



United States Steel Corporation
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David W. Hacker
Counsel - Environmental



Via E-Mail and First Class Mail

September 8, 2014

Ms. Katie Koster
Michigan Department of Environmental Quality- Air Quality Division
Detroit Field Office
3058 West Grand Blvd, Suite 2-300
Detroit, MI 48202

Re: Response to Violation Notice dated August 18, 2014
United States Steel Corporation
SRN: A7809, Wayne County

Dear Ms. Koster:

United States Steel Corporation (U. S. Steel) has a long history of working cooperatively and collaboratively with government agencies, including the Michigan Department of Environmental Quality (MDEQ or Department). For this reason, it is with great disappointment that I am responding to the above-referenced violation notice (VN). While U. S. Steel is currently engaged in litigation with MDEQ, this has not stopped U. S. Steel's commitment to continue to work with MDEQ in an amicable manner. It is unfortunate, however, that it appears that the Department would rather act in an arbitrary and capricious manner by the unreasonable issuance of the VN in such haste. Furthermore, U. S. Steel respectfully disagrees with the allegations raised in the VN and finds them baseless and without merit. That being said, it is, again, in collaborative spirit, that U. S. Steel is responding to the MDEQ's violation notice. We are hopeful that we can communicate openly and avoid further misunderstandings.

On August 20, 2014, U. S. Steel received the VN alleging three separate violations. Each of these allegations is addressed below.

General Condition 11 of ROP 19960132d

The first violation alleged by the Department is that U. S. Steel violated General Condition 11 of ROP 19960132d. This allegation is particularly troubling, especially considering the open and regular dialogue that U. S. Steel has had with the Department during the time period immediately preceding the issuance of the VN. General Condition 11 of the ROP provides:

"The permittee shall furnish to the department, **within a reasonable time** [emphasis added] any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the RO Permit or to determine compliance with this RO Permit. Upon request, a person shall also furnish to the department copies of any records that are required to be kept as a term or condition of this RO Permit. (R 336.1213(1)(e))"

The Department then comments that, “[i]nformation requested should have been readily available to provide by the requested deadline and is needed to determine compliance with the ROP.”

U. S. Steel strongly disagrees with the allegation and contends that the allegation is without merit for a host of reasons as provided below.

First, U. S. Steel did, indeed promptly respond to the request for information on August 19th, prior to receipt of the VN but after U. S. Steel advised the Department that it could not respond by the requested date of August 14, 2014. In short, U. S. Steel provided the information to the Department within a reasonable time. Shortly after receiving the information request, U. S. Steel advised the Department that it could not respond by the requested date. The issuance of the VN for this allegation appears to be more of a rushed response because of dissatisfaction with U. S. Steel’s prompt explanation to the Department that we could not provide the information by the requested date. In this instance, the Department’s requested deadline was unreasonable and unjustified considering the circumstances and the timely responses that U. S. Steel provided to the Department’s requests throughout the preceding months. The request for information was not an isolated request, but was after numerous requests for information and prompt responses. The July 29 and August 1 requests made by the Department were part of a larger exchange of emails and other communication in which U. S. Steel timely responded to numerous Department inquiries. By way of background, U. S. Steel regularly, reasonably, and quickly responded to information requests made by the Department, as it did in this instance to which the Department now falsely contends that a violation occurred. A summary of relevant events follows:

