



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

May 28, 2021

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: May 10, 2021 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 May 10, 2021, 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 Level 3 and 4 nuisance odors allegedly observed by an EGLE inspector in residential areas downwind of the blast furnace slag pits and occurring at the following times:

- Saturday May 1, 2021 from approximately 1650 to 1805 hours

Levy was alerted via email at 1201 hours on Thursday, May 6 by Mr. Jonathan Lamb, EGLE, that odor complaints were received from 1609 hours to 18:33 hours in the residential neighborhood bounded by the following roads: Dix Avenue, Wyoming Avenue, Eagle Street, and Amazon Street. In a follow-up email, Mr. Lamb noted the times of the complaints were: 1609, 1646, 1700, 1703, and 1833 hours. Due to the delay between the time of the complaints and the notification to Levy, Levy was unable to conduct a timely investigation of the alleged odor source.

Based upon our investigation, routine blast furnace slag pit operations such as pouring slag pots and digging and stockpiling hardened slag occurred during the timeframe of the complaints. Watering of air-cooled blast furnace slag occurred during this time, and the odor control system (liquid potassium permanganate fed into the quench water) was operational, without interruption or upset during the timeframe of the complaints. Review of Levy operating logs during and around this time found no abnormal operations or circumstances that would be associated with odor-generating conditions.

At this time, we have not identified a source for the alleged odors. We will continue to evaluate our systems for opportunities to reduce potential odors.

Also, please note that Zayd Sufyan is now Operations Manager of the Levy Plant 6 Operations. Please include Zayd on future written correspondence and via email at zsufyan@edwclevy.net, in place of Tim Lazarz, who was copied on this Violation Notice.

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

Sincerely,



Keith Walker

~~General Operations Manager, Steel Mill Services,~~ *General Manager of Operations*

Edw. C. Levy Co.

kwalker@edwclevy.net

260-417-6331

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

CC: Russell Burke, VP Steel Mill Services, Levy
Zayd Sufyan, Operations Manager, Levy Plant 6
Eliot Weiner, Executive Vice President, Levy
Tom Green, Director of EHS, Levy
Matt Perko, Environmental Engineer, Levy
Jim Earl, Environmental Manager, AK Steel Dearborn Works