



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

January 28, 2020

UPS NEXT DAY DELIVERY

Mr. Tim Lazarz, Plant Manager  
Edw. C. Levy Co.  
8800 Dix Avenue  
Detroit, Michigan 48209

Mr. Matt Perko, Environmental Engineer  
Edw. C. Levy Co.  
51445 West 12 Mile Road  
Wixom, Michigan 48393

SRN: A8640 – Section 2, Wayne County

Dear Mr. Lazarz and Mr. Perko:

**SECOND VIOLATION NOTICE**

On November 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) investigated complaints of nuisance odors alleged to be the result of operations at Edw. C. Levy Co. (Company), located at 4001 Miller Road, Dearborn, Michigan. The purpose of the investigation was to determine the Company's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and Renewable Operating Permit (ROP) No. MI-ROP-A8640-2016a.

On December 26, 2019, the AQD sent the Company a Violation Notice (VN) citing a violation discovered because of the investigation and requested the Company's written response by January 20, 2020. A copy of this VN has been enclosed for your reference. As of the date of this letter, the AQD has not received the Company's written response to the cited violation.

Please be advised that failure to respond in writing and identifying actions the Company will take or has taken to resolve the cited violation may result in an escalated enforcement action by the AQD. Please provide the information requested in the VN dated June 21, 2019 by February 11, 2020, which corresponds to 14 days from the date of this letter.

The Company's written response must be submitted to Ms. Katherine Koster at EGLE, AQD, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202, and must

Mr. Lazarz and Mr. Perko

Page 2

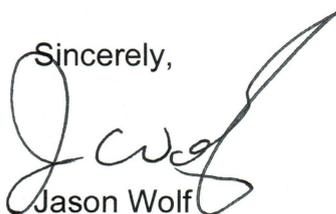
January 28, 2020

include a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD,  
P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this VN does not preclude or limit EGLE's ability to  
initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding this matter or the actions necessary to bring the  
Company into compliance, please contact me at the number listed below.

Sincerely,



Jason Wolf  
Enforcement Unit  
Air Quality Division  
517-284-6772

Enclosure

cc/via e-mail: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Jeff Korniski, EGLE  
Ms. Katherine Koster, EGLE  
Ms. Jenine Camilleri, EGLE



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

December 26, 2019

Mr. Tim Lazarz, Plant Manager  
Edw. C. Levy Co., Plant 6  
8800 Dix Avenue  
Detroit, Michigan 48209

Mr. Matt Perko, Environmental Engineer  
Edw. C. Levy Co.  
51445 W. 12 Mile Road  
Wixom, MI 48393

SRN: A8640 - Section 2, Wayne County

Dear Mr. Lazarz and Mr. Perko:

**VIOLATION NOTICE**

On November 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated complaints of nuisance odors alleged to be the result of operations at Edw. C. Levy Company ("Levy"), located at 4001 Miller Road, Dearborn, Michigan. The purpose of the investigation was to determine Levy'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; Renewable Operating Permit (ROP) No. MI-ROP-A8640-2016a, Section 2, and to investigate complaints of nuisance odors received on November 25, 2019.

On November 25, 2019, AQD staff performed an investigation from approximately 1:45 PM to 3:15 PM, during which time the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
EUBLSTFCESLAGPIT (Blast Furnace Slag Pits)	R 336.1901(b);  ROP No. MI-ROP-A8640-2016a, Section 2, GC 12(b)	Moderate to Strong (Level 3 and 4) blast furnace slag pits odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigation on November 25, 2019, persistent, moderate to strong (Level 3 and 4) blast furnace slag pit odors were detected in residential areas downwind of the facility which were traced back to Levy's blast furnace slag pits near the intersection of Dix and Miller Roads. In AQD staff's professional judgment, the odors observed were of sufficient intensity and duration to constitute a violation of Rule 901(b), General

Mr. Tim Lazarz  
Mr. Matt Perko  
Page 2  
December 26, 2019

Condition 12(b) of Section 2 of ROP No. MI-ROP-A8640-2016a: 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 January 20, 2020. The written response should include: the date 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.

Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Edw. C. Levy Co. believes the above observations or statements are inaccurate or do not constitute violations 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

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE