



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

December 7, 2021

Mr. Christopher Hessler
Gerdau Special Steel North America
3000 East Front Street
Monroe, Michigan 48161

SRN: B7061; Monroe County

Dear Mr. Hessler:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has reviewed the quarterly excess emission report submitted on November 2, 2021 by Gerdau Special Steel North America located at 3000 East Front Street in Monroe. PTI 75-18 requires the facility to monitor and record carbon monoxide (CO) emissions from EUEAF on a continuous basis in a manner and with instrumentation acceptable to the AQD.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUEAF (SVBH-01-Stack1) EUEAF (SVBH-01-Stack2)	PTI 75-18 EUEAF, VI, 4	The permittee shall continuously monitor and record, in a satisfactory manner, the carbon monoxide emissions from the EAF baghouse stacks (SVBH-01-Stack1 and SVBH-01-Stack2) of EUEAF. The permittee shall operate each Continuous Emission Rate Monitoring System (CERMS) to meet the timelines, requirements and reporting detailed in Appendix B.

Process Description	Rule/Permit Condition Violated	Comments
EUEAF (SVBH-01-Stack1) EUEAF (SVBH-02-Stack2)	PTI 75-18 EUEAF, VI, 4	Failure to continuously monitor carbon monoxide.

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The 2021 third quarter excess emission reports indicate excess periods of CO monitor downtime for EUEAF, Stack 1 of 10.94 percent, and EUEAF, Stack 2 of 10.87 percent.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 28, 2021 (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 Gerdau Special Steel North America 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,



Lindsey Wells
Environmental Quality Analyst
Air Quality Division
517-282-2345

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Scott Miller, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Mike Kovalchick, EGLE