



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 14, 2022

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

SRN: A7809, Wayne County

Dear Mr. Ghuman:

VIOLATION NOTICE

On February 2, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received and reviewed information from United States Steel Great Lakes Works ("U.S. Steel") regarding the installation and operation of two No. 2 fuel oil boilers located at No. 1 Quality Drive, Ecorse, Michigan. 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; and the conditions of Renewable Operating Permit (ROP) No. 199600132d.

Based on AQD's review, the following violation was noted:

Process Description	Rule/Permit Condition Violated	Comments
Two No. 2 fuel oil boilers	R 336.1201(1)	Installation of two No. 2 fuel oil boilers without obtaining a permit to install.

According to U.S. Steel personnel, there was an interruption in steam production due to an incident at the U.S. Steel Main Plant Boiler House No. 1 on January 19, 2022. This resulted in the No. 8 and No. 9 boilers being taken out of service and a loss of steam for operations and building heat. As such, a 5 MMBTU/hr No. 2 fuel oil boiler was installed and operational as of January 20, 2022. Additionally, an 85-90 MMBTU/hr No. 2 fuel oil boiler was installed and operating as of January 27, 2022.

AQD acknowledges U.S. Steel's intention to operate these boilers temporarily. Since their installation, U.S. Steel has secured a general permit to install from the AQD for the subsequent installation of natural gas fired boilers to supply steam to the Main Plant in place of the fuel oil boilers. Regardless, this is a violation of R 336.1201(1) of the administrative rules promulgated under Act 451. Rule 201(1) states in part:

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a person shall not install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment pertaining thereto, which may emit any of the following, unless a permit to install that authorizes such action is issued by the department.

(a) Any air pollutant regulated by title I of the clean air act and its associated rules, including 40 C.F.R. §51.165 and §51.166, adopted by reference in R 336.1902.

(b) Any air contaminant.

The size of the 85-90 MMBTU/hr boiler exceeds the 20 MMBTU/hr limit for No. 2 fuel oil burning equipment specified in R 336.1282(2)(b)(ii) of the permit to install (PTI) exemptions. Furthermore, the potential to emit from the activity (i.e. the concurrent and related installation of both boilers) is above significance levels referenced in Rule 278(1)(b) and defined in Rule 119 for nitrogen oxide, sulfur dioxide, and particulate matter 2.5. This precludes the use of any of the PTI exemptions for either boiler as stated in Rule 278.

A program for compliance may include a completed PTI application for the boilers. An application form is available by request, or at the following website:
www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that R 336.1201(1) requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 7, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

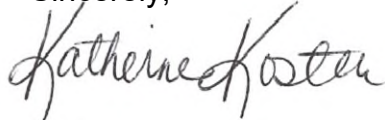
Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If U.S. Steel believes the above observations or statements are inaccurate or do not constitute a violation 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Koster".

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