



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

January 19, 2023

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 8, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), completed review of the Secondary Baghouse and Electrostatic Precipitator (ESP) stack test results received on September 23, 2022, for Cleveland-Cliffs Steel Corporation Dearborn Works (Cleveland-Cliffs) located at 4001 Miller Road, Dearborn, Michigan. The purpose of this review 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; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A8640-2016a.

Based on the review of the report, the following violation was noted:

Process Description	Rule/Permit Condition Violated	Comments
FGBOFSHOP	ROP No. MI-ROP-A8640-2016a, FGBOFSHOP, V. Testing/Sampling, Special Condition 7	Facility failed to perform an acceptable stack test for total mercury (Hg) in accordance with department requirements within three years of the date of the prior test.

ROP No. MI-ROP-A8640-2016a, FGBOFSHOP, V. Testing/Sampling, Special Condition 7, requires, in part, Cleveland-Cliffs to “verify and quantify Mn (manganese), Pb (lead), and total Hg emissions rates from the FGBOFSHOP (secondary baghouse stack and ESP stack simultaneously) by testing at owner's expense, in accordance with department requirements” and it stipulates that testing is performed “once every three years from the completion of the previous stack test.”

Cleveland-Cliffs performed a stack test for total Hg and other pollutants on July 26 and 27, 2022. Upon AQD review of the results, it was determined that the testing failed to meet the requirements in the federal reference test methods. As such, AQD did not accept the results of the test. The prior test for total Hg was performed in August 2019. Consequently, an acceptable test was required by August 2022. AQD acknowledges that Cleveland-Cliffs

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conducted another total Hg test in December 2022. However, since this test occurred beyond the timeframe specified in the permit condition, this is a violation of ROP No. MI-ROP-A8640-2016a, FGBOFSHOP, V. Testing/Sampling, Special Condition 7. As a courtesy, AQD discussed this allegation with your staff on December 12, 2022.

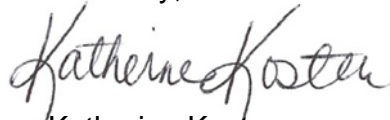
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 9, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include, at a minimum, the dates the violation occurred, an explanation 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.

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 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 a violation 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: Jim Earl, Cleveland Cliffs
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Regina Angellotti, EGLE
Jeff Korniski, EGLE