

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



November 26, 2019

Mr. LaDale Combs, General Manager AK Steel Dearborn Works 4001 Miller Road Dearborn, Michigan 48121-1699

Dear Mr. Combs:

SRN: A8640, Wayne County

VIOLATION NOTICE

On November 18, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the stack test report for testing conducted on September 17, 2019. Testing was conducted on the Basic Oxygen Furnace (BOF) and BOF Shop Operations at AK Steel Dearborn Works ("AK Steel") located at 4001 Miller Road, Dearborn, Michigan. Staff reviewed the report to determine AK 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 Air Pollution Control Rules; and Renewable Operating Permit (ROP) number MI-ROP-A8640-2016a.

Based on the stack test report, the following air pollution violations were observed:

Process Description	Rule/Permit Condition Violated	Comments
FGBOFSHOP	ROP No. MI-ROP-A8640- 2016a, FGBOFSHOP, S.C.I.10	The stack test result was 0.158 pounds per hour (pph) of Pb(lead) for the FGBOFSHOP Secondary Baghouse and ESP stacks combined.
		The permit limit for FGBOFSHOP Secondary Baghouse and ESP stacks combined is 0.067 pph for Pb.
FGBOFSHOP	ROP No. MI-ROP-A8640- 2016a, FGBOFSHOP, S.C.I.12	The stack test result was 0.16 pph of Mn(manganese) for the FGBOFSHOP Secondary Baghouse and ESP stacks combined.
		The permit limit for the FGBOFSHOP Secondary Baghouse and ESP stacks combined is 0.10 pph for Mn.

Mr. LaDale Combs AK Steel Dearborn Works Page 2 November 26, 2019

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 17, 2019 (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.

Please submit the written response to 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If AK Steel Dearborn Works 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,

Katherine Koster

Senior Environmental Engineer

Katherine Kooter

Air Quality Division 313-456-4678

cc: Mr. Neil Gordon, AG

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

Mr. Jonathan Lamb, EGLE