



November 19, 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. 5 Pickle Line Fume Scrubber  
Violation Notice dated October 29, 2015**

Dear Ms. Koster,

On or about November 4, 2015, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated October 29, 2015 from the Michigan Department of Environmental Quality (MDEQ) regarding the No. 5 Pickle Line fume scrubber. In the notice, MDEQ alleges U. S. Steel violated the Hydrochloric acid emission limitation of 18 ppmvd as incorporated in condition II.B.I of Section 1, Table E-01.08 of Title V Renewable Operating Permit No. 199600132d and promulgated in 40 CFR Part 63 Subpart CCC, 63.157(a)(2). Please note U. S. Steel did not receive the VN until 6 days after the letter was dated. Within the letter, a response is requested 21 days from the date of issuance and thus is requesting a written reply on or before November 19, 2015.

U. S. Steel investigated to determine the root cause of the abnormal emission event. The No. 5 Pickle line scrubber underwent a thorough inspection. During the inspection It was identified that the mister sprays which inject pressurized water across the packed bed scrubber had abnormal wear to the point the discharge port was larger than normal. This in turn reduces the pressure which the sprays are injected at. Ultimately, due to the reduced spray pressure, flow to the entire packed bed scrubber was not evenly distributed and allowed hydrochloric acid exhaust fumes to short circuit through the scrubbing unit escaping to the atmosphere untreated.

To resolve the problem, all spray nozzles were replaced. U. S. Steel is committed to preserving the environment and is taking actions to ensure the cause of this abnormal emission event does not reoccur. To mitigate any potential of worn nozzles in the future, all spray nozzles will be automatically scheduled for replacement quarterly during the routine inspection.

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.

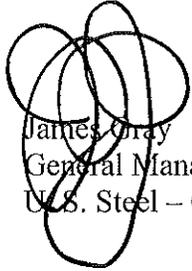
Ms. Katherine Koster, MDEQ

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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,

A handwritten signature in black ink, appearing to read "James Gray". The signature is somewhat circular and scribbled.

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

A handwritten signature in black ink, appearing to read "Alexis Piscitelli". The signature is more fluid and cursive than the one on the left.

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