DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B424348438

FACILITY: EDW C LEVY CO PLANT 6		**SRN / ID:** B4243
LOCATION: 13800 MELLON AVE, DETROIT		**DISTRICT:** Detroit
CITY: DETROIT		**COUNTY:** WAYNE
CONTACT: Tom Green , Environmental Manager		**ACTIVITY DATE:** 04/09/2019
STAFF: Katherine Koster	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: FY2019 Targeted Inspection		
RESOLVED COMPLAINTS:		

Reason for Inspection: Targeted Inspection
Level of Inspection: PCE
Inspected by: Katie Koster, AQD
Personnel Present: Matt Perko, Corporate Environmental Engineer
Facility phone number: 313-820-4057

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FACILITY BACKGROUND

Edw C. Levy Co. Plant 6 is a support facility for AK Steel – Dearborn Works (formerly Severstal Dearborn, LLC). All of the plant operations are entirely dependent on AK Steel. The plant operates 24 hours a day, 7 days a week, and handles and processes steel slag such as BOF slag, runway/pit slag, caster/tundish slag, and other miscellaneous slag generated by the AK Steel mill. Blast furnace (BF) slag is not processed here; it is processed at the BF slag pits at Miller and Dix by Levy and desulfurization slag is processed at the recently installed desulfurization slag/kish pot watering station (PTI 70-13). The blast furnace slag pits and kish watering station are not considered part of Plant 6; they are included in Section 2 of the AK Steel ROP. At Plant 6, all metallics are separated from the slag, crushed, screened, and returned to AK Steel. The non metallic portion of the slag is conveyed across the Rouge River to Mellon Street. On the Mellon Street side of the operations, the non metallics are separated into different sizes by screening and sold by Levy.

REGULATORY ANALYSIS

Although this site is a support facility to AK Steel, it was negotiated through a court order that the facility be issued its own ROP. Below is an excerpt from the existing ROP staff report (the Severstal name is used because that was the owner of the facility when this was decided):

"Under Rule 336.1119(r), Edw. C. Levy Co. Plant 6 and the Severstal North America, Inc. are determined and treated as a single stationary source and therefore Edw. C. Levy Co., Plant 6 was originally aggregated in the Severstal North America, Inc.'s Title V permit as Section 2. However, through negotiations that arose from the court judgment of the suit filed by the company against the AQD contesting the aggregation of the Levy Plant 6 with the Severstal ROP, Edw. C. Levy Co., Plant 6 agreed to submit a separate ROP application and will be issued its own ROP." As such, the facility has its own ROP. Plant 6 reports annual emissions under MAERS but it only pays emissions fees and not the facility fee.

Facility is operating under its own Wayne County fugitive dust SIP consent order 18-1993 revised 9/9/94 which is included in the ROP. The ROP was renewed in 2016.

New Source Performance Standards (NSPS)

The facility is not subject to Subpart OOO. Slag is not considered a non metallic mineral. See file for EPA applicability determination.

I reviewed the list of source categories for NSPS. No other NSPS appear to apply. The regulation for metallic mineral processors (Subpart LL) relates to mining and recovery of materials from ore which is not the situation at Plant 6.

NESHAP/MACT

Facility did not include any MACT subject equipment, such as generators, in the recent ROP application. I did not observe this type of equipment while on site.

PROCESS OVERVIEW

The Levy Plant 6 operation handles all of AK Steel's steel slag. The steel slag is collected in slag pots from AK Steel's Basic Oxygen Facility (BOF). The slag is conveyed by Levy using motorized pot carriers to the EUBOFSLAGPIT where it is poured into one of three pits for air and water cooling before processing. There is fourth pit designated for caster slag. After a pit is full, it is quenched with water sprays for about 16-24 hours. It is very important that during the dumping of molten slag, the area is free of water due to the potential for a thermal explosion. The temperature of the slag and molten steel causes any standing water to instantly expand into steam and the water-slag mixture will "explode". During normal routine steel making operations at the AK Steel BOF Shop, Levy collects and dumps 12 to 16 slag pots per 8-hour shift and digs this dumped slag after 16-24 hours. From the pit, slag is moved by front end loader to another area (aka the watering hole) where it is sprayed with more water and then moved to the staging area for loading into the screening/crushing process. Slag moves through a series of conveyors and screens to remove the metallics on the "Dearborn side" of the plant. Anything metallic from 6 to 60 inches is returned to the mill for reuse. The non metallic portion of the slag is conveyed across the river in the "bridge conveyor" for crushing and separation into various sizes.

