



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



February 28, 2017

Ms. Katherine Koster
MDEQ Detroit, AQD
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

**Subject: Violation Notice dated February 23, 2017
AK Steel & Edw. C. Levy Co., Plant 6
SRN: A8640**

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of the Violation Notice dated February 23, 2017, for an alleged citizen complaint on or around December 23, 2016 concerning a large brown plume from the AK Steel Dearborn Works property. The Violation Notice alleges that AK Steel Dearborn Works (AK Steel) and Levy violated General Condition No. 12(b) of Renewable Operating Permit (ROP) Number MI-ROP-A8640-2016a and Rule 901(b).

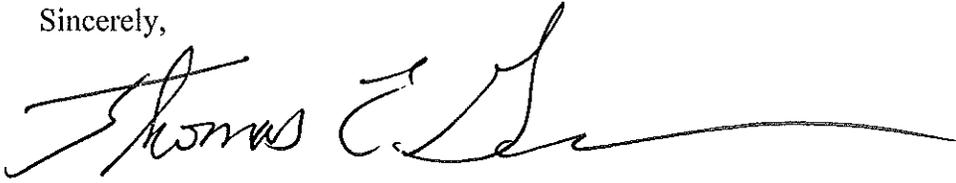
AK Steel and Levy conducted a thorough joint investigation of the alleged plume. The probable source of the plume was dumping a blast furnace slag pot that contained an abnormally large amount of iron. This excess iron in the slag pot caused the abnormal emissions during the dumping process. The root cause for this upset condition was the malfunction of a slag skimmer at the furnace, which resulted in iron discharging into a slag pot instead of a torpedo car. The discharge of iron into slag pots rarely happens.

The results of this joint investigation were previously provided to you in memorandums on December 29, 2016 and January 13, 2017 from James Earl, AK Steel Dearborn Environmental Affairs Manager.

AK Steel and Levy have reviewed and updated internal procedures related to the handling of slag pots containing iron. If in the future a slag pot is filled with iron, Levy operating personnel will immediately notify Levy Management prior to handling the pot. Levy Management, with collaboration with AK Steel Management, will determine the safest and most environmentally sound manner to handle the slag pot.

If you need additional information, please call me at (313) 690-0139.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas E. Green". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Thomas E. Green
Director, Environmental Services
Edw. C. Levy Co.

cc: B. Michalik, Edw. C. Levy Co.
E. Patino, Edw. C. Levy Co.
T. Smith, Edw. C. Levy Co.