



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 10, 2021

Mr. J. Keith Walker, II - General Manager Operations
Edw. C. Levy Co.
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. Walker and Mr. Perko:

VIOLATION NOTICE

On May 1, 2021, 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 investigations 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 May 1, 2021.

On May 1, 2021, Mr. Jonathan Lamb of the AQD performed an investigation from approximately 4:50 PM to 6:05 PM. During this investigation, 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 pit and sulfur odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigation, persistent, moderate to strong (Level 3 and 4) blast furnace slag pit and sulfur 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

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sufficient intensity, duration, and frequency to constitute a violation of Rule 901(b), and General Condition 12(b) of Section 2 of ROP No. MI-ROP-A8640-2016a: an “unreasonable interference with the comfortable enjoyment of life and property.”

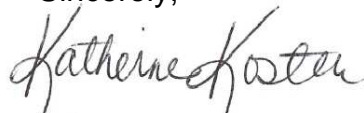
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 31, 2021. The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; 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 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
Environmental Engineer Specialist
Air Quality Division
313-418-0715

cc: Mr. Tom Green, Edw. C. Levy Co.
Mr. Tim Lazarz, Edw. C. Levy Co.
Mr. James Earl, Cleveland Cliffs
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE
Mr. Jonathan Lamb, EGLE