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DEC 16 2019

Air Quality Division
Detroit Office

December 6, 2019

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: November 18, 2019 Violation Notice Response
Edw. C. Levy Co., Plant 6
SRN: A8640-Section 2, Wayne County**

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of the subject Violation Notice (VN) dated November 18, 2019, for alleged fallout detected beyond the facility's property line that occurred the evening of April 7, 2019. The VN alleges violation of General Condition No. 12(b) of ROP No. MI-ROP-A8640-2016a Section 2, and Rule 901(b). Furthermore, the Air Quality District (AQD) reviewed the facility's slag/kish dewatering logs, which were received by AQD on May 8, 2019. The VN notes a violation of the ROP Section 2, FGDESULFWTR-STN, S.C. III.5, which requires watering of kish pots for a minimum of 24 hours. The records submitted by Levy show a kish pot was watered for less than 24 hours on four occasions:

- March 10, 2019 – 23 hours and 49 minutes
- March 26, 2019 – 20 hours and 57 minutes
- March 27, 2019 – 23 hours and 55 minutes
- March 28, 2019 – 22 hours

In each event, only one pot was watered for less than the permit-required 24 hours.

As previously communicated to AQD on the Semi-Annual Deviation Report for the period from January 1 to June 30, 2019, submitted on September 12, 2019, around March 4, 2019, several desulfurization slag (also known as kish) pots were removed from service for repair for continued safe operation of the system. This decreased the kish pot rotation from the standard ten pots to six pots, thus shortening watering time. The four pots in question were incorrectly removed by operators prior to the 24-hour mark. On April 9, 2019, three pots were returned to the rotation for a total of nine. This allowed for increased watering time due to a greater number of pots being available. Operators were also retrained on the pot watering process. An additional tenth pot was later added to restore the typical rotation.

Please contact Matt Perko, Environmental Engineer (313-820-4057; mperko@edwclevy.net) or Tom Green, Director of EHS (313-690-0105, tgreen@edwclevy.net) if you have any questions or need additional information.

Sincerely,



Thomas E. Green
Director, Environmental Health & Safety
Edw. C. Levy Co.
tgreen@edwclevy.net
(313) 690-0139

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

Tim Lazarz, Operations Manager, Levy Plant 6
Russ Burke, Director, Steel Mill Services, Levy
Brian Lasley, Vice President Steel Mill Services, Levy
Malcom Dunbar, Vice President EHS, Levy
Keith Walker, General Operations Manager Levy
Matt Perko, Environmental Engineer, Levy
Jim Earl, Environmental Manager, AK Steel Dearborn Works