

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : U S STEEL GREAT LAKES WORKS		SRN : A7809
Location : 1 QUALITY DR		District : Detroit
		County : WAYNE
City : ECORSE	State: MI	Zip Code : 48229
Compliance Status :		Non Compliance
Source Class : MEGASITE	Staff : Katherine Koster	
FCE Begin Date : 5/11/2014	FCE Completion Date :	5/11/2017
Comments : Non compliance was chosen as the No 5 Pickle line scrubber is not operating at the required minimum flow rates established by the stack test in February 2017. As of 5/11/2017, facility has not provided a plan to comply with this requirement.		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/11/2017	Scheduled Inspection	Compliance	FY2017 Scheduled Inspection - No 1 Argon, No 2 Argon/LMF, Vacuum Degasser, Slab Scarfing
04/28/2017	CO/CJ	Non Compliance	Quarterly inspection records for the No. 5 Pickle Line for the 1st quarter of 2017 were submitted per the newly issued CO 22-2016. Records indicate new spray nozzles and new demister pad were installed in March. A leak was noted in the ductwork in the December inspections. It is unclear whether it has been repaired because the fume scrubber no 1 spray pump and scrubber tower piping inspections indicate leaks off and on in the weekly inspections throughout the quarter with notes stating that repairs will be performed in the June 2017 outage. Also, a review of the daily records of scrubber parameters indicates that the scrubber is not operating above the required minimum flow rates established in the February 14 stack testing. Facility was informed of this on May 11 during an AQD inspection. As such, non compliance was chosen.

04/07/2017	Stack Test	Compliance	<p>Stack test results for the No.1 Argon baghouse were received via email on January 19, 2017. TPU staff received a hard copy. This was a retest as the two prior tests for PM were failed. TPU conducted a review and the test was passed. Memo from Mr. Tom Gasloli, dated February 10, 2017, is attached. BTEC did not include non production/non sampling time in the lb/hr calculation which was done in past stack tests and was unacceptable to AQD.</p> <p>As reported by BTEC, PM test results were: 0.04 lb/hr (permit limit is 1.4); .0002 gr/dscf (limit is .02 gr/dscf); and 0.036 lb/heat (limit is 0.543 lb/heat).</p> <p>However, four runs were performed because the first run failed post test leak check. The fourth run had a negative particulate catch. The negative value was treated as a zero. The testers had an error in their calculations for the third run. They used 0.6 mg for the particulate catch when it was 0.3 mg. Mr. Gasloli calculated emissions for Runs 2-4 and Runs 2 and 3. Either scenario resulted in compliance with the permit limits. Using the highest values, the PM results was 0.0003 gr/dscf (0.02 limit); 0.054 lb/hr (1.4 limit); and 0.049 lb/heat (0.543 limit).</p> <p>Test report was missing process data that was requested in the test plan approval letter. ***** *****</p> <p>UPDATE: Process data was received via email on 4/18/17. Pressure drops were between 4.1 and 4.5 in w.c. for the 1st module and 3.1 and 3.4 in w.c. for the 2nd module. Fan amps were between 198 and 209. Steel produced per heat was fairly consistent at 252-263 tons. It appears that Run 2 ended 12 minutes after the final stir, Run #3 ended 2 minutes after the final stir and Run #4 ended 10 minutes before the final stir. Ideally, runs should end as close to the final stir time as possible.</p>
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03/21/2017	Stack Test	Compliance	<p>A stack test on the ESP was performed on 12/13/16-12/14/16 to demonstrate compliance with the limit of 0.057 lbs PM/1000 lbs (dry) exhaust gas. This limit is in the ROP at E-01.18. The UAR for this limit is Rule 331 and the test method is in the Part 10 AQD rules (Rule 336.2013). This rule requires testing only during oxygen blowing and 4 blows constitutes one run. This is different than the testing requirements in the Iron and Steel MACT which requires testing over the steel production cycle so the tests have to be performed separately at this time. The prior test was performed on 2014. Testing is required every other year per the ROP.</p> <p>The stack test was performed by BTEC. The test plan was received around 11/15/16 and stack test approval letter was sent on December 7 (attached). The results were 0.004 lb PM/1000 lbs. exhaust gas (dry). The report also listed a result of .002 gr/dscf and 8.37 lb/hr but there is no emission limit to compare these values to as the ESP does not have a lb/hr limit and the gr/dscf limit is from the Iron and Steel MACT which requires a different test method. TPU staff did not review this report. Maintenance records for the last three months for the ESP were mailed to the Detroit Office and are in the facility orange file. However, process and ESP operational data requested in the approval letter was missing from the submittal. As such, compliance status is unknown at this time.</p> <p>*****</p> <p>UPDATE: Additional operating information was received on April 18 (attached). All fields and lanes of the ESP were operating. Tons of steel per heat and average blow rate were fairly consistent throughout the test (about 275 tons per heat and approximately 18,000 SCFM). COMS data indicated that there were no exceedances of the 6 minute or 1 hour average standard. As such, compliance was chosen as the</p>
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03/21/2017	Stack Test	Compliance	compliance status. Of note, for Run #1, all heats were on #26 vessel. For Run #2 and Run #3, the vessels were alternated. Also, the VE reader did observe two roof monitor exceedances during one of the oxygen blows indicating that not all of the emissions were routed to the ESP during Run #1. However, as emissions were measured well below the limit (by an order of magnitude), at this time, it does not appear that the absence of the two exceedances would have made a difference in the compliance status. These exceedances were reported in the ROP deviation report for CY2016.
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Activity Date	Activity Type	Compliance Status	Comments
03/21/2017	Stack Test	Compliance	<p>An Integrated Iron and Steel MACT stack test on the ESP was performed on 12/15/16 to demonstrate compliance with the limit of 0.02 gr/dscf. This limit is in the ROP at E-01.18. The Iron and Steel MACT requires that testing be performed over the steel production cycle (as opposed to only oxygen blows) and requires a test twice per ROP term. As an ROP term is 5 years, AQD interprets this requirement to be once every 2.5 years. The company believes that since the ROP has not yet been renewed, the next term does not start until the renewal date. AQD disagrees with this interpretation. Regardless, it was decided that a MACT test would be conducted after request by AQD. Due to the late scheduling of the test, no test protocol and approval letter was generated. The stack test was performed by BTEC. The results were 0.002 grains PM /dscf and the MACT limit is 0.02 grains PM/dscf for an existing open hood BOF. The cover letter lists the source as "No. 2 BOP" but it should really read ESP. TPU staff did not review this report. Maintenance records for the last three months for the ESP were mailed to the Detroit Office. However, process and ESP operational data requested in the approval letter was missing from the submittal. As such, compliance status is unknown at this time.</p> <p>***** *****</p> <p>UPDATE: Additional operating information was received on April 18 (attached). All fields and lanes of the ESP were operating. Tons of steel per heat and average blow rate were fairly consistent throughout the test (about 275 tons per heat and approximately 18,000 SCFM). COMS data indicated that there were no exceedances of the 6 minute or 1 hour average standard. As such, compliance was chosen as the compliance status.</p>

