



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

November 25, 2019

Mr. LaDale Combs, General Manager
AK Steel Dearborn Works
4001 Miller Rd.
Dearborn, MI 48121-1669

SRN: A8640, Wayne County

Dear Mr. Combs:

VIOLATION NOTICE

On October 20 and 21, 2019, the Department of Environment, Great Lakes, and Energy (ELGE), Air Quality Division (AQD), conducted investigations in response to citizen complaints regarding fallout in Dearborn which occurred between the early evening of October 19, 2019, through the morning of October 20, 2019. The investigations included an evaluation of AK Steel Dearborn Works' ("AK Steel") 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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A8640-2016a.

During the investigations, AQD staff observed substantial fallout at the complainants' homes. AQD staff collected samples of the fallout and sent the samples to a lab for analysis. The analysis determined the samples to be consistent with steel manufacturing. The sample results are attached to this letter. During the time period when the fallout is believed to have occurred, AK Steel reported that the C Blast Furnace was going through start-up after an extended shutdown, during which time winds were primarily from the southwest, placing the complainants downwind of AK Steel during the approximate time period the fallout occurred.

As a result, AQD staff has determined that AK Steel was in violation of the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCFURNACE	ROP No. MI-ROP-A8640-2016a, General Condition 12(b), Section 1; R 336.1901(b)	Detection of fallout beyond the facility's property line, attributable to the facility, of sufficient magnitude as to constitute an unreasonable interference with the comfortable enjoyment of life and property.

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Based on the analysis of the fallout samples, wind direction, and start-up operations of the C Blast Furnace at AK Steel during the time period the incident occurred, AQD staff has determined that AK Steel was the most likely source of the fallout. In the professional judgment of AQD staff, the fallout was sufficient to constitute a violation of General Condition 12(b), Section 1 of ROP No. MI-ROP-A8640-2016a and R 336.1901(b): an "unreasonable interference with the comfortable enjoyment of life and property."

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 16, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE
Ms. Katie Koster, EGLE