



CLEVELAND-CLIFFS INC.
Cleveland-Cliffs Steel Corporation
Dearborn Works
4001 Miller Road, Dearborn, MI 48120
P 313.317.8900 clevelandcliffs.com

RECEIVED

JAN 18 2023

Air Quality Division
Detroit Office

January 9, 2023

Ms. Katherine Koster
Senior Environmental Engineer
EQLE, AQD, Detroit District
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EQLE, AQD
P.O. Box 30260
Lansing, Michigan 48909-7760

Re: Cleveland-Cliffs Dearborn Works
Response to Violation Notice dated December 19, 2022

Dear Mss. Koster and Camilleri:

I am writing on behalf of Cleveland-Cliffs Dearborn Works in response to the Violation Notice dated December 19, 2022. The alleged violations are based on visible emissions observations conducted by EGLE on the BOF Roof Monitor on December 11, 2022. Specifically, the NOV alleges a total of 5 exceedances of the 20% 3-minute average opacity limit in ROP No. MI-ROP-A8640-2016a – Section 1, EUBOF, Special Condition I.2 and 40 CFR Part 63, Subpart FFFFF, with a high observed opacity of 64.2% from 1:44 PM to 1:46 PM. The following is the information requested by EGLE.

The dates the violation occurred

The EGLE observations on the BOF Roof Monitor were conducted on December 11, 2022.

An explanation of the causes and duration of the violation

The cause of the emissions was leakage from the B-Vessel relief dampers due to compromised packing within the B-Vessel relief damper north door. No emissions were observed during routine Method 9 observations of the BOF Roof Monitor on the afternoon of December 9. Dearborn Works was made aware that a PEAS call was made concerning emissions from the facility on December 11, and that EGLE conducted Method 9 observations on the BOF Roof Monitor as part of the investigation. As noted in the NOV, Method 9 readings were conducted by EGLE between 1:42 PM and 2:45 PM on December 11 with 5 exceedances of the 20% 3-minute average (a total of 15 minutes) being observed between 1:43 PM and 1:58 PM.

Whether the violation is ongoing

The alleged violation is not 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

B-Vessel was taken offline after the completion of the B-Vessel heat at 2:01 PM on December 11 and the relief dampers and doors were repacked. No leakage was evident during the following B-Vessel oxygen blow from 7:38 PM to 7:58 PM.

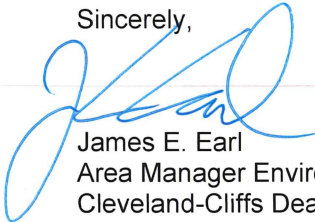
Steps being taken to prevent a reoccurrence

B-Vessel was taken offline again on December 12 for approximately 11 hours to re-inspect and perform additional repairs of the B-Vessel relief dampers. Since the completion of these repairs, excess emissions have not been noted from the B-Vessel relief dampers during the plant's routine Method 9 readings on the BOF Roof Monitor.

Internal Cleveland-Cliffs procedures require Vessel Operators to monitor the emissions while blowing heats and to take corrective action when emissions are present. The Vessel Operators failed to effectively follow these procedures. All affected employees were contacted and re-trained on the relevant procedures. In addition, larger screen monitors have been installed in both vessel operating pulpits and in the central vessel operation area. These screens have been locked on an external building view to ensure that emissions can be more effectively monitored within the operating pulpits. This also allows for an additional layer of monitoring by supervisors within the central vessel operation area.

If you have any questions regarding the provided information or require additional information, please contact David Pate at 313-323-1261.

Sincerely,



James E. Earl
Area Manager Environmental
Cleveland-Cliffs Dearborn Works