Slag pots usually contain some steel as it is impossible to get a complete separation of steel and slag when tapping a heat at the BOF. After dumping the molten slag out of the pot, a hard accumulation of cooled steel mixed with slag usually remains at the bottom and sides of the pot which is called a "skull". To remove this accumulation, the pot carrier moves to the skull knocking station, tips the pot, and bangs it on the wall of the pit. During the banging, the red-hot skull dislodges from the pot and falls into the pit. This can create a cloud of fugitive emissions. A partial enclosure was constructed at the skull knocking pit several years ago for dust control. In addition, two dust boss misters are also in operation inside of the enclosure during knocking. Dislodged skulls are watered and moved to the EUDROPBALLCRANE operation located near the slag pits. The skulls are cracked and broken into smaller pieces by dropping a heavy steel ball with an electromagnetic crane onto the skulls. The broken skulls are returned to AK Steel's BOF for remelting.

This facility has periodically been a source of fallout and opacity complaints. Complaints have resumed in the last several months either related to slag handling and/or kish handling (although kish operations are not a part of Plant 6; it is AK Steel – Section 2 of the ROP)

Levy Plant 6 consists of the following emission units as described in the ROP:

1. EULEVYPLANT6 - Processing equipment associated with Levy Plant 6, including a grizzly feeder, seven conveyors, two screens and a crusher. Equipped with water spray system for air pollution control. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN. Note: This emission unit was recently reconstructed as several components were replaced by "temporary" components and is now operating under PTI 5-19.

2. EUDEISTERSCREEN - A 350 ton per hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and four knuckle conveyors. All but two conveyors are located downstream of the screen. Equipped with water spray system and adjustable stacker height mechanism for air pollution control.

3. EUCONVEYORSYSTEM - Five conveyors, located downstream of the Deister Screen (EUDEISTERSCREEN), designed to transfer slag and related materials to finished product stockpiles. Equipped with water spray system for air pollution control. Additional conveyors located downstream of the Deister Screen are not part of this emission unit.

4. EUBOFSLAGPIT - This emission unit comprises the BOF steel slag dumping area with a water spray quench system for slag cooling and fugitive dust control. Also includes a partial enclosure of the pot knocking station for emission control.

5. EUPROCESSNO2 - 1-100 tons per hour hopper and 2-100 tons per hour conveyor used for recycling slag materials back into the screening portion of the existing slag processing plant.

6. EUCOLDCLEANERS – Cold cleaners that meet the applicable requirements of R336.1281(h).

7. EUDROPBALLCRANE - This process consists of dropping a large steel ball from a crane onto scrap steel to break it into small pieces to be reused by adjacent steel mill, AK Steel, Dearborn Works.

8. EUMATRANSCONVEY - 1-200 tons per hour hopper and one conveyor (Pot Slagger).

INSPECTION NARRATIVE

I arrived at Levy Plant 6 around 10:30 a.m. on April 9, 2019. Mr. Matt Perko from the Levy corporate office escorted me onto the premises. We met Mr. Tim Lazarz, Operations Manager, and drove around the site. Just prior to my entrance on the facility, Levy had a fire at their operations. I was told my Levy corporate staff, in the presence of Mr. Tom Green, that the fire started in the kish dumping area as a mass broke open revealing molten material and sparked a fire. I received several photographs from AQD staff that witnessed the smoke while they were at a neighboring facility. Also, regarding kish watering, I was told that two pots have cracked recently and were taken out of service. As such, watering time had been significantly reduced from 70-80 hours per pot to 27 hours per pot. While this is still above the permit minimum of 24 hours, it may not be ideal. Note, AQD has received several fallout complaints with descriptions of kish like material in March.

Mr. Perko drove us around the site. No slag pots were being dumped in the slag pits during the inspection. Water sprays were not in use at the pits. I was told by Mr. Lazarz that the spray system was not working and that it had not been working since at least before November 2018. The staging area (watering hole) did have sprays working.

The skull knocking station and drop ball crane were not in operation. The slag in the staging area awaiting loading into the grizzly feeder appeared to be thoroughly wetted. I did not observe any fugitive emissions from this process. The skull knocking station enclosure appeared to be in good condition. Several years ago, the enclosure had been damaged by a water/slag "explosion" during a heavy storm. Dust boss misters are supposed to be in use at the knocking station but as it was not in use, I was unable to verify this.

