



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



DAN WYANT  
DIRECTOR

May 27, 2015

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

SRN: A7809, Wayne County

Dear Mr. Gray:

**VIOLATION NOTICE**

On March 30, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received information requested by the AQD regarding the replacement of Basic Oxygen Process Furnace (BOPF) Vessel No. 26 in the No. 2 BOP Shop at United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. AQD reviewed this information 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; the conditions of Renewable Operating Permit (ROP) number 199600132d; and Consent Order AQD No. 1-2005.

During this review, AQD staff noted the following violation:

Process Description	Rule/Permit Condition Violated	Comments
No. 2 BOP Shop (FG2BOP-SHOP)	Rule 336.1201(1)(a)	The facility failed to obtain a Permit to Install prior to installing a new BOPF Vessel No. 26 at the No. 2 BOP Shop.

In the 4<sup>th</sup> quarter of 2014, U.S. Steel installed a new BOP vessel shell, trunnion ring and bearings, and tilt drive to replace Vessel No. 26. The new vessel also has an increased freeboard volume. This was done without first obtaining a Permit to Install per R 336.1201(1)(a).

Based on U.S. Steel's March 30 letter, the facility claims this installation did not require a Rule 336.1201 permit because it met the exemption criteria in Rules 336.1285(a) and (b) of the Michigan Air Rules. AQD does not agree with this analysis. Rule 285(a) applies to "routine maintenance, parts replacement, or other repairs that are considered by the department to be minor." First, your letter states that the last time the vessel was replaced was 1980. An activity that occurs once every 35 years is not "routine". Also, as the BOPF vessel is an emission unit, as defined in the Integrated Iron and Steel Manufacturing Facilities MACT (40 CFR Part 63 Subpart FFFFF), this activity does not constitute parts replacement or minor repair. Furthermore, examples of minor repairs

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are provided in the exemption such as: replacing bags in a baghouse, or replacing or repairing piping, hoods, ductwork, pumps, and/or motors. Replacing a BOPF vessel is not comparable to these examples.

Rule 285(b) is not applicable as it pertains to changes that do not involve installing or reconstructing an emission unit. A BOPF vessel is an emission unit.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 17, 2015 (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 a violation 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: Ms. Alexis Piscitelli, U.S. Steel  
Mr. Bradley Wargnier, U.S. Steel  
cc via email: Ms. Lynn Fielder, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