



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



DAN WYANT  
DIRECTOR

December 2, 2015

Mr. Thomas Green  
Director, Environmental Services  
Edw. C. Levy Co.  
8800 Dix Avenue  
Detroit, Michigan 48209

SRN: B3533, Wayne County

Dear Mr. Green:

**VIOLATION NOTICE**

On October 21, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Edward C. Levy Company (Levy) – Plant 1 located at 8800 Dix Avenue, Detroit, Michigan. The purpose of this inspection was to determine Edw. C. 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 and the conditions of Wayne County Installation Permits (WCIPs) C-8611 through C-8614 and State Implementation Plan (SIP) Consent Order 16-1993, revised September 9, 1994.

Following the inspection and review of required records, the AQD has identified the following:

Process Description	Rule/Permit Condition Violated	Comments
Blast furnace slag processing facility	WCIPs C-8611 through C-8614, Special Condition 18	The facility does not maintain records to demonstrate compliance with the pound per hour and ton per year limits for screening tower 1.
	WCIPs C-8611 through C-8614, Special Condition 20	The facility does not maintain records to demonstrate compliance with the pound per hour and ton per year limits for screening tower 2.
	WCIPs C-8611 through C-8614, Special Condition 21	The facility does not maintain records to demonstrate compliance with the pound per hour and ton per year limits for crushing and iron processing.

	WCIPs C-8611 through C-8614, Special Condition 28	Records provided indicate that the facility operated air cooled slag operations greater than 2,000 hours during 2013, 2014, and 2015.
	WCIPs C-8611 through C-8614, Special Condition 34	The facility failed to maintain the minimum moisture content of 1.5 percent by weight in the raw materials and processed slag. Records provided indicate that the measured moisture content was 1.3 percent for product 1107-5G BF
	WCIPs C-8611 through C-8614, Addendum – Fugitive Dust Records  SIP Consent Order 16-1993 (revised September 9, 1994), Stipulation 9, Exhibit A	The facility failed to maintain records of date of treatment, control measure, etc. for storage piles and material handling.

During this inspection, Levy Plant 1 was unable to produce emission records that demonstrate compliance with the pound per hour limits and ton per year limits for screening tower 1 (Special Condition [SC] 18), screening tower 2 (SC 20), and crushing and iron processing (SC 21).

Hours of operation records provided indicate the facility has exceeded the hours of operation limit (SC 28) for air cooled slag processing (2,000 hours per year) during 2013 (2,360 hours), 2014 (2,228 hours), and 2015 (2,012 hours).

Moisture content records provided indicate that the measured moisture content for product 1107-5G BF was 1.3 percent during January 1, 2014 through December 31, 2014. The minimum moisture content required is 1.5 percent by weight (SC 34).

Fugitive dust records provided via email on October 29, 2015 do not include records of treatment, control measures, responsible person's initials, dilution ratio (if applicable), amount of dust suppressant/water applied, identification of pile/material handling operation treated, and equipment used for storage piles and material handling. SIP Consent Order 16-1993 (revised September 9, 1994) and WCIPs C-8611 through C-8614 addendum both require that such records are maintained.

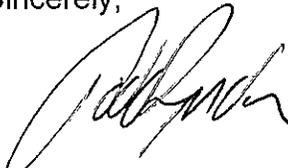
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 23, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Levy 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 violations cited above and for the cooperation that was extended to me during my inspection of Levy Plant 1. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Todd Zynda, P.E.  
Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Ms. LaReina Wheeler, City of Detroit, BSEED  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