager of the Levy Plant 6 Operations. Please include Zayd on future written correspondence and via email at zsufyan@edwclevy.net, in place of Tim Lazarz, who was copied on this Violation Notice. Please contact Matt Perko, Environmental Engineer (313-820-4057; mperko@edwclevy.net) or Tom Green, Director of EHS (313-690-0139, tgreen@edwclevy.net) if you have any questions or need additional information.

Sincerely,

Russell Burke VP, Steel Mill Services Edw. C. Levy Co. kwalker@edwclevy.net 260-417-6331

cc: Ms. Jenine Camilleri Supervisor, Enforcement Unit EGLE, Lansing AQD PO Box 30260 Lansing, MI 48909-7760

Keith Walker, General Operations Manager, Levy Zayd Sufyan, Operations Manager, Levy Plant 6 Eliot Weiner, Executive Vice President, Levy Tom Green, Director of EHS, Levy Matt Perko, Environmental Engineer, Levy Jim Earl, Environmental Manager, AK Steel Dearborn Works