



9300 Dix Avenue, Dearborn, Michigan 48120, (313) 843-7200

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Air Quality Division  
Detroit Office

August 26, 2022

Ms. Katie Koster  
Sr. Environmental Engineer  
EGLE Detroit, AQD  
Detroit Field Office, Cadillac Place  
3058 W. Grand Blvd., Suite 2-300  
Detroit, MI 48202-6058

**Subject: August 12, 2022 Violation Notice Response**  
**Edw. C. Levy Co., Plant 6**  
**SRN: B4243, Wayne County**

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of the subject Violation Notice (VN) dated August 12, 2022, alleging violation of Rule 336.1901 (b) and ROP No. MI-ROP-B4243-2015, General Condition 12(b) on June 28, July 9, and July 10, 2022 due to "Detection of fallout beyond the facility's property line, attributable to the facility, of sufficient magnitude as to constitute an unreasonable interference with the comfortable enjoyment of life and property."

During our investigation, Levy identified an abnormal condition at the kish watering station. The waterlines to several pot watering stations had a reduced flow rate. This reduced flow rate appeared to be caused by partial obstruction of the waterlines by pieces of mineral deposit that were dislodged during routine maintenance of the system, pipe cleaning to remove mineral deposits, conducted in June 2022.

While all kish pots were watered for over 48 hours prior to being dumped, the lower water flow at some stations may have caused decreased moisture in the kish at the bottom of the pot when dumping.

On Tuesday July 12, 2022, Levy worked with two industrial cleaning contractors to clean 100 percent of the water spray piping to remove any obstructions. Water flow rates were closely monitored over the following weeks to identify any obstructions, and there were none.

As a process improvement, Levy modified the piping system to allow pipe cleaning of half the watering stations while the other half remained in operation. Previously, the entire system had to be shut down to cleaning the pipes, limiting our opportunities to perform this maintenance. This modification will facilitate more frequent maintenance of the piping, as Levy will no longer need to rely on scheduled mill outages to complete the work.

Levy will continue to monitor our site for opportunities to reduce potential emissions from our operations.

We request that you continue to notify us as soon as possible when you receive a complaint from one of our neighbors, as was done in these instances.

Please contact Matt Perko, Environmental Engineer (313-820-4057; [mperko@edwclevy.net](mailto:mperko@edwclevy.net)) or Tom Green, Director of EHS (313-690-0139, [tgreen@edwclevy.net](mailto:tgreen@edwclevy.net)) if you have any questions or need additional information.

Sincerely,

Keith Walker

Keith Walker  
General Operations Manager, Steel Mill Services  
Edw. C. Levy Co.  
kwalker@edwclevy.net  
260-417-6331

cc: Ms. Jenine Camilleri  
Supervisor, Enforcement Unit  
EGLE, Lansing, AQD  
PO Box 30260  
Lansing, MI 48909-7760

CC: Russell Burke, VP Steel Mill Services, Levy  
Zayd Sufyan, Operations Manager, Levy Plant 6  
Eliot Weiner, Executive Vice President, Levy  
Tom Green, Director of EHS, Levy  
Matt Perko, Environmental Engineer, Levy  
Jim Earl, Environmental Manager, AK Steel Dearborn Works.

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