- The Department conducted an inspection of Great Lakes Works on June 25 – June 26, 2014.
- After that, in completing its review, on approximately five different occasions, the Department sent requests for information; and follow-up requests for information based upon U. S. Steel’s responses. There was a regular line of communication between the Department and U. S. Steel regarding the July 29 and August 1 requests and the various preceding requests. Thus, U. S. Steel promptly provided responses to all of the requests and regularly communicated with the Department regarding the requests and responses (including the requests made on July 29 and August 1.) The exchange of communication regarding the instance which led to the inappropriately issued VN is particularly disturbing considering U. S. Steel’s cooperation and promptness that it communicated with the Department throughout the Department’s ROP review.
- On August 1, 2014, the Department made a follow-up request to U. S. Steel in which it requested that part of the response be provided to the Department by August 7, 2014; and the remainder by August 14, 2014.
- On August 6, 2014, U. S. Steel responded that since the requests were related to issues currently in litigation, that the response would undergo legal review and, therefore, U. S. Steel could not respond by the requested date.
- On August 8, 2014, U. S. Steel received a terse email from the Department explaining that U. S. Steel’s email of August 6, 2014 was unacceptable, and then the Department provided what it referred to as “options moving forward” – all with dates requiring U. S. Steel to submit the requested information the immediate following week (week of August

11 when U. S. Steel counsel was not available.) In short, all of the so-called "options" still required U. S. Steel to respond by August 14, 2014.

- On August 8, 2014, almost immediately after receiving the Department's terse email, U. S. Steel promptly, but respectfully, responded to the Department indicating that much of the information was not needed to determine ROP compliance; but that U. S. Steel would cooperate and work with the Department in good faith and provide a response. In that email, U. S. Steel also responded that it could not provide a response the following week as demanded by the Department since the topics of the requests were topics in litigation and counsel was not available to review the response before the requested response date. However, it is significant to note that U. S. Steel clarified that it would still timely respond to the Department's inquiries.
- On August 19, 2014, U. S. Steel responded to the Department's July 29 and August 1 requests. (U. S. Steel notes that it received a separate inquiry from the Department on August 6, 2014, and responded to it on August 11, 2014.)
- On August 20, 2014, U. S. Steel received the VN to which this correspondence responds.

Considering the history of communications and regular open dialogue that U. S. Steel maintains with the Department, it is perplexing that the Department would abuse its discretion and act in such an arbitrary and capricious manner by issuing the VN. In addition, U. S. Steel finds the Department's rationale that somehow because no alternative dates were proposed by U. S. Steel that the issuance of the VN was necessary. While it is true that U. S. Steel did not propose an alternate date, U. S. Steel did indicate that a response was forthcoming. Furthermore, considering the open dialogue and regular lines of communication between the Department and U. S. Steel, U. S. Steel believes that the Department could have simply asked U. S. Steel for such a date (as part of the regular exchanges of emails.) Such an approach would have been more appropriate and simpler than issuing the VN. The relevant email exchanges are provided in Attachment A for your reference.

Second, the Department's incorrect assertion that the information "should have been readily available...to determine compliance with the ROP" is particularly troubling because much of the requested information, while topics in litigation, was not relevant or necessary to determine compliance with the ROP or whether revision to the ROP is necessary. In the August 1, 2014 email, the Department asks several questions that are well beyond any requirement in the ROP and are not needed to determine compliance with the ROP. Such examples of overreaching of the Department include but are not limited to the following inquiries as provided in its August 1, 2014 email request for information:

- Is steam injected anywhere in the blast furnace gas collection system at any point in time?
- What else does the top gas analyzer measure?
- What is the reason for the move of the offtake for the B2 clean gas bleeder?

While these and many other inquiries may be of interest to the Department, maintaining and providing such information is not relevant for the Department's determination of compliance with the ROP or whether revision to the ROP is necessary, therefore General Condition 11 is not applicable to such requests. Furthermore, these requests are directly related to topics in

litigation to which U. S. Steel provided countless documents to the Department. Nonetheless, as noted above, instead of objecting or questioning the validity of the request or the Department's authority to make the request, U. S. Steel simply stated that it could not provide a response within the few days MDEQ requested it. However, the Department's demand and deadline were unreasonable and were arbitrary and capricious.

