

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> U S STEEL GREAT LAKES WORKS		<b>SRN :</b> A7809
<b>Location :</b> 1 QUALITY DR		<b>District :</b> Detroit
		<b>County :</b> WAYNE
<b>City :</b> ECORSE	<b>State:</b> MI	<b>Zip Code :</b> 48229 <b>Compliance Status :</b> Compliance
<b>Source Class :</b> MEGASITE		<b>Staff :</b> Katherine Koster
<b>FCE Begin Date :</b> 5/31/2020		<b>FCE Completion Date :</b> 5/31/2023
<b>Comments :</b> At the time of this FCE report, facility appears to be in compliance.		

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
05/31/2023	On-site Inspection	Compliance	FY23 Inspection
05/01/2023	ROP Other	Compliance	Letter received related to a change in responsible official. As of April 17, 2023, Joseph Hunter is the new responsible official.
04/11/2023	ROP Annual Cert	Compliance	Annual deviation report received for TMS International (A7809-Section 3) for 2022. No deviations reported. Report was signed by Responsible Official, Jerimi Yost. Process has been idled since July 2020.
04/11/2023	ROP SEMI 2 CERT	Compliance	Semi annual deviation report received for TMS International (A7809 - Section 3) for July through December 2022. No deviations reported. Note, scarfing operations ceased as of June 24, 2020. Report was signed by Responsible Official, Jerimi Yost.

Activity Date	Activity Type	Compliance Status	Comments
04/11/2023	Stack Test	Compliance	<p>Stack test results for the No. 5 Pickle Line were received hard copy on January 30, 2023. Testing was conducted on December 13, 2022. Minimum makeup flow rate was reset at 74 gpm (prior was set at 100 gpm).</p> <p>At this time, recirculation water is not in use as the scrubber is reportedly designed to only use fresh water. Average pressure drop was 6.1, tons charged was between 235-273 tons/hr. The test results (based on three run average) were 1.59 ppmv (prior tests were 9.5 ppmv, and less than 0.102 ppmv, dry); limit is 18 ppmv, dry, and 1.64 lb/hr (prior tests were 0.52 lb/hr, less than 0.0068 lb/hr); limit is 1.64 lb/hr). Removal efficiency was calculated at 99.5%. Of note, inlet concentrations were 296.14 ppmv average (prior was 1029 ppmv average)</p> <p>Emissions results were similar for all three runs. Tank temperatures and acid concentrations were recorded periodically throughout the test. Stack flow average was 8787 DSCFM (prior test was 9564 DSCFM).</p>
04/05/2023	ROP Annual Cert	Compliance	No deviations were report for Annual Period of CY2022 for ROP Section 1. Note, most of the equipment covered in this section has been idled since March 31, 2020.
04/05/2023	ROP Annual Cert	Compliance	No deviations reported for Section 5 of the USS ROP. Note, this equipment has been idled since March 31, 2020.
04/05/2023	ROP SEMI 2 CERT	Compliance	No deviations reported for Section 1 of the USS ROP. However, USS iron and steel making operations have been temporarily and/or permanently idled since March 31, 2020.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2023	ROP SEMI 2 CERT	Compliance	No deviations were reported for Section 5 of the USS ROP which covers the PCI system for the time period of July - December 2020. However, USS iron and steel making operations have been temporarily idled since March 31, 2020.
04/05/2023	MACT (Part 63)	Compliance	No deviations from the Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) were reported for USS GLW ROP, Section 1, for the semi annual period of July - December 2022. Note, US Steel idled its iron and steel making operations on March 31, 2020. Report does not include this information. Report was included with the semi annual ROP deviation report for the same time period.
03/23/2023	On-site Inspection	Compliance	FY 23 Inspection
03/23/2023	Stack Test Observation	Compliance	CGL stack test

Activity Date	Activity Type	Compliance Status	Comments
03/14/2023	MACT (Part 63)	Compliance	<p>US Steel - GLW, Section 1, submitted a semi-annual SSM report for the HCI steel pickling line per 40 CFR Part 63 Subpart CCC for the reporting period July - Dec 2022. Report was received on February 1, 2023. Facility reported one start up/shut down for planned maintenance. Fan and mesh pad eliminator were replaced during a two week outage starting October 1, 2022. CMS was last calibrated in June 2022. Note, the report referenced 63.1164(c) which only requires a report if there are scrubber malfunctions. This is the language from the MACT regarding the semi annual reporting requirement: 63.1164(c) Reporting malfunctions. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.1159(c), including actions taken to correct a malfunction. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>However, the ROP 199600132d has a requirement with a UAR of 63.1164(c)(2) which also addresses start up and shutdowns due to an older version of the MACT which has since been removed. But, since it is still a condition in the ROP, the information is still required.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/14/2023	ROP Semi 1 Cert	Compliance	Delray Connecting Railroad, Section 2, Semi-Annual ROP Certification for time period January - June 2022, was received on February 9, 2023. Facility reported no deviations and cover letter also states that coke screening operations ceased completely in November 2021.
03/14/2023	ROP Annual Cert	Compliance	Delray Connecting Railroad, Section 2, Annual ROP Certification for time period January - December 2022, was received on February 9, 2023. Facility reported no deviations and cover letter also states that coke screening operations ceased completely in November 2021.
03/14/2023	CO/CJ	Compliance	Quarterly fugitive dust report submitted for the 4th quarter 2022 from US Steel (Section 1) and was received hard copy on February 1, 2023. Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still performs fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.

Activity Date	Activity Type	Compliance Status	Comments
03/14/2023	MACT (Part 63)	Compliance	<p>Annual compliance report for MACT DDDDD: Major sources industrial commercial and institutional boilers and process heaters. Report was received hard copy on February 1, 2023. For the annual report, dates of most recent tuneups were: CGL anneal furnace November 10, 2022 (November 9, 2021 prior date), F building anneal, Zug Island Boilerhouse No 3, and Boilerhouse 5, all did not operate in 2021, and B building anneal was August 24, 2022 (prior date was June 22, 2021). All furnaces that were operating burn natural gas.</p> <p>For the biennial report, J building annual furnaces were tuned most recently on June 21, 2021.</p>
02/28/2023	CO/CJ	Compliance	<p>Semi Annual report for the period of Jul - Dec 2022 was received on February 28, 2023 from USS as required per CD 2:12-cv-304. The report states that iron and steel making operations were idled on March 31, 2020. During the reporting period, all of the operations covered in the Consent Decree did not operate.</p>
12/13/2022	Stack Test Observation	Compliance	Pickle line stack test

