



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

April 20, 2016

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 April 4, 5, and 8, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated complaints regarding opacity from U.S. Steel operations on Zug Island located in River Rouge, Michigan. The purpose of these investigations 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; the conditions of Renewable Operating Permit (ROP) number 199600132d, and Consent Order AQD No. 1-2005.

During these investigations, AQD staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
D4 blast furnace casthouse roof monitor (EGBLAST-FCE-D)	Rule 336.1358(1) ROP No. 199600132d, Table E-01.14, Section II.B 40 CFR Part 63 Subpart FFFFF, Table 1.7	On April 4, 2016, 58% was the highest 6-minute average opacity calculated (see enclosed VE form). The plume color was orange. 20% opacity on a 6-minute average is the visible emission limit.
B2 blast furnace (EGBLAST-FCE-B)	40 CFR Part 63.6(e)(1) ROP No. 199600132d, Table F-01.05, Section VI.5	The bell seals were observed to be malfunctioning as the seal and inter bell relief valve were emitting black particulate on April 4, 5, and 8, 2016. Facility failed to actively mitigate emissions in accordance with good air pollution control practices.

On April 4, 2016, AQD staff performed Method 9 readings on the D4 casthouse roof monitor. The opacity limit is 20% on a 6 minute average. The highest 6 minute average observed was 58%.

AQD staff also observed emissions from a leaking bell on the B2 blast furnace caused by improper sealing or other malfunction associated with the bell system. These emissions were ongoing as they were observed on April 4, 5, and 8. U.S. Steel failed to cease production or otherwise take action to return the furnace to its normal operating condition in order to minimize emissions. Failure to actively mitigate emissions caused by a known malfunction is a violation of 40 CFR Part 63.6(e)(1) and ROP No. 199600132d, Table F-01.05, Section V1.5.

Additionally, on April 4, 2016, black particulate was exiting the D4 stove stack intermittently between approximately 2:30 and 3:15 p.m. AQD informed U.S. Steel of these observations on April 5.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 11, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Also in your response, please provide the reason for the D4 stove stack emissions and the corrective actions that have been taken to prevent a reoccurrence. Per Rule 336.1911, the AQD is requesting that U.S. Steel provide a malfunction abatement plan (MAP) for the D4 and B2 blast furnace stoves as described in Rule 336.1911(2) by May 11, 2016. Finally, your response should include copies of all non-certified and certified visible emissions observations of any of the operations on Zug Island taken by U.S. Steel or its contractor(s) from January through April 2016.

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 violations cited above. If you have any questions regarding the violations 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

Enclosure

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