



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

May 31, 2018

CERTIFIED MAIL-7010 0290 0000 3734 2811
RETURN RECEIPT

Mr. Craig Metzger
Gerdau MacSteel Monroe
3000 E. Front Street
Monroe, Michigan 48161

SRN: B7061, Monroe County

Dear Mr. Metzger:

VIOLATION NOTICE

On April 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Gerdau MacSteel Monroe (Company) located at 3000 E. Front Street, Monroe, Michigan. The purpose of this inspection was to determine the Company's 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) and the associated Air Pollution Control Rules and Renewable Operating Permit (ROP) MI-ROP-B7061-2016.

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGMELTSHOP-This includes a 140-ton capacity electric arc furnace (EAF), a ladle metallurgy system and a twin vacuum tank degassing station.	ROP MI-ROP-B7061-2016 Condition FGMELTSHOP V. TESTING/SAMPLING 2.	Required annual mercury testing not conducted in 2017. Future test report results need to document the amount of auto scrap added to the Melts during testing since auto scrap is likely the primary source of mercury in the emissions that are tested.
EUEAF-This includes a 140 capacity EAF.	ROP MI-ROP-B7061-2016 Condition EUEAF VI. MONITORING /RECORDKEEPING 15.	Required annual natural draft opening (NDO) testing conducted to determine the direction of airflow into the building housing the EAF was not performed in 2017. It appears that previous

		testing failed to test each natural draft opening as required or adhere to EPA guidance document EPA/452/B-02-001 on Permanent Total Enclosures. Prevention of Significant Deterioration Best Available Control Technology (PSD-BACT) analysis for particulate emissions from the Melt Shop including the EAF requires full building evacuation and essentially 100% capture of particulate emissions. Testing to date has not proven that these criteria are being met.
FGBLDGFUG	ROP MI-ROP-B7061-2016 Condition III. PROCESS/OPERATIONAL RESTRICTION(S) 2.	Malfunction abatement plan (MAP) was not amended within 45 days as required when new equipment was installed such as the DVLMFBAGHOUSE or when malfunctions occurred due to improper maintenance procedures that resulted in emission exceedances. The Company has stated via email that they plan to submit a revised MAP by June 15, 2018 to the DEQ-AQD.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 21, 2018. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are 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 what steps are being taken to prevent a reoccurrence.

If the Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of this Company. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-416-5025

cc: Mr. Scott Miller, DEQ
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ
Ms. Jenine Camilleri, DEQ