Activity Date	Activity Type	Compliance Status	Comments
11/28/2022	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 3rd quarter 2022 records were received on November 9, 2022. Scrubber was replaced in November 2021. Testing occurred in January 2022 to set minimums.</p> <p>Scrubber nozzles were replaced according to the records. New scrubber was operating between 96 and 116 gpm (prior was 80 and 110 gpm) flow rate and around 4-8 in (prior was 3 in.) for the pressure drop.</p> <p>Also, secondary (outside) fume scrubber records were submitted with recirc, make up water, and pressure drop values. Pressure drop is less than 1. in. In December, recirculation flow was generally in the high 20's gpm and the make up flow was around 1 gpm. Need more information on why so different between quarters.</p>
11/28/2022	ROP Other	Compliance	<p>R801 report for USS GLW was received on 11/03/2022. Report is due within 60 days of the end of the ozone control season (September 30). Report was accompanied by an ROP certification form signed by the responsible official. Report states that the HSM remained idled during the entire 2022 ozone season and therefore there were zero NOx emissions from the HSM.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/28/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for the 3rd quarter 2022 from US Steel (Section 1) and was received hard copy on November 3, 2022. Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still performs fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.</p>
10/18/2022	ROP Semi 1 Cert	Compliance	<p>No deviations were reported for the semi annual period of Jan - June 2022. Note, USS idled it's iron and steel making operations as on March 30, 2020. Finished operations such as galvanizing and pickling are still in operation.</p>
10/18/2022	ROP Semi 1 Cert	Compliance	<p>No deviations reported for Section 5 of the USS ROP - PCI. Note, this process has been idled since March 30, 2020.</p>
10/18/2022	MACT (Part 63)	Compliance	<p>No deviations from the Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) were reported for USS GLW ROP, Section 1, for the semi annual period of Jan - Jun 2022. This information was included in the ROP semi annual deviation report. Statement was added about scrap providers. Note, US Steel idled its iron and steel making operation on March 31, 2020.</p>



Activity Date	Activity Type	Compliance Status	Comments
10/18/2022	NSPS (Part 60)	Compliance	Notification of a NSPS Dc subject boiler in operation was received on 8/31/2022. Temporary natural gas fired boiler no longer meets the regulatory definition of "temporary" as it has operated for more than 180 days. Facility used date that 180 days was exceeded as date of start up in the notification. This seems acceptable. Letter also states facility does not intend to have the boiler on site in 2023. Natural gas, heat input capacity is 94MMBTU/hr, no SO2 controls. Attached is an email inquiry about the boiler NESHAP
10/18/2022	CO/CJ	Compliance	Semi Annual report for the period of Jan-Jun 2022 was received on August 31, 2022, from USS as required per CD 2:12-cv-304. The report states that iron and steel making operations were idled on March 31, 2020. During the reporting period, all of the operations covered in the Consent Decree did not operate.
10/17/2022	ROP Semi 1 Cert	Compliance	Delray Connecting Railroad, Section 2, Semi-Annual ROP Certification for time period January - June 2022, was received on September 14, 2022. Facility reported no deviations and cover letter also states that coke screening operations ceased completely in November 2021.

Activity Date	Activity Type	Compliance Status	Comments
10/17/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for the 2nd quarter 2022 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still performs fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.</p>
10/17/2022	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 2nd quarter 2022 records were received on August 3, 2022. Scrubber was replaced in November 2021. Testing occurred in January 2022 to set minimums.</p> <p>Nozzles were new this quarter along with the new scrubber so not replaced. Old scrubber nozzles were replaced in October according to the records. New scrubber was operating between 80 and 110 gpm flow rate and around 3 in. for the pressure drop.</p> <p>Also, new to this report, secondary (outside) fume scrubber records were submitted with recirc, make up water, and pressure drop values. Pressure drop is less than 1. in. In December, recirculation flow was generally in the high 20's gpm and the make up flow was around 1 gpm.</p>

09/26/2022	Stack Test	Compliance	<p>Stack test results for the No. 5 Pickle Line were received hard copy on August 17, 2022. Testing was conducted on June 28, 2022. Average flow rate was 120.6 gpm, lowest flow rate 79.9 gpm. Cover page of test report states that company is setting the minimum at 100 gpm (makeup water). Prior test minimum was 67 gpm. At this time, recirculation water is not in use. Average pressure drop was 6.1, tons charged average was 233 tons/hr. Based on attached TPU memo, the test results (based on three run average) were 9.5 ppmv (prior test was less than 0.102 ppmv, dry; limit is 18 ppmv, dry), and 0.52 lb/hr (prior test was less than 0.0068 lb/hr; limit is 1.64 lb/hr). Removal efficiency was calculated at 99.1% (prior test was 99.99%). Of note, inlet concentrations were 1029 ppmv average.</p> <p>Emissions results were similar for all three runs. Tank temperatures and acid concentrations were recorded periodically throughout the test. Stack flow average was 9564 DSCFM.</p> <p>Also, facility resubmitted pg 20 of the test report because the drawing was incorrect. It is attached.</p> <p>While this test indicates compliance, it is noted that there are seemingly significant emission rate increases from the prior test conducted in January 2022 and this is with a new scrubber that was installed in November 2021. Discussion with Nate Ganhs of USS indicated that company was also concerned in the increase and a series of investigations ensued. It was discovered that it was installed incorrectly from the manufacturer and was missing a component that held the mist eliminator in place. This has since been remedied. Upcoming test in December 2022 will indicate whether this makes a difference.</p> <p>Note, in the future, facility should conduct three runs at the minimum flow rate that they are planning to use moving forward after a compliant test is</p>
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09/26/2022	Stack Test	Compliance	demonstrated.
07/14/2022	CO/CJ	Compliance	USS submitted the Supplemental Environmental Project - River Rouge Blight Project Completion Report per Paragraph 13.F of CO AQD No. 2020-11. There were delays in completing the project which were communicated to AQD during the project. USS was granted an extension from December 24, 2021 to June 10, 2022 for project completion and project was completed by June 6, 2022. Pictures and invoices were attached.
06/07/2022	On-site Inspection	Compliance	FY22 Targeted Inspection - Pickle line, temporary boilers
05/17/2022	Stack Test	Compliance	<p>Stack test results for the No. 5 Pickle Line were received on March 2, 2022. Testing was conducted on January 11, 2022. Protocol was received on November 19, 2021 (hard copy). 7 day notice was received on January 7, 2022 (hard copy). Minimum flow rate was set at 67 gpm. At this time, recirculation water is not in use. The test results (based on three run average) were less than 0.102 ppmv, dry (limit is 18 ppmv, dry), and less than 0.0068 lb/hr (limit is 1.64 lb/hr). Removal efficiency was calculated at 99.99%. Of note, inlet concentrations were 1,267 ppmvd (average of three runs) and 84.9 lb/hr (average of three runs)</p> <p>Throughput per run was 173 tons, 335 tons, and 258 tons. Emissions results were similar for all three runs regardless of throughput variations. Minimum flow for Run 1 was 67 gpm, Run 2 was 90 gpm, and Run 3 was 91 gpm. Pressure drop for all three runs was between 6.5-6.9 in H<sub>2</sub>O. Tank temperatures and acid concentrations were recorded periodically throughout the test.</p>
05/17/2022	ROP SEMI 2 CERT	Compliance	No deviations reported for Section 1 of the USS ROP. Most of the equipment covered in the section has been either temporarily or permanently idled.

