



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

October 27, 2014

Mr. Brian Bishop, General Manager - Operations
AK Steel - Dearborn Works
4001 Miller Rd.
P.O. Box 1699
Dearborn, MI 48120-1699

SRN: A8640, Wayne County

Dear Mr. Bishop:

VIOLATION NOTICE

On September 12, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the semi-annual Title V deviation report for January through June 2014 for AK Steel - Dearborn Works (formerly Severstal Dearborn, LLC) located at 4001 Miller Road, Dearborn, Michigan. AQD staff reviewed the report to determine AK Steel's compliance status 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 199700004.

Based on this review, staff noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Basic Oxygen Furnace - Electrostatic Precipitator (EGBOF)	General Condition 2(a) of ROP No. 199700004, Section 1	ESP COMS data indicated 28 six-minute average periods that exceeded 20% opacity that were not attributable to steam interference during the reporting period January - June 2014.
Basic Oxygen Furnace - Electrostatic Precipitator (EGBOF)	Table E-01.04, Condition III.A.3.6, ROP No. 199700004, Section 1 Table E-01.04, Condition V.11, ROP No. 199700004, Section 1 Table E-01.04, Condition V.12, ROP No. 199700004, Section 1 40 CFR 63.7800(b), 40 CFR 63.7834(a)	Failure to perform all required inspections and preventative maintenance on the ESP and associated capture system as prescribed in the Integrated Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) during the reporting period January - June 2014
Basic Oxygen Furnace - Electrostatic Precipitator (EGBOF)	Table E-01.04, Condition V.1, ROP No. 199700004, Section 1 Rule 336.1910	Failure to properly maintain and operate the ESP and associated capture system based on failure to perform

		preventative maintenance and inspections at the frequencies required in the Integrated Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) during the reporting period January - June 2014
Basic Oxygen Furnace - Electrostatic Precipitator (EGBOF)	Table E-01.04, Condition III.A.3.7, ROP No. 199700004, Section 1 40 CFR 63.7834(a), 40 CFR 63.7842(d)	Failure to maintain records to demonstrate continuous compliance with the operation and maintenance requirements in the Integrated Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) during the reporting period January - June 2014
Basic Oxygen Furnace - BOF Secondary Baghouse (EGRELADLINGSOUTH)	Table E-01.14, Condition V.2, ROP No. 199700004, Section 1 40 CFR 63.7830(b), 40 CFR 63.7834(a)	Failure to perform all required inspections and preventative maintenance on the Secondary Baghouse and associated capture system as prescribed in the Integrated Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) during the reporting period January - June 2014
Basic Oxygen Furnace - BOF Secondary Baghouse (EGRELADLINGSOUTH)	40 CFR 63.7834(a), 40 CFR 63.7842(d)	Failure to maintain records to demonstrate continuous compliance with the operation and maintenance requirements in the Integrated Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) during the reporting period January - June 2014
Basic Oxygen Furnace - BOF Secondary Baghouse (EGBOF) C Blast Furnace Casthouse (EGCBFCASTHOUSE)	Table B-1, Condition VI.3, ROP No. 199700004, Section 1 40 CFR 63.7824(c)	Facility did not conduct a new performance test prior to changing capture system operating parameters since the initial performance test was conducted, as required by the Integrated Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF)

The Integrated Iron and Steel MACT (40 CFR Part 63, Subpart FFFFF), 40 CFR Part 63.7824(c), requires the following if the operating limits for a capture system are changed:

"...(1) Submit a written notification to the Administrator of your request to conduct a new performance test to revise the operating limit.

(2) Conduct a performance test to demonstrate compliance with the applicable emission limitation in Table 1 of this subpart.

(3) Establish revised operating limits according to the applicable procedures in paragraphs (a) and (b) of his section for a control device or capture system."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice and information requested above by November 17, 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 addition, please provide an updated MACT O&M plan for the BOF shop, including the ESP and Secondary Baghouse, and C Blast Furnace with your response.

If AK 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,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Mr. James Earl, AK Steel
Mr. Dave Miracle, AK Steel
cc via email: Ms. Kasey Barton, USEPA
Mr. Patrick Miller, USEPA
Mr. Michael Zoeller, USDOJ
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Mike Kovalchick, DEQ
Ms. Katie Koster, DEQ
Mr. Neil Gordon, AG