



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

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Air Quality Division
Detroit Office

November 1, 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: October 13, 22 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 October 13, 2022, alleging violation of Rule 336.1901 (b) and ROP No. MI-ROP-B4243-2016, General Condition 12(b) on August 27 (on Wall Street in Melvindale) and September 6, 2022 (on Mellon Street in Detroit) 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."

Based upon our investigation, routine basic oxygen furnace (BOF) slag pit operations, such as pouring slag pots, digging pits, and stockpiling and transporting hardened slag occurred during the timeframe of the complaints. Employee interviews and a review of Levy operating records during and around these times found that emissions controls were operating as designed.

As we continue to review our operations for environmental improvement opportunities, we made the following change:

- Pots of caster/ladle metallurgical furnace (LMF) slag have historically been dumped into BOF Pit 6, the westernmost BOF slag pit. On September 28, 2022, Levy modified the LMF slag handling process to dump within the knock station enclosure to enhance control of potential fugitive emissions from LMF slag handling. The two Dust Bosses located within the enclosure are activated when the pots are dumped and during subsequent material handling.

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.

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

Sincerely,



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