It appears that dust suppressant had recently been applied to unpaved areas as required. The road has a wet appearance after the suppressant is applied.

We also drove past the blast furnace slag pits. I observed the operations. There is a screener in this area which needs to be reviewed for exemption status.

Next, Mr. Perko drove us to the Mellon Street side of the operations. There are 6 different products sizes that can be produced; but at this time, the facility is down to screening for only two products, the 25X and the 3X. Conveyors were not in use. Water sprays along the conveyors are manually activated as needed. The sprays are not on all the time as too much water could mud up the operation. No load out operations were occurring at the time.

Facility recently obtained PTI 5-19 to temporarily replace part of EULEVYPLANT6, slag processing equipment due to the old equipment becoming "unsafe for use" according to the facility.

APPLICABLE RULES/PERMIT CONDITIONS

PTI 5-19 EULEVYPLANT6

DESCRIPTION

Processing equipment associated with Levy Plant 6, including a plant feeder/magnetic separator, twelve conveyors including the bridge conveyor, a screen and a crusher. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT Water spray system

I. EMISSION LIMIT(S)

IN COMPLIANCE – Facility has not reported any deviations to the limits in the table below or the limits in the current ROP. Limits in this table are effective March 12, 2019. Note, they are more restrictive than prior limit for PM10 and PM so compliance with these indicates compliance with prior limit before March 12

Pollutant	Limit	Time Period / Operating Scenario	Equipment
1. PM10	0.73 pounds per hour	Calendar day average	EULEVYPLANT6
2. PM10	0.64 tons per year	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6
3. Particulate Matter	2.03 pounds per hour	Calendar day average	EULEVYPLANT6
4. Particulate Matter	1.79 tons per year	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6
5. Visible Emissions	10% opacity	6-Minute Average	Slag screening operations, conveyors or transfer points on conveyors
6. Fugitive dust	5% opacity	3-Minute Average	Roadways, parking lots, or storage piles, including any material handling activity at a storage pile

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment
1. Slag processing plant raw material throughput	400 tons per hour NOT IN COMPLIANCE. Based on records provided from Jan 2018- March 2019, the May 21, 2018 reported throughput was 872 tons per hour.	Calendar day average	EULEVYPLANT6

Material	Limit	Time Period / Operating Scenario	Equipment
2. Slag processing plant raw material throughput	704,000 tons per year IN COMPLIANCE. Highest 12 month rolling from Jan 2018 – March 2019 appears to be 441799 tons.	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6
3. Hexavalent chromium content of raw materials (slag) processed	Not more than 11 ppmw UNKNOWN. Results have not yet been submitted. Deadline for submission has not passed.	Average of all samples taken, not to exceed three samples per month[a]	EULEVYPLANT6

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. COMPLIANCE/NON COMPLIANCE. This condition has changed with the issuance of PTI 5-19. Company is in compliance with the condition as of the issuance date for PTI 5-19 which was March 12, 2019. Prior to that date, the minimum moisture requirement applied to all of the finished product and it was not being maintained for the larger size products. See attached records. Also, facility never reported these as deviations in the Title V semi annual and annual reports. The permittee shall maintain a minimum moisture content of 1.5 percent by weight in the raw materials less than three quarters of an inch in diameter and finished product less than three quarters of an inch in diameter.

2. UNKNOWN. Records state "pass" for opacity sensor, knuckle stacker, and plant water sprays. However, given the incorrect records provided for the BOF slag pits, it is unclear if these records are accurate. The permittee shall not operate the slag processing plant unless the adjustable stacker height mechanisms and water spray systems are installed, operated, and maintained to minimize fugitive dust emissions on crushers, screen, conveyors, and at all exit points in order to meet the visible emission and fugitive dust limits in SC.1.
3. IN COMPLIANCE. Facility is only handling slag generated from the steel mill. The permittee shall not crush and screen asbestos tailings or asbestos containing materials, as defined by the National Emission Standards for Hazardous Air Pollutants (40 CFR, 61.143) regulations, in the crushing plant.
4. NOT IN COMPLIANCE. Facility is not fully complying with the SIP Consent Order 18-1993 that outlines the program for continuous fugitive dust emissions control; specifically, watering slag before digging from the pits. The permittee shall not operate the slag processing plant unless the program for continuous fugitive dust emissions control for the plant has been implemented and maintained.