03/21/2017	Stack Test	Compliance	<p>A stack test of the No. 1 Baghouse at the No. 2 BOP Shop was performed on 12/13/16-12/14/16. The No. 1 baghouse mainly controls charging and tapping of the BOP vessels. The testing is required every other year. The test protocol was received on November 21 and the approval letter was issued on December 7. Note, in this case, regarding the test plan approval letter, the term hot metal transfer refers to the transfer of molten iron from a ladle into the BOF vessel. Testing was performed by BTEC. This is a 14 compartment positive pressure baghouse. The PM limits are 0.005 gr/dscf (permit limit), 0.01 gr/dscf (MACT limit) and 0.038 lb/1000 lbs exhaust gas, dry (permit limit). Results as reported by BTEC were .0021 gr/dscf (train A) and .0014 gr/dscf (train B) and 0.004 lb/1000 lbs exhaust gas, dry (train A) and 0.003 lb/1000 lbs exhaust gas dry. Results indicate compliance. TPU did not review this report.</p> <p>This test suffices for the MACT testing requirement. However, a variance has been reportedly granted by EPA which is explained in the test report and has been reviewed and allowed by TPU. This test methodology has been used for the last several testing cycles. Two sampling trains are run during testing. VE readings of the BOP roof monitor were conducted over three steel production cycles. Two opacity exceedances were noted but they occurred during oxygen blowing which is not when the baghouse is the main emission control.</p> <p>Three months of maintenance records were submitted separately and received on February 10, 2017. Records are in the facility orange file. Process data was provided in terms of scrap and iron charge per heat, start time of each activity, and pressure drop and fan amps for the baghouse. It appears that compartments 2,5 and 8 were off line for portions of the testing on 12/13 to simulate having a compartment out of</p>
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03/21/2017	Stack Test	Compliance	<p>service for maintenance. On 12/14, it appears that only compartment 8 was offline. Pressure drop between 3 and 15 in w.c. is the normal operating range specified in the ROP which appears to have been met (except for right after a cleaning cycle). Fan amps were above the required minimum of 115 amps per fan per the Iron and Steel MACT O&M plan (May 14, 2010 version).</p>
03/16/2017	MACT (Part 63)	Compliance	<p>USS - Facility submitted semi annual SSM report for the HCl steel pickling lines per 40 CFR Part 63 Subpart CCC for July - December 2016. They reported 1 planned start up/shut down and no malfunctions. Company certified that they followed procedures in their SSM plans. Reason for shut down was planned outage maintenance. Also, flow meters and pressure differential meter were last calibrated on November 2, 2015. This calibration is required annually. However, the facility reported that the calibrations were missed and did not occur until Jan 20, 2017. At this time, discretion is being used as facility identified the deviation and readily corrected it. However, it should appear in the Title V deviation report.</p> <p>Note, the report referenced 63.1164(c) which only requires a report if there are scrubber malfunctions. However, the ROP 199600132d has a requirement with a UAR of 63.1164(c)(2) which also addresses start up and shutdowns which is not longer a part of the CCC MACT.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/16/2017	CO/CJ	Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observations for the BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for January 2017 were received by the Detroit Office on 2/3/17. Readings were performed on the BOP roof monitor on January 4 and 18, 2017, and on the ESP Stack on January 13, 2017. Vessel 26 was read for the RM readings. Blow rate was approximately 18,000. No excess opacity was observed from the RM and ESP stack.
03/16/2017	Other	Compliance	Surveillance
03/15/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form. Compliance relates solely to the receipt of the ROP certification form.
03/15/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form. 2016 MAERS ROP Certification Form. Compliance relates solely to the receipt of the ROP certification form.
03/03/2017	Stack Test	Compliance	Flow meter RATA in the exhaust duct work from the east desulfurization station top and bottom and west station was performed on December 12, 2016. AQD staff was not available to witness the test. This test is required per the NSPS Na 60.143a(c) which reads "(c) All monitoring devices required by paragraph (a) of this section are to be certified by the manufacturer to be accurate to within ± 10 percent compared to Method 2 of appendix A of this part. The owner or operator shall recalibrate and check the device(s) annually and at other times as the Administrator may require, in accordance with the written instructions of the manufacturer and by comparing the device against Method 2." Results from the December 2016 test indicated the east station top and bottom ducts and west station were all below 10% variance (4.3%, 3.7%, 5.0% respectively). Test is required annually. Prior test was conducted in December 2015. Compliance was chosen.

Activity Date	Activity Type	Compliance Status	Comments
03/03/2017	Scheduled Inspection	Compliance	FY2017 Scheduled Inspection - CGL, HSM, Main Plant generators
02/17/2017	CO/CJ	Compliance	Revised O&M plan for the No. 5 Pickle Line was submitted as required per the newly issued CO 22-2016. The revised plan indicates that the spray nozzles in the scrubber will be replaced every three months as opposed to inspected and replaced as needed.
02/17/2017	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 4th quarter 2016 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.
02/17/2017	CO/CJ	Compliance	Quarterly baghouse inspections for the No. 2 baghouse for the 4th quarter of 2016 at the #2 BOP were received on 1/27/2017. These records are required to be submitted quarterly per Consent Order No. 50-2014, Condition 9.C.2. Compliance status only relates to the fulfillment of the requirement to submit records. However, spot check of records does not indicate on going non compliance issues. Follow up item: December inspection noted some dampers and shakers not operating properly. Will check January 2017 records to ensure this was corrected.
02/17/2017	CO/CJ	Compliance	Quarterly inspection records for the No. 5 Pickle Line were submitted per the newly issued CO 22-2016. Records indicate new spray nozzles were installed in November. A leak was noted in the ductwork in the December inspections. Will review January records to ensure it was repaired.
02/17/2017	Malfunction Abatement Plan	Compliance	Revised Operation and Maintenance Plan for the No 5 Pickle Line scrubber was received on January 18,2017 per the newly issued CO 22-2016. The Steel Pickling MACT requires that an OMP be in place. It appears that the main update was that all of the spray nozzles will now be changed every three months (as opposed to changed as needed upon inspection).

Activity Date	Activity Type	Compliance Status	Comments
02/14/2017	Stack Test Observation	Unknown	Retest of No. 5 Pickle Line Scrubber
01/25/2017	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 3rd Quarter 2016 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.
01/25/2017	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 1st Quarter 2016 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.
12/28/2016	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 1st quarter 2016 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.

Activity Date	Activity Type	Compliance Status	Comments
12/09/2016	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for September 2016 were received by the Detroit Office on 11/4/16. Readings were performed on the BOP roof monitor on September 1, 12 and 28. Readings on the ESP Stack were performed on September 12 and 28. Vessel 25 and 26 processed heats during the roof monitor readings. An exceedance of 24.2% was observed on September 28 from vessel 25. Blow rate was from 14,000 - 18,100 during the readings. A violation notice will be issued. No exceedances were observed at the ESP stack.
12/09/2016	CO/CJ	Compliance	Quarterly baghouse inspections for the No. 2 baghouse for the 3rd quarter of 2016 at the #2 BOP were received on 11/21/2016. These records are required to be submitted quarterly per Consent Order No. 50-2014, Condition 9.C.2. Compliance only relates to the fulfillment of the requirement to submit records.
12/07/2016	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 3rd quarter 2016 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.

Activity Date	Activity Type	Compliance Status	Comments
12/07/2016	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for October 2016 were received by the Detroit Office on 12/2/16. Readings were performed on the BOP roof monitor on October 12. The second required reading was missed due to the shop shutting down "unexpectedly". This is a deviation. Readings on the ESP Stack were performed on October 24. Vessel 25 was read for the roof monitor. A slopping event occurred resulting in an exceedance of 63.3%. Blow rate was 17,700. A violation notice will be issued.
12/07/2016	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for November were received. Facility reported 3 deviations from the roof monitor. AQD calculated 4. A violation notice was issued. Exceedances were all attributed to a hole in the No. 25 vessel downcomer.
12/02/2016	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for August 2016 were received by the Detroit Office on 10/6/16. Readings were performed on the BOP roof monitor on August 3 and 19 and on the ESP Stack on August 3 and 10. Vessel 25 was read three times and 26 once for the RM readings. Blow rate was 17,500-18,000. Two VE exceedances were observed. A violation notice will be issued. Reason given was hole in the No. 25 vessel downcomer. Note, it appears facility has shortened the amount of time they perform the VEO's readings to tap to tap but both taps do not need to be on the same vessel.

Activity Date	Activity Type	Compliance Status	Comments
12/02/2016	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for June 2016 were received by the Detroit Office on 8/2/16.</p> <p>Readings were performed on the BOP roof monitor on June 8 and 21 and on the ESP Stack on June 21. Vessel 25 and 26 were both observed for the RM readings. Blow rate was 17,000-18,000. Extra readings of the ESP Stack were taken due to the COMS being temporarily relocated lower in the stack to repair the top portion. This was discussed with Field and TPU staff and approved. See emails in facility file. No VE exceedances were observed.</p>
12/02/2016	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for May 2016 were received by the Detroit Office on 6/27/16.</p> <p>Readings were performed on the BOP roof monitor on May 9 and 26 and on the ESP Stack on May 5. Vessel 25 and 26 were both observed for the RM readings. Blow rate was 15,100-19,294. Extra readings of the ESP Stack were taken due to the COMS being temporarily relocated lower in the stack to repair the top portion. This was discussed with Field and TPU staff and approved. See emails in facility file. No VE exceedances were observed.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/02/2016	CO/CJ	Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for April 2016 were received by the Detroit Office on 6/1/16. Readings were performed on the BOP roof monitor on April 14 and 29 and ESP Stack on April 6. Vessel 25 and 26 were both observed for the RM readings. Blow rate was 17,100-17,800. No VE exceedances were observed.
11/23/2016	ROP Semi 1 Cert	Non Compliance	Non compliance. See activity report.
11/23/2016	Other	Non Compliance	Review of Title V report for the semi annual period Jan - June 2016. Report includes deviations associated with the Iron and Steel MACT (Subpart FFFFF).
10/27/2016	Other	Non Compliance	Review of Title V report for the semi annual period July - December 2015. Report includes deviations associated with the Iron and Steel MACT (Subpart FFFFF).
10/27/2016	ROP Semi 1 Cert	Compliance	No deviations were reported for Section 5 of the USS ROP
10/27/2016	ROP SEMI 2 CERT	Non Compliance	See activity report CA_A780937360
10/27/2016	ROP SEMI 2 CERT	Compliance	No deviation reported for Section 5 of the USS ROP
10/27/2016	MACT (Part 63)	Non Compliance	Subpart FFFFF - Non compliance due to ongoing No 2 BOPShop roof monitor violations. These violations are reported in the semi annual ROP deviation report. See CA_A780937360
10/27/2016	ROP Annual Cert	Non Compliance	Non compliance is based on the compliance status after review of each of the semi annual reports. Also, AQD questions the completeness/accuracy of the deviation report and is in the process of obtaining additional information. See activity report for each semi annual period for more details.
10/27/2016	ROP Annual Cert	Compliance	No deviations were reported related to Section 5 of the USS ROP.

