



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 30, 2021

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

SRN: A7809, Wayne County

Dear Mr. Brown:

VIOLATION NOTICE

On April 21, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), completed review of the stack test report for the No. 5 Pickle Line scrubber test performed on February 16, 2021, at United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. The stack test report was received on April 5, 2021. The purpose of this review 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 Air Pollution Control Rules; 40 CFR Part 63, Subpart CCC; the conditions of Renewable Operating Permit (ROP) No. 199600132d; and AQD Consent Order No. 2020-11.

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

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Pickle Line (EG5-PICKLE-LINE)	ROP No. 199600132d, Section 1, Table E-01.08, Condition II.B 40 CFR Part 63, Subpart CCC, §63.1157(a)(1) and (2) AQD Consent Order No. 2020-11, Paragraph 9.A.	The HCl emissions were 1.96 lb/hr and 38.9 parts per million by volume (ppmv), dry. The tested collection efficiency of the scrubber was 91.8% The HCl limit is 1.64 lb/hr and either 18 ppmv, dry or a collection efficiency of at least 97%.

The February 16, 2021, stack test results are in violation of ROP No. 199600132d, Section 1, Table E-01.08, Condition II.B, 40 CFR Part 63, Subpart CCC, §63.1157(a)(1) and (2), and AQD Consent Order No. 2020-11, Paragraph 9.A. Additionally, per AQD

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Consent Order No. 2020-11, Paragraph 18, these violations are subject to stipulated fines.

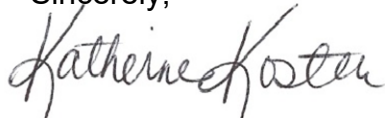
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 21, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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. AQD acknowledges that a retest was conducted on March 11, 2021, and results demonstrated compliance and were reviewed by AQD.

Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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,



Katherine Koster
Environmental Engineer Specialist
Air Quality Division
313-418-0715

cc: Mr. Nathan Ganhs, U.S. Steel
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE