

GRETCHEN WHITMER GOVERNOR STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

JACKSON DISTRICT OFFICE



PHILLP D. ROOS DIRECTOR

September 30, 2024

VIA EMAIL

Christopher Hessler Gerdau MacSteel Monroe Mill 3000 E. Front Street Monroe, Michigan 48161

SRN: B7061, Monroe County

Dear Christopher Hessler:

## VIOLATION NOTICE

On September 18, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an announced compliance inspection of Gerdau MacSteel Monroe Mill (Company) located at 3000 E. Front Street, Monroe, Michigan. The purpose of this inspection was to determine the Company's compliance 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 Air Pollution Control Rules; Renewal Operating Permit ROP-B7061-2016 (ROP) and Permit to Install (PTI) 75-18.

Based on the inspection and subsequent records review, the AQD identified the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Ladle metallurgy furnace (LMF) and the 2 vacuum tank degassers (VTD) that both exhaust to a common baghouse known as DVLMFBAGHOUSE. The flexible group FGLMFVTD includes the LMF and the VTD.	PTI 75-18; FGLMFVTD Condition 1. EMISSION LIMITS. 8. SO <sub>2</sub> (R 336.2803, R 336.2804, R 336.2810)	Per 2022 stack test: 32.40 lb SO <sub>2</sub> /hour. Emission limit is 13.05 lb SO <sub>2</sub> /hour. Considered an on-going emission violation since October 2021.
LMF and VTD that both exhaust to a common baghouse known as DVLMFBAGHOUSE	PTI 75-18; FGLMFVTD Condition 1. EMISSION LIMITS. 9. SO <sub>2</sub> (R 336.2803, R 336.2804, R 336.2810)	76 tons $SO_2$ based on the most recent calculated 12-month rolling average. Limit is 45.22 tons $SO_2$ for a 12-month rolling average. Considered on-going since April 2022.
LMF and VTD that both exhaust to a common baghouse known as DVLMFBAGHOUSE	PTI 75-18; FGLMFVTD Condition 1. EMISSION LIMITS. 10. CO (R 336.2803, R 336.2804, R 336.2810)	Per 2022 stack test 20.65 lb CO /hour. Emission limit is 18.55 lb CO /hour. Considered on-going since October 2021.

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LMF and VTD that both	PTI 75-18; FGLMFVTD	Per 2022 stack test: 3.08 lb
exhaust to a common	Condition 1. EMISSION	VOC/hour. Emission limit is
baghouse known as	LIMITS. 14. VOC	1.63 lb VOC/hour. Considered
DVLMFBAGHOUSE	(R 336.1702(a))	on-going since October 2021.
LMF and the VTD that both	PTI 75-18; FGLMFVTD	7.29 tons of VOC based on the
exhaust to a common	Condition 1. EMISSION	most recent 12-month rolling
baghouse known as	LIMITS. 15. VOC	average. Emission limit is 6.08
DVLMFBAGHOUSE.	(R 336.1702(a))	tons per 12 month rolling
		average. Considered on-going
		since May 2022.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by XXX, (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. It should be noted that the Company has previously submitted PTI Application APP-2023-0160 to address the emission limit violations. To date, this PTI Application is considered incomplete as it does not fully address all the regulatory requirements that must be met in order to be eligible for a permit.

Please submit the written response to EGLE, AQD, Jackson District, at 301 E. Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Mike Kovalchik

Mike Kovalchick Senior Environmental Engineer Air Quality Division 517-416-3537

CC:

Ms. Jenine Camilleri, EGLE Mr. Brad Myott, EGLE Scott Miller, EGLE