



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

March 13, 2014

Mr. James Gray, General Manager
United States Steel Great Lakes Works
No. 1 Quality Drive
Ecorse, Michigan 48229

SRN: A7809, Wayne County

Dear Mr. Gray:

VIOLATION NOTICE

On February 11 and February 25, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received and reviewed information regarding the emergency generators on site at U.S. Steel Great Lakes Works located at No. 1 Quality Drive, Ecorse, MI. The purpose of this review was to determine U.S. Steel's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Renewable Operating Permit (ROP) number 199600132d.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two 2,922 hp diesel emergency generators (QSK60-G6 Cummins) installed at the HSM River Pump House	R 336.1201(1)	Installation of emergency generators without obtaining a permit to install pursuant to R 336.1201(1)

During this review, it was noted that U.S. Steel had installed and commenced operation of unpermitted equipment at this facility. Using a maximum fuel consumption of 137.5 gal/hr at 100% load and a diesel fuel HHV of 138,700 BTU/gal, the AQD calculated maximum heat input for each generator is 19.01 million British thermal units per hour (MMBtu/hr), which is greater than the permit to install (PTI) exemption value of 10 MMBtu/hr heat input. Additionally, as discussed with U.S. Steel on December 10, 2013, PTI exemption Rule 336.1282(b) is not applicable to emergency generators. Therefore, the two 2,922 hp emergency generators are in violation of R336.1201 and require a PTI.

A program for compliance may include a completed PTI application for the emergency generators. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP

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Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 3, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If U.S. Steel believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Katie Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