



February 23, 2015

Ms. Katherine Koster
State of Michigan, Department of Environmental Quality
Air Quality Division, Southeast District
3058 W. Grand Blvd, Suite 2-300
Detroit, MI 48202

SENT VIA ELECTRONIC MAIL AND CERTIFIED MAIL

**SUBJECT: United States Steel Corporation – Great Lakes Works
No. 2 BOP Shop Roof Monitor
Second Violation Notice dated February 9, 2015**

Dear Ms. Koster,

On or about February 13, 2015, U. S. Steel – Great Lakes Works (U. S. Steel) received a “second” violation notice (VN) dated February 9, 2014 from the Michigan Department of Environmental Quality (MDEQ) regarding the No. 2 BOP Shop roof monitor. In the notice, MDEQ acknowledges receipt of U. S. Steel’s response to the alleged opacity violations which were to have occurred on November 15, 2014. However, MDEQ asserts the response was “*insufficient as it failed to provide the steps being taken to prevent a reoccurrence.*” Please note, U. S. Steel did not receive this “second” VN until four days after the letter was dated. Within the letter, a response is requested 14 days from the date of issuance and thus is requesting a written reply on or before February 23, 2015. Historically, U. S. Steel is allotted 21 days to respond to any notice of violation but in this instance was granted only 9 days. This is perplexing to the company as U. S. Steel has always maintained an open line of communication with the department and does not understand the rationale as to why the department would request this information in such a hastened timeframe. This request to respond in writing on or before the aforementioned date has no rational precedent, is unreasonable, and is overly burdensome.

In addition, it is with great disappointment and surprise in which we received the “second” VN. The allegations raised in the “first” VN were discussed with MDEQ’s counsel from the Michigan Attorney General’s office and others (as copied on the “second” VN, collectively, “the Government”) at a meeting in Chicago on January 28th. U. S. Steel, at that time, agreed to include the allegations raised in the “first” VN in any proposed resolution as well as consider some of the suggestions raised by the Government.

Because U. S. Steel considers its commitment to environmental compliance a priority, we will not necessarily “wait” for resolution of the matter to take any appropriate actions. However, in the interest of efficiencies of all parties and since the matter has been discussed with the Michigan Attorney General’s office, and it appears that enforcement has informally been escalated – as it was discussed at a settlement meeting, it seems illogical and inappropriate for

Ms. Katherine Koster, MDEQ

February 23, 2014

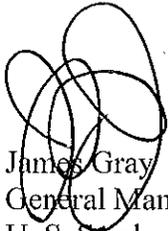
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the BOP in the years after we acquired the assets from National Steel. In addition, we spend several million dollars annually to operate and maintain the air pollution control equipment at the BOP. We regularly review and update our practices in an effort to continuously improve our environmental performance. Finally, while we strive to have no deviations, the slopping event that was alleged to have caused an opacity exceedance is not a systemic issue.

We would be pleased to address any questions or concerns the MDEQ may have. If you have any questions regarding this matter or require additional information, please contact Alexis Piscitelli at 313-749-3900.

I certify that based off information and belief formed after reasonable inquiry, the information provided in this response is true and correct to the best of my knowledge and information.

Sincerely,



James Gray
General Manager
U. S. Steel – Great Lakes Works



Alexis Piscitelli
Director, Environmental Control
U. S. Steel – Great Lakes Works

cc: Neil Gordon, Esq. (Michigan AG)
Dave Hacker, Esq. (USS)
Tishie Woodwell (USS)
Bradley Wargnier (USS)