



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT FIELD OFFICE



DAN WYANT  
DIRECTOR

February 3, 2014

Mr. James Gray, General Manager  
United States Steel Great Lakes Works  
No. 1 Quality Drive  
Ecorse, Michigan 48229

SRN: A7809, Wayne County

Dear Mr. Gray:

**VIOLATION NOTICE**

On January 13, 2014 the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the results of the nitrogen oxide emissions stack test on the Continuous Galvanizing Line Annealing Furnace conducted on October 24, 2013 at U.S. Steel Great Lakes Works located at No. 1 Quality Drive, Ecorse, Michigan. The purpose of this stack test was to determine U.S. 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 administrative rules; and the conditions of Renewable Operating Permit (ROP) number 199600132d.

AQD District Staff and Technical Programs Unit reviewed the stack test results. Based on a review of the test results and monthly natural gas usage data provided by U.S. Steel on July 2, 2013 for January 2012 – June 2013, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Continuous Galvanizing Line Operations (EG-CON-GALV-LINE)	Table E-01.11, Section II.B.2.A.1 of ROP No. 199600132d  R336.1205	Based on the October 2013 stack test, nitrogen oxide emissions were 8.9 lb/hr.  The permit limit for nitrogen oxide from the annealing furnace is 6.6 lb/hr.
Continuous Galvanizing Line Operations (EG-CON-GALV-LINE)	Table E-01.11, Section II.B.2.A.2 of ROP No. 199600132d  R336.1205	Based on the natural gas usage records with and without urea injection, and stack test results from February 2010, May 2013, and October 2013, 12 month rolling emissions of nitrogen oxide at the end of each month starting in December 2012 through May 2013 were 35 to 37 tons.

		The permit limit for nitrogen oxide from the annealing furnace is 25 tons per year on a 12 month rolling basis.
Continuous Galvanizing Line Operations (EG-CON-GALV-LINE)	Table E-01.11, Section II.B.1.A.1 of ROP No. 199600132d  R336.1205	Based on the October 2013 stack test, nitrogen oxide emissions were 8.9 lb/hr.  The permit limit for NOx from the annealing furnace and edge burners is 7.24 lb/hr.
Continuous Galvanizing Line Operations (EG-CON-GALV-LINE)	Table E-01.11, Section II.B.1.A.2 of ROP No. 199600132d  R336.1205	Based on the natural gas usage records with and without urea injection, and stack test results from February 2010, May 2013, and October 2013, 12 month rolling emissions of nitrogen oxide at the end of each month starting in December 2012 through May 2013 were 35 to 37 tons.  The permit limit for NOx from the annealing furnace and edge burners is 27.51 tons per year on a 12 month rolling basis.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 24, 2014 (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. In your response, please provide the monthly natural gas usage records with and without urea injection for July 2013 – January 2014.

If U.S. Steel 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.

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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. Alexis Piscitelli, U.S. Steel  
cc via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