



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

August 18, 2017

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

SRN: A7809, Wayne County

Dear Mr. Kostyo:

VIOLATION NOTICE

On August 3, 2017, and April 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the 2nd and 1st Quarter 2017 Maintenance Records, respectively, for the No. 5 Pickle Line scrubber as required per AQD Consent Order No. 22-2016, for United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. AQD staff reviewed these reports 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; Consent Order AQD No. 22-2016; and 40 CFR Part 63 Subpart CCC, NESHAP for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants (also known as MACT CCC).

During this review, AQD staff noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Pickle Line (EG5-PICKLE-LINE)	ROP No. 199600132d, Table E-01.08, Section III.A.2 ROP No. 199600132d, Table E-01.08, Section V.1	The No. 5 Pickle Line scrubber did not operate at or above the required minimum recirculation and makeup water flow rates on multiple occasions between February 15, 2017 and June 30, 2017. These flow rates were established on February 14, 2017, during a stack test required by MACT CCC and the ROP.

No. 5 Pickle Line (EG5-PICKLE-LINE)	ROP No. 199600132d, Table E-01.08, Section V.2 Rule 336.1910	Permittee shall not operate the pickle line unless the acid fume wet scrubber is installed, maintained, and operated in a satisfactory manner.
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A stack test was conducted on February 14, 2017, to determine the HCl emissions from the acid fume wet scrubber at EG5-PICKLE-LINE. During the test, 40 CFR Part 63, Subpart CCC, 63.1161(b), requires that the facility record the makeup water and recirculation flow rate at least once every 15 minutes during each run to establish site specific operating parameter values for the minimum scrubber makeup water flow rate and the minimum recirculation water flow rate. The condition also states that "the owner or operator shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per paragraph (a)(2) of this section."

Based on the information that was recorded during the test and the calculated lowest average value from each run, the minimum required makeup water flow is 38 gallons per minute (gpm) and the minimum required recirculation rate is 564 gpm. In the cover letter with the stack test report, U.S. Steel stated that the minimum values were 35 gpm for makeup water and 525 gpm for recirculation flow. These values do not represent the minimum average values recorded during the February 14, 2017 compliance test. AQD informed your staff of this inaccuracy during a site inspection on May 11, 2017.

ROP No. 199600132d, Table E-01.08, Section III, Condition A.2 states, in part: "The water flow rate to the scrubber must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the scrubber shall be with a minimum scrubber makeup water flow rate and recirculation water flow rate as established during the most recent performance test. "

A review the records from the February 15, 2017 through June 30, 2017, indicate that the minimum makeup water flow rate of 38 gpm was not met on 15 occasions in April and 18 occasions in May. The minimum recirculation flow rate of 564 gpm was not met on 22 occasions in February, 58 occasions in March, 62 occasions in April, and 15 occasions in May. This is based on a recording of these values once per shift.

Also, ROP No. 199600132d, Table E-01.08, Section V.2 states: "The permittee shall not operate EUPICKLE5 unless the acid fume wet scrubber is installed, maintained, and operated in a satisfactory manner." Additionally, Rule 336.1910 states that "an air pollution control device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law."

Mr. Ron Kostyo
Page 3
August 18, 2017

Operating the wet scrubber below the minimum required flow rates while operating EG5-PICKLE-LINE is a failure to operate the scrubber in a satisfactory manner and a failure to operate the scrubber in accordance with existing law.

As such, the source has not submitted an acceptable performance test that demonstrates that EG5-PICKLE-LINE is in compliance with the conditions specified in the Department's rules or the permit to install as the EG5-PICKLE-LINE scrubber is not operating in the same manner as it was during the performance test. AQD requests a retest per Rule 336.2001(1)(c). This test should be conducted within 60 days of the date of this letter per Rule 336.2001(2) to establish new minimum operating values for the pickle line scrubber.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 8, 2017 (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

cc: Ms. Alexis Piscitelli, U.S. Steel
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Jonathan Lamb, DEQ