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Air Quality Division
Detroit Office

September 22, 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, SRN A7809
No. 1 Argon Stir Station Baghouse Stack Test – May 17, 2016
Violation Notice dated September 1, 2016**

Dear Ms. Koster,

On September 7, 2016, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated September 1, 2016, via email from the Michigan Department of Environmental Quality (MDEQ) regarding the No. 1 Argon Stir Station Baghouse (baghouse) Stack Test. In the VN, MDEQ refers to stack test results for the No. 1 Argon Stir Station baghouse test conducted on May 18, 2016. U. S. Steel did not conduct a stack test at No. 1 Argon Stir Station baghouse on May 18, 2016; the test was conducted on May 17, 2016.

In the notice, MDEQ alleged that U.S. Steel violated the following:

- AQD alleged that the emissions were 0.932 lb/ht PM based on a three-run average exceeding the 0.543 lb/ht permit limit. (ROP No. 199600132d, Section 1, Table E-01.03, Condition 11.B.1.2))
- AQD alleged that the emissions were 2.0 lb/hr PM based on a three-run average exceeding the permit limit of 1.4 lb/hr. (ROP No. 199600132d, Section 1, Table E-01.03, Condition II.B.2.1).)
- AQD alleged that U. S. Steel failed to properly operate and maintain an air pollution control device. (ROP No. 199600132d, Section 1, Table E-01.03, V.2)
- AQD alleged that U. S. Steel failed to properly monitor baghouse cleaning cycles to ensure proper operation using an appropriate methodology. (40 CFR 63.7830(b)(4)(iv))

U. S. Steel does not agree with MDEQ's emission calculations. As included in the stack test result report, USS experienced a malfunction during the third run of the stack test when the baghouse remained in a cleaning cycle. As provided in a July 18, 2016 follow-up email to the No. 1 Argon Stack Test Report to AQD submitted on July 15, 2016, a normal cleaning cycle starts when the differential pressure reaches 6.4 inches of water column and turns off at 4.6 inches of water column. During the third test run, by reviewing available operating data in a



If you have any questions regarding this matter or require additional information, please contact Alexis Piscitelli at 313-749-3900 or apiscitelli@uss.com.

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", written over the typed name.

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

A handwritten signature in black ink, appearing to read "Alexis Piscitelli", written over the typed name.

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

cc: Dave Hacker (U. S. Steel)