Third, the Department requested Continuous Opacity Monitoring (COM) data in a format that is not required to be maintained by U. S. Steel. Again, instead of objecting to the request, U. S. Steel provided reduced COM data in the format requested by the Department, although it is not required to maintain the data in the manner in which the Department requested it. In short, this information is not required to be maintained by U. S. Steel, but U. S. Steel, working in good faith with the Department, created the requested data. Such information was not required to be "readily available" as asserted by the Department.

In sum, U. S. Steel did respond to the request for information in a reasonable time, and therefore, no violation occurred.

ROP 19960132d, Table F-01.05, Condition III.B.3.2

In the VN, the Department alleges that U. S. Steel violated the above-referenced ROP Condition. The ROP condition states:

Within one year of issuance of the permit, PM and NOx emission factors shall be determined for the combustion of blast furnace gas for one of the FGBLASTFURNACES, by testing at owner's expense, in accordance with Department requirements.

As U. S. Steel previously communicated with the Department, U. S. Steel has been unable to locate any stack test for NOx regarding the combustion of blast furnace gas at Great Lakes Works. As the Department is aware, changes in personnel in the Environmental Department over the last few years have made locating of historic documents problematic. The stack test was required to be conducted within one year of the issuance of the ROP. The ROP was issued originally in March 2005; and version (d) – ROP 19960132d – was issued on March 6, 2007. This means that U. S. Steel would have been required to test the blast furnace gas by March 2006 if using the March 2005 issuance date; or as late as March 2008, if using the March 2007 issuance date. U. S. Steel notes that while it has been unable to locate the stack test report, it is under no obligation to maintain or furnish the stack test report. U. S. Steel notes that Condition III (the very same section to which the obligation to test is provided) clearly states that, "[r]ecords of all of the following [which specifically includes Condition III.B.3.2] shall be maintained on file for a period of 5 years." Because more than five years has passed since the obligation to test has passed, U. S. Steel is not required to maintain or furnish the test report to the Department. No violation occurred.

ROP 19960132d, Table F-01.06, Condition V

In the VN, the Department alleges that U. S. Steel violated the above-referenced ROP Condition. The ROP condition states:

The permittee shall reduce hydrogen sulfide emissions generated at the blast furnace slag pits servicing casthouses A, B, and D by installing and properly maintaining hydrogen peroxide spray water quenching systems.

In the VN, the Department asserts that "sufficient information has not been provided to demonstrate that the facility is properly maintaining the spray water quenching system." Again, the VN was issued on questionable subjective basis. U. S. Steel provided the Department with information and records on the water flow system. However, there is no recordkeeping requirement regarding Condition V, above. Therefore, the Department's rationale for issuing the VN on this basis is unclear. Regardless of the Department's false assertions, the spray waster system is inspected and maintained on a daily basis. The tasks are specifically included as part of the work requirements. In Attachment B, U. S. Steel is providing a sample of a portion of the daily inspection sheet (with non-responsive information redacted) pertaining to the inspection of the spray systems. However, U. S. Steel notes that it is not required to maintain the inspection work orders per the terms of the ROP, as Condition V does not contain any recordkeeping obligation.

For reasons explained above, no violations occurred. The Department's issuance of the VN was arbitrary and capricious. The issuance of the VN and U. S. Steel's drafting of the response to the VN could have been avoided if the Department was willing to keep the lines of communication with U. S. Steel open. We encourage the Department to reconsider its position on this issue, so that both of our limited resources can be used for more meaningful purposes. In addition, U. S. Steel believes the VN could have been avoided if the issuance of VNs were based upon an objective evaluation of communications and responses. We appreciate the Department's review and consideration of this correspondence and are hopeful that this can be resolved without unnecessary, protracted costly litigation. Should you have any questions regarding this correspondence, please contact Alexis Piscitelli at (313) 749-3900 or me.