Activity Date	Activity Type	Compliance Status	Comments
05/17/2022	ROP SEMI 2 CERT	Compliance	No deviations reported for Section 5 of the USS ROP. Note the equipment covered in this section is not operating and has been temporarily idled.
05/17/2022	ROP Annual Cert	Compliance	One deviations was related to fugitive dust measures not fulfilled because of road repair/repaving. This is acceptable at this time. The other deviation was for a failed pickle line test in February 2021. Facility was already cited and paid a stipulated penalty. Also, two more compliance tests were conducted in 2021 and facility passed the tests.
05/17/2022	CO/CJ	Compliance	Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 1st quarter 2022 records were received on May 3, 2022 . Scrubber was replaced in November 2021. Testing occurred in January 2022 to set minimums. 67 gpm is the new min. Records demonstrated compliance. Nozzles changed on 3/7/22.  Also, new to this report, secondary (outside) fume scrubber records were submitted.
05/17/2022	MACT (Part 63)	Compliance	No deviations from the Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) were reported for USS GLW ROP, Section 1, for the semi annual period of July - December 2021. Note, US Steel idled its iron and steel making operations on March 31, 2020. Report does not include this information.
05/16/2022	ROP Annual Cert	Compliance	Delray Connecting Railroad, Section 2, Annual ROP Certification for time January - December 2021 was received on January 19, 2022. Facility reported no deviations.
05/16/2022	ROP Annual Cert	Compliance	Annual deviation report received for TMS International (A7809-Section 3) for 2021. No deviations reported. Report was signed by Responsible Official, Jerimi Yost. Equipment has been idled since July 2020.

Activity Date	Activity Type	Compliance Status	Comments
05/16/2022	ROP SEMI 2 CERT	Compliance	Semi annual deviation report received for TMS International (A7809- Section 3) for July through December 2021. No deviations reported. Note, scarfing operations ceased as of June 24, 2020. Report was signed by Responsible Official, Jerimi Yost.
05/16/2022	CO/CJ	Compliance	Quarterly fugitive dust report submitted for the 1st quarter 2022 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still performs fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.
05/16/2022	CO/CJ	Compliance	Semi Annual report for the period of July 1 - December 31, 2021 was received on March 2, 2022, from USS as required per CD 2:12 -cv-304. The report states that iron and steel making operations were idled on March 31, 2020. During the reporting period, all of the operations covered in the Consent Decree did not operate.
04/30/2022	ROP Annual Cert	Compliance	No deviations reported for Section 5 of the USS ROP. Note, equipment has been idled since March 30, 2020.
04/28/2022	On-site Inspection	Compliance	Section 2 - Transtar/Delray Connecting Railroad

Activity Date	Activity Type	Compliance Status	Comments
03/22/2022	MAERS	Compliance	<p>MAERS report electronically submitted on March 22, 2022. MAERS certification form received on March 15, 2022. SB-101 Supplemental Control Template Submission.</p> <p>No changes were made. Most of the equipment is idled at the moment.</p>
03/14/2022	MACT (Part 63)	Compliance	<p>Annual compliance report and biennial compliance report for MACT DDDDD: Major sources industrial commercial and institutional boilers and process heaters. Both reports were received hard copy on January 31, 2022. For the annual report, dates of most recent tuneups were: CGL anneal furnace November 9, 2021, F building anneal, Zug Island Boilerhouse No 3, and Boilerhouse 5, all did not operate in 2021, B building anneal tune up June 22, 2021. All furnaces burn natural gas.</p> <p>For the biennial report, J building annual furnaces were tuned most recently on June 21, 2021.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/14/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for the 4th quarter 2021 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still performs fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.</p>



Activity Date	Activity Type	Compliance Status	Comments
03/14/2022	MACT (Part 63)	Compliance	<p>U S Steel - GLW, Section 1, submitted a semi-annual SSM report for the HCI steel pickling line per 40 CFR Part 63 Subpart CCC for the reporting period July 1 - December 31, 2021. Report was received on January 31, 2022. Facility reported one start up/shut down to replace the primary fume scrubber that control emissions from the pickle line. Shut down occurred on November 4, 2021. Two flow meters and two pressure differential meters were calibrated prior to the November 17, 2021 restart of the line.</p> <p>Note, the report referenced 63.1164(c) which only requires a report if there are scrubber malfunctions. This is the language from the MACT regarding the semi annual reporting requirement: 63.1164(c) Reporting malfunctions. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.1159(c), including actions taken to correct a malfunction. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>However, the ROP 199600132d has a requirement with a UAR of 63.1164(c)(2) which also addresses start up and shutdowns due to an older version of the MACT which has since been removed. But, since it is still a condition in the ROP, the information is still required.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/14/2022	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 4th quarter 2021 records were received on February 1, 2022. Scrubber was replaced this quarter in November. Testing occurred in January 2022 to set minimums. Nozzles were new this quarter along with the new scrubber so not replaced. Old scrubber nozzles were replaced in October according to the records. New scrubber was operating between 80 and 110 gpm flow rate and around 3 in. for the pressure drop.</p> <p>Also, new to this report, secondary (outside) fume scrubber records were submitted with recirc, make up water, and pressure drop values. Pressure drop is less than 1. in. In December, recirculation flow was generally in the high 20's gpm and the make up flow was around 1 gpm.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/12/2022	MACT (Part 63)	Compliance	<p>On November 16, 2021, US Steel submitted an initial notification of compliance status for the Iron and Steel MACT as it relates to the new mercury/scrap provisions that were added to the MACT after the EPA completed its mandatory residual risk and technology review (albeit very overdue). Letter states that as of July 13, 2021, facility participates in and purchases scrap only from providers who participate in a program for removal of mercury switches.</p> <p>Note, this report is potentially late; the deadline for submitting the NOCS related to the new mercury provisions is unclear to me when I read the MACT. Enforcement discretion applied as letter has been submitted and no additional action is needed.</p> <p>Mercury requirements. If you have an existing affected sources, you must meet the mercury emission limit for each BOPF Group in Table 1 to this subpart or procure steel scrap pursuant to the requirements in paragraphs (a) through (c) of this section beginning [DATE 1 YEAR AFTER DATE OF PUBLICATION OF FINAL RULE IN THE FEDERAL REGISTER</p>
01/10/2022	CO/CJ	Compliance	<p>Revised O&amp;M plan for the No. 5 Pickle Line was received on November 2, 2021. An O&amp;M plan is required for the No. 5 Pickle Line as part of the MACT CCC and CO 11-2020. This revision was submitted in anticipation of the replacement of the main scrubber with a new scrubber of a different design on or about November 22, 2021. This plan also includes the separate scrubber installed to control tank farm emissions.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/10/2022	Stack Test	Compliance	<p>Stack test results for the No. 5 Pickle Line were received on October 11, 2021. Testing was conducted on August 24, 2021. Protocol was received on July 8, 2021. Based on the reported results, the HCl emissions were 0.1 lb/hr (limit is 1.64 lb/hr) and 1.7 ppmv, dry (limit is 18 ppmv, dry prior) and 99.8% control (referred to as collection in the MACT) efficiency (based on a 3 run average). 7 day test notification was received timely. TPU reviewed the results and arrived at the same values. See attached memo from Regina Angellotti, dated November 8, 2021.</p> <p>In the October 11, 2021 cover letter that accompanied the test results, facility listed the following minimum scrubber flow rates based on data recorded during the test: makeup water: 66.5 gpm and recirculation rate: 535 gpm. The facility recently increased the makeup rate and decreased the recirc rate. There was also an HCl audit sample submitted and was reportedly within the acceptance limit. AQD requested the audit sample.</p> <p>Pressure drop during the test was approximately 5 in w.c. Production ranged from 205-337 tons per run. This was on the lower end compared to past testing. However, the run with the lowest production did not have the lowest emissions.</p> <p>Note, pressure drop range in the ROP is listed as 3-10; however the permit condition states that operating outside of the range is not a deviation. The steel pickling MACT only requires monitoring of the pressure drop to identify changes that may indicate a need for maintenance. As the facility passed the test with the pressure drop below 3 in. w.c., USS has requested to modify the range. This is acceptable to AQD and will be addressed in the ROP renewal.</p>

