



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

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Air Quality Division
Detroit Office

August 6, 2019

Mr. Johnathan Lamb
Sr. Environmental Quality Analyst
EGLE Detroit, AQD
Detroit Field Office, Cadillac Place
3058 W. Grand Blvd., Suite 2-300
Detroit, MI 48202-6058

**Subject: July 16, 2019 Violation Notice Response
Edw. C. Levy Co., Plant 6
SRN: B4243, Wayne County**

Dear Mr. Lamb:

The Edw. C. Levy Co. (Levy) is in receipt of the subject Violation Notice (VN) dated July 16, 2019, for alleged fallout detected beyond the facility's property line that occurred between the evening of June 6 and the morning of June 7, 2019. The VN alleges violation of General Condition No. 12(b) of ROP No. MI-ROP-B4243-2009 and Rule 901(b).

During the dates of the alleged fallout incident, there were no known fugitive dust events from Levy operations. Levy operations were operating normally during each of the alleged fallout incident days. EGLE did not report this alleged fallout incident to Levy until receipt of the Violation Notice dated July 16, 2019, via U.S. Mail. Therefore, Levy was unable to conduct a timely investigation of the alleged impacted areas. Review of Levy operating logs during and around this time found no abnormal operations or circumstances that would be associated with fallout conditions.

Based upon the Merit Laboratories, Inc. Report, identified as Report ID S03330.01(02) and generated on July 10, 2019, which was attached to the VN, the sample collection location on June 7, 2019 was "14301 Mellon" with samples taken from two cars, identified as Sample 1 and Sample 2.

Stereomicroscopy and polarized light microscopy (PLM) showed that the samples contained the following constituents:

- 1) About 40% blackish-to deep red, glassy, rough, irregularly shaped particle which respond to a magnet;
- 2) About 20% black and multicolored agglomerate particles (20%) which also respond to a magnet;
- 3) About 15% yellowish-red to red magnetic particles;
- 4) About 15% multicolored, squarish to irregularly shaped particles, some of which respond to a magnet; and
- 5) A few glass-like, colorless, thick fiber type particles with concentric ring marks and some larger rectangular particles with grooves in rows on the surface; and

- 6) "Most of the remaining particles" being tiny, black or colorless or reddish, most of which respond to a magnet.

These samples are not representative of the slag products managed by Levy Plant 6. In total, over 75 percent of the particles in the samples are recorded as "responding to a magnet." The slag processed at Levy Plant 6, based on historic testing data, quantifies iron oxides present in amounts under 30 percent by weight. For slag products, a majority of the remaining constituents consists of calcium oxides (>35 percent by weight), silicon oxides (>10 percent by weight); magnesium oxides (>9 percent by weight), and smaller amounts of oxides of aluminum, manganese, phosphorus, and titanium (about 1 to 4 percent by weight), which are not reported in the collected samples. In addition, slag products produced at Levy Plant 6 are typically gray in color and do not match the descriptions of various colors provided in the laboratory narrative. Thus, the materials included in the sample analysis provided in the Violation Notice are not representative of slag materials from Levy Plant 6.

As a result, it is unlikely that Levy Plant 6 was the source of the alleged fallout on June 6-7, 2019. We respectfully request that this Violation Notice be withdrawn as it relates to Levy.

Levy will continue to monitor our sites for opportunities to reduce potential emissions from our operations. As we have communicated in the past, timely notification of fallout complaints is key to identification of potential sources. Please notify us as soon as possible when you receive a complaint from one of our neighbors.

Please provide notification to the following three individuals:


Matt Perko
Environmental Engineer
(313) 820-4057 (Cell)

Tim Lazarz
Operations Manager
Edw. C. Levy Co., Plant 6
(260) 229-7211 (Cell)

Tom Green
Director, Environmental, Health, and Safety
Edw. C. Levy Co.
(313) 690-0139 (Cell)

Please let me or Matt Perko, Environmental Engineer (313-820-4057; mperko@edwclevy.net) know if you have any questions or need additional information.

Sincerely,



Thomas E. Green, P.E.
Director, Environmental, Health, and Safety
Edw. C. Levy Co.
tgreen@edwclevy.net
(313) 690-0139

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

Tim Lazarz, Operations Manager, Levy Plant 6
Keith Walker, General Operations Manager, Levy
Russ Burke, Director, Steel Mill Services, Levy
Brian Lasley, Vice President Steel Mill Services, Levy
Malcom Dunbar, Vice President EHS, Levy
Matt Perko, Environmental Engineer, Levy
Jim Earl, Environmental Manager, AK Steel Dearborn Works