Regards,



David W. Hacker

Attachments

cc via email:

- N. Gordon, Esq. (Michigan Department of Attorney General)
- L. Fiedler (MDEQ)
- M. A. Dolehanty (MDEQ)
- T. Seidel (MDEQ)
- T. Hess (MDEQ)
- W. McLemore (MDEQ)
- J. Lamb (MDEQ)
- J. Gray (USS)
- A. Piscitelli (USS)
- B. Wagnier (USS)
- D. Smiga, Esq. (USS)
- T. Woodwell (USS)
- M. Dzurinko (USS)
- V. Morton (USS)

ATTACHMENT A
RELEVANT EMAIL CORRESPONDENCE



RE: [External]-Follow up questions based on 7/9 and 7/23 information 

David W Hacker to: Koster, Katherine (DEQ)

08/08/2014 11:18 AM

Cc: Alexis Piscitelli, Bradley J Wargnier

Katie:

I respectfully disagree that all of the information is needed to determine compliance with the ROP. We never stated that the requests "were made for the pending litigation." We only stated that they are topics in litigation. Furthermore, there are many inquiries below (as well as previous inquiries) that I believe are beyond determining the compliance with the ROP (e.g., set points of bleeders)- and are the very topics currently in litigation; and to which MDEQ has received much information through discovery.

We have always worked in good faith to respond to your inquiries and we intend to continue to do so. We have consistently provided prompt responses to your numerous inquiries. And, again, we will be providing timely responses to your inquiries, but we simply cannot accommodate the unreasonable time frame in which you requested it. It is only appropriate and reasonable to have Brad discuss responses with his counsel since we are in litigation. However, I am on my way out of town and will not be able to review and discuss by the dates that you request.

Regards,



United States Steel Corporation

David W. Hacker
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United States Steel Corporation
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"Koster, Katherine (DEQ)"

This is unacceptable. This information is...

08/08/2014 11:01:16 AM

From: "Koster, Katherine (DEQ)" <KOSTERK1@michigan.gov>
To: Bradley J Wargnier <BJWargnier@uss.com>,
Cc: David W Hacker <DWHacker@uss.com>, Alexis Piscitelli <APiscitelli@uss.com>
Date: 08/08/2014 11:01 AM
Subject: RE: [External]-Follow up questions based on 7/9 and 7/23 information

This is unacceptable. This information is related to the annual AQD inspection to determine compliance with the ROP and is not being requested for the pending litigation. Additionally, AQD has provided a generous timeframe for response as much of this information can be

answered verbally in a matter of minutes. Furthermore, as a courtesy to USS staff in recognition of their time and other work obligations, AQD decided to request this information at a later date instead of extending the onsite inspections even longer into the day. Unfortunately, this was with the mistaken understanding that information requested would be provided in a timely manner as it has been in the past.

Here are the options moving forward:

1. Submit all of the requested information in writing (including the COMS data requested in my 7/30/14 email) by 8/14/14. This is an extension to my original request for some of the data by 8/7.
2. Meet in the AQD office on 8/12 or 8/13 any time to provide the information verbally except for COMS records and NOx stove test results (if they exist) which need to be provided hard copy or electronically by 8/14. A USS attorney can be present for the meeting or can be present via phone.
3. Schedule a phone call with me on 8/12 or 8/13 any time to provide the information verbally and provide hard copy or electronic copies of the COMS data and test results by 8/14.

If USS decides not to meet one of the timelines provided, this will be considered a failure to provide any information the Department requests within a reasonable timeframe to determine compliance with the ROP as required by law. AQD will be issuing a violation notice for failure to provide requested information as well as noncompliance with stack testing requirements and slag pit water spray maintenance requirements.

I would rather resolve this through a meeting or phone call. Again, I am available any time on 8/12 or 8/13 and would be happy to meet either in person or via phone. Please let me know what is decided.

