



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

January 13, 2020

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

SRN: A8640, Wayne County

Dear Mr. Combs:

SECOND 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.

As a result of these investigations, the AQD issued to AK Steel the attached Violation Notice, dated November 25, 2019, and requested your written response to the violation cited therein by December 16, 2019. Your response to the violation notice, received on December 20, 2019, is inadequate. It fails to provide 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 specific steps being taken to prevent a reoccurrence.

As you reported, AK Steel started up the C Blast Furnace from an extended outage at approximately 4:00 PM on October 19. Startup and associated activities continued throughout that night, the following day, and beyond. During a startup when a furnace is "blown in" from a "bank", there is a significant amount of slag present. The initial casts from such a startup tend to contain an elevated amount of blast furnace slag, and therefore these casts were directed into slag pots and subsequently beached in the blast furnace slag pits at AK Steel.

AQD received eleven complaints of fallout in the South Dearborn area that allegedly occurred during blast furnace startup activities. AQD collected samples and provided microscopy results to you which indicated the fallout contained materials associated with steel manufacturing. Wind direction during the time period indicates complainants

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were downwind of AK Steel operations at times. Additionally, AQD staff collected a ghost wipe sample of the fallout on October 20 that was analyzed for metals. Results are enclosed for your reference. The results show the majority of the fallout contained the metals calcium, aluminum, magnesium, iron, and manganese. The composition of blast furnace slag, per the "Making, Shaping and Treating of Steel, 10th Edition" and the Edw. C. Levy Co. blast furnace slag SDS, is mostly oxides of silicon, calcium, aluminum, magnesium, iron, and manganese. Blast furnace slag is also a material associated with steel manufacturing.

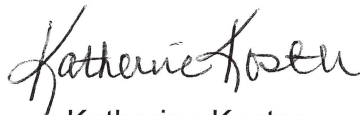
The Air Quality Division disagrees with AK Steel's statement that particulate matter from AK Steel operations, deposited onto neighboring properties, is not an unreasonable interference with the comfortable enjoyment of life and property. AQD understands that this type of startup is uncommon. Nevertheless, AK Steel is required to be in compliance with applicable state air quality requirements cited herein under all circumstances and every type of operation.

Please submit a written response by January 27, 2020 (which coincides with 14 calendar days from the date of this letter) 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.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

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

Sincerely,



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

Enclosure

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Jeff Korniski, EGLE
Mr. Jonathan Lamb, EGLE