



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



C HEIDI GREETHER
DIRECTOR

October 5, 2018

Mr. Ron Kostyo, General Manager
United States Steel Great Lakes Works
No. 1 Quality Drive
Ecorse, MI 48229

SRN: A7809, Wayne County

Dear Mr. Kostyo:

VIOLATION NOTICE

On July 23, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), completed review of the stack test report for the No. 5 Pickle Line scrubber test performed on April 27, 2018, at United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. The purpose of this review was to determine U.S. Steel'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; and the conditions of Renewable Operating Permit (ROP) No. 199600132d.

Based on AQD's review of the test report, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Pickle Line (EG5-PICKLE-LINE)	ROP No. 199600132d, Section 1, Table E-01.08, Condition II.B 40 CFR Part 63, Subpart CCC, §63.1157(a)(1) and (2) Rule 336.1225	The HCl emissions were 54 ppmv, dry and 3.55 lb/hr (based on a three run average). The HCl limit is 18 ppmv, dry and 1.64 lb/hr. The tested collection efficiency was 96% (based on a three run average). The required collection efficiency is at least 97%.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 26, 2018 (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.

Mr. Ron Kostyo
Page 2
October 5, 2018

In addition, please provide a demonstration that the No. 5 Pickle Line upgrades, including pickling tank and tank cover replacements, in or around the 4th quarter of 2015, did not require a Rule 336.1201 permit and did not meet the criteria for a "reconstructed affected continuous pickling line" under 40 CFR Part 63 Subpart CCC (HCl Process Facilities and Hydrochloric Acid Regeneration Plants) and 40 CFR Part 63 Subpart A (General Provisions).

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If U.S. Steel 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 violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Katherine Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc: Ms. Alexis Piscitelli, U.S. Steel
Mr. Nathan Ganhs, U.S. Steel
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