Activity Date	Activity Type	Compliance Status	Comments
10/25/2016	ROP Other	Compliance	Notification was received on 10/25/16 that there was a change in the Responsible Official for Delray Connecting Railroad (Section 2 of the USS ROP). The RO is now Joseph Campeau.
10/24/2016	MACT (Part 63)	Compliance	<p>The boiler MACT (Subpart DDDDD) Notification of Compliance Status was received on April 4, 2016. Facility certified compliance with all work practice standards. Report stated that the affected units do not have any applicable emission limits. Report states that the required initial tune up for all boilers and process heaters was conducted as well as an energy assessment.</p> <p>At this time, AQD has not verified the accuracy of these statements. Compliance status relates only to the submission of the report.</p>
10/24/2016	CO/CJ	Compliance	Quarterly baghouse inspections for the No. 2 baghouse for the 2nd quarter of 2016 at the #2 BOP were received by August 18, 2016. These records are required to be submitted quarterly per Consent Order No. 50-2014, Condition 9.C.2. Compliance status only relates to the fulfillment of the requirement to submit records.
10/24/2016	CO/CJ	Compliance	Quarterly baghouse inspections for the No. 2 baghouse for the 1st quarter of 2016 at the #2 BOP were postmarked on 4/22/2016. Records were submitted on a memory stick. These records are required to be submitted quarterly per Consent Order No. 50-2014, Condition 9.C.2. Compliance status only relates to the submission of the records. March internal chamber inspections indicate that the walkways and in between the bags needs to be cleaned out in every chamber.

Activity Date	Activity Type	Compliance Status	Comments
10/17/2016	ROP Semi 1 Cert	Compliance	Semi annual deviation report received for TMS International (A7809- Section 3) for January through June 2016. No deviations reported. There is an attachment with the report for June 2016. There is an exceedance of the 2400 cubic feet of natural gas per operating hour on 6/21. However, this does not to be a 12 month rolling value which is how the limit is written. How facility is determining the cubic feet on natural gas used per hour on a 12 month rolling time period needs further discussion with facility. An inspection will be conducted 2016-2017 fiscal year.
10/17/2016	ROP Semi 1 Cert	Compliance	No deviations reported for Delray Connecting (A7809- Section 2) for the semi annual time period of 1/1/2016-6/30/2016.
10/14/2016	Other	Compliance	Surveillance
09/19/2016	ROP Other	Compliance	All certified and non certified VE observations of operations on Zug Island from January - April 2016 were submitted by USS as requested by MDEQ in the 4/20/2016 VN. Records appear to demonstrate compliance with opacity limits.
09/19/2016	MACT (Part 63)	Compliance	USS - Facility submitted semi annual SSM report for the HCl steel pickling lines per 40 CFR Part 63 Subpart CCC for January - June 2016. They reported 2 planned start ups/shut downs and 1 unplanned shut down. Company certified that they followed procedures in their SSM plans. Reasons for shut downs were given. Also, flow meters and pressure differential meter were last calibrated on November 2015. This calibration is required annually.
09/19/2016	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 2nd quarter 2016 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.

Activity Date	Activity Type	Compliance Status	Comments
09/01/2016	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for July 2016 were received by the Detroit Office on 9/1/16. Readings were performed on the BOP roof monitor on July 7 and July 20 and on the ESP Stack on July 12 and 20. Vessel 25 and 26 were both read. Blow rate was 16,700-18,200. No VE exceedances were observed from the roof monitor. 1 exceedance of the 6 minute average 20% opacity limit was observed at the ESP stack. As this stack has a continuous opacity monitor, and at this time, there are no ongoing unaddressed opacity issues from the ESP, status of compliance was chosen.</p>

08/08/2016	Stack Test	Non Compliance	<p>Stack test of No. 1 Argon Stir Station baghouse was performed on May 18, 2016. Results were received on July 20, 2016. Facility failed the lb/hr and lb/heat limits based on a three run average. TPU staff reviewed the test results and calculated the following three run average: 2.1 lb/hr and 0.964 lb/heat. The reported results were 1.36 lb/hr and 1.4 lb/heat. However, the results included periods of non processing time in the lb/hr value which AQD disagrees with. USS is claiming that AQD is trying to change a "clock hour limit" to an "operating hour limit". AQD's position is that the maximum number of heats that can be processed in an hour should be processed during stack testing and that downtime between heats should be minimal if there is steel to process. Therefore, the clock hour and the operating hour should be essentially the same. The lb/heat value varies depending on where the "heat" processing time is stopped (i.e apparently a heat can sit under the hood after argon stirring is complete because there is no where for it to go; stack testing should not be occurring during this timeframe). The permit limit is 1.4 lb/hr and 0.543 lb/heat.</p> <p>The test results included a request to drop the third run based on AQD Rule 336.2003(2) which states: "For the purpose of determining compliance with an applicable emission limit, rule, or permit condition, the arithmetic mean of results of the 3 samples shall apply. If a sample is accidentally lost or conditions occur in which 1 of the 3 samples must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions, or other circumstances beyond the owner's or operator's control, then compliance may, upon the approval of the department, be determined using the arithmetic mean of the results of 2 samples." The MACT testing language is similar.</p>
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08/08/2016	Stack Test	Non Compliance	<p>The May 18, 2016, stack test does not meet the criteria outlined in the rule because 1 of the 3 samples was not lost or discontinued. Also, AQD does not agree that a failure to recognize that the baghouse was stuck in a continuous cleaning cycle is a circumstance beyond the owner or operator's control.</p> <p>As such, non compliance was chosen and a violation notice was issued. A retest has not been scheduled. AQD requested a re-test within 60 days per the authority under R336.2001(1)(c).</p>
08/03/2016	Complaint Investigation	Non Compliance	Complaint investigation
06/30/2016	Other	Non Compliance	Surveillance
06/08/2016	Scheduled Inspection	Non Compliance	NO. 2 BOP SHOP
05/27/2016	Other	Unknown	Observation of visible emissions from Zug Island on 5/27/2016
05/25/2016	MAERS	Compliance	<p>Hard copy was received prior to March 15th; submittal not considered late.</p> <p>Cursory review of emissions data compared to prior year report was conducted. Most emissions changes are in line with changes in fuel gas usage. Spreadsheet with detailed calculations is attached.</p> <p>Need clarification on how caster emissions are zero, and why No 1 argon EF was not updated based on recent stack test.</p> <p>BOP HMT has significant change in PM emissions due to a stack test performed in 2015.</p> <p>MP No. 1 BH began using COG which is why they are now reporting SO 2 emissions</p> <p>Pickle line did get updated to use most recent stack test result</p> <p>Still missing lime receiving and emergency generators (however, emissions will be minimal)</p>

Activity Date	Activity Type	Compliance Status	Comments
05/17/2016	Stack Test Observation	Non Compliance	This is a retest of No. 1 Argon Stir per AQD CO 1-2016. Facility failed the test in 2015. Non compliance is shown as compliance has not yet been demonstrated.
05/06/2016	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for March 2016 were received by the Detroit Office on 5/6/16. Readings were performed on the BOP roof monitor on March 3, 17, and 30 and on the ESP Stack on March 17. Vessel 25 was read twice and 26 once. Blow rate was 17,400-17,700. One VE exceedance was observed. A violation notice was issued.
05/06/2016	CO/CJ	Compliance	According to the attached letter, as of May 6, 2016, the equipment required by AQD CO 33-2015 and PTI 219-06B has been installed. The required equipment was a pre-burner for the SCR system to heat the incoming exhaust air from the annealing furnace to at least the minimum temperature needed for the SCR system.
04/18/2016	CO/CJ	Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for February 2016 were received by the Detroit Office on 3/28/16. Readings were performed on the BOP roof monitor on February 5 and 17 and on the ESP Stack on February 17. Vessel 25 was read. Blow rate was 18,000 and 17,600. No VE exceedances were observed.
04/18/2016	Complaint Investigation	Non Compliance	Observation of the B2 blast furnace leaking bell
04/12/2016	Complaint Investigation	Non Compliance	Surveillance due to ongoing complaints of black plumes from Zug Island
04/04/2016	Complaint Investigation	Non Compliance	Surveillance due to ongoing complaints of black plumes from Zug Island