01/10/2022	Stack Test	Compliance	<p>Stack test results for the No. 5 Pickle Line were received on April 8, 2021. Testing was conducted on March 11, 2021. This was a retest because the test on February 16, 2021 was failed. TPU completed review on 4/21/21 and sent the attached memo. Based on the reported results and TPU calculations, the HCl emissions were 0.48 lb/hr in the test report and 0.50 calculated by AQD (10/21 test was 0.1 lb/hr; limit is 1.64 lb/hr) and 7.86 ppmv, dry in the test report and 8 ppmv calculated by AQD (10/21 test was 1.7 ppmv, dry; limit is 18 ppmv, dry) based on a 3 run average. 97.2% was the AQD calculated collection efficiency; at least 97% is the regulatory requirement. Also, 4 runs were completed because the sampling line fell out of the inlet sampling location during Run 2. As such, AQD calculations are based on the three highest runs. Test was rescheduled in a timely manner after facility was aware that they failed.</p> <p>The following minimum scrubber flow rates based on data recorded during the test: makeup water: 69 gpm and recirculation rate: 533 gpm (based on averages from Run 3). Makeup rate was increased for this test and recirc rate was decreased. Pressure drop during the test was approximately 5 in w.c. Production ranged from 198-291 (10/21 test was 205-337 tons per run).</p> <p>Note, pressure drop range in the ROP is listed as 3-10; however the permit condition states that operating outside of the range is not a deviation. The steel pickling MACT only requires monitoring of the pressure drop to identify changes that may indicate a need for maintenance. As the facility passed the test with the pressure drop below 3 in. w.c., USS has requested to modify the range. This is acceptable to AQD and will be addressed in the ROP renewal.</p> <p>Cover letter submitted with results</p>
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01/10/2022	Stack Test	Compliance	that outlines actions facility took to investigate the failed test and the actions taken between the February 2021 and March 2021 test such as: water flow rates were adjusted, fan damper was opened slightly to increase air flow, and a different lab was used to analyze the samples. The scrubber and components such as the packing, mist eliminator, and fan ware all inspected after the failed test. No obvious deficiencies were noted.
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01/10/2022	Stack Test	Non Compliance	<p>Stack test results for the No. 5 Pickle Line were received on April 8, 2021. Testing was conducted on February 16, 2021. TPU completed review on 4/21/21 and sent the attached memo. Based on the reported results and TPU calcs, the HCl emissions were 1.96 lb/hr in the test report and the AQD calculated result (3/21 test was 0.48 lb/hr, 10/21 test was 0.1 lb/hr; limit is 1.64 lb/hr) and 38.7 ppmv, dry in the test report, 38.9 was AQD calculated result (3/21 test was 7.86 ppmv, dry, 10/21 test was 1.7 ppmv, dry; limit is 18 ppmv, dry) based on a 3 run average. 91.8% was the AQD calculated collection efficiency; the regulatory requirement is at least 97%.</p> <p>The following were the approximate minimum scrubber flow rates based on data recorded during the test: makeup water: 48 gpm (3/21 test 69 gpm) and recirculation rate: 571 gpm (3/21 test 533 gpm). Pressure drop during the test was approximately 2 in w.c. (3/21 test was 5 in w.c.). Production ranged from 175-204 tons (3/21 test was 198-291 tons, 10/21 test was 205-337 tons per run).</p> <p>Note, pressure drop range in the ROP is listed as 3-10; however the permit condition states that operating outside of the range is not a deviation. The steel pickling MACT only requires monitoring of the pressure drop to identify changes that may indicate a need for maintenance. As the facility passed the test with the pressure drop below 3 in. w.c., USS has requested to modify the range. This is acceptable to AQD and will be addressed in the ROP renewal.</p> <p>Cover letter submitted with results that outlines actions facility took to investigate the failed test and the actions taken between the February 2021 and March 2021 test such as: water flow rates were adjusted, fan damper was opened slightly to increase air flow, and a different lab was used to analyze the samples. The scrubber and</p>
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01/10/2022	Stack Test	Non Compliance	<p>components such as the packing, mist eliminator, and fan ware all inspected after the failed test. No obvious deficiencies were noted. Note, facility installed a new separate scrubber to control emissions from the tank farm in December 2020. Previously, emissions from loading, unloading, and storage were controlled by the main pickle line scrubber.</p> <p>A violation notice was issued in April 2021.</p>
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01/10/2022	MACT (Part 63)	Non Compliance	<p>U S Steel - GLW, Section 1, submitted a semi-annual SSM report for the HCI steel pickling line per 40 CFR Part 63 Subpart CCC for the reporting period July 1 - December 31, 2020. Report was received on August 3, 2021. Facility did not report startup/shut downs or calibration dates.</p> <p>Report includes information about the failed stack test in February 2021 and the subsequent actions that US Steel took. Report states there was a possible malfunction of the scrubber. AQD disagrees with this assessment. There was nothing presented by US Steel to indicate that the scrubber malfunctioned nor did AQD staff witness anything to indicate that the scrubber was malfunctioning.</p> <p>Note, the report referenced 63.1164(c) which only requires a report if there are scrubber malfunctions. This is the language from the MACT regarding the semi annual reporting requirement: 63.1164(c) Reporting malfunctions. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.1159(c), including actions taken to correct a malfunction. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>However, the ROP 199600132d has a requirement with a UAR of 63.1164(c)(2) which also addresses start up and shutdowns due to an older version of the MACT which has since been removed. But, since it is still a condition in the ROP, the</p>
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01/10/2022	MACT (Part 63)	Non Compliance	information is still required.
01/10/2022	CO/CJ	Compliance	Revised O&M plan for the No. 5 Pickle Line was received on June 24, 2021. An O&M plan is required for the No. 5 Pickle Line as part of the MACT CCC and CO 11-2020. This revision was submitted in response to a failed stack test in February 2021 and to incorporate the newer outside scrubber. Cover letter states that the plan will be implemented within 60 days or when EGLE approves, whichever is earlier. AQD approved the plan on 7/13/21 (see attached).
01/04/2022	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 2nd quarter 2021 records were received on August 3, 2021. Reported flow rates and pressure drop appear to be in compliance with the minimum flow rates and pressure drop range set during March 2021 stack testing (recirc 535 GPM, makeup 69 GPM).</p> <p>Also, inspection records are included. Records indicate all 9 spray nozzles were replaced during the quarter. Weekly visible inspection has wrong minimums listed on the form. However, all recorded values were above the March 2021 stack test minimums.</p>
01/03/2022	ROP Semi 1 Cert	Compliance	Semi annual deviation report received for TMS International (A7809- Section 3) for January through June 2021. No deviations reported. Note, scarfing operations ceased as of June 24, 2020. Report was signed by Responsible Official, Jerimi Yost.
01/03/2022	ROP Other	Compliance	R801 report for USS GLW was received on 11/10/2021. Report is due within 60 days of the end of the ozone control season (September 30). Report was accompanied by an ROP certification form signed by the responsible official. Report states that the HSM remained idled during the entire 2021 ozone season and therefore there were zero NOx emissions.

