



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



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

November 18, 2019

Mr. LaDale Combs, General Manager  
 AK Steel Dearborn Works  
 4001 Miller Road  
 Dearborn, Michigan 48121-1699

SRN: A8640, Wayne County

Dear Mr. Combs:

**VIOLATION NOTICE**

On October 15, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the stack test report for the Basic Oxygen Furnace (BOF) and BOF Shop Operations conducted on August 13 and 14, 2019, at AK Steel Dearborn Works located at 4001 Miller Road, Dearborn, Michigan. Staff reviewed the report to determine AK 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 Renewable Operating Permit (ROP) number MI-ROP-A8640-2016a.

Based on the stack test report, the following air pollution violations were observed:

Process Description	Rule/Permit Condition Violated	Comments
FGBOFSHOP	ROP No. MI-ROP-A8640-2016a, FGBOFSHOP, S.C.I.10	The stack test result was 0.095 pounds per hour (pph) of Pb(lead) for the FGBOFSHOP Secondary Baghouse and ESP stacks combined.  The permit limit for FGBOFSHOP Secondary Baghouse and ESP stacks combined is 0.067 pph for Pb.
FGBOFSHOP	ROP No. MI-ROP-A8640-2016a, FGBOFSHOP, S.C.I.12	The stack test result was 0.23 pph of Mn(manganese) for the FGBOFSHOP Secondary Baghouse and ESP stacks combined.

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		The permit limit for the FGBOFSHOP Secondary Baghouse and ESP stacks combined is 0.10 pph for Mn.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 9, 2019 (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, 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If AK Steel Dearborn Works 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. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE  
Mr. Jonathan Lamb, EGLE