IV. DESIGN/EQUIPMENT PARAMETER(S) NA

V. TESTING/SAMPLING

1. PENDING. 60 day window had not passed when inspection was conducted. Within 60 days after permit issuance, the permittee shall verify the hexavalent chromium content of the raw materials (slag) used in EULEVYPLANT6 using method SW-846 7199 or another method acceptable to the AQD District Supervisor that is capable of accurately determining the hexavalent chromium content

of the material being tested. The permittee must submit the test results to the AQD District Supervisor within 45 days of sample collection.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. IN COMPLIANCE. Records are attached. The permittee shall monitor and record the daily tonnage of material throughput. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

2. IN COMPLIANCE. Records are attached. The permittee shall monitor and record the daily hours of operation of the slag processing plant. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

3. IN COMPLIANCE. Records are attached. The permittee shall monitor and record the total material throughput of the slag processing plant on a monthly and 12-month rolling time period, as determined at the end of each calendar month.

4. IN COMPLIANCE. Facility maintains these records. Example recordkeeping is attached. The permittee shall calculate and maintain records of the PM and PM10 hourly emissions based on the daily operating hours and daily throughput and appropriate AP-42 emission factors or other factors agreed upon by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

5. IN COMPLIANCE. Facility maintains these records. Example recordkeeping is attached. The permittee shall keep, in a satisfactory manner, calculations determining the monthly and 12-month rolling time period mass emissions of PM and PM_{10} as determined at the end of each calendar month. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

6. IN COMPLIANCE. Records are being kept. Note, Addendum and Appendix A do not appear to cover/include slag pit water sprays. The permittee shall keep records as specified in the fugitive dust control program and as required under Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum and Appendix A of this permit. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

7. IN COMPLIANCE. VE's are being performed at the required frequency. The permittee shall perform a Method 9 certified visible emission observation of the plant feeder/magnetic separator, screen, crusher, or of the conveyor system at least once every two calendar weeks for a minimum of 15 minutes during representative operations. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

8. IN COMPLIANCE. VE's are being performed at the required frequency. The permittee shall perform a Method 9D certified visible emission observation of loading activities from a finished product storage pile into a truck at least once every two calendar weeks for a minimum of 15 minutes when the loading process is operating. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable fugitive dust emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

9. UNKNOWN. Records state pass for opacity sensor, knuckle stacker, and plant water spray. However, given the incorrect records provided for the BOF slag pits, it is unclear if these records are accurate. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the adjustable stacker height mechanisms, water spray systems, crushers, screen, conveyors and the bridge conveyor side shields (from both sides of the river), and if necessary, identify the reasons for malfunction or failure. These inspections shall be conducted immediately after observing visible emissions in excess of the visible emission limit, but not less frequently than at least once a month and the permittee shall keep a written or electronic record of each inspection and corrective action taken if any. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

10. IN COMPLIANCE. As of March 12,2019, with the issuance of PTI 5-19, facility is performing the sampling at the required frequency and has not had any deviations from moisture requirements. Permittee shall sample each finished product storage pile to determine the minimum moisture content by weight on a weekly basis. The sampling procedure, averaging period for determining the moisture content of each finished product, and corrective actions that will be taken if the moisture content is below the required minimum, shall be submitted to the AQD District Supervisor for review and approval. Records of minimum moisture content sampling and corrective actions taken, if applicable, shall be maintained. After six weekly samples, the permittee may petition to the Department to reduce the sampling frequency to monthly. This petition must be submitted in writing and approved by the AQD District Supervisor.

11. PENDING. Sample results have not yet been received. The permittee shall keep, in a satisfactory manner, records of the hexavalent chromium content of each raw material sample used in EULEVYPLANT6. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

VII. REPORTING

1. IN COMPLIANCE. Notification was received and is in the facility file. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of the crusher.

VIII. STACK/VENT RESTRICTION(S) NA

IX. OTHER REQUIREMENT(S)

1. IN COMPLIANCE. Notification is in the facility file. Within 30 days of issuance of this permit, the permittee shall label the EULEVYPLANT6 equipment according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed.

2. This permit shall be terminated on and after March 12, 2021.

APPENDIX A – IN COMPLIANCE. Facility appears to be maintaining records required in Appendix A.
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MI-ROP-B4243-2016

EUBOFSLAGPIT

DESCRIPTION: Basic Oxygen Furnace (BOF) slag pit with water spray system for fugitive dust emission control. Also includes a partial enclosure of the pot knocking station for emission control.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Water sprays

I. EMISSION LIMIT(S) - IN COMPLIANCE. Facility has not reported any deviations from the opacity limits based on their interpretation of the slag pits being subject to 20% 3 minute average limit. This is based on applying 20% 3 minute average opacity limit to the slag pits and not treating them as "storage piles". This interpretation has been approved by AQD management related to ongoing negotiations with US Steel regarding their slag pits.