Thanks

Katie Koster

Michigan Department of Environmental Quality

Air Quality Division - Detroit Office

phone: 313-456-4678; fax: 313-456-4692

email: kosterk1@michigan.gov

From: Bradley J Wargnier [mailto:BJWargnier@uss.com]

Sent: Wednesday, August 06, 2014 1:56 PM

To: Koster, Katherine (DEQ)

Cc: David W Hacker; Alexis Piscitelli

Subject: Re: [External]-Follow up questions based on 7/9 and 7/23 information

Ms. Koster,

This email is in regards to your request for additional information pursuant to the 7/9 and 7/23 follow up

responses supplied by U. S. Steel. As you are aware, U. S. Steel is involved in litigation proceedings with the MDEQ and as such, all responses will undergo legal review. U. S. Steel will be responding to your requests via email, however, the responses will not be prepared before the requested due dates. Should you have any questions regarding this matter, please contact Dave Hacker @ 1-(412)-433-2919.

In regards to the email received this morning pertaining to the alleged complaint at the blast furnace around 1:40 PM yesterday, U. S. Steel will investigate.

Thanks,

Bradley J Wargnier
United States Steel Great Lakes Works
Environmental Engineer - Air Compliance
1-(313)-749-2744 (Office)
1-(313)-912-6074 (Cell)
bjwargnier@uss.com

1 Quality Drive
Ecorse MI, 48229

From: "Koster, Katherine (DEQ)" <KOSTERK1@michigan.gov>
To: "Bradley J Wargnier (BJWargnier@uss.com)" <BJWargnier@uss.com>,
Date: 08/01/2014 04:35 PM
Subject: [External]-Follow up questions based on 7/9 and 7/23 information

Hi Brad,

A couple of questions as I am reviewing the information you provided:

1. How is USS determining compliance with the ammonia limit using the 2012 test results?
2. Is steam injected anywhere in the blast furnace gas collection system at any point in time?
3. What else does the top gas analyzer measure?
4. What is the reason for the move of the offtake for the B2 clean gas bleeder?
5. Table F-01.05 Condition III.B.3.2 of the existing ROP requires the generation of a NOx emission factor from the stoves for BFG combustion. I could not find a test in our files. Please advise.
6. What are the clean and dirty gas bleeder set points for B2 and D4?
7. I see inspections of the peroxide pump but not the water flow system including the slag pit spray nozzles which is required by Table F-01.06 Condition III.A.2. Please advise. Also, what prompts the generation of the slag pit spray work orders?
8. In the slag pit procedures 6.2.3, it states that the quench water could be black. Why would the water be black? It seems like use of dirty water would cause a particulate problem and

potential non compliance with opacity limits. Has USS conducted VE readings during this situation?

9. I know USS has submitted a request to modify the SIP CO conditions for fugitive dust control. As a reminder, in the meantime, any deviations from the current requirements should be reported in the semi annual deviation reports.

Please let me know whether you would like to respond in writing or discuss verbally. In terms of priority, I would like to receive answers to 5,7, and 8 by next Thursday, 8/7 and the remainder by 8/14.

Thanks

Katie

313-456-4678

Kosterk1@michigan.gov

Response to Follow up questions based on 7/9 and 7/23 information

Bradley J Wagnier to: kosterk1
Cc: David W Hacker, Alexis Piscitelli

08/19/2014 06:02 PM

History: This message has been forwarded.

Ms. Koster,

Please find attached the requested COMs data from the 1st quarter 2014. Additionally, the answers requested to the follow up questions posed on 8/1 are also below.



COM readings Jan 1-2014 to March 31-2014.xls

1. How is USS determining compliance with the ammonia limit using the 2012 test results?

USS Response - U. S. Steel Great Lakes Works is using the 2012 ammonia test results to certify compliance for 2012 and 2013 test results to certify compliance for 2013. In both 2012 and 2013, the ammonia limit was under the allowable limit as required in Great Lakes Works' Title V Permit, E-01.15, II.B.1&2. Both Test results were submitted in the last response. If you have additional questions regarding methods for certifying compliance, please let me know.

