



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

February 23, 2017

Mr. Nicholas Kohlhas, General Manager  
AK Steel Dearborn Works  
4001 Miller Road  
Dearborn, Michigan 48121-1699

Mr. Thomas Smith, General Manager  
Edw. C. Levy Company  
8800 Dix Avenue  
Detroit, Michigan 48209

SRN: A8640, Wayne County

Dear Mr. Kohlhas and Mr. Smith:

**VIOLATION NOTICE**

On December 23, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an investigation in response to a citizen complaint regarding a large brown plume from the AK Steel Dearborn Works ("AK Steel" hereafter) property near the corner of Dix and Miller Roads causing subsequent fallout in Dearborn. Photographs were provided by the complainant. Based on the location of the plume from the photographs and the wind direction, AQD staff identified AK Steel and Edw. C. Levy Co. operations as a potential source. The purpose of the investigation was to determine AK Steel and Edw. C. Levy Co.'s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and Renewable Operating Permit (ROP) No. MI-ROP-A8640-2016a (AK Steel and Edw. C. Levy Co. operations inclusive).

During the investigation, AQD staff collected a fallout sample at 10550 Dix Street in Dearborn. The sample was sent to a laboratory for microscopic examination. The attached lab results show the fallout sample contained substantial amounts of slag, unfused ash, and iron containing particles, along with graphite, which is consistent with the properties of blast furnace slag. Also, meteorological data indicates that the fallout location was downwind of your operations.

Based on the investigation and the sample results, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
Blast furnace (iron) slag handling and processing operations	ROP No. MI-ROP-A8640-2016a, General Condition 12(b), Sections 1 and 2  R 336.1901(b)	Detection of fallout beyond the facility's property line, attributable to the facility, of sufficient magnitude as to constitute an unreasonable interference with the comfortable enjoyment of life and property.

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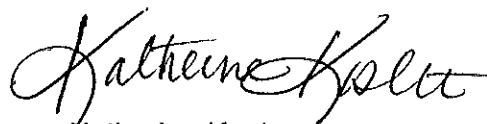
Based on the analysis of the fallout sample, photographs, and wind direction at the time of the incident, AQD staff has determined that the Edw. C. Levy Co. blast furnace slag pit operations at the AK Steel facility are the most likely source of the fallout. In the professional judgment of AQD staff, the fallout observed during this investigation was sufficient enough as to constitute a violation of General Condition 12(b), Section 1 and Section 2, of ROP No. MI-ROP-A8640-2016a and R 336.1901(b): an "unreasonable interference with the comfortable enjoyment of life and property."

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 16, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is 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; and what steps are being taken to prevent a reoccurrence. AQD acknowledges that an investigation was conducted and that AK Steel has already provided some of this information.

If AK Steel and/or Edw. C. Levy Co. believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Katherine Koster  
Senior Environmental Engineer  
Air Quality Division  
313-456-4678

Enclosure

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ  
Mr. Jon Lamb, DEQ