



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

September 1, 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 July 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received and reviewed the stack test results for the No. 1 Argon Stir Station baghouse performed on May 18, 2016, at United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. This was a re-test due to a prior failed test on December 9, 2014. On August 18, 2016, AQD received and reviewed additional information related to the May 18, 2016 test. The purpose of these reviews 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) No. 199600132d; and SIP Consent Order No. 27-1993.

Based on AQD's review and analysis of the test report and additional information, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
No 1. Argon Stir (EGARGON-STIR)	ROP No. 199600132d, Section 1, Table E-01.03, Condition II.B.1.2 SIP CO No. 27-1993, Exhibit B, Paragraph 4	The AQD calculated particulate matter (PM) emissions were 0.932 lb/heat (based on a 3 run average). The PM limit is 0.543 lb/heat.
No. 1. Argon Stir (EGARGON-STIR)	ROP No. 199600132d, Section 1, Table E-01.03, Condition II.B.2.1	The AQD calculated PM emissions were 2.0 lb/hr (based on a 3 run average). The PM limit is 1.4 lb/hr.
No. 1. Argon Stir (EGARGON-STIR)	ROP No. 199600132d, Section 1, Table E-01.03, V.2 R336.1910	Failure to properly operate and maintain an air pollution control device.

No. 1. Argon Stir (EGARGON-STIR)	40 CFR 63.7830(b)(4)(iv)	Failure to properly monitor the baghouse cleaning cycles to ensure proper operation using an appropriate methodology.
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The test results included a request to drop the third run based on AQD Rule 336.2003(2) which states: "For the purpose of determining compliance with an applicable emission limit, rule, or permit condition, the arithmetic mean of results of the 3 samples shall apply. If a sample is accidentally lost or conditions occur in which 1 of the 3 samples must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions, or other circumstances beyond the owner's or operator's control, then compliance may, upon the approval of the department, be determined using the arithmetic mean of the results of 2 samples."

The May 18, 2016, stack test does not meet the criteria outlined in the rule because 1 of the 3 samples was not lost or discontinued. Also, AQD does not agree that a failure to recognize that the baghouse was stuck in a continuous cleaning cycle is a circumstance beyond the owner or operator's control.

ROP No. 199600132d, Section 1, Table E-01.03, V.2 states: "The permittee shall not operate the argon stirring station unless the baghouse dust collector is installed and operating properly" and Rule 336.1910 states that "an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law." As the baghouse did not control emissions to an acceptable level, it is not being maintained and operated properly.

40 CFR 63.7830(b)(4)(iv) requires the permittee to "monitor cleaning cycles to ensure proper operation using an appropriate methodology" for the baghouse. The stack test results state that the baghouse was stuck in a continuous cleaning cycle that was not recognized by U.S. Steel during or after the test until the draft results were received. This is a failure to properly monitor the baghouse cleaning cycles.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 22, 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.

Additionally, AQD is requesting another performance test per Rule 336.2001(1)(c) as an acceptable performance test that demonstrates that the source is in compliance with the department's rules and with the conditions specified in ROP 199600132d has not been submitted. AQD recognizes that the No. 1 Argon baghouse is currently being repaired

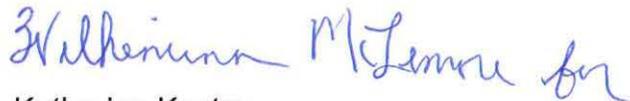
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due to fire damage. This test shall be completed within 60 days of start-up of the baghouse as required by Rule 336.2001(2).

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,

A handwritten signature in blue ink that reads "Wilhemina McLemore for".

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

cc: Ms. Alexis Piscitelli, USS
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