Activity Date	Activity Type	Compliance Status	Comments
01/03/2022	CO/CJ	Compliance	Semi Annual report for the period of January 1 - June 30, 2021 was received on August 31, 2021 , from USS as required per CD 2:12 -cv-304. The report states that iron and steel making operations were idled on March 31, 2020. During the reporting period, all of the operations covered in the Consent Decree did not operate.
01/03/2022	CO/CJ	Compliance	Quarterly fugitive dust report submitted for the 3rd quarter 2021 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still perform fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.

Activity Date	Activity Type	Compliance Status	Comments
01/03/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for the 2nd quarter 2021 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still perform fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/03/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for the 1st quarter 2021 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations, and no truck traffic that they are responsible for on Zug Island. The main gate to access the US Steel portion of the island is reportedly "locked." The Hot Strip Mill has also been idled and gate access restricted as of March 2021. AQD conditionally granted the request. EES Coke still perform fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.</p>
11/02/2021	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 3rd quarter 2021 records were received on November 2, 2021. Facility switched to new form with different minimum on September 22. Changed nozzles August 30, 2021.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/27/2021	ROP Semi 1 Cert	Compliance	Three deviations were reported for USS GLW ROP, Section 1, for the semi annual period of January - July 2021. All three deviations relate to the failure of the pickle line to meet the ppm and lb/hr HCl limits at the scrubber during the February 16 stack test. A violation notice was already issued. Facility retested on March 11 and passed. Length of deviation is listed as one day, the date of the stack test, which AQD disagrees. Length should be from the failed test until a passing test. Note, US Steel idled its iron and steel making operation on March 31, 2020. Note, compliance was chosen due to the facility passing the most recent stack test. However, AQD has concerns that the facility will be able to maintain compliance in the long term based on historical compliance issues at this stack.
09/27/2021	MACT (Part 63)	Compliance	No deviations from the Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) were reported for USS GLW ROP, Section 1, for the semi annual period of Jan - Jun 2021. This was included in the ROP semi annual deviation report. Note, US Steel idled its iron and steel making operation on March 31, 2020.
09/27/2021	ROP Semi 1 Cert	Compliance	Delray Connecting Railroad, Section 2, Semi-Annual ROP Certification for time period January - June 2021, was received on September 14, 2021. Facility reported no deviations and that all VE readings are performed as required. Note, USS idled its iron and steel making operations on March 31, 2020 but apparently DCRR is still operating in some capacity. An inspection will be performed in 2022.
08/31/2021	ROP Semi 1 Cert	Compliance	No deviations reported for Section 5 of the USS ROP - PCI. Note, this process has been idled since March 30, 2020.
07/14/2021	On-site Inspection	Non Compliance	FY21 Targeted Inspection - Continuous Galvanizing Line (CGL) and Pickle Line Tank Farm new scrubber. No parametric monitoring installed is reason for non compliance.

Activity Date	Activity Type	Compliance Status	Comments
05/28/2021	MAERS	Compliance	<p>MAERS report submitted on March 15, 2021. ROP Section 1 &amp; 5.</p> <p>Facility idled primary operations (iron and steel making) on or around 3/31/20 Supplemental spreadsheet submitted and attached to this report. If facility starts up operation in the future, all EF's need to be reviewed and reevaluated.</p> <p>Do not agree with 100% capture of particulate during O2 blowing at the ESP Do not agree with use of different stack flow rates for calculating emissions from same stack Do not agree with 99% capture efficiency at charge/tap baghouse Still have question about containment factor HMT - spreadsheet uses 2005 value but a test was conducted in 2019; USS updated the calculations based on the latest test Need updated COG SO2 EF - USS updated the supplemental spreadsheet; actual emissions reported in MAERS were always correct Note, staff needs to ask USS for supplemental spreadsheet each year HMT/Desulf EF shown is for gr/dscf of PM in MAERS although the default units are "lb/"</p>

Activity Date	Activity Type	Compliance Status	Comments
05/04/2021	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 1st quarter 2021 records were received on May 4, 2021.</p> <p>Reported flow rates and pressure drop appear to be in compliance with the minimum flow rates and pressure drop range set during December 2019 compliant stack testing. Minimum recirculation rate is 574 gpm and minimum makeup water rate is 48 GPM. Also, pressure drop was between 1.0 and 10.0 in. H<sub>2</sub>O. However, a stack test was performed in February 2021 and the company failed the test. A retest was performed in March and was passed. As such, in mid March, the daily flow rates sheet was modified to reflect the new minimums were set.</p> <p>Also, inspection records are included. Records indicate all 9 spray nozzles were replaced.</p>
05/03/2021	ROP Annual Cert	Compliance	<p>Delray Connecting Railroad, Section 2, Annual ROP Certification was received on February 25, 2021. Facility reported no deviations and that all VE readings are performed as required. Note, USS idled its iron and steel making operations on March 31, 2020 but apparently DCRR is still operating in some capacity. An inspection will be performed in 2021.</p>
05/03/2021	ROP SEMI 2 CERT	Compliance	<p>Delray Connecting Railroad, Section 2, Semi-Annual ROP Certification for time period July 1 - December 31, 2020, was received on February 25, 2021. Facility reported no deviations and that all VE readings are performed as required. Note, USS idled its iron and steel making operations on March 31, 2020 but apparently DCRR is still operating in some capacity. An inspection will be performed in 2021.</p>



Activity Date	Activity Type	Compliance Status	Comments
05/03/2021	ROP SEMI 2 CERT	Compliance	No deviations were reported for USS GLW ROP, Section 1, for the semi annual period of July - December 2020. This includes deviations related to the Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF). Note, US Steel idled its iron and steel making operation on March 31, 2020.
05/03/2021	MACT (Part 63)	Compliance	No deviations from the Iron and Steel MACT (40 CFR Part 63 Subpart FFFFF) were reported for USS GLW ROP, Section 1, for the semi annual period of July - December 2020. Note, US Steel idled its iron and steel making operation on March 31, 2020.
05/03/2021	ROP SEMI 2 CERT	Compliance	Semi annual deviation report received for TMS International (A7809- Section 3) for July - December 2020. No deviations reported. Report was signed by Responsible Official, Jerimi Yost.  Cover letter states "TMS scarfing operations commenced at the Ecorse facility on June 24, 2020." AQD is unclear about the meaning of this sentence as USS idled the Hot Strip Mill in May 2020. An email was sent to the facility. Facility responded that the sentence should have read "ceased" instead of "commenced."
05/03/2021	ROP Annual Cert	Compliance	Annual deviation report received for TMS International (A7809-Section 3) for 2020. No deviations reported. Report was signed by Responsible Official, Jerimi Yost.
05/03/2021	ROP Annual Cert	Compliance	2020 Annual ROP certification for USS GLW was received March 15, 2021. No additional deviations were reported beyond what was included in the semi annual Jan - June report. The July - December report had zero deviations. As such, compliance was chosen at this time.
05/03/2021	ROP Annual Cert	Compliance	No deviations reported for USS GLW ROP, Section 5, for the annual period of 2020.

