



January 8, 2016

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  
Violation Notice dated December 9, 2015**

Dear Ms. Koster,

On or about December 17, 2015, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated December 9, 2015 from the Michigan Department of Environmental Quality (MDEQ) regarding the No. 2 BOP Shop roof monitor. In the notice, MDEQ alleges U. S. Steel exceeded the applicable opacity limit of 20% 3-minute average limitation required by ROP No. 199600132d, Section 1, Table F-01.07, Condition II.B.3. The Department also alleges such emission were in violation of MI Rule 336.1364(2); 40 CFR Part 63 Subpart FFFFF, and Consent Order AQD No. 1-2005, Paragraph 11.A.3 (e).

U. S. Steel is required to submit, on a monthly basis, a report detailing both Electrostatic Precipitator (ESP) and BOP Roof Visible Emission Observations (VEO). On November 13, 2015, U. S. Steel submitted the report for all VEOs conducted within the month of October, 2015 and self reported two (2) deviations in which the visible emissions observed exceeded the applicable 20% 3-minute average as observed at the BOP Shop roof monitor.

The times at which emissions in excess of the 20% 3-minute average were observed are as follows:

- 1.) 10/15/2015 – 8:51 – 8:54 AM – 23%
- 2.) 10/15/2015 – 9:00 – 9:03 AM – 21%

The abnormal emission event occurred during the oxygen blow. U. S. Steel investigated the incident and discovered the cause of the abnormal emission event was the result of a small leak in the 25 vessel down comer. After the cause of the abnormal emission source was located, repairs were immediately scheduled and were then completed on October 16, 2015. Since repairs to the No. 2 vessel down comer were completed, no abnormal emissions originating from the down comer have been observed.



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,

A handwritten signature in blue ink, appearing to be "James Gray", written over a circular stamp or seal.

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

A handwritten signature in black ink, appearing to be "Alexis Piscitelli", written in a cursive style.

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

cc: Dave Hacker (USS)

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