



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 7, 2022

VIA EMAIL AND CERTIFIED-RETURN RECEIPT REQUESTED

Christopher Hessler
Gerdau MacSteel Monroe Mill
3000 E. Front Street
Monroe, Michigan 48161

SRN: B7061, Monroe County

Dear Christopher Hessler:

VIOLATION NOTICE

On May 25, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received stack test results for FGLMFVTD and other emission units from Gerdau MacSteel Monroe Mill (Company) located at 3000 E. Front Street, Monroe, Michigan. The purpose of this testing 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); the Air Pollution Control Rules; Renewal Operating Permit ROP-B7061-2016 (ROP) and Permit to Install (PTI) 75-18.

Based on the stack test results and subsequent records review, the AQD identified the following violations:

| Process Description | Rule/Permit Condition Violated | Comments |
|---|--|--|
| Ladle metallurgy furnace (LMF) and the 2 vacuum tank degassers (VTD) that both exhaust to a common baghouse known as DVLMFBAGHOUSE. The flexible group FGLMFVTD includes the LMF and the VTD. | PTI 75-18; FGLMFVTD Condition 1. EMISSION LIMITS. 8. SO ₂ (R 336.2803, R 336.2804, R 336.2810) | 32.40 lb SO ₂ /hour tested value. Emission limit is 13.05 lb SO ₂ /hour. Considered on-going since October 2021. |
| LMF and VTD that both exhaust to a common baghouse known as DVLMFBAGHOUSE | PTI 75-18; FGLMFVTD Condition 1. EMISSION LIMITS. 9. SO ₂ (R 336.2803, R 336.2804, R 336.2810) | 52 tons SO ₂ per calculated 12-month rolling average. Limit is 45.22 tons SO ₂ for a 12-month rolling average. First exceedance was in April 2022. |

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| <p>LMF and VTD that both exhaust to a common baghouse known as DVLMFBAGHOUSE</p> | <p>PTI 75-18; FGLMFVTD Condition 1. EMISSION LIMITS. 10. CO (R 336.2803, R 336.2804, R 336.2810)</p> | <p>20.65 lb CO /hour tested value. Emission limit is 18.55 lb CO /hour. Considered on-going since October 2021.</p> |
| <p>LMF and VTD that both exhaust to a common baghouse known as DVLMFBAGHOUSE</p> | <p>PTI 75-18; FGLMFVTD Condition 1. EMISSION LIMITS. 14. VOC (R 336.1702(a))</p> | <p>3.08 lb VOC/hour tested value. Emission limit is 1.63 lb VOC/hour. Considered on-going since October 2021.</p> |
| <p>EULADLEPREHEAT2-This emission unit is a 30 MMBTU/hr natural gas-fired ladle preheater located in the Melt Shop.</p> | <p>PTI 75-18, EULADLEPREHEAT2 Condition V. TESTING /SAMPLING 1. (R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R336.2810, R 336.2908)</p> | <p>Company failed to verify NOx, SO₂, CO, PM, PM₁₀, and PM_{2.5} emissions within 180 days after commencement of initial startup of EULADLEPREHEAT2. To date, stack testing for this emission unit has yet to occur.</p> |
| <p>EU-EAF-This emission unit is an electric arc furnace (EAF) with 130 tons of liquid steel per hour capacity.</p> | <p>PTI 75-18, EUEAF Condition V. TESTING/SAMPLING 1. (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810, 40 CFR 60.272a)</p> | <p>Company failed to verify PM₁₀ and PM_{2.5} emissions within 180 days of start-up. In this case, start-up was September 24, 2021. Stack testing conducted in March 2022 failed to correctly test for PM₁₀ and PM_{2.5}.</p> |

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 28, 2022, (which coincides with 21 calendar days from the date of this letter). 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 violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

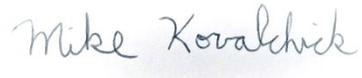
Please submit the written response to EGLE, AQD, Jackson District, at 301 E. Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in blue ink that reads "Mike Kovalchick". The signature is written in a cursive style and is positioned above the typed name and title.

Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-416-3537

cc:
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Scott Miller, EGLE