



Great Lakes Works
Environmental Dept.
No. 1 Quality Drive
Ecorse, Michigan 48229



February 21, 2018

Mr. Jonathan Lamb
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
B2 Blast Furnace Casthouse Roof Monitor
Violation Notice dated January 31, 2018**

Dear Mr. Lamb:

On February 1, 2018, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated January 31, 2018 from the Michigan Department of Environmental Quality (MDEQ) regarding the B2 Blast Furnace casthouse roof monitor. In the notice, MDEQ alleges U. S. Steel exceeded the applicable opacity limit of 20% 6-minute average limitation required by ROP No. 199600132d, Table E-01.13, Section II.B. The Department also alleges such emissions were in violation of MI Rule 336.1358(1) and 40 CFR Part 63 Subpart FFFFF, Table 1.7.

As required by the test protocol acceptance letter dated October 5, 2017, U. S. Steel conducted visible emission observations (VEOs) of the B2 casthouse roof monitor using Method 9 during every test run conducted on October 24 and 25, 2017. The results of the Method 9 observations were included with the stack test report submitted on December 21, 2017. As we previously reported, U. S. Steel experienced an isolated abnormal event with a mud gun that resulted in intermittent opacity excursions that were recorded during the test. In particular, while U. S. Steel observed and recorded opacity during the entire duration of every test run, the following intermittent deviations were identified on the Method 9 sheets during the test runs:

- 1.) 10/25/2018 – 9:57 to 10:02 AM – 21.67% (Run2)
- 2.) 10/25/2018 – 11:34 to 11:39AM – 21.46% (Run 3)
- 3.) 10/25/2018 – 11:40 to 11:45 AM – 29.17% (Run 3)
- 4.) 10/25/2018 – 11:46 to 11:51 AM – 26.25% (Run 3)
- 5.) 10/25/2018 – 11:52 to 11:57 AM – 22.92% (Run3)

While a deviation was first observed during 9:57 -10:02 at the end of the second run, the deviation was not continuous and was intermittent; as U. S. Steel also conducted Method 9 observations during the third run beginning at 10:46 through 11:33 with no deviations being observed during

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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,



Ronald Kostyo
General Manager
U. S. Steel – Great Lakes Works



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