Activity Date	Activity Type	Compliance Status	Comments
04/01/2016	Complaint Investigation	Compliance	Fallout and opacity complaint investigation
03/15/2016	Other		Surveillance
03/15/2016	CO/CJ	Compliance	Facility was required to submit a revised Operation and Maintenance Plan for the No. 1 Argon baghouse per the terms of CO No. 1-2016. Plan was received on 3/15/16.
03/14/2016	ROP Annual Cert	Compliance	2015 annual deviation report received for TMS International (A7809- Section 3). No deviations reported.
03/14/2016	ROP SEMI 2 CERT	Compliance	Semi annual deviation report received for TMS International (A7809- Section 3) for July through December 2015. No deviations reported.
03/09/2016	ROP SEMI 2 CERT	Compliance	Semi annual deviation report received for Delray Connecting Railroad (A7809- Section 2) for July through December 2015. No deviations reported.
03/09/2016	ROP Annual Cert	Compliance	2015 annual deviation report received for Delray Connecting Railroad (A7809- Section 2). One deviation reported that the semi annual report for the 1st half of 2015 was not postmarked by September 15. Staff has been retrained. No further action is required at this time.
03/07/2016	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for December 2015 were received by the Detroit Office on 1/29/16. Readings were performed on the BOP roof monitor on December 9 and 23 and the ESP Stack on December 9. Each vessel was read. Blow rate was 18,800 and 19,900 when reading roof and 20,300 when reading the ESP. One exceedance of the 20% 3 minute average were observed on December 9 and the company attributed it to slopping. Non compliance was chosen as there are continuing compliance issues at the roof monitor. A VN was issued on March 7, 2016.

Activity Date	Activity Type	Compliance Status	Comments
03/07/2016	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for January 2016 were received by the Detroit Office on 3/01/16. 3 exceedances of the 20% 3 minute average opacity limit were observed. A violation notice was issued on 3/7/2016.
03/07/2016	Stack Test	Compliance	Flow meter RATA in the exhaust duct work from the east desulfurization station top and bottom and west station was performed on December 23, 2015. Test protocol was approved on December 22, 2015. Test plan was received on December 14, 2015. Due to the date, AQD staff was not available to observe the test. This test is required per the NSPS Na 60.143a(c) which reads "(c) All monitoring devices required by paragraph (a) of this section are to be certified by the manufacturer to be accurate to within ±10 percent compared to Method 2 of appendix A of this part. The owner or operator shall recalibrate and check the device (s) annually and at other times as the Administrator may require, in accordance with the written instructions of the manufacturer and by comparing the device against Method 2." Results from the December 2015 test indicated the east station top and bottom ducts and west station were all below 10% variance (2.8%, 4.3%, 2.7% respectively). Test is required annually. Prior test was conducted in December 2014. Compliance was chosen.
03/01/2016	CO/CJ	Compliance	Quarterly baghouse inspections for the No. 2 baghouse for the 4th quarter of 2016 at the #2 BOP were received on 3/1/2016. These records are required to be submitted quarterly per Consent Order No. 50-2014, Condition 9.C.2. Compliance determination is based solely on the fulfillment of the requirement to submit quarterly records.

Activity Date	Activity Type	Compliance Status	Comments
02/02/2016	MACT (Part 63)	Compliance	<p>USS - Facility submitted semi annual SSM report for the HCl steel pickling lines per 40 CFR Part 63 Subpart CCC for July - December 2015. They reported 2 planned start ups/shut downs and no malfunctions. Company certified that they followed procedures in their SSM plans. Reasons for shut downs were given. Also, flow meters and pressure differential meter were last calibrated on November 2, 2015. This calibration is required annually. The report also mentions the failed August 11, 2015 stack test for the scrubber and subsequent actions taken. However, this incident was not a malfunction (sudden, infrequent, and not reasonably preventable). Therefore, it does not belong in the SSM report. Compliance status was chosen as it relates to the SSMs events in the report (excluding the failed stack test).</p>
01/27/2016	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for 4th QTR 2015 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.</p>
01/21/2016	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for 4th Quarter 2015 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/21/2016	CO/CJ	Non Compliance	<p>Quarterly fugitive dust report submitted for 2nd Quarter 2016 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.</p>
01/19/2016	ROP Semi 1 Cert	Compliance	<p>Delray Connecting Railroad semi annual compliance certification for Jan - June 2015 was postmarked September 22, 2015. No deviations were reported. However, facility has submitted quarterly reports for the fugitive dust consent order that contains deviations. This order is a part of the ROP. As such, pending was chosen. I will follow up with facility ***** UPDATE: Quarterly reports reference outdated equipment that is no longer in use and has been replaced by newer equipment. As such, discretion is being used in terms of a violation notice. However, these should be reported as ROP deviations.</p>
01/14/2016	CO/CJ	Non Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for November 2015 were received by the Detroit Office on 12/29/15. Readings were performed on the BOP roof monitor on November 11 and 24 and on the ESP Stack on November 11. Each vessel was read. Blow rate was 18,100 and 18,400. Two exceedances of the 20% 3 minute average were observed on November 11, and the company attributed these exceedances to slopping. A violation notice will be issued.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/08/2015	CO/CJ	Compliance	AQD CO No. 50-2014 requires USS to submit records of No. 2 BH (at the No.2 BOP) inspections on a quarterly basis. Records for the third quarter 2015 were received on 11/18/2015. Spot check of the records indicates that inspections are being performed at the appropriate intervals and appropriate maintenance is being initiated.
12/08/2015	CO/CJ	Compliance	AQD CO No. 50-2014 requires USS to submit records of No. 2 BH (at the No.2 BOP) inspections on a quarterly basis. Records for the second quarter 2015 were received on 8/31/2015. Spot check of the records indicates that inspections are being performed and appropriate maintenance is being initiated.
12/04/2015	Scheduled Inspection	Compliance	FY2016 Scheduled Inspection - Delray Connecting Railroad (Section 2)
11/18/2015	Stack Test	Non Compliance	A stack test of the No. 5 Pickle Line was performed at USS on August 11, 2015. The results, along with a signed ROP certification, were received on October 14, 2015. The test protocol was approved on August 3 and test plan was received on June 17. All are attached to this report. Results were 1.36 lb HCl/hr (permit limit is 1.64) and 19.6 ppmvd HCl, the permit (and MACT) limit is 18. TPU reviewed the result in the attached November 18 memo and arrived at the same values. A violation notice was issued.

Activity Date	Activity Type	Compliance Status	Comments
11/06/2015	CO/CJ	Non Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for October 2015 were received by the Detroit Office on 11/18/15. Readings were performed on the BOP roof monitor on October 15 and 30 and on the ESP Stack on October 15. Each vessel was read. Blow rate was 18,000 and 19,800. Two exceedances were observed on October 15. A violation notice will be issued. Note, cover letter states that leak in downcomer for No. 25 vessel was cause and that it was repaired the following day. However, no information was given on how the facility was going to prevent recurrence of this situation.</p>
11/06/2015	Other Non ROP	Compliance	<p>R801 report received. Report shows tons of NOx during ozone season for 2015. USS is not subject to a total tons limit from the reheat furnaces. No further action necessary.</p>
11/06/2015	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for 1st Quarter 2015 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/06/2015	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for 3rd Quarter 2015 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.</p>
11/06/2015	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for August 2015 were received by the Detroit Office on 9/29/15. Readings were performed on the BOP roof monitor on August 5 and 21 and on the ESP Stack on August 5. Both readings were on 25 vessel. Blow rate was 20,000 and 17,600 for the roof monitor readings and 20,000 for the ESP reading. No exceedances were observed.</p>
11/06/2015	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for September 2015 were received by the Detroit Office on 10/21/15. Readings were performed on the BOP roof monitor on September 14 and 30 and on the ESP Stack on September 14. Both readings were on 26 vessel. Blow rate was 18,000 for the roof monitor readings and the ESP reading. No exceedances were observed.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/06/2015	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 3rd QTR 2015 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. On September 9, some roads were only swept once due to precipitation. This is allowed by the Consent Order.
11/06/2015	Other Non ROP	Compliance	R801 report received. Report shows tons of NOx during ozone season for 2016. USS is not subject to a total tons limit from the reheat furnaces. No further action necessary. However, report states that USS developed a new NG emission factor at the HSM. The factor was changed from AP-42 0.28#/MMBTU NOx to 0.172 #/MMBTU NOx. AQD is awaiting information supporting this change from USS. ***** A copy of the stack test data was received upon request by AQD. It is attached to this report. It was not reviewed by TPU. As the new EF value does not impact compliance with an emission limit related to Rule 801, compliance was chosen as the status at this time.
11/02/2015	ROP Semi 1 Cert	Compliance	Tube City IMS, Section 3, semi annual deviation report for Jan - June 2015. No deviations reported.
10/28/2015	ROP Semi 1 Cert	Non Compliance	US Steel semi annual deviation report for Jan - June 2015; report includes MACT Subpart 5F deviations as well. See activity report.
10/28/2015	ROP Semi 1 Cert	Compliance	No deviations reported for U.S. Steel, Section 5, for Jan - June 2015.
10/28/2015	Other	Non Compliance	Review of Title V report for the semi annual period January - June 2015. Report includes deviations associated with the Iron and Steel MACT (Subpart FFFFF).
10/21/2015	MACT (Part 63)	Unknown	Notification received from USS that a mercury fuel analysis on the coke oven gas will be performed in accordance with 40 CFR Part 63 DDDDD. The purpose of the analysis is to classify the gas as an Other Gas 1 fuel.