Activity Date	Activity Type	Compliance Status	Comments
05/03/2021	CO/CJ	Compliance	Semi Annual report for the period of July 1 - December 31, 2020 was received on March 15, 2021, from USS as required per CD 2:12-cv-304. The report states that iron and steel making operations were idled on March 30, 2020. During the reporting period, all of the operations covered in the Consent Decree did not operate.
05/03/2021	CO/CJ	Compliance	Quarterly fugitive dust report submitted for the 4th quarter 2020 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations and no truck traffic that they are responsible for. The main gate to access the US Steel portion of the island is reportedly "locked." AQD conditionally granted the request. EES Coke still perform fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements and a certification by the company that those requirements were met. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.
05/03/2021	CO/CJ	Compliance	Semi Annual report for the period of July 1 - December 31, 2022 was received on February 28, 2023, from USS as required per CD 2:12-cv-304. The report states that iron and steel making operations were "indefinitely idled" on March 31, 2020. During the reporting period, all of the operations covered in the Consent Decree did not operate.
04/28/2021	ROP SEMI 2 CERT	Compliance	No deviations were reported for Section 5 of the USS ROP which covers the PCI system for the time period of July - December 2020. However, USS iron and steel making operations have been temporarily idled since March 31, 2020.

Activity Date	Activity Type	Compliance Status	Comments
03/15/2021	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 2nd quarter 2020 records were received hard copy on August 7, 2020. Reported flow rates and pressure drop appear to be in compliance with the minimum flow rates and pressure drop range set during December 2019 compliant stack testing. Minimum recirculation rate is 574 gpm and minimum makeup water rate is 48 GPM. Also, pressure drop was between 1.0 and 10.0 in. H<sub>2</sub>O.</p> <p>Also, inspection records are included. Records indicate spray nozzles were replaced in May.</p>
03/11/2021	On-site Inspection	Non Compliance	Targeted Inspection FY2021 - Pickle Line
03/11/2021	Stack Test Observation	Compliance	Pickle Line stack test

Activity Date	Activity Type	Compliance Status	Comments
02/24/2021	MACT (Part 63)	Compliance	<p>U S Steel - GLW, Section 1, submitted a semi-annual SSM report for the HCl steel pickling line per 40 CFR Part 63 Subpart CCC for the reporting period July 1 - December 31, 2020. Report was received on February 3, 2021. Facility reported one start up/shut down for maintenance. Flow meters and pressure differential meter were most recently calibrated in December 2020; this calibration is required annually.</p> <p>Note, the report referenced 63.1164(c) which only requires a report if there are scrubber malfunctions. This is the language from the MACT regarding the semi annual reporting requirement: 63.1164(c) Reporting malfunctions. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.1159(c), including actions taken to correct a malfunction. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>However, the ROP 199600132d has a requirement with a UAR of 63.1164(c)(2) which also addresses start up and shutdowns due to an older version of the MACT which has since been removed. But, since it is still a condition in the ROP, the information is still required.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/24/2021	CO/CJ	Compliance	<p>Revised Operation and Maintenance Plan for the No. 5 Pickle Line was submitted as required by CO AQD NO.11-2020. It was required to be submitted within 30 days of the effective date of the order. Effective date of the order was November 19, 2020. It was received via email on December 18 and hard copy on December 23. Plan includes increased visual observation at least once every two weeks of operation, inspect hold down grating annually, and diagram of scrubber indicating where nozzles are located. According to Mr. Ganhs, it's two weeks versus one week just because of the intermittent nature of the pickling operations as it is dependent on outside coils. At this time, O&amp;M plan appears to be sufficient.</p>
02/24/2021	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 4th quarter 2020 records were received on February 11, 2021. Reported flow rates and pressure drop appear to be in compliance with the minimum flow rates and pressure drop range set during December 2019 compliant stack testing. Minimum recirculation rate is 574 gpm and minimum makeup water rate is 48 GPM. Also, pressure drop was between 1.0 and 10.0 in. H<sub>2</sub>O.</p> <p>Also, inspection records are included. Records indicate all 9 spray nozzles were replaced on 10/28/20. The demister pad was also replaced. Flow meters and pressure gauges were calibrated in December 2020. Calibration records were included.</p>
02/03/2021	MACT (Part 63)	Compliance	Subpart DDDDD report received.
01/13/2021	ROP Semi 1 Cert	Compliance	See Compliance Activity Report CA_A780956654

Activity Date	Activity Type	Compliance Status	Comments
01/13/2021	MACT (Part 63)	Compliance	<p>Deviations related to the Integrated Iron and Steel MACT (Subpart FFFFF) for the semi annual period of January - June 2020 were included in the ROP semi annual report for the same time period. Deviations were reviewed in Compliance Activity report CA_A780956654 and were listed as 2 deviations in the ROP report; however counting each individual instance as a deviation results in 7 deviations. However, the MACT report also contained additional required information as outlined in 63.7841 and 63.10(d) (5) such as: there were no periods where the CPMS or the COMS were out of control, and report states that there were deviations from emission limits or operation and maintenance requirements. Report seems to be missing operating hours for the unit that had deviations as required by 63.7841(b)(7). Note, iron and steel making operations were temporarily idled on or around March 31, 2020. This missing information will be addressed with the facility upon startup of the operations.</p>
01/13/2021	Other	Compliance	<p>USS GLW January - June 2020 Semi Annual ROP Deviation Report for Section 1 &amp; 5 and MACT 5F deviation report for Section 1</p>
01/07/2021	ROP Semi 1 Cert	Compliance	<p>No deviations reported for USS GLW ROP, Section 5, for the semi annual period of Jan - June 2020.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/07/2021	CO/CJ	Compliance	<p>Semi Annual report for the period of January 1 - June 30, 2020 was submitted on September 15, 2020, by USS as required per CD 2:12-cv-304. The report contains three sections; Section 1- Blast Furnace Bell inspection, Section 2 - Compliance Updates, Section 3 - No. 2 BOP VE observations. Report states that B2 bell was not inspected based on the December 19, 2019 notice that was submitted stating US Steel's intention to indefinitely idle B2; B2 had already been idled since June 2019. The December 2019 notice also stated that most of the facility would be idled as of March 31, 2020. US Steel continued enhanced VEO's of the BOP Shop roof monitor until the BOP Shop idled; the last VEO reading was taken on March 30, 2020. US Steel had zero 30 days rolling periods with more than 4 exceedances. There were a total of three exceedances of the 20% average opacity limit recorded by the VE reader.</p> <p>Report states lighting project was completed on March 30, 2020 and completion report was submitted on April 28, 2020. "Compliance" was chosen as it relates to the facility adhering to the CD requirements. Deviations are related to the opacity exceedances but they are not deviations/violations of the CD provisions.</p>
01/04/2021	ROP Semi 1 Cert	Compliance	Semi annual deviation report received for TMS International (A7809- Section 3) for January through June 2020. No deviations reported. Report was signed by a Responsible Official, Jerimi Yost.
12/23/2020	Stack Test	Compliance	Pickle line stack test protocol received on 12/23/20 (hard copy). Proposed stack test date is February 16, 2021. 7 day notification was received.

