



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



August 21, 2023

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: July 28, 2023 Violation Notice
July 31, 2023 Violation Notice
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 Notices (VN) dated July 28, 2023 and July 31, 2023. Both VNs allege violation of Rule 336.1901 (b) and ROP No. MI-ROP-B4243-2016, General Condition 12(b), 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." The July 28, 2023 VN was for fallout alleged to have occurred between the evening of June 6th and 4:30 a.m. on the morning of June 7th. The July 31, 2023 VN was for fallout alleged to have occurred on July 4th between 5:00 a.m. and 10:00 a.m.

Based upon our investigation, routine basic oxygen furnace (BOF) slag pit operations, such as pouring slag pots, digging pits, and stockpiling hardened slag occurred during the timeframe of the alleged fallout events. Employee interviews and a review of Levy operating records found that all emission controls were operating as designed and no abnormal operating condition occurred during the time of the alleged events. In fact, on the morning of July 4th, there was very little activity on Levy's site. We dumped a total of 6 slag pots. There was no BOF slag pit digging, no conveyance of material across the river, no truck loading, and no drop crane operations. Due to the holiday, activity was kept to the absolute minimum.

As a result, we do not believe Levy was the source of the alleged fallout events.

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 Dan Deaton, Environmental Engineer (313-407-21505; ddeaton@levynet.com) or Tom Green, Director of EHS (313-690-0139, tgreen@edwclevy.net) if you have any questions or need additional information.

Sincerely,

Russell D. Burke

Russell Burke
VP Steel Mill Services, Levy
Edw. C. Levy Co.
rburke@edwclevy.net
313-720-9238

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

CC: Keith Walker, General Operations Manager, Steel Mill Services, Levy
Zayd Sufyan, Operations Manager, Levy Plant 6
Eliot Weiner, Executive Vice President, Levy
Tom Green, Director of EHS, Levy
Daniel Deaton, Environmental Engineer, Levy
Jim Earl, Environmental Manager, Cleveland Cliffs Steel Dearborn Works