Activity Date	Activity Type	Compliance Status	Comments
10/01/2015	MACT (Part 63)	Compliance	USS - Facility submitted semi annual SSM report for the HCI steel pickling lines per 40 CFR Part 63 Subpart CCC for January - June 2015. They reported 3 planned start ups/shut downs and no malfunctions. Company certified that they followed procedures in their SSM plans. Reasons for shut downs were given. Also, flow meters and pressure differential meter were last calibrated on November 17, 2014. This calibration is required annually.
10/01/2015	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 2nd Quarter 2015 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.
10/01/2015	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 2nd QTR 2015 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.
09/15/2015	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for May 2015 were received by the Detroit Office on 7/6/15. Readings were performed on the BOP roof monitor on May 1, 11, and 15 and on the ESP Stack on May 15. Two readings were on 25 vessel and one reading was on 26. Blow rate was between 17,600 and 20,700. One 3minute average exceedance was observed. No root cause could be identified. For the ESP, no VE's were observed.

Activity Date	Activity Type	Compliance Status	Comments
09/15/2015	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for June 2015 were received by the Detroit Office on 7/17/15. Readings were performed on the BOP roof monitor on June 10 and 24 and on the ESP Stack on June 10. Both readings were on 25 vessel. Blow rate was 19,000 for the roof monitor readings and 19,600 for the ESP reading. One 3 minute average exceedance was observed due to a degraded steal seal. Report states seal and thimble were subsequently replaced. For the ESP, no VE's were observed.
09/15/2015	CO/CJ	Non Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for July 2015 were received by the Detroit Office on 8/28/15. Readings were performed on the BOP roof monitor on July 10 and 23 and on the ESP Stack on July 15. Both readings were on 25 vessel. Blow rate was 17,900 and 19,900 for the roof monitor readings and 20,100 for the ESP reading. Two 3 minute average exceedances were observed. One was attributed to a leaking sand seal which was reportedly repaired and the other was of an unknown cause. For the ESP, no VE's were observed.
08/19/2015	Scheduled Inspection	Non Compliance	BOP Visible Emission limits, No.5 Pickle Line
08/18/2015	Scheduled Inspection	Compliance	D4 and B2 blast furnace

Activity Date	Activity Type	Compliance Status	Comments
07/09/2015	CO/CJ	Non Compliance	AQD CO No. 50-2014 requires USS to submit records of No. 2 BH (at the No.2 BOP) inspections on a quarterly basis. Records for the first quarter 2015 were received on 7/9/2015. The previous quarterly submittal was received on 2/26/15. As such, the records were late because they were not received on a quarterly basis as required in the CO. An email from US Steel is attached which attributes the delay to the plant mail system or USPS. At this time, I am exercising enforcement discretion. If reports continue to be late, a violation notice may be warranted. Spot check of the records indicates that inspections are being performed and appropriate maintenance is being initiated for the No. 2 BH.
05/26/2015	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 1st QTR 2015 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.
05/26/2015	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 1st Quarter 2015 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.

05/20/2015	MAERS	Compliance	<p>Report submitted with 97 errors which I sent back to the facility to correct. I also informed them that the generators and lime receiving emission units should be included. I reviewed the yearly totals side by side from 2010 through 2014. Significant changes in emissions from 2011 to 2012 are most likely due to extensive USEPA ICR testing conducted in 2012 which resulted in changes to emission factors. Facility added ammonia emissions from the cooling tower this year. The SO₂ factor (lb/mmbtu) for coke oven gas combustion was changed based on EES Coke CEMS data. In general, changes from the prior year (2013) are in line with gas throughput changes. Other changes are attributable to stack testing events in 2014 which resulted in emission factor changes. Note, annual BOP HMT/Desulf PM emissions appear to exceed limits at first glance. However, MAERs reported emissions include fugitives and the emission limit in permit is only for the baghouse stack. Facility reduced the capture efficiency at HMT/Desulf to 96% (from 99%). AQD has asked for justification for the 99% several times and it was not provided. 96% is more reasonable as I have observed fugitive emissions the last several times I have observed the desulf process. SO₂, NO_x, and CO emissions are much higher from AK Steel stove stack as compared to USS even though the D4 stove combusted similar quantities of blast furnace gas. AK Steel factors are based on stack testing and an SO₂ CEMS. USS is not using site specific stack test data for the stoves. AQD will be requesting testing in the future. For the blast furnace baghouse stacks, PM/PM₁₀ emissions are similar between USS and AK Steel for similar iron throughput. SO₂, NO_x and CO emissions from the blast furnace baghouse are much lower than AK Steel but both facility estimates are based on stack testing. Blast furnaces lb/ton iron charged emission factor does not make sense as it should</p>
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05/20/2015	MAERS	Compliance	be based on a lb/tons iron cast. I contact Brad Wargnier, USS to discuss. He revised the PM emissions for D4 furnace using a lb/tons iron cast emission factor and provided an updated stack test report. The spreadsheet with emissions factors and calculations from USS is attached to this report. As USS operations are the bulk of the emissions, I focused my review on those emission units. I performed a cursory review of emissions from the facilities identified in Sections 2 - 5 of the ROP.
05/18/2015	ROP Annual Cert	Non Compliance	See activity report
05/18/2015	ROP SEMI 2 CERT	Non Compliance	US Steel semi annual deviation report for July - December 2014; report includes MACT Subpart 5F deviations as well. See activity report
05/18/2015	ROP SEMI 2 CERT	Compliance	No deviations reported for U.S. Steel, Section 5
05/18/2015	ROP Annual Cert	Compliance	No deviations reported for U.S. Steel Section 5
05/18/2015	MACT (Part 63)	Non Compliance	See semi annual and annual Title V deviation report.
05/18/2015	CO/CJ	Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for April 2015 were received by the Detroit Office on 5/11/15. Readings were performed on the BOP roof monitor on April 1 and 16, and on the ESP Stack on April 8. Readings were performed during operation of both vessels. While some VE's were observed from the roof monitor and ESP, it did not result in any opacity exceedances.
05/18/2015	Other	Non Compliance	Review of Title V report for annual 2014 and semi annual period July - December 2014. Report includes deviations associated with the Iron and Steel MACT (Subpart FFFFF).

Activity Date	Activity Type	Compliance Status	Comments
05/01/2015	Stack Test	Compliance	<p>Stack test results for the ESP were received on November 21, 2014. Testing was conducted on 9/25/2014. Testing was performed to show compliance with the PM limit of 0.057 lb/1000 lb dry gas. The UAR for this limit is R331 and the test method is in Part 10 which requires testing only during oxygen blows and 4 blows equal one run. This is different than the procedure to show compliance with the gr/dscf Iron and Steel MACT limit. This test was a compliance demonstration for the R331 limit only. Results based on a three run average were .009 lb PM/1000 lb dry gas (permit limit is .057 lb/1000 lb dry gas). Process data indicates that there were several opacity stops during Run 1; it does not appear that testing was paused either. Run #1 was the highest of the three runs; however it was still well below the limit (.011 vs. .057) so no further action appears warranted at this time. Readings of the BOPSHOP roof monitor were performed. Some emissions were observed but none over the opacity limit on a three minute average. COMS data was also provided; no opacity exceedances were registered. Awaiting full TPU review at this time.</p> <p>***** *****</p> <p>UPDATE: No TPU review was performed. Results are as reported. 12/7/16 - KRK</p>