Activity Date	Activity Type	Compliance Status	Comments
12/21/2020	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for the 3rd quarter 2020 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its iron and steelmaking operations around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to no iron making operations and no truck traffic that they are responsible for. The main gate to access the US Steel portion of the island is reportedly "locked." AQD conditionally granted the request. EES Coke still perform fugitive dust measures for the part of the island they are utilizing. This report is based on the approved reduced fugitive dust requirements. A visual check of Zug Island is still performed weekly with suppressant applied as needed based on the observations.</p>
12/21/2020	CO/CJ	Compliance	<p>Quarterly fugitive dust report submitted for the 2nd quarter 2020 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter. Note, USS temporarily idled all of its operations on Zug Island and the hot metal operations at the Main Plant on or around March 31, 2020. As such, they requested to reduce some of the fugitive dust requirements due to eventual no operations and no truck traffic. AQD conditionally granted the request. This report is based on the approved reduced fugitive dust requirements.</p>



Activity Date	Activity Type	Compliance Status	Comments
12/21/2020	MACT (Part 63)	Compliance	<p>U S Steel - GLW, Section 1, submitted a semi-annual SSM report for the HCl steel pickling lines per 40 CFR Part 63 Subpart CCC for the reporting period July 1, - December 31, 2019. Report was received on January 28, 2020. Facility reported 2 start up/shut down events due to planned maintenance. Company certified that they followed procedures in their SSM plans for each event. Flow meters and pressure differential meter were most recently calibrated in December 2019; this calibration is required annually.</p> <p>Note, the report referenced 63.1164(c) which only requires a report if there are scrubber malfunctions. This is the language from the MACT regarding the semi annual reporting requirement: 63.1164(c) Reporting malfunctions. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.1159(c), including actions taken to correct a malfunction. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>However, the ROP 199600132d has a requirement with a UAR of 63.1164(c)(2) which also addresses start up and shutdowns due to an older version of the MACT which has since been removed. But, since it is still a condition in the ROP, the information is still required.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/21/2020	MACT (Part 63)	Compliance	<p>U S Steel - GLW, Section 1, submitted a semi-annual SSM report for the HCl steel pickling lines per 40 CFR Part 63 Subpart CCC for the reporting period January 1 - June 30, 2020. Report was received on August 7, 2020. Facility reported no start up/shut down events. Flow meters and pressure differential meter were most recently calibrated in December 2019; this calibration is required annually.</p> <p>Note, the report referenced 63.1164(c) which only requires a report if there are scrubber malfunctions. This is the language from the MACT regarding the semi annual reporting requirement: 63.1164(c) Reporting malfunctions. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.1159(c), including actions taken to correct a malfunction. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>However, the ROP 199600132d has a requirement with a UAR of 63.1164(c)(2) which also addresses start up and shutdowns due to an older version of the MACT which has since been removed. But, since it is still a condition in the ROP, the information is still required.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/07/2020	ROP Semi 1 Cert	Compliance	<p>Delray Connecting Railroad, Section 2, Semi-Annual 1 ROP Certification for time period January 1-June 30, 2020 was received on October 29, 2020. Facility reported no deviations and that all VE readings are performed as required. Note, report is late but AQD is unsure of how much delay was caused by current COVID restrictions.</p>
12/07/2020	CO/CJ	Compliance	<p>Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 3rd quarter 2020 records were received on October 23, 2020. Reported flow rates and pressure drop appear to be in compliance with the minimum flow rates and pressure drop range set during December 2019 compliant stack testing. Minimum recirculation rate is 574 gpm and minimum makeup water rate is 48 GPM. Also, pressure drop was between 1.0 and 10.0 in. H<sub>2</sub>O.</p> <p>Also, inspection records are included. Records indicate all 9 spray nozzles were replaced on 9/15/20. The demister pad was also replaced.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/20/2020	ROP Other	Compliance	R801 report for USS GLW was received on 10/20/2020. Report is due within 60 days of the end of the ozone control season (September 30). Report was accompanied by an ROP certification form signed by the responsible official. Report shows 16.59 tons of NOx emissions during ozone season for 2020 from the 80" Hot Strip Mill. To calculate NOx emissions when burning natural gas, facility used a NOx emission factor of 0.172 lb/MMBtu which is based on October 2016 stack test results. AQD was not present for that testing but test report was submitted to TPU. Report indicates no coke oven gas is being burned at the Hot Strip Mill. USS is not subject to an emission limit from the reheat furnaces. As such, report is only required to include total emissions and hours of operation which it does. Note, the HSM shut down indefinitely in July 2020. No further action necessary.
08/18/2020	CO/CJ	Compliance	Quarterly inspection records for the No. 5 Pickle Line for the 3rd Quarter 2019 were received on October 28, 2019 in accordance with Paragraph 9.B.2 of CO AQD No. 22-2016. Reported flow rates and pressure drop appear to be in compliance with the minimum flow rates and pressure drop range set during the September 2018 compliant stack testing. Minimum recirculation rate is 571 gpm and minimum makeup water rate is 49 GPM. Also, pressure drop was between 1.0 and 10.0 in. H2O. Also, inspection records are included. New nozzles installed on July 23, 2019.
08/11/2020	On-site Inspection	Compliance	FY20 Targeted Inspection - CGL
07/13/2020	ROP SEMI 2 CERT	Compliance	No deviations were reported for Delray Connecting Railroad Company, Section 2 of the USS ROP, for the semi annual period July - December 2019.
07/13/2020	ROP Annual Cert	Compliance	No deviations were reported for Delray Connecting Railroad Company, Section 2 of the USS ROP, for the CY2019.

