

September 19, 2014

Mr. Jonathan Lamb, Senior Environmental Quality Analyst
Air Quality Division, Detroit District Office
Michigan Department of Environmental Quality
Cadillac Place, Suite 2-300
3058 West Grand Boulevard
Detroit, MI 48202



Subject: AK Steel Dearborn Works (Formerly known as Severstal Dearborn, LLC
(Severstal)) Response to September 2, 2014 Violation Notice

Dear Mr. Lamb:

Severstal has received your September 2, 2014 violation notice letter citing the “failure to use good air pollution control practices to minimize emissions during the beaching of molten iron,” in accordance with R 336.1912 (1) on August 14, 2014. Your letter states that: “If Severstal 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.” Severstal believes this event did not constitute a failure to use good air pollution control practices to minimize emissions during the beaching of molten iron, as presented below.

During the August 14, 2014 iron beaching event, Severstal followed its standard beaching procedures to control emissions by visually observing the pit to check that no standing water was present, adding hot slag to eliminate the surface moisture in the pit, and operating dust bosses to create a water mist to control fugitive dust as the pouring is conducted. We also have operating personnel observing to help control the pour rate based on the level of emissions that are generated. When the plume of smoke was observed, the beaching was immediately aborted. Although there were elevated instantaneous opacity readings, the Method 9 visible emission observation conducted during this event indicates that by immediately ceasing the beaching activity when the unusual event occurred, Severstal was able to minimize the emissions and prevent an opacity exceedance based on a 3-minute average. The Method 9 reading is enclosed with this response letter.

Although this event was an abnormal condition, we do not believe this was a violation of rule 912 since there was no exceedance of the applicable emission standard, and therefore the source is presumed to have been operated in a manner consistent with good air pollution control practices for minimizing emissions. In addition, Severstal believes that by following the existing procedure and utilizing the dust bosses, we conducted the beaching activity in a manner that, under normal circumstances, minimizes emissions “to the extent reasonably possible”.



This event was a result of the unusually heavy “100-year” rainfall event that occurred on August 11, 2014 that resulted in excess moisture in the ground that could not be detected despite the careful visual inspection and ground preparation conducted prior to beaching. When the molten metal came in contact with the excess moisture that was still present just below the surface of the ground, an eruption occurred that led to the visible plume of smoke. We have stopped all outside beaching until we are sure we have the procedures in place to prevent this type of incident from reoccurring. Prior to this event, our beaching practices were successful with our most recent procedure, and therefore we believe this was an isolated extraordinary event due to the recent weather.

The following is the information requested by MDEQ in relation to the specifics of this incident:

1. Reason or cause of the beaching

Process interruptions at the Continuous Caster prevented the iron from being used to manufacture steel. To prevent the molten iron from damaging the bottle car, the iron had to be removed.

2. Location of the beaching

Beaching pit adjacent to the northeast side of the BOF, just west of the boat slip.

3. Amount of metal beached

Approximately one quarter of a bottle car or 37.5 tons of iron. Beaching was aborted immediately after the plume of smoke was observed.

4. The time the beaching occurred (start and end times)

9:58 a.m. to 10:02 a.m.

5. If visible readings were taken, please provide copies

See enclosed visible emission evaluation form.

6. Summary of actions taken to reduce emissions during beaching and action taken to prevent or reduce reoccurrence of beaching events

Beaching procedures were followed. Outdoor beaching of iron has ceased until we have procedures in place to prevent a reoccurrence.

Because this event did not result in an exceedance of any applicable emission standard, we do not believe that it is necessary to prepare a Malfunction Abatement Plan per Rule 911. Since we have been able to demonstrate compliance with beaching using our most current procedures, we believe these procedures and practices are adequate to minimize emissions.

I am available to discuss this event and the information provided herein. If have any questions or concerns, please contact me at (313) 317-8955.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Bishop". The signature is stylized with a large, sweeping initial "B" and a long, horizontal tail.

Brian Bishop
General Manager, Dearborn Works

Enclosure

cc: J. Earl
C. Levengood
J. Ryan

SEVERSTAL DEARBORN, LLC VISIBLE EMISSIONS EVALUATION FORM

DATE: 8/4/14
 OBSERVER: L. Trumb
 START: 9:58 am pm
 FINISH: 10:02 am pm


Source:
 North BOF Beaching

Observation Point
 East Boat Slip

distance from: 300'
 direction from: SE
 source height: Ground

wind direction N
 wind speed 1-5 mph
 sky condition Scattered
 amb. temp. (F) 61°F
 color of emissions White to Brownish
 other;

Remarks;
 started beaching
 @ 9:58 am x
 stopped @
 10:02 am

Observer's Signature


MIN	0	15	30	45	REMARKS	MIN	0	15	30	45	REMARKS
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Last Certification Date April 2014

RECEIVED

SEP 22 2014

Air Quality Division
Detroit Office

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OBSERVER: L. Trinh

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BOF

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& Stoppeal @
10:02 am

Observer's Signature
[Signature]

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