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Air Quality Division

Detroit Office

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

December 9, 2021

Ms. Katie Koster Sr. Environmental Engineer EGLE Detroit, AQD Detroit Field Office, Cadillac Place 3058 W. Grand Blvd., Suite 2-300 Detroit, MI 48202-6058

Subject:

November 18, 2021 Violation Notice Response

Edw. C. Levy Co., Plant 6 SRN: B4243, Wayne

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of the subject Violation Notice (VN) dated September 22, 2021, alleging violation of Rule 336.1901 (b) and ROP No. MI-ROP-B4243-2015, General Condition12(b) on August 2 and September 29, 2021 due to "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."

Based upon our investigation, routine basic oxygen furnace (BOF) slag pit operations, such as pouring slag pots, digging pits, and stockpiling hardened slag occurred during the timeframe of the complaints. Employee interviews and a review of Levy operating records during and around these times found no abnormal operations or circumstances that would result in off-site fallout impacts. All emission control systems were operating as designed.

As we continue to review our site for environmental improvement opportunities, please be advised of the following changes that have occurred in recent months:

- Replaced two Dust Bosses located inside the BOF Knock Station. Completed the week of November 15, 2021 (replacement-in-kind with most current technology).
- Increased the volume of water supplied to the sprinklers used to water caster slag prior to handling, thereby increasing the amount of moisture in the slag. Completed the week of October 11, 2021.

Levy will continue to monitor our site for opportunities to reduce potential emissions from our operations.

We request that you continue to notify us as soon as possible when you receive a complaint from one of our neighbors, as was done in these instances.

Please contact Matt Perko, Environmental Engineer (313-820-4057; mperko@edwclevy.net) or Tom Green, Director of EHS (313-690-0139, tgreen@edwclevy.net) if you have any questions or need additional information.

Sincerely,

Russ Burke

Vice President of Steel Mill Serivces

Edw. C. Levy Co. rburke@edwclevy.net 313-720-9238

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

CC: Russell Burke, VP Steel Mill Services, Levy Zayd Sufyan, Operations Manager, Levy Plant 6 Eliot Weiner, Executive Vice President, Levy Tom Green, Director of EHS, Levy Matt Perko, Environmental Engineer, Levy Jim Earl, Environmental Manager, AK Steel Dearborn Works