Activity Date	Activity Type	Compliance Status	Comments
04/30/2015	Stack Test	Compliance	<p>Stack testing of the No. 1 baghouse in the No. 2 BOPSHOP was conducted in September 2014. Results were received on November 20. The No. 1 baghouse controls charging and tapping at the basic oxygen vessels. Test results were as follows: 0.002 lbs PM/1000 lbs dry gas (0.038 is the permit limit); and 0.001 gr PM /dscf (0.005 gr/dscf is the permit limit). This is a positive pressure baghouse. Process data was reviewed. Sampling purportedly occurred only during charging, 5 minutes into oxygen blow, and paused until tapping and turndown and then paused until the next scrap charge. Pressure drop was within 3 and 15 in. w.c. as required in the ROP. Pending chosen as I am awaiting full TPU review.</p> <p>***** *****</p> <p>UPDATE: No TPU review was performed. Results are as reported. 12/7/16 - KRK</p>

Activity Date	Activity Type	Compliance Status	Comments
04/22/2015	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for March 2015 were received by the Detroit Office on 4/21/15. Readings were performed on the BOP roof monitor on March 5 and 17, and on the ESP Stack on March 5 and 17. All readings on these dates were performed during operation of No. 26 Vessel. While some VE's were observed from the roof monitor, it did not result in any opacity exceedances. For the ESP, no VE's were observed.</p> <p>A review of the readings from December 2014 to present indicate that 65% of the readings have occurred on No 26 vessel (recently replaced and ductwork repaired due to downcomer collapse). While AQD realizes it may not be possible to alternate vessels every reading, the readings should be more evenly distributed between the two vessel. This will be monitored by AQD moving forward.</p>
04/20/2015	ROP Annual Cert	Compliance	<p>Delray Connecting Railroad annual compliance certification for 2014 was postmarked March 13, 2015. No deviations were reported. However, facility has submitted quarterly reports for the fugitive dust consent order that contains deviations. This order is a part of the ROP. As such, pending was chosen. I will follow up with facility during upcoming inspection.</p> <p>*****</p> <p>UPDATE: Quarterly reports reference outdated equipment that is no longer in use and has been replaced by newer equipment. As such, discretion is being used in terms of a violation notice. However, these should be reported as ROP deviations.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/20/2015	ROP R215 Notification	Compliance	Change in Responsible Official for USS - Harsco Metals from Marcelino Martinez to Glenn Hundermark as of 1/1/2015. This will be changed in the ROP renewal process which is currently underway.
04/20/2015	ROP SEMI 2 CERT	Compliance	<p>Delray Connecting Railroad semi annual compliance certification for July - Dec 2014 was postmarked March 13, 2015. No deviations were reported. However, facility has submitted quarterly reports for the fugitive dust consent order that contains deviations. This order is a part of the ROP. As such, pending was chosen. I will follow up with facility during upcoming inspection.</p> <p>*****</p> <p>UPDATE: Quarterly reports reference outdated equipment that is no longer in use and has been replaced by newer equipment. As such, discretion is being used in terms of a violation notice. However, these should be reported as ROP deviations.</p>

04/20/2015	CO/CJ	Non Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observations for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. The readings for January 2015 were received by the Detroit Office on March 2, 2015. Readings were performed on the BOP roof monitor on January 7 and 23 (three readings on No 26 vessel, one on No 25 vessel) and on the ESP Stack on January 14. Additional readings of the ESP were taken on January 7, 9, 10, 13, 14 and 15. No deviations were observed during all of the above readings.</p> <p>However, on January 22, roof monitor readings were taken in conjunction with stack testing on the No 2 BH. Two deviations from the 20% 3 minute average opacity at the roof monitor were observed. Hence the non compliance status was chosen. One deviation was due to skull build up on the oxygen lance which dislodged the steam thimble. Facility is in the process of changing lances from standard to post combustion lances. I spoke to Brad Wargnier on 3/10. He stated that there are additional ports in the post combustion lance further up the shaft which will reduce buildup and the replacement of the entire fleet was already underway. He did not know the total # of lances or when the project would be complete. The second deviation occurred during slag skimming. No reason or corrective actions were given. I requested additional information from the facility. On 4/17, I spoke with Mr. Wargnier. He stated that the skim pot had a crack in it and refractory was applied before the pot was completely dry (pots are watered for 24 hours when containing kish). As such, when the pot was placed back into service, the moisture trapped by the refractory reacted with the hot slag. A procedure is being developed to ensure pots are completely dry before being placed back into service. Facility will provide the procedure once it is finalized. As</p>
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04/20/2015	CO/CJ	Non Compliance	<p>reasons for the deviations and corrective actions were provided by the facility for these incidents, and the reasons given do not appear to be recurring at present, no violation notice will be issued at this time. I also inquired about the extra ESP readings. Facility claims the ESP is falsely inflating the opacity due to the extremely cold weather creating more moisture than normal in the stack. On 4/17, I asked Brad if facility was still maintaining the "false" COMS readings and he stated that they were. I also inquired how they were able to complete any heats as the system is set up to stop processing when a high opacity is observed. He stated that they bypassed the opacity stop function during these times. Note: the opacity stop function is a USS internal procedure and not required by permit. Visible emissions readings by certified observers did not result in any opacity exceedances.</p>
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Activity Date	Activity Type	Compliance Status	Comments
04/20/2015	Stack Test	Compliance	<p>A stack test on the No. 2 BOP, No.2 baghouse was conducted on January 22 and 23, 2015. The baghouse controls hot metal transfer, desulfurization, and desulf slag skimming. Test protocol was received on December 22, 2014 and test plan approval letter was issued on January 12, 2015. In 2012, this emission unit failed two stack tests and barely passed a third one. As such, this prompted an AQD Consent Order (50-2014). The January 2015 stack test was performed to fulfill a requirement of the consent order. BTEC performed the test. According to their report, the PM emissions, based on a three run average were 0.44 lb/hr and 0.0003 gr/dscf. The permit limits are 4.65 lb/hr and 0.0029 gr/dscf.</p> <p>A review of the process data indicates that one on the nine baghouse chambers was taken out of service for the test to simulate maintenance or inspection activities. Roof monitor readings were conducted and two deviations occurred. This was reported in the monthly VE observation report. See write-up for additional details. Overall differential pressure was 5.3 on 1/22 and 5.9 on 1/23.</p>
04/20/2015	ROP SEMI 2 CERT	Compliance	<p>ROP Semi-Annual 2 Certification for Tube City IMS (Section 3) of ROP No. 199600132d. No deviations reported. Report was postmarked March 16, 2015 so it is late. As this is not a recurring issue, a VN will not be sent at this time.</p>
04/20/2015	ROP Annual Cert	Compliance	<p>ROP Annual Certification for Tube City IMS (Section 3) of ROP No. 199600132d. No deviations reported. Report was postmarked March 16, 2015 so it is late. As this is not a recurring issue, a VN will not be sent at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/20/2015	Stack Test	Unknown	<p>Flow meter RATA in the exhaust duct work from the east and west desulfurization stations was performed on September 25, 2014. This test is required per the NSPS Na 60.143a(c) which reads "(c) All monitoring devices required by paragraph (a) of this section are to be certified by the manufacturer to be accurate to within ± 10 percent compared to Method 2 of appendix A of this part. The owner or operator shall recalibrate and check the device(s) annually and at other times as the Administrator may require, in accordance with the written instructions of the manufacturer and by comparing the device against Method 2."</p> <p>Results from the test indicated the east station top and bottom duct was above 10% variance (10.8% for the top duct and 20.2% for the bottom). The west station was 7.5%. Cover letter states that the flow meters were recalibrated and test will be re-performed in December 2014. At this time, this is sufficient and there is no basis for a violation notice based on the language in 60.143a(c).</p>
04/17/2015	Telephone Notes	Compliance	Telephone conversation with Brad Wargnier, USS Environmental Engineer - Miscellaneous topics

