



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



October 2, 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: September 12, 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 September 12, 2019, for alleged fallout detected beyond the facility's property line that occurred between the evening of August 13 and the morning of August 14, 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, and a review of Levy operating logs during and around this time found no abnormal operations or circumstances that would be associated with fallout conditions.

Unfortunately, the Air Quality District (AQD) did not contact Levy regarding this alleged fallout until transmitting the referenced Violation Notice on September 12, 2019. As a result, Levy was unable to provide technical and operating information to AQD in a timely manner to assist in the agency's investigation, which may have prevented the issuance of this Violation Notice.

On August 14, 2019, the Plant 6 Operations Manager visited Ramsey's Auto Recyclers (14301 Mellon Street) after receiving a phone call from the business reporting fallout on parked vehicles. The Operations Manager visited Ramsey's Auto Recyclers that day and observed fallout that was red-orange in color. This color of fallout is not consistent with the materials processed at Levy Plant 6, which are typically gray in color. This information was provided to the owner and operator of Ramsey's Auto Recyclers.

Based upon the Merit Laboratories, Inc. Report, identified as Report ID S06026.01(01) and generated on September 5, 2019, which was attached to the VN, the sample collection location on August 15, 2019 was "14301 Mellon" with one sample, taken from a car and identified as Sample 1.

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

- 1) “Many” or about 45% blackish-to deep red, irregularly shaped particles which respond to a magnet and string together like beads after exposure to a magnet;
- 2) “Many” or about 30% black and multicolored agglomerate particles which also respond to a magnet;
- 3) About 5% “small” yellow-reddish to red, magnetic particles, characterized as “likely iron oxide or covered with iron oxide”; and
- 4) About 15% multicolored, squarish to irregularly shaped particles, some of which respond to a magnet.

**These results are not representative of the composition of slag products processed at Levy Plant 6.** In total, over 90 percent of the particles in the samples are recorded as “responding to a magnet.” Lab testing for the slag processed at Levy Plant 6 historically 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.

Furthermore, the closing statement of the Summary of Results from Merit Laboratories states “The metal content, the reddish iron oxide, the presence of calcite and the many particles responding to a magnet are consistent with steel manufacturing.” The metal content and color as described by Merit, as well as the magnetic properties observed, do not match the slags processed at Levy Plant 6 as described in the preceding paragraph. Thus, the materials included in the sample analysis provided in the Violation Notice are not representative of slag materials from Levy Plant 6.

Based upon this information, Levy Plant 6 was not the source of the alleged fallout on August 13-14, 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](mailto: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  
Matt Perko, Environmental Engineer, Levy  
Jim Earl, Environmental Manager, AK Steel Dearborn Works