



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

May 5, 2017

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

SRN: A8640, Wayne County

Dear Mr. Kohlhas:

**VIOLATION NOTICE**

On January 30 and April 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the 4<sup>th</sup> quarter 2016 and 1<sup>st</sup> quarter 2017 Fugitive Dust Status Reports, respectively, as required by Consent Decree Civil Action No. 15-cv-11804 for AK Steel Dearborn Works located at 4001 Miller Road, Dearborn, Michigan. These reports were reviewed to determine AK Steel's compliance status 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; the conditions of Renewable Operating Permit (ROP) Number MI-ROP-A8640-2016a Section 1; and Consent Decree Civil Action No. 15-cv-11804.

Based on the information in the reports, the following violation was noted:

Process Description	Rule/Permit Condition Violated	Comments
Runway Slag Handling	Consent Decree Civil Action No. 15-cv-11804, VI. Compliance Requirements, C. Fugitive Dust Emissions, Paragraph 23.a.	For the 4 <sup>th</sup> Quarter 2016, Defendant did not adhere to the requirements set forth in the Fugitive Dust Control Plan for Slag Handling on 6 occasions  For the 1 <sup>st</sup> Quarter 2017, Defendant did not adhere to the requirements set forth in the Fugitive Dust Control Plan for Slag Handling on 3 occasions.

Consent Decree Civil Action No. 15-cv-11804, VI. Compliance Requirements, C. Fugitive Dust Emissions, Paragraph 23.a. states, in part, that "the Defendant shall comply with the requirements set forth in the Fugitive Dust Control Plan for Slag Handling, attached hereto as Appendix D." Condition II.B.1 of the Fugitive Dust Control

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Plan for Slag Handling requires that fugitive dust shall be controlled with water when material handling operations take place outside of a building. On nine separate occasions between October 1, 2016 and March 31, 2017, runway slag was placed in an outside temporary stockpile (i.e. handled outside of a building) without the use of water.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 26, 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.

If AK Steel believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirement 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.

Sincerely,



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

cc: Mr. Jim Earl, AK Steel  
Mr. Dave Pate, AK Steel  
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. Jeffrey Korniski, DEQ  
Mr. Jonathan Lamb, DEQ