



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 22, 2021

Mr. J. Keith Walker II, Steel Mill Services  
General Manager of Operations  
Edw. C. Levy Co.  
8800 Dix Avenue  
Detroit, Michigan 48209

SRN: A8640, Section 2, Wayne County

Dear Mr. Walker:

**VIOLATION NOTICE**

On September 17, 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 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 September 17, 2021.

On September 17, 2021, AQD performed an investigation from approximately 10:15 AM to 11:15 AM. 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 odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigation, persistent and objectionable blast furnace slag/sulfur odors of moderate to strong (Level 3 and 4) intensity were detected in residential areas and at, or near, Salina Elementary and Salina Intermediate Schools, downwind of the facility. These odors 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, 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.”

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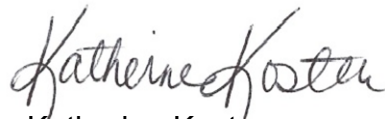
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 13, 2021. The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; 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. Zayd Sufyan, Edw. C. Levy Co.  
Mr. Matt Perko, 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