Activity Date	Activity Type	Compliance Status	Comments
07/07/2020	ROP Annual Cert	Compliance	2019 annual deviation report received for TMS International (A7809- Section 3). No deviations reported.
07/07/2020	ROP SEMI 2 CERT	Compliance	Semi annual deviation report received for TMS International (A7809- Section 3) for July through December 2018. No deviations reported. Baghouse compartment pressure drops and VE readings were attached. Note, facility requested a change to the pressure drop minimum (from 5 to 4) during the ROP renewal process which was accepted by AQD and put into the draft ROP. The range is allowed to be changed per the permit condition.
07/07/2020	CO/CJ	Compliance	Quarterly pickle line maintenance records are required to be submitted per Paragraph 9.B.2 of CO AQD No. 22-2016. The 1st quarter 2020 records were received on May 12, 2020. Reported flow rates and pressure drop appear to be in compliance with the minimum flow rates and pressure drop range set during December 2019 compliant stack testing. Minimum recirculation rate is 574 gpm and minimum makeup water rate is 48 GPM. Also, pressure drop was between 1.0 and 10.0 in. H <sub>2</sub> O.  Also, inspection records are included. Records indicate spray nozzles were replaced on 3/19.
07/06/2020	CO/CJ	Compliance	Quarterly fugitive dust report submitted for the 3rd quarter 2019 from US Steel (Section 1). Company certified that all fugitive dust requirements were met during the quarter.
06/30/2020	Other	Non Compliance	USS GLW July - December 2018 Semi Annual ROP Deviation Report for Section 1 & 5 and MACT 5F deviation report for Section 1

Activity Date	Activity Type	Compliance Status	Comments
06/29/2020	MACT (Part 63)	Non Compliance	<p>Deviations related to the Integrated Iron and Steel MACT (Subpart FFFFF) for the semi annual period of January - June 2019 were included in the ROP semi annual report for the same time period. Report was postmarked September 13, 2019. Deviations were reviewed in Compliance Activity report CA_A780954060. 6 deviations were listed in the ROP deviation report (16 individual instances in the MACT report) However, facility has entered into CD 2:12-cv-304 in March 2017 to address, in part, opacity exceedances at the BOP Shop and implemented improvements to the capture and control system based on the results of a 3rd party study. Improvements should be nearing completion.</p> <p>However, the MACT report also contained additional required information as outlined in 63.7841 and 63.10(d)(5) such as: there were no periods where the CPMS or the COMS were out of control, and report states that there were deviations from emission limits or operation and maintenance requirements. Report seems to be missing operating hours for the unit that had deviations as required by 63.7841(b)(7).</p>
06/29/2020	ROP Semi 1 Cert	Non Compliance	See Activity Report CA_A780954060
06/29/2020	ROP Semi 1 Cert	Compliance	No deviations reports for Semi Annual period of January- June 2019 for Section 5 of the USS ROP.

Activity Date	Activity Type	Compliance Status	Comments
06/29/2020	MACT (Part 63)	Compliance	<p>Deviations related to the Integrated Iron and Steel MACT (Subpart FFFFF) for the semi annual period of July - December 2019 were included in the ROP semi annual report for the same time period. Report was postmarked March 13, 2020. Deviations were reviewed in Compliance Activity report CA_A780954042 and were listed as 2 deviations in the ROP report; however counting each individual instance as a deviation results in 7 deviations. However, the MACT report also contained additional required information as outlined in 63.7841 and 63.10(d)(5) such as: there were no periods where the CPMS or the COMS were out of control, and report states that there were deviations from emission limits or operation and maintenance requirements. Report seems to be missing operating hours for the unit that had deviations as required by 63.7841(b)(7).</p>
06/29/2020	Other	Compliance	<p>Review of July - December 2019 semi annual deviation report for USS Great Lakes Works. Report includes MACT 5F deviations.</p>
06/29/2020	CO/CJ	Compliance	<p>City of Detroit Vegetative Particulate Buffer Project Completion Report per CD 2:12-cv-304 was received from US Steel on April 23, 2019. Letter is dated April 18, 2019. Vegetative buffers were installed and completed at Kemeny Playfield, Beard Park, and Riverside Park. Supplemental information including pricing, location, and photos were attached to the report.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/29/2020	CO/CJ	Compliance	<p>January through June 2019 semi annual report per CD 2:12-cv-304 was received from US Steel on September 18, 2019. Large bell on B2 was inspected quarterly as required and inspection is included in the report. No issues were noted. There is also a compliance update section; of note, final portion of BOP improvements were completed and a table of activities and dates was provided; as such, enhanced VEO observations started on August 6, 2019. CD terms were modified to include rec centers for lighting improvements. USS removed and replaced three PCB transformers at the Main Plant. Roof monitor VEOs were also included. Four VE exceedances were observed during the semi annual period.</p> <p>Compliance was chosen as it relates to the fulfillment of consent order requirements to date. Deviations are related to the opacity exceedances but they are not deviations/violations of the CD provisions.</p>
06/29/2020	Other	Non Compliance	USS GLW January - June 2019 Semi Annual ROP Deviation Report for Section 1 & 5 and MACT 5F deviation report for Section 1
06/22/2020	ROP SEMI 2 CERT	Compliance	See Compliance Activity Report CA_A780954042
06/22/2020	ROP SEMI 2 CERT	Compliance	No deviations reported for USS GLW ROP, Section 5, for the semi annual period of July - December 2019.
06/22/2020	ROP Annual Cert	Compliance	No deviations reported for USS GLW ROP, Section 5, for the annual period of 2019.
06/22/2020	ROP Annual Cert	Compliance	2019 Annual ROP certification for USS GLW was postmarked March 13, 2020. Non compliance issues in the 1st half of 2019 appear to have been addressed in the 2nd half of 2019. As such, compliance was chosen at this time.



Activity Date	Activity Type	Compliance Status	Comments
06/08/2020	CO/CJ	Compliance	<p>Semi Annual report for the period of July 1 - Dec 31, 2019 was submitted by USS as required per CD 2:12-cv-304. The report contains three sections; Section 1- Blast Furnace Bell inspection, Section 2 - Compliance Updates, Section 3 - No. 2 BOP VE observations. Report states that no issues were found during the B2 bell inspections (two were conducted and reports were included); B2 has been idled since June 2019. For the 120 day time period of September 25, 2019 through January 22, 2020, US Steel had zero 30 days rolling periods with more than 4 exceedances. Therefore, US Steel reduced its monitoring requirements from 4 days per week to 3 days per week starting the week of January 27, 2020. However, report also states that US Steel will be indefinitely idling on or around April 1, 2020. For the SEP related to lighting ballast and bulbs, the company made "good progress" during the second half of 2019; approximately half of the lighting project has been completed. All VEO sheets for the BOP Shop were submitted and an explanation with corrective actions was included for the reported exceedances (5 exceedances over 4 days).</p> <p>"Compliance" was chosen as it relates to the facility adhering to the CD requirements.</p>
06/08/2020	CO/CJ	Compliance	<p>As required per CD 2:12-cv-304, USS submitted final documentation in the form of a final disposal certificate from the disposal facility regarding the replacement of lighting ballasts and light bulbs which is part of the SEP project for this CD. Report was received on May 5, 2020. "Compliance" was chosen as it relates to the facility adhering to the CD requirements.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/08/2020	CO/CJ	Compliance	As required per CD 2:12-cv-304, USS submitted a replacement of lighting ballasts and light bulbs in public schools and public recreation centers in Detroit/Ecorse/River Rouge Michigan Project Completion report. Report was received on May 12, 2020. "Compliance" was chosen as it relates to the facility adhering to the CD requirements.

Name: Kyle

Date: 11/28/23

Supervisor: April D. Wendling

11/28/23