Activity Date	Activity Type	Compliance Status	Comments
04/13/2015	Stack Test	Compliance	<p>Stack test results for the No. 2 Argon Stir Station/LMF baghouse at USS were received on 2/9/2015. This is a positive pressure baghouse. Testing was performed on December 9, 2014. The test protocol was received on November 7. TPU staff, Mr. Tom Gaslioli, reviewed the results. AQD Detroit Office received a memo with the details of his review on April 6, 2015. The AQD results were as follows: PM gr/dscf - 0.0001 (result), 0.005 (limit); PM lb/heat - 0.068 (result), 0.180 (limit). Sampling was only performed during a heat; however, facility reported lb/hr and lb/heat emissions by including time during the run when no sampling/processing was occurring. At this time, this is not acceptable. While this is a batch process, ladles can be moved in and out within minutes so emissions could be virtually continuous; downtime should not be included in the lb/hr calculation. Additionally, it appears that this method of calculating emissions by the company/stack testers is new (hasn't been used in prior tests). Regardless, test results as calculated by TPU, which does not include non operating time, indicate compliance. Production data was reviewed. Pressure drop was between 3-12 in w.c. during testing as required by permit; one compartment was taken out of service per run to simulate cleaning or maintenance. Fan amps were approximately 50 during the testing.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/01/2015	CO/CJ	Non Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for February 2015 were received by the Detroit Office on 4/1/15. Readings were performed on the BOP roof monitor on February 5 and 17, and on the ESP Stack on February 17 and many more additional days in February. Readings of the roof monitor were observed during No 26 and No 25 vessel operation. There were two opacity exceedances at No 25 vessel. At the time of the report submittal, facility was still investigating the root cause. For the ESP, no VE's were observed. AQD needs further explanation of how the facility is deciding the COMS is not working properly and requires manual VE readings. According to Mr. Wargnier, USS is still maintaining the COMS data as well. At this time, it is unclear whether the COMS is showing exceedances of the 20%, 6 min average or unusual spikes.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/25/2015	Stack Test	Non Compliance	<p>Stack test report for No 1 Argon Stir was received on 2/9/2015. Testing was conducted on December 9. The test protocol was approved on November 12, 2014 (attached). TPU conducted a review of the results which I received on March 25, 2015 (attached). The ROP requires a pressure drop between 1 and 8 in. w.c. be maintained. Review of process data in Appendix E indicated pressure drop was below 8. Per the protocol letter, test was to be performed over an integral number of batches. However, process data indicates partial batches were part of each test run. The PM results based on a 3 run average were as follows: 0.0069 gr/dscf (permit limit is 0.02 gr/dscf), 1.93 lb/hr (permit limit is 1.4 lb/hr), and 1.44 lb/heat (permit limit is 0.543 lb/heat). A violation notice will be issued for the lb/hr and lb/heat exceedance. Note: testers attempted to include period of time where no activity was occurring in the lb/hr calculation. However, AQD does not agree with this approach and it does not appear that this is how the permit limit was established. See attached.</p>
03/16/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
03/16/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
03/16/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
03/16/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
03/16/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form

Activity Date	Activity Type	Compliance Status	Comments
03/10/2015	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 3rd Quarter 2014 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.
03/10/2015	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 4th Quarter 2014 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were implemented at least as frequently as required by SIP No 8 -1993. However, type of vehicles specified in the order (20 years ago) have been retired but facility believes modern equipment in use for dust control is equivalent. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.
03/10/2015	Other	Compliance	Surveillance
03/06/2015	Other	Non Compliance	Review of Title V report for semi annual period Jan - June 2014. Report includes deviations associated with the Iron and Steel MACT (Subpart FFFFF).
03/06/2015	ROP Semi 1 Cert	Non Compliance	See activity report CA_A780928730
03/06/2015	ROP Semi 1 Cert	Compliance	No deviations reported for Section 5, Pulverized Coal System, of USS ROP.

Activity Date	Activity Type	Compliance Status	Comments
03/05/2015	MACT (Part 63)	Compliance	USS - Facility submitted semi annual SSM report for the HCl steel pickling lines per 40 CFR Part 63 Subpart CCC for July - December 2014. They reported 4 planned start ups/shut downs and no malfunctions. Company certified that they followed procedures in their SSM plans. Reasons for shut downs were given. Also, flow meters and pressure differential meter were calibrated on November 17, 2014. This calibration is required annually.
02/26/2015	CO/CJ	Compliance	AQD CO No. 50-2014 requires USS to submit records of No. 2 BH (at the No.2 BOP) inspections on a quarterly basis. Records for the fourth quarter 2014 were received on 2/26/2015. Spot check of the records indicates that inspections are being performed and appropriate maintenance is being initiated.
02/19/2015	Stack Test	Compliance	On 1/29/15, AQD Detroit Office received stack test results for the PCI transport exhaust stacks (northeast/transport and southwest/silo). Test protocol was approved on 11/12/14. Testing was performed by BTEC for PM on 12/3/14. Results were reviewed by TPU staff, Mr. Tom Gasloli and I received a memo on March 26. Mr. Gasloli identified an error in the test report and informed BTEC which led to the submission of a revised report with different emissions for the transport silo (attached). Regardless, test results indicated compliance with the mg/m ³ and lb/hr PM limits in ROP 199600132d, Section 5. Pressure drop recorded during the test and presented in Appendix E was within the normal range specified in the ROP (0-3.5 in. w.c.).

Activity Date	Activity Type	Compliance Status	Comments
02/19/2015	Stack Test	Compliance	<p>On 1/29/15, AQD Detroit Office received the D4 blast furnace baghouse stack test results. PM testing was performed on December 3, 2014. The permit limit from ROP 199600132d is 0.0052 gr/dscf. The reported results (average of three runs) was .0007 gr/dscf. Report is missing tons cast per run data. TPU reviewed the report and I received a memo from Mr. Tom Gasloli on March 25. He arrived at the same PM result as the testers (0.0007 gr/dscf). *****</p> <p>UPDATE: Each run contained only one complete cast. Testing occurred over the entire cast. Tons cast per run was provided via email on 3/11/15. Table 4 contains a tons PM/iron charged emission factor. This is incorrect as facility should be using a lb/ton of iron cast factor as the baghouse is controlling emissions during casting. While this is not a permit limit, this factor is used by the facility to calculate emissions for MAERS so it should be correct. I have informed the facility and am awaiting an updated table and revised MAERS. Fan amps during all runs were above the MACT CPMS minimum listed in the D4 O&M plan (58 amps is the minimum). According to the ROP, D4 baghouse pressure drop should be between 1 and 12 in w.c. Production data in the stack test report indicates it ranged from 8.6 - 9.5. VE readings were performed on the baghouse stack and the casthouse roof monitor during the test. No exceedances were observed.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/22/2015	CO/CJ	Non Compliance	<p>Quarterly fugitive dust report submitted for 4th QTR 2014 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. However, sweeping activities were not performed October 13-31 due to blocked access to roads because of maintenance and repaving. While the reasons given may be legitimate, the consent order does not except these types of events so these should be reported as deviations. Consent order only allows for an exception to daily sweeping due to weather. As such, non compliance was chosen. However, as the reason given appear to be legitimate, no violation notice will be issued at this time.</p>
01/22/2015	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. The readings for December 2014 were received by the Detroit Office on January 20, 2015. Readings were performed on the BOP roof monitor on December 8 and 24 (during operation of No.25 and 26) and on the ESP Stack. No violations were observed.</p>
01/15/2015	CO/CJ	Non Compliance	<p>Cover letter states that facility completed inspection of No. 2 BOP Baghouse Leak Detection System on Dec. 15, 2014, in accordance with CO AQD No. 50-2014 to certify that the BLD is operating in compliance with 40 CFR Part 63 Subpart FFFFF. However, no information is provided in the report that demonstrates compliance with the MACT. AS such, non compliance was chosen. Additional information will be requested.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/26/2014	CO/CJ	Non Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. The readings for November 2014 were received by the Detroit Office on December 19, 2014. Readings were performed on the BOP roof monitor on November 15 (during operation of No.25 Vessel) and November 24 (during operation of No. 25 and 26 Vessels), and on the ESP Stack on November 18 (during operation of No. 25 Vessel). During readings performed on November 15, 2014, US Steel reported two deviations of the 20%, 3-minute opacity limit for the BOP Shop roof monitor (51% and 26%), which the company attributed to slopping caused by excess silicon in the iron. Only sporadic, light (<15%) emissions were noted during the observations performed on November 18 and 24. As a result of the exceedances observed on November 15, a Violation Notice was issued to US Steel on December 29, 2014.</p> <p>A review of the readings from December 2013 to present indicate that the great majority of readings have occurred at the No 25 vessel. While AQD realizes it may not be possible to alternate vessels every reading, the readings should be more evenly distributed between the two vessel, especially since No 26 vessel had the ductwork collapse in March. AQD will address through the ROP renewal.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/12/2014	CO/CJ	Non Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for September 2014 were received by the Detroit Office on 10/23/14. Observations were performed at the BOP roof monitor on September 4 (during operation of No. 26 vessel) and on September 15 (during operation of the No. 25 vessel), and on the ESP stack on September 11. Additional readings were performed of the roof monitor during compliance testing on September 23 and 25. US Steel reported four exceedances of the 20% 3-minute average during the readings performed on September 15, which they attributed to a variety of malfunctions and causes. As a result, a Violation Notice was issued to US Steel on Dec. 12, 2014.</p> <p>A review of the readings from December 2013 to present indicate that the great majority of readings have occurred at the No 25 vessel. While AQD realizes it may not be possible to alternate vessels every reading, the readings should be more evenly distributed between the two vessel, especially since No 26 vessel had the ductwork collapse in March. AQD will address through the ROP renewal.</p>
12/12/2014	Other Non ROP	Compliance	<p>R.801 report received. Facility reported 75.1 tons of NOx emissions during the 2014 ozone season (May through September). USS is not subject to a total tons limit from the reheat furnaces. No further action necessary.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/12/2014	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for October 2014 were received by the Detroit Office on 11/21/14. Readings were performed on the BOP roof monitor on October 1, 16, and 29, and on the ESP Stack on October 16. All readings on these dates were performed during operation of No. 25 Vessel. While some VE's were observed from the roof monitor, it did not result in any opacity exceedances. For the ESP, no VE's were observed.</p> <p>A review of the readings from December 2013 to present indicate that the great majority of readings have occurred at the No 25 vessel. While AQD realizes it may not be possible to alternate vessels every reading, the readings should be more evenly distributed between the two vessel, especially since No 26 vessel had the ductwork collapse in March. AQD will address through the ROP renewal.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/13/2014	CO/CJ	Non Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for July 2014 were received by the Detroit Office on 8/15/14.</p> <p>Observations were performed at the BOP roof monitor on July 10 and July 23, each consisting of two heats on No. 25 vessel and one heat on No. 26 vessel. VE's in excess of 20% 3-minute average were observed on July 10 for one 3-minute period. Observations were performed on the ESP Stack on July 15 during two heats on No. 25 vessel and one heat on No. 26 vessel; some VE's were noted but were below the 20%/3-minute average limit. A Violation Notice was not issued for this exceedance.</p> <p>A review of the readings from December 2013 to present indicate that the great majority of readings have occurred at the No 25 vessel. While AQD realizes it may not be possible to alternate vessels every reading, the readings should be more evenly distributed between the two vessel, especially since No. 26 vessel had the ductwork collapse in March. AQD will address through the ROP renewal.</p>
11/13/2014	Malfunction Abatement Plan	Compliance	<p>Facility submitted a revised No. 2 BOP No. 2 Baghouse Operations and Maintenance Plan in accordance with Paragraph 9.C.3 of CO AQD No. 50-2014. Plan was received within 30 days from the effective date of the CO, as required.</p> <p>*****</p> <p>UPDATE: I spoke to Brad Wargnier, USS, on 3/10/15 and asked him to identify the updates made to the plan. He stated that an annual dye test and annual thermography were added (KRK)</p>

