



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT FIELD OFFICE



DAN WYANT  
DIRECTOR

September 30, 2015

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 August 26, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted certified Method 9 visible emissions readings of the No.2 BOP Shop at U.S. Steel Great Lakes Works located at No. 1 Quality Drive, Ecorse, Michigan. Additionally, on September 15, 2015, AQD reviewed the January through June Title V semi-annual deviation report and the July 2015 monthly visible emissions report for the No. 2 BOP Shop. The purpose of these readings and the review 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.

During the visible emissions readings and report review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
No. 2 BOP Shop - Roof Monitor	ROP No. 199600132d, Section 1, Table F-01.07, Condition II.B.3  Rule 336.1364(2)  40 CFR 63.7790(a) and Table 1.12	On August 26, 2015, 46% was the highest 3-minute average opacity calculated (see enclosed VE form). The plume color was brown.  20% opacity on a 3-minute average is the visible emission limit.
No. 2 BOP Shop - Roof Monitor	ROP No. 199600132d, Section 1, Table F-01.07, Condition II.B.3  Rule 336.1364(2)  40 CFR 63.7790(a) and Table 1.12 AQD Consent Order No. 1-2005, Condition 11.A.3.e	From January through July 2015, visible emissions observations of 15 full steel production cycles (tap to tap) were conducted by an independent certified observer. 9 exceedances of the 20% 3-minute average opacity limit were observed.

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Enclosed are copies of the instantaneous and three-minute average readings taken on August 26, 2015 by AQD at US Steel.

U.S. Steel is required by AQD Consent Order No. 1-2005 to perform Method 9/9C readings during one full steel production cycle (tap to tap) once every two weeks. Compliance with the 20% opacity limit on a 3-minute average during these readings is to be determined by an independent certified observer as outlined in Condition 11.A.3.d and e. of the referenced order. Based on these readings, 9 opacity exceedances were observed over 15 full steel production cycles between January and July 2015.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 21, 2015 (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.

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.

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

Enclosure

cc: Ms. Alexis Piscitelli, U.S. Steel  
Mr. Brad Wargnier, U.S. Steel  
cc via email: Ms. Lynn Fiedler, DEQ  
Ms. Barb Rosenbaum, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