



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

March 25, 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: March 4, 2020 Violation Notice Response  
Edw. C. Levy Co., Plant 6  
SRN: A8640-Section 2, Wayne County**

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of the subject Violation Notice (VN) dated March 4, 2020, alleging violation of Rule 336.1901 (b) and ROP No. MI-ROP-A8640-2016a, Section 2, General Clause 12(b).

The alleged violation was for nuisance odors allegedly occurring in residential areas downwind of the blast furnace slag pits and occurring at the following times:

- February 21, 2020 from 2235 to 2305 hours
- February 22, 2020 from 2000 to 2050 hours
- February 23, 2020 from 2030 to 2200 hours

Levy was alerted via email at 2030 hours on February 23, 2020 that the odors were detected on Salina, Holly, Roulo, Amazon, and other streets in the vicinity.

Based upon our investigation, the odor control system (potassium permanganate system) on the blast furnace slag pits was operating without interruption during the time period noted in the VN. No upset conditions were identified. As previously communicated, we have been working to improve the odor control system in response to recent odor complaints. Our improvement efforts include the following:

- The concentration and dosage of potassium permanganate in the water sprayed on the blast furnace slag pits has increased. Over the past three months, the volume of potassium permanganate injected into the water sprays has increased, our weekly feed rate of solid permanganate into our mixing tank has more than doubled, and the solution in our mixing tank has reached saturation.
- In January 2020, the potassium permanganate feed pump at the blast furnace slag pits was replaced to ensure consistent operation.
- In January 2020, the potassium permanganate feed line to the blast furnace slag pits was replaced to eliminate any potential scaling or blockage due to mineral deposits within the old lines.

- On February 6, a chemist, from the potassium permanganate manufacturer, reviewed our process and made recommendations to improve mixing in the batch dosing system to further increase chemical concentration. He also recommended the addition of slow-release tablets to our water holding tanks. These improvements were implemented by the end of February 2020.
- In March 2020, we modified the water spray nozzles to improve water distribution to the blast furnace slag pits. This effort is ongoing. New nozzle designs are being acquired for testing and evaluation.
- On March 23, 2020, we purchased and received a larger capacity pump to feed the potassium permanganate into the water sprays. This will allow further increases in the dosage of potassium permanganate into the water used on the blast furnace slag pits. This pump is in the process of being installed.

We will continue to evaluate our systems for opportunities to reduce potential emissions. Thank you again for the timely notification of a complaint.

Also, please note that Randy Cullen has been named Operations Manager of the Levy Plant 6 Operations. Please include Randy on future written correspondence and via email at [rcullen@edwclevy.net](mailto:rcullen@edwclevy.net), in place of Tim Lazarz.

Please contact Matt Perko, Environmental Engineer (313-820-4057; [mperko@edwclevy.net](mailto:mperko@edwclevy.net)) or Tom Green, Director of EHS (313-690-0139, [tgreen@edwclevy.net](mailto:tgreen@edwclevy.net)) if you have any questions or need additional information.

Sincerely,



Thomas E. Green, PE  
Director, Environmental Health and Safety  
Edw. C. Levy Co.  
[tgreen@edwclevy.net](mailto:tgreen@edwclevy.net)  
(313) 690-0139

cc: Ms. Jenine Camilleri  
Supervisor, Enforcement Unit  
EGLE, Lansing AQD  
PO Box 30260  
Lansing, MI 48909-7760

Randy Cullen, Operations Manager, Levy Plant 6  
Russ Burke, Director, Steel Mill Services, Levy  
Brian Lasley, Vice President Steel Mill Services, Levy  
Malcom Dunbar, Vice President EHS, Levy  
Matt Perko, Environmental Engineer, Levy  
Jim Earl, Environmental Manager, AK Steel Dearborn Works