



9300 Dix Avenue, Dearborn, Michigan 48120, (313) 843-7200

January 31, 2020

Ms. Katie Koster
Sr. Environmental Engineer
EGLE Detroit, AQD
Detroit Field Office, Cadillac Place
3058 W. Grand Blvd., Suite 2-300
Detroit, MI 48202-6058

**Subject: December 26, 2019 Violation Notice Response
Edw. C. Levy Co., Plant 6
SRN: B4243, Wayne County**

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of the subject Violation Notice (VN) dated December 26, 2019, alleging violation of Rule 336.1901 (b) and ROP No. MI-ROP-A8640-2016a Section 2 General Clause 12(b).

The alleged violation is for nuisance odors occurring on November 25, 2019 in the vicinity of 4001 Miller Road, Dearborn Michigan.

On November 25, 2019, from 4:30 pm to 7:30 pm, Matt Perko and Jim Earl, AK Steel, conducted an inspection of the blast furnace slag pits, desulfurization slag watering station and surrounding areas in response to your e-mail, which was received at 3:18 pm on that day. Thank you for the prompt notification.

At the time of the investigation, the potassium permanganate system (odor control system) on both the blast furnace slag pits and the desulfurization slag watering station were in operation. A Phocheck 5000 multi-gas meter was used to detect the presence or absence of hydrogen sulfide gas near the blast furnace slag pits and the desulfurization slag watering station. Immediately at both operations, hydrogen sulfide gas was detected at low levels. A short distance away from these operations the hydrogen sulfide gas dissipated and was undetectable. There was no detection of hydrogen sulfide gas at the property line downwind from the blast furnace slag pits and desulfurization slag watering station.

The following preventative actions have been implemented in response to your notification:

- The concentration and dosage of potassium permanganate was immediately increased on the blast furnace slag pits (November 26, 2019)
- The potassium permanganate feed line on the blast furnace slag pits was replaced in January 2020 to eliminate the potential of blockage from mineral deposits, which would restrict flow.
- In January 2020, the potassium permanganate feed pump at the blast furnace slag pits was replaced to ensure consistent operation.

Levy will continue to monitor both operations for nuisance odors and take corrective actions when required.

Please contact Matt Perko, Environmental Engineer (313-820-4057; mperko@edwclevy.net) or me if you have any questions or need additional information.

Sincerely,



Thomas E. Green, PE
Director, Environmental Health and Safety
Edw. C. Levy Co.
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cc: Ms. Jenine Camilleri
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Randy Cullen, Operations Manager, Levy Plant 6
Russ Burke, Director, Steel Mill Services, Levy
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Matt Perko, Environmental Engineer, Levy
Jim Earl, Environmental Manager, AK Steel Dearborn Works