2. Is steam injected anywhere in the blast furnace gas collection system at any point in time?

USS Response - Steam injection into the blast furnace gas collection system, if it were to ever happen, would be an extremely rare occurrence. This would not be a normal practice; however, in the event nitrogen was not available, U. S. Steel would inject steam into the blast furnace gas collection system.

3. What else does the top gas analyzer measure?

USS Response - The top gas analyzers only measure the concentrations of each chemical in the Blast Furnace Gas which include the following chemicals:

- Hydrogen
- Nitrogen
- Methane
- Carbon Monoxide
- Carbon Dioxide
- Oxygen

4. What is the reason for the move of the offtake for the B2 clean gas bleeder?

USS Response - Due to the location of the offtake for the B2 clean gas bleeder, the bleeder would empty liquid from the sump of the venturi which would exit via the clean gas bleeder valve. By relocating the offtake further downstream in the gas cleaning system, the bleeder valve no longer pulls liquid from the sump.

5. Table F-01.05 Condition III.B.3.2 of the existing ROP requires the generation of a NOx emission factor from the stoves for BFG combustion. I could not find a test in our files. Please advise.

USS Response - At this time, U. S. Steel is unable to locate these records due to recent personnel changes. We have reached out to headquarters to locate test results.

6. What are the clean and dirty gas bleeder set points for B2 and D4?

USS Response - The current clean and dirty gas bleeder set points for each furnace are as follows:

Clean Gas Bleeders

B2 – 11 lbs

D4 – 10 lbs

Dirty Gas Bleeders

B2 – 12 lbs

D4 – 11 lbs

7. I see inspections of the peroxide pump but not the water flow system including the slag pit spray nozzles which is required by Table F-01.06 Condition III.A.2. Please advise. Also, what prompts the generation of the slag pit spray work orders?

USS Response - U. S. Steel inspects the water spray system which includes the slag pit spray piping and valves (which includes the nozzles) on a daily basis. If the mechanic identifies an issue with the slag pit spray, a work order is created to address the issue identified.

8. In the slag pit procedures 6.2.3, it states that the quench water could be black. Why would the water be black? It seems like use of dirty water would cause a particulate problem and potential non compliance with opacity limits. Has USS conducted VE readings during this situation?

USS Response - During normal blast furnace operations, rarely, if ever would black water be seen and if it is observed, it is not a prolonged event. Black water may possibly be seen if a malfunction occurs within the blast furnace recycle system water treatment plant. However, due to the rarity/brevity of such events, U. S. Steel has not conducted visible emission readings.

Thanks,

Bradley J Wargnier
United States Steel Great Lakes Works
Environmental Engineer - Air Compliance
1-(313)-749-2744 (Office)
1-(313)-912-6074 (Cell)
bjwargnier@uss.com

1 Quality Drive
Ecorse MI, 48229

ATTACHMENT B

**SAMPLE – BLAST FURNACE DAILY INSPECTION SHEET –
SLAG SPRAY PIPING AND VALVES**

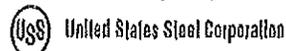
Facility: 541 GREAT LAKES WORKS
 Unit : B2BF Project :
 W/O Type: PM Priority: 01 W/O Dspln:
 Planner : ARN2255 ARNTSON C M
 W/O Title : B2 2ND TURN DAILY CHECKLIST
 W/O Task Title: B2 2ND TURN DAILY CHECKLIST
 Written To : 2 STOVE
 Task Dspln :
 Work Request : Completed By: 20140601
 Outage No. : Work Grp:



Work Order Package

07006354 01

Rpt : TIPMC11
Date: 05/31/14



Page: 1

Work Order Task Written To

Facility : 541 Unit : B2BF Op Sys : STVPRO
 Division : IM Area : BF Sys/Cls:
 Equipment : STOVE BF324-2 Component:
 Work Item : Eqt. List: Ops Review Req'd:
 Equip. Tag: 541-IM-0048 Alt:
 UTC : Tbl/Brkdwn: (Past 12 mo)
 Catalog ID: Job Type : CO UCR:
 Client/Act:
 Location : JIP MATERIAL GREAT LAKES IRON PRODUCING MATERIAL WAREHOUSE
 Cost Centr: 54125260 Activity : User Def:
 Percentage: 100.000 Acct No. : SL 3120

