



October 16, 2019

Mr. Mike Kovalchick
Michigan Department of Environment, Great Lakes and Energy
Jackson District, Air Quality Division
301 East Louis Glick Highway
Jackson, MI 49203

Re: Response to Violation Notice dated 9/25/19

Dear Mike:

Gerdaul Jackson has reviewed the violation notice dated 9/25/19 concerning the issue with the Slag pile at TMS. After investigating the cause of the issue, it has been determined that the source of the wood observed in the slag pile was used wood from the rabbling process. During the rabble process, wood boards are used by an operator to scrape slag off the steel. Most of the wood is consumed by the molten metal in the ladle. The remaining wood is recycled and reused by adding more wood boards. Once the wood is no longer usable to pull the slag off the metal, the wood is placed in the slag pit to be consumed.

On the day of the inspection, a piece of rabble wood was observed in the slag pile. Gerdaul believes this material is part of the process and is not refuse or trash. Gerdaul has modified its process to not put the used rabble wood in the slag pit. The material will be collected in the side pit for removal. This will avoid future events of rabble wood burning in the slag product piles at TMS.

If you have any questions, please contact me at 517/764-3967.

Sincerely,

A handwritten signature in black ink that reads 'Craig Metzger'.

Craig Metzger
Regional Environmental Manager
Gerdaul Special Steel North America

cc: Darrel Moore
Ms. Jenine Camilleri - MDEGLE
File