Activity Date	Activity Type	Compliance Status	Comments
11/13/2014	ROP Semi 1 Cert	Compliance	<p>ROP Semi-Annual 1 Certification for Delray Connecting Railroad (Section 2) of ROP No. 199600132d. No deviations reported. *** UPDATE: Company has been reporting deviations in the quarterly SIP CO reports. These should also be included in the Title V deviation report. AQD will inform the facility.</p>
11/13/2014	ROP Semi 1 Cert	Compliance	<p>ROP Semi-Annual 1 Certification for Tube City IMS (Section 3) of ROP No. 199600132d. No deviations reported.</p>
11/10/2014	CO/CJ	Non Compliance	<p>Quarterly fugitive dust report submitted for 3rd QTR 2014 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. ***** Update: Upon further review, status changed to non compliance. Required daily sweeping activities did not occur on 4 days due to road construction. While the reasons given may be legitimate, the consent order does not except these types of events so these should be reported as deviations. Consent order only allows for an exception to daily sweeping due to weather. As such, non compliance was chosen (KRK)</p>

Activity Date	Activity Type	Compliance Status	Comments
10/03/2014	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for August 2014 were received by the Detroit Office on 10/4/14.</p> <p>Observations were performed at the BOP roof monitor and ESP Stack on Aug. 7 during operation of No. 26 vessel; no VEs were observed from either location.</p> <p>Observations were performed on the BOP roof monitor on Aug. 22 during operation of No. 25 vessel; some VE's were noted but were below the 20%/3-minute average limit. A review of the readings from December 2013 to present indicate that the great majority of readings have occurred at the No 25 vessel. While AQD realizes it may not be possible to alternate vessels every reading, the readings should be more evenly distributed between the two vessel, especially since No 26 vessel had the ductwork collapse in March. AQD will address through the ROP renewal.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/08/2014	CO/CJ	Compliance	<p>CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for February 2014 were received by the Detroit Office on 3/20/14. While some VE's were observed from the roof monitor, it did not result in any opacity exceedances. For the ESP, some VE's were observed but it did not result in an opacity exceedance. In this report, company claims the COMS was not operating properly on Feb 6,7,8,10,11,12,17,26,27,28, 2014 due to extreme cold weather. As such, VE readings were taken throughout the daylight hours on those days. No violations were observed. However, the COMS was measuring opacity and providing data. AQD has asked for the COMS data and an explanation of how facility determined it was not properly operating. To date, sufficient information has not been provided. Hence the Pending compliance status.</p> <p>UPDATE: 7/31/17. See attached email. Facility response was the certified Method 9 readings confirmed that there was steam interference. At this time, this is an acceptable response.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/08/2014	CO/CJ	Pending	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for March 2014 were received by the Detroit Office on 4/23/14. While some VE's were observed from the roof monitor, it did not result in any opacity exceedances. For the ESP, some VE's were observed but it did not result in an opacity exceedance. In this report, company claims the COMS was not operating properly on March 2,3,4,6 and 13. As such, VE readings were taken throughout the daylight hours on those days. No violations were observed. However, the COMS was measuring opacity and providing data. AQD has asked for the COMS data and an explanation of how facility determined it was not properly operating. To date, sufficient information has not been provided. Hence the Pending compliance status.
08/05/2014	CO/CJ	Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. No readings were taken in April because the No 2 BOP did not operate due to the collapse of the downcomer from No 26 veseel.
08/05/2014	CO/CJ	Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. No VE exceedances were observed.
08/05/2014	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 1st Quarter 2014 from Delray Connecting Railroad (Section 2). Company certified that fugitive dust control measures were not needed for the time period based on visual observation and weather as allowed by the SIP No 8-1993.

Activity Date	Activity Type	Compliance Status	Comments
08/05/2014	CO/CJ	Compliance	CO No.1-2005 Paragraph 11.A.3.d and 11.A.6.b requires visible emission observation for BOP roof monitor (Method 9c) every other week and ESP stack (Method 9) monthly. Records for June 2014 were received by the Detroit Office on 7/24/14. While some VE's were observed from the roof monitor, it did not result in any opacity exceedances. For the ESP, no VE's were observed. A review of the readings from December 2013 to present indicate that the great majority of readings have occurred at the No 25 vessel. While AQD realizes it may not be possible to alternate vessels every reading, the readings should be more evenly distributed between the two vessel, especially since No 26 vessel had the ductwork collapse in March. AQD will address through the ROP renewal.
08/05/2014	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 1st QTR 2014 from US Steel (Section 1). Company certified that all fugitive dust requirements were met unless suspended due to weather (as allowed per the SIP consent order 27-1993).
08/05/2014	CO/CJ	Compliance	Quarterly fugitive dust report submitted for 2nd QTR 2014 from US Steel (Section 1). Company certified that all fugitive dust requirements were met.
07/09/2014	Meeting Notes	Non Compliance	PTI application to increase NOx limits on the CGL annealing furnace
06/26/2014	Scheduled Inspection	Non Compliance	Targeted FY2014 Inspection - Partial inspections of HSM, Delray, Tube City, BOP roof monitor
06/25/2014	Scheduled Inspection	Non Compliance	Targeted FY 2014 inspection - Partial inspections of blast furnaces, slag pits, cooling tower, emergency generators, screening, zug island boilerhouses
06/02/2014	Other	Compliance	MAERS review

Activity Date	Activity Type	Compliance Status	Comments
06/02/2014	MAERS	Compliance	Company (USS) submitted report prior to deadline and DEQ submitted the info to the MAERS system on 3/21/2014. Report was not late. ROP cert was also submitted. See Compliance Activity report for full review of the MAERS.
06/02/2014	ROP Other	Compliance	2013 MAERS Report/ROP Certification Form - Delray Connecting Railroad Company
06/02/2014	ROP Other	Compliance	2013 MAERS Report/ROP Certification Form - Tube City IMS
06/02/2014	ROP Other	Compliance	2013 MAERS Report/ROP Certification Form - Great Lakes Recover Systems, Harsco Material
05/12/2014	ROP Annual Cert	Compliance	No deviations report for Section 3, USS, Tube City IMS.
05/12/2014	ROP SEMI 2 CERT	Compliance	No deviations report for Section 3, USS, Tube City IMS.
05/12/2014	Complaint Investigation	Unknown	Complaint of emissions from Zug Island on Saturday, 5/10/14

Name: Kate Kosi

Date: 8/11/17

Supervisor: W.M.