



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

January 6, 2016

Mr. Darrel Moore
Gerdau Monroe Mill
3000 East Front Street
Monroe, Michigan 48161

SRN: B7061, Monroe County

Dear Mr. Moore:

VIOLATION NOTICE

On October 13, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) issued a Violation Notice (VN) to Gerdau Monroe Mill addressing the reported sulfur dioxide (SO₂) emission exceedance from the electric arc furnace (EAF) and vacuum tank degasser (VTD) that occurred during the month of September 2015. At that time, Gerdau Monroe Mill was subject to the SO₂ emission limits contained in Renewable Operating Permit (ROP) No. MI-ROP-B7061-2009a. Gerdau Monroe Mill reported that on October 2, 2015, the facility achieved the capacity to operate at increased output, as defined in Permit to Install (PTI) No. 102-12A. Upon achieving the capacity to operate at increased output, the facility became subject to the SO₂ emission limits contained in PTI No. 102-12A, which were established in accordance with state and federal Prevention of Significant Deterioration (PSD) regulations. Additionally, Gerdau Monroe Mill notified the AQD that despite considerable efforts to reduce SO₂ emissions, the average emission rate from the EAF and VTD is currently 0.28 pounds per ton of liquid steel, which is above the Best Available Control Technology Limit of 0.20 pounds per ton of liquid steel contained in PTI No. 102-12A.

Reported violation:

Process Description	Rule/Permit Condition Violated	Comments
FGMELTSHOP	PTI No. 102-12A, Special Condition I.9 R336.2803, R336.2804 and R336.2810	Exceedance of sulfur dioxide emission rate in pounds per ton of liquid steel.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 27, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Mr. Darrel Moore
Gerdau Monroe Mill
Page 2
January 6, 2016

If Gerdau Monroe Mill believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation 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,

A handwritten signature in black ink, appearing to read "Eric Grinstern", with a long horizontal flourish extending to the right.

Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-0266

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Michael Gabor, DEQ