Pollutant	Limit	Time Period/ Operating Scenario	Equipment
1. Fugitive Dust	5% opacity[2]	3-minute average[a,b]	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile
2. Fugitive Dust	20% opacity[2]	3-minute average	Fugitive dust from any other source

II. MATERIAL LIMIT(S) NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. NOT IN COMPLIANCE. This condition clearly refers to water sprays on the slag pits as that is the only place slag is present before digging. Water sprays were not in use in use as evidenced during the inspection. Also, plant personnel informed AQD that sprays have not been in use for some time; at least since before November of 2018. The permittee shall quench the dumped slag by water sprays before digging.

2. IN COMPLIANCE. Enclosure with water sprays is installed and appears to be proper condition. Area was damp indicating that sprays were working but I did not observe it in use as no pot knocking was occurring. The permittee shall operate and maintain a partial enclosure with water misting at the pot knocking station.

IV. DESIGN/EQUIPMENT PARAMETER(S) and V. TESTING/SAMPLING NA
VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

IN COMPLIANCE for #1 and #2. Method 9D VE observations appear to be occurring at the required frequency. No exceedances have been reported for CY2018.

1. **The permittee shall perform a Method 9D certified visible emission observation of slag dumping or digging operation at least once every calendar week for a minimum of 15 minutes during representative dumping or digging operations. Both operations shall be observed within a month. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken.**

2. **The permittee shall perform a Method 9D certified visible emission observation of the pot knocking station during representative pot knocking operations at least once every calendar week for a minimum of 15 minutes. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken.**

3. NOT IN COMPLIANCE. See attached log. Inspections are conducted at the required frequency but records never indicate an issue which is false as the sprays are not and have not been working. Additionally, no corrective actions have been taken and no notation of the reason(s) for the failure were documented. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the water spray systems on the slag pit dumping areas and the pot knocking station, and if necessary record the reasons for malfunction or failure noted from the inspection. These inspections shall be conducted during scheduled outages or downtimes, and immediately after observing visible emissions, but not less frequently than at least once every calendar week and permittee shall keep a written or electronic record of each inspection and corrective action taken if any.

SOURCE-WIDE CONDITIONS

Levy Plant 6 has an approved fugitive dust control program which is outlined in Consent Order SIP No. 18-1993, revised 9/9/94. The requirements and conditions of the Consent Order were made part of the ROP as Source-wide Requirements. Some of the main elements of the order are summarized below:

- **Paved roads – Cleaned daily with a power flush or wet vac truck.**
- **Unpaved roads - Apply dust suppressant but no frequency specified.**
- **Tarping of all trucks carrying finished product and drop heights no more than 2 feet.**
- **Stock piles – Once per month application of dust suppressant if using lignosulfonate; no frequency specified if using an alternate suppressant.**

Based on the records provided, it appears that the frequency of calcium chloride application is once per month for unpaved roads and stockpiles on the Detroit/Mellon Street side (DS in the records). Facility claims they are not responsible for any paved roads. No trucks were on site at the time of the inspection.

NOT IN COMPLIANCE. MI-ROP-B4243-2016, Source-Wide Conditions, Condition VII.4 and SIP Consent Order 18-1993 (Revised 9/9/94), Paragraph 11, require the company to submit a quarterly report identifying each day in which an emission limit, operational requirement, or recording requirement, as specified in SIP No. 18-1993 (Revised 9/9/94) Exhibit A (Fugitive Dust Control Plan, Edward C. Levy Co. – Plant #6), was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. These reports shall be submitted within 30 days following the end of the calendar quarter in which the data was collected. Watering the dumped slag with water sprays before digging is an operational requirement from SIP Consent Order 18-1993 (Revised 9/9/94), Exhibit A, and it was not being met. However, based on the records reviewed from January 2018 through March 2019, no quarterly reports have been submitted identifying each day in which this operational requirement was not met nor providing the additional required information.

COMPLIANCE DETERMINATION

At this time, facility is not in compliance with several conditions that were evaluated in this report. Also, facility has not been reporting these violations as deviations in the semi annual and/or annual Title V reports. A violation notice will be issued.

NAME Kate Kosc DATE 12/23/19 SUPERVISOR W. M