



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

April 14, 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 April 4, 2014 the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received and reviewed the R336.1912 (Rule 912) report submitted by U.S. Steel Great Lakes Works, located at No. 1 Quality Drive, Ecorse, MI in response to a partial collapse of the #26 vessel downcomer and Electrostatic Precipitator (ESP) dirty gas main ductwork at the No. 2 BOP Shop on March 27, 2014. 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 |
|-------------------------------|--|---|
| No. 2 BOP Shop - Roof Monitor | Rule 336.1364(2) State of Michigan Renewable Operating Permit No. 199600132d, Table E-01.18, Section II.2 40 CFR Part 63 Subpart FFFFF, Table 1.12 | Facility reported exceeding the opacity limit for the No. 2 BOP Shop roof monitor intermittently between approximately 4:55 p.m. and 7:15 p.m. The opacity limit is 20% on a 3-minute average. |
| No. 2 BOP Shop | Rule 336.1910 State of Michigan Renewable Operating Permit No. 199600132d, Table E-01.18, Section VI.1 | Facility reported the release of approximately 3.375 tons of uncontrolled particulate matter. This is a failure to control the particulate matter emissions with the ESP to a limit of 0.057 lb /1000 lbs exhaust gas and 0.02 gr/dscf in Table E-01.18. |

| | | |
|---------------------------|-----------------------------------|---|
| No. 2 BOP Shop (cont.) | | Also, processing at BOP vessel #26 occurred after the ductwork collapsed. The ROP prohibits the permittee from operating the BOP vessels unless the air pollution control equipment is installed and operating properly. The downcomer and dirty gas main ductwork are an integral part of the proper operation of the air pollution control equipment (the ESP). |
| No. 2 BOP Shop | AQD CO No. 1-2005, Condition B | Failure to implement an adequate operation and maintenance plan for the ESP capture/collection system. |

AQD acknowledges that an incident investigation is currently being conducted. Please submit a written response to this Violation Notice by May 5, 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.

Also, please include the following information in your response:

- Records of ESP inspections and ESP related capture system and ductwork inspections for the last five years
- Results of all ESP duct and duct support thickness testing for the last five years
- A list of all emission units that emitted opacity during the event
- Total duration of the event including start and end of observed opacity
- Copies of all visible emissions (VE) readings taken during the event
- ESP COMS data for the 24 hour period from 12:01 a.m. to 11:59 p.m. for March 27
- Dimensions of the ductwork that collapsed
- An explanation of how the estimate of 3.375 tons of uncontrolled particulate matter released was derived
- A list of operations that occurred at the No. 2 BOP shop after the ductwork collapsed and the approximate duration of each operation

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.

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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,



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

cc: Ms. Alexis Piscitelli, U.S. Steel
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