



February 11, 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 January 20, 2016**

Dear Ms. Koster,

On or about January 27, 2016, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated January 20, 2016 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, Table E-01.18, Section II.2. 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 (d) and (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 December 18, 2015, U. S. Steel submitted the report for all VEOs conducted within the month of November 2015 and self reported two (2) deviations in which the visible emissions observed exceeded the applicable 20% 3-minute average as reported as observed at the BOP Shop roof monitor.

In the report, U. S. Steel identified the following VEOs as deviations:

- 1.) 11/11/2015 – 4:51 to 4:54 PM – 65%
- 2.) 11/11/2015 – 4:54 to 4:57 PM – 23%

On 11/11/2015, during heat No. 26-5057 at approximately 4:51 PM, abnormal emissions were seen exiting the BOP Shop Roof Monitor. Certified Method 9c observations reached 2 consecutive 3 minute averages of 65% and 23% respectively.

The incident was investigated and it was found that the cause of the abnormal emission event was slopping during the oxygen blow. When the slop occurred the blowing of the heat was immediately stopped to minimize emissions. Additionally, after the heat, the lance was checked for proper height. Heat no. 26-5057's abnormal chemical reaction caused the molten metal within the vessel to slop.



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 read "James Gray".

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

A handwritten signature in blue ink, appearing to read "Alexis Piscitelli".

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

cc: Dave Hacker (USS)