

*Manila*  
*Delray Connecting*  
*USS (Section 2)*  
*A7809*

DEPARTMENT OF ENVIRONMENTAL QUALITY  
 AIR QUALITY DIVISION  
 ACTIVITY REPORT: Scheduled Inspection

A780932686

FACILITY: U S STEEL GREAT LAKES WORKS		SRN / ID: A7809
LOCATION: 1 QUALITY DR, ECORSE		DISTRICT: Detroit
CITY: ECORSE		COUNTY: WAYNE
CONTACT: Alexis Piscitelli , Environmental Manager		ACTIVITY DATE: 12/04/2015
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: FY2016 Scheduled Inspection - Delray Connecting Railroad (Section 2)		
RESOLVED COMPLAINTS:		

COMPANY NAME: US Steel – Delray Connecting Railroad  
 REASON FOR INSPECTION: Targeted Inspection  
 INSPECTED BY: Katie Koster, AQD  
 PERSONNEL PRESENT: Mario Herrera (DCRR), Brad Wagnier (USS)  
 FACILITY PHONE NUMBER : 1-(313)-749-2744 (Office)

**FACILITY BACKGROUND**

Delray Connecting Railroad Company is one of the support facilities for US Steel – Great Lakes Works (USS-GLW). It is Section 2 of the USS ROP (199600132d). The company is a subsidiary of U.S. Steel Corporation and is located on Zug Island. It operates the coke screening and handling facility consisting of screening machines, conveyors, and coke handling and storage. It is also responsible for maintaining and operating the locomotives that transport molten iron from the blast furnaces on Zug Island to the basic oxygen furnaces at the Main Plant in Ecorse.

**COMPLAINT/COMPLIANCE HISTORY**

The prior AQD inspection was conducted in 2010.

**OUTSTANDING CONSENT ORDERS**

Facility is operating under the fugitive dust SIP CO 8-1993.

**OUTSTANDING LOVs**

None

**INSPECTION NARRATIVE**

On December 4, 2015, I arrived at Delray Connecting Railroad Company (DCRR) on Zug Island and met with Mr. Mario Herrera, Assistant Superintendent of Operations, and Mr. Brad Wagnier, USS Environmental Manager. Mr. Herrera explained the current operations to me. Nut coke and coke breeze are separated from the furnace coke in the material handling section of the USS blast furnaces. Blast furnace coke is at least 1.25 inches, nut coke is 0.5 inches to 1.25 inches, and breeze coke is 0 to 0.5 inches. This nut and breeze mixture is transported to Delray Connecting by Levy Company. The mixture is feed into the DCRR fixed screen which operates for about 8 hours per day, 7 days per week, to separate the nut coke from the breeze. There are two conveyors off of the screen; each was affixed with a cover. Trucks arrive each day to remove the breeze. Mr. Herrera and Mr. Wagnier did not know where the breeze is taken; they were unfamiliar with the nearby Waterfront Petroleum Terminal. The nut coke is loaded into a railcar via front end loader and returned to the furnace. I observed this loading process and did not see any fugitive emissions. There is no grinding or crushing of coke material, merely screening and sorting activities along with general handling.

DCRR is no longer screening furnace coke or sump coke (material from the quench pit) for EES Coke Battery, LLC located on the island. The fixed screen used to be devoted to this purpose. The furnace coke and sump coke are now screened for EES Coke with portable screens by Dynamic Railroad Consulting. Dynamic is not affiliated with Delray, and Delray no longer provides any services to EES Coke. DCRR also no longer screens A and B scrap for US Steel. This practice was discontinued several years ago and the screen has not been in use. The scrap now stays at the Main Plant and Mr. Herrera was unsure of how it is currently handled. Also, DCRR is no longer screening scarfing fines from Tube City IMS which is located near the hot strip mill.

Two portable screens, Warrior and Pioneer, are also on site. The Warrior has been down for three to four months, but plans are to bring it back to service. The Pioneer screener has been down since 2013. A review of the yearly MAERS data supports this information. The facility tried to switch the Pioneer screen from screening scrap to coke but they are having some operational problems. The portable screens do not have covered conveyors.

Mr. Herrera drove us to the fixed screen. It was "on" due to vibration of the equipment but no material was being screened at the time. I observed the presence of fixed covers on the conveyors. While driving around the property, I did not observe any fugitive dust issues from the roadways or from the piles of screened and unscreened materials. We viewed the two portable screens which were not in operation.

I also reviewed the fugitive dust records while on site. Records of asphalt emulsion application and sweeping were well organized and presented. VE readings both certified and uncertified readers were in a binder and appeared to occur at the frequency required in the ROP. I reviewed the information and did not notice any periods of non compliance with the 5% opacity limit. Monthly and 12 month rolling material screening records were presented. I sent several additional information requests to the facility and received the attached additional information.

## APPLICABLE RULES/PERMIT CONDITIONS

III. A.2. **IN COMPLIANCE.** Permittee shall record the treatment information for the fugitive dust sources using the format specified in Appendix 2.4. Records were presented during the inspection and were in good order.

IV. 4. **NOT IN COMPLIANCE.** Facility has been submitting the quarterly report because the specific equipment identified in the fugitive dust SIP CO 18-1993 is not what is in service due to the fact that the CO is more than 20 years old. No deviations from the treatment schedule have been reported. At this time, AQD is using enforcement discretion as it relates to type of vehicle used for dust suppressant activities.

