



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

August 17, 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 August 3, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), performed an investigation of the No. 2 BOP Shop at U.S. Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. This investigation was performed in response to complaints of emissions from the No. 2 BOP Shop roof monitor received the morning of August 3, 2016, and to determine U.S. Steel's compliance status 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 investigation, AQD staff performed Method 9C visible emissions (VE) readings of the No. 2 BOP Shop roof monitor and noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
No. 2 BOP Shop Roof Monitor (EG2BOF-VESSELS)	ROP No. 199600132d, Table E-01.18, Section II.2  Rule 336.1364(2)  40 CFR 63.7790(a) and Table 1.12	Visible emissions exceeded 20% over a 3-minute average six times during the readings. The highest 3-minute average was 49.6%.

AQD performed Method 9C VE readings between 3:47 p.m. and 3:59 p.m. and 4:48 p.m. and 5:17 p.m. on August 3, 2016. Brown particulate emissions were exiting the No. 2 BOP shop roof monitor. During the time the Method 9C readings were performed, the 3-minute average opacity exceeded the 20% opacity limit allowed in ROP No. 199600132d, Table E-01.18, Section II.2, Rule 336.1364(2), and 40 CFR 63.7790(a) and Table 1.12 a total of six times with a high of 49.6% from 5:03:00 PM to 5:05:45 PM. Copies of the Method 9C VE readings are included with this letter.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 7, 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.

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 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. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