



United States Steel Corporation
Great Lakes Works
Environmental Department
No. 1 Quality Drive
Ecorse, Michigan 48229

March 7, 2022

Ms. Katherine Koster
Environmental Engineer Specialist
State of Michigan, Department of Environment
Great Lakes, and Energy
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SENT VIA ELECTRONIC MAIL AND CERTIFIED MAIL

**SUBJECT: United States Steel Corporation – Great Lakes Works
Violation Notice dated February 14, 2022**

Dear Ms. Koster:

On February 22, 2022, U. S. Steel – Great Lakes Works (U. S. Steel) received a violation notice (VN) dated February 14, 2022, from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). In the notice, EGLE alleges U. S. Steel violated R 336.1201(1) [Permits to Install] with the installation of one 5 MMBTU/hr No. 2 fuel oil boiler on January 20, 2022; and the installation of one 85-90 MMBTU/hr No. 2 fuel oil boiler on January 27, 2022.

As EGLE states in the VN, U. S. Steel experienced an interruption to regular steam production at the Great Lakes Works facility on January 19, 2022. This incident, which was sudden and unexpected, resulted in the loss of steam production from boilers No. 8 and No. 9 at the Main Plant boiler house. These boilers not only supply steam for U. S. Steel operations, including the cold mill wastewater treatment plant (CMWWTP), but also provide heat for the employees at most of the production areas and office buildings. U. S. Steel regularly communicated with EGLE regarding the incident beginning on January 19th and during subsequent telephone conversations.

U. S. Steel reacted quickly in an effort to protect the facility from the near 0° F temperatures projected for the next several days by procuring temporary boilers as soon as possible. U. S. Steel was able to locate a small 5 MMBTU/hr portable boiler that combusts No. 2 fuel oil and had it delivered the night of January 19th in an effort to protect the CMWWTP from freezing and maintain

compliance with NPDES permit discharge limits. The CMWWTP is heated solely through steam and was a critical priority to ensure U. S. Steel could continue to effectively treat wastewater and to protect the equipment from severe damage. This small boiler to maintain the CMWWTP was installed and operating on January 20, 2022 and is still in operation.

U. S. Steel also pursued larger temporary boilers that would support the heating/steam needs for the rest of the Main Plant facility. U. S. Steel was not able to locate any temporary boilers capable of meeting EGLE's General Permit conditions on such short notice. In light of the concerns for the safety of its employees and U. S. Steel's assets, an 85 MMBTU/hr boiler that combusts No. 2 fuel oil was located for immediate delivery and was operational on January 27, 2022.

As U. S. Steel communicated with EGLE, U. S. Steel continued searching for temporary natural gas boilers and had no intention of utilizing the larger No. 2 fuel oil boiler for longer than the time necessary to have replacement natural gas boilers permitted and installed. Two natural gas boilers were located and delivered to the Great Lakes Works facility by January 31, 2022. Prior to delivery, U. S. Steel submitted a permit application and received a General Permit for both temporary natural gas boilers on January 25, 2022. U. S. Steel appreciates the Department's understanding of the emergency situation and the prompt issuance of the General Permit. U. S. Steel and its contractors worked continuously to install the first permitted natural gas boiler as soon as practical. The boiler was running by February 14, 2022. The 85 MMBTU/hr No. 2 fuel oil boiler was shut down and disassembled on February 17, 2022 and removed from the site on February 23, 2022.

Though EGLE states these two boilers were concurrent and related installations, it is important to note that the smaller (5 MMBTU/hr) boiler located at the CMWWTP meets the de minimis exemption in R 336.1291. The CMWWTP boiler was brought in to solely provide steam for the CMWWTP operations and no other sources at U. S. Steel. The boiler was installed, operated, and continues to operate independently of the larger No. 2 fuel oil boiler. Conversely, the larger No. 2 fuel oil boiler was used to provide steam for the rest of the facility. U. S. Steel is continuing to operate the smaller boiler at the CMWWTP to ensure effective wastewater treatment and maintain compliance with discharge permit limits. As noted above, the larger boiler was installed, operated, and subsequently removed from operation separately from the smaller boiler. In sum, while we appreciate EGLE's prompt attention and collaboration in the issuance of the General Permit for the installation of the two natural gas boilers, we respectfully disagree installation of the smaller boiler violated R 336.1201(1) as the installation and operation of the boiler remains independent from the larger boiler; and the unit's purpose is independent from the purpose of the larger boiler.

We would be pleased to address any questions or concerns the EGLE may have. If you have any questions regarding this matter or require additional information, please contact Nathan Ganhs at 313-749-3857.

Ms. Katie Koster, Department of Environment, Great Lakes, and Energy

March 7, 2022

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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,



Harvey Ghuman

Plant Manager

U. S. Steel – Great Lakes Works