



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

December 17, 2018

UPS NEXT DAY DELIVERY

ENFORCEMENT NOTICE

In the matter of:

United States Steel – Great Lakes Works
No. 1 Quality Drive
Ecorse, Michigan 48229

SRN: A7809; Wayne County

ATTENTION: Ms. Alexis Piscitelli, Environmental Manager

This letter is to advise you of the commencement of escalated enforcement action against United States Steel – Great Lakes Works (Company). This letter follows the August 18, 2017 and October 5, 2018 Violation Notices issued by the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) which detailed violations of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart CCC; the NESHAP for Integrated Iron and Steel Manufacturing Facilities, 40 CFR Part 63, Subpart FFFFF; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451, as amended (NREPA), MCL 324.5501 *et seq.* and the administrative rules promulgated thereunder, and the following violations of Renewable Operating Permit No. 199600132d:

- No. 5 Pickle Line (EG5-PICKLE-LINE), Section 1, Table E-01.08, Conditions II.B, III.A.2, and V.2
- B2 Blast Furnace Casthouse Roof Monitor (EGBLAST-FCE-B), Table E-01.13, Condition II.B, Visible Emissions from roof monitor
- D4 Blast Furnace Slag Pits (FG-SLAG-PITS), Table B-1, Source-wide Requirements, Condition II.B
- B2 Furnace Backdraft Stack (EGBLAST-FCE-B) and D4 Blast Furnace Backdraft Stack (EGBLAST-FCE-D), General Condition 2.a

The cited violations against the Company are federally enforceable and are considered a High Priority Violation (HPV) by the United States Environmental Protection Agency (EPA). The HPV designation means that the EPA places a priority on enforcing the regulations governing this violation and on formally resolving alleged violations of this type. The AQD is required to report all HPVs to the EPA, pursuant to the state's grant commitments with the EPA and the state's delegated enforcement authority of the federal Clean Air Act.

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The AQD is providing the Company with an opportunity to formally resolve these violations through the entry of a legally enforceable agreement that will include a compliance program and payment of an appropriate monetary penalty pursuant to Section 5528 of Part 55 of NREPA, MCL 324.5528.

Be advised that failure to respond to this Enforcement Notice in a timely manner and adequately resolve or address the cited violations may result in further enforcement proceedings, including but not limited to, referral of the matter to the Michigan Department of Attorney General (MDAG) for commencement of civil litigation. This Enforcement Notice does not preclude or limit the MDEQ's ability to initiate any other enforcement action under federal or state law as appropriate.

Please contact me at 517-284-6769, or by email at morane@michigan.gov, no later than Friday, December 28, 2018 to schedule a meeting to discuss the resolution of this matter.

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY

By: 
Erin Moran
Air Quality Division, Enforcement Unit

Date: 

cc: Ms. Sarah Marshall, U.S. EPA, Region 5
Mr. Neil Gordon, MDAG
Ms. Wilhemina McLemore, MDEQ
Ms. Jenine Camilleri, MDEQ