



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

December 19, 2022

LaDale Combs, General Manager  
Cleveland-Cliffs Steel Corporation Dearborn Works  
4001 Miller Road  
Dearborn, MI 48121-1699

SRN: A8640, Wayne County

Dear LaDale Combs:

**VIOLATION NOTICE**

On December 11, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated a complaint about visible emissions from Cleveland-Cliffs Steel Corporation Dearborn Works (Cleveland-Cliffs) located at 4001 Miller Road, Dearborn, Michigan. The purpose of this investigation was to determine Cleveland-Cliffs' 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 Air Pollution Control Rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-A8640-2016a; and to investigate a complaint received on December 11, 2022, regarding visible emissions attributed to Cleveland-Cliffs' operations.

During the investigation, Jonathan Lamb of the AQD performed Method 9 visible emission (VE) readings of the Basic Oxygen Furnace (BOF) Shop building and noted the following violation:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
EUBOF Shop building	MI-ROP-A8640-2016a - Section 1, EUBOF, S.C. 1.2;  40 CFR Part 63 Subpart FFFFF, Table 1.12	Visible emissions exceeded 20% over a 3-minute average. The highest 3-minute average was 64.2%

Jonathan Lamb performed Method 9 VE readings of the EUBOF Shop building from approximately 1:43 PM to 2:45 PM on December 11, 2022. During the time period in which the Method 9 readings were performed, the 3-minute average opacity exceeded the 20% opacity limit allowed in ROP No MI-ROP-A8640-2016a – Section 1, EUBOF, Special Condition 1.2 and 40 CFR Part 63 Subpart FFFFF, Table 1.12, a total of five times, with a high of 64.2% from 1:44 PM to 1:46 PM. Copies of the Method 9 VE readings are included with this letter.

LaDale Combs  
Cleveland-Cliffs  
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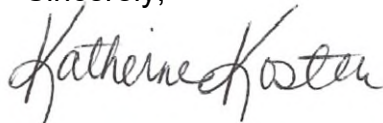
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 9, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the 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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Cleveland-Cliffs 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,



Katie Koster  
Senior Environmental Engineer  
Air Quality Division  
313-418-0715

Enclosure

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Dr. April Wendling, EGLE  
Jeff Korniski, EGLE  
Jonathan Lamb, EGLE