V. 2. **IN COMPLIANCE.** Shall not operate unless a fugitive dust plan is implemented and maintained. Fugitive dust records for SIP CO 18-1993 which covers roads and lots are maintained and no issues were observed during the onsite inspection. However, this condition originated in PTI 304-99. This permit required a fugitive dust plan for areas of the plant that were not covered by the SIP consent order such as the screening process, storage piles, truck traffic, and training. The fugitive dust plan that was Appendix A of the permit is attached. The facility provided the attached response regarding how they are complying with the plan. At this time, a fugitive dust problem has not been identified at this facility and this documentation appears to be sufficient.

V.3. **IN COMPLIANCE.** Paved roads must be flushed with water twice per week, paved lots monthly, and paved open areas 4 times per year. Based on my conversation with Mr. Herrera and Mr. Wagnier, DCRR is not responsible for any paved roads as U.S. Steel treats the roads. There are two paved parking lots which are swept once a week and flushed with water once per month as indicated in the records. There are no paved "open areas" and I verified this visually through the inspection.

VI. **NOT IN COMPLIANCE.** This section describes the fugitive dust measures that must be implemented between the months of April and November and on an as needed basis thereafter. U.S. Ecology (formerly EQ and Vac-All) provides sweeping and Kleenway applies asphalt emulsion. Application records were presented during the inspection and were in good order and appeared to meet the required frequency. Monthly dust suppressant application and weekly sweeping of paved lots were demonstrated. USS takes care of paved roads. These records will be reviewed in the next USS inspection. All of the 2015 fugitive dust records for DCRR are on the thumb drive attached to this report. Part B of the condition specifies the actual cleaning equipment to be used. However, specific equipment identified in the fugitive dust SIP CO 18-1993 is not what is in service due to the fact that the CO is more than 20 years old. Enforcement discretion is being used as suppressant activities are being met.

E-02-01 – EGCOKESCREEN – Conditions apply to the Fixed Screen

II. A. **IN COMPLIANCE.** Facility did not process more than 150,000 tons of coke per year on a 12 month rolling basis in the fixed screener. Monthly and 12 month rolling records were presented from January 2007 – October 2015. The highest 12 month throughput during this time period was 129,311 in August 2008. The 2014 MAERS report showed a throughput of 78,816 tons.

III A.2. **IN COMPLIANCE.** Facility shall keep monthly and 12 month rolling records of material processed. Monthly and 12 month rolling throughput records were presented during the inspection and are attached.

III A.3. 1 and 2 **IN COMPLIANCE.** Shall perform non certified VE's once a week and certified Method 9 VE's once a month. VE records were presented during the inspection and appeared to meet the schedule outlined in this condition. No exceedances of the opacity limits have been observed based on my review of the records and discussion with Mr. Herrera and Mr. Wargnier. Mr. Wargnier inquired about the appropriate opacity limit. A review of other screen permits contain a limit on 10% on a 6 minute average (PTI 123-12A or 108-15). As this permit contains no corresponding VE limit for the screening, it appears that the applicable opacity limit is Rule 301 (20% on a 6 minute average).

V. 1. **IN COMPLIANCE.** Covers were observed on all conveyors on the fixed screen plant.

E-02-02 – EGCOKEHANDLING

II. B. **IN COMPLIANCE.** VE's shall not exceed 5%. No VE's were observed during the on site inspection.

III A.3 1 and 2 **IN COMPLIANCE.** Shall perform non certified VE's once a week and certified Method 9 VE's once a month. VE records were presented during the inspection and appeared to meet the schedule outlined in this condition. Based on a spot check of the records and discussion with Mr. Herrera and Mr. Wargnier, no exceedances have been observed.

Two portable screens

Facility submitted a Rule 290 demonstration for the Warrior Coke Screener and the Pioneer Scrap Screener. Note, the Pioneer is not in service and has not screened scrap for several years. Note, previously a Horizon model was in use but was replaced by the Warrior in late 2011. Facility is applying Rule 290(a)(ii) which reads(a) An emission unit which meets any of the following criteria: (ii) Any emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all of the following criteria are met: (A) For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in R 336.1122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively.

Screening level in use for coke is 12 ug/m<sup>3</sup>. This is the same screening level that was developed for pet coke (see attached memo) and it appears to be a reasonable application for this material as well. Screening units are uncontrolled. According to calculations presented, the Warrior would have to screen approximately 30,000 tons per month to exceed the 1,000 lbs. PM uncontrolled limit. The throughput for the prior two years (which is the time period required per R290) shows a maximum monthly throughput at 19,777 tons in September 2014. The Pioneer has not operated for the past two years.

NSPS: They are exempt from OOO because they do not have any crushers or grinding mills.

NESHAP: There are none.

**FINAL COMPLIANCE DETERMINATION**

At the time of this inspection, facility appears to be in compliance with applicable state and federal regulations evaluated in this report. As noted above, enforcement discretion is being used as it relates to the updated equipment currently in use for dust suppressant activities that does not match the exact description in the 20+ year old SIP CO 8-1993. Note: The dust suppressant type and frequency are being met.

NAME Katie Koa

DATE 2/8/16

SUPERVISOR W.M.