Work Order Task Instructions

W/O TITLE : B2 2ND TURN DAILY CHECKLIST
 W/O TASK TITLE: B2 2ND TURN DAILY CHECKLIST
 WRITTEN TO : 2 STOVE

M. Masalskis

Date: 6-6-14

Rec'd:

V:\Departments\Ironmaking\Ironmaking\BF Maintenance Planning\B2 Mech. PM Work Orders

M. Masalskis
 Rec'd
 Date: 6-1-14

Post Maintenance Test Info

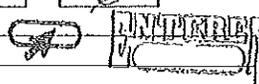
PMT Work Order/Task:

Labor Hours Worked

| Name | Employee No. | Date | Shift | Hours |
|------------------|--------------|--------|-------|-------|
| <i>W. S. ...</i> | 10746 | 6-1-14 | 2nd | 6 |
| <i>Street</i> | 07124 | | | 6 |

Comments:
(rework?)

(12)



SAFETY:

FIRST AID (2411), FIRE DEPARTMENT (2511), PLANT PROTECTION (2611)

SAFETY LINE-UP WITH THE MANAGER ON THE JOB

HAVE ALL PROPER PPE ON (HARD HAT, SAFETY GLASSES, ORANGES, SAFETY SHOES, HEARING PROTECTION, PROPER GLOVES FOR THE TASK, A CALIBRATED CO MONITOR, ETC.)

SIGN IN ON THE FURANCE (SIGN IN STATIONS ARE LOCATED, ON GROUND LEVEL EAST END OF POWER HOUSE NORTH OF ABC ROAD, AND IN THE PYROMETER ROOM)

HAVE A FACE TO FACE WITH THE BLOWER (REQUIRED)

EVACUATION PLAN: MUSTER AT Z.I. CHEM LAB IN CASE OF GENERAL EVACUATION (SECONDARY IS AT MAIN GATE NEAR Z.I. MAIN OFFICE)

If you are instructed to evacuate by Emergency Responders or the alarm sounds:

- Remain calm.
- Listen for alarm or specific evacuation instructions.
- If time permits, take your laptop with you.
- Do not return for personal items.
- Walk, do not run.
- Do not go to the restrooms.
- Do not use the elevators!
- Direct visitors or anyone needing assistance to nearest stairwell.
- Use the nearest stairwell and evacuate to the Evacuation Assembly Area.
- At the Ground Floor, employees should exit the building and go directly to the designated Evacuation Assembly Area.
- If an Emergency Responder asks you to assist in the evacuation (i.e. guiding others, carrying disabled employees, etc.) please comply.
- It is imperative that you "check-in" with your supervisor or other department personnel at the Evacuation Assembly Area so all employees are accounted for.

| CHECK AND FILL IN THE BOX (OR BOXES) THAT APPLY (IF BOXES B,C,D,E,F,G ARE CHECKED WRITE IN COMMENTS WHY) | A | B | C | D | E | F | G |
|--|----|--------|------------------|-----------------------|---------------------------------------|-------------------------|----------|
| | OK | NOISES | LEAKS/ CRACKS | REPAIRED/ ADJUSTED | NEEDS TO BE REPAIRED / ADJUSTED | NEEDS TO BE REPLACED | REPLACED |

| | | | | | | | |
|------------------------------|-------------------------------------|--|--|--|--|--|--|
| SLAG SPRAY PIPING AND VALVES | <input checked="" type="checkbox"/> | | | | | | |
| SLAG PIT WALLS AND DOORS | <input checked="" type="checkbox"/> | | | | | | |