



9300 Dix Avenue, Dearborn, Michigan 48120, (313) 843-7200

January 18, 2021

Ms. Katie Koster
Sr. Environmental Engineer
EGLE Detroit, AQD
Detroit Field Office, Cadillac Place
3058 W. Grand Blvd., Suite 2-300
Detroit, MI 48202-6058

**Subject: Response to Three Violation Notices Dated December 21, 2020
Edw. C. Levy Co., Plant 6
SRN: B4243, Wayne County**

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) is in receipt of three Violation Notices (VN) December 21, 2020, containing information about five events that are alleged violations of ROP No. MI-ROP-B4243-2016 Condition 12(b) and State of Michigan Rule 336.1901(b) due to "Detection of fallout beyond the facility's property line, attributable to the facility, of sufficient magnitude as to constitute an unreasonable interference with the comfortable enjoyment of life and property."

We address the alleged violations below by date of the alleged events.

VN One: Events of July 30 and 31, 2020

DATE OF ALLEGED EVENT: July 30, 2020

EGLE COMMENT: EGLE investigated a complaint from a location in Melvindale, where fallout allegedly occurred prior to 8:00 AM on July 30, 2020. No further information is detailed in the VN and there is no laboratory testing information associated with this date.

LEVY COMMENT: Levy received an email from Katie Koster at 10:03 AM of fallout on a red vehicle in the area of Wall and Mellwood Streets. Levy Environmental Department staff visited the area and did not find additional evidence of fallout in the area.

DATE OF ALLEGED EVENT: July 31, 2020

EGLE COMMENT: EGLE investigated a complaint from a business at 14301 Mellon Street, Detroit, where fallout allegedly occurred prior to 8:00 AM on July 31, 2020. Lab testing including Polarized Light Microscopy (PLM) was performed on two samples at Merit Laboratories.

LEVY COMMENT: Levy is not aware of pollution control equipment failures during the times of the alleged fallout events.

As EGLE is aware, AK Steel began restarting operations the week of July 20th following an approximately four-month shutdown. During this time, Levy made multiple changes to slag

quenching operations to enable steam-free trucking slag trucking on public roads. Due to the unforeseen potential entrainment of particulate in the steam clouds generated during the additional watering, Levy began planning and implementing multiple improvements in the BOF area.

Following EGLE's notification of these alleged fallout events, Levy modified pot slagging operations to occur with only 3X slag material (which has been screened to remove fines content) and extended the run time of the BOF knock station dust suppression equipment (Dust Bosses) to aid in preventing particulate from leaving the canopy during pot slagging and knocking operations. Levy also relocated a rental Dust Boss unit to the BOF knock station area to provide additional cooling on hot skulls and to control particulate matter generated while moving skulls.

VN Two: Events of August 6 and 14, 2020

DATE OF ALLEGED EVENT: August 6, 2020

EGLE COMMENT: EGLE investigated a complaint from a business at 14301 Mellon Street, Detroit, where fallout allegedly occurred during the overnight hours between August 5-6, 2020. Lab testing including Polarized Light Microscopy (PLM) was performed on two samples at Merit Laboratories.

DATE OF ALLEGED EVENT: August 14, 2020

EGLE COMMENT: EGLE investigated a complaint from a location in Melvindale at 17379 Wall Street, where fallout allegedly occurred during the overnight hours between August 13-14, 2020

LEVY COMMENT: Levy is not aware of pollution control equipment failures during the times of the alleged fallout events.

Following EGLE's notification of these alleged fallout events, Levy moved an additional rental Dust Boss unit to the west side of the knock station for additional coverage of the knock station during pot knocking and slagging. The Dust Boss on the east side of the knock station was aimed at caster slag material prior to and during material handling in this area to provide additional particulate control and moisture in the material. Levy also made coaching and personnel actions related to employees whose actions generated unexpected particulate matter.

VN Three: Event on September 11 to 12, 2020

DATE OF ALLEGED EVENT: September 11 to 12, 2020

EGLE COMMENT: On September 14, 2020 EGLE investigated a complaint from a business at 14301 Mellon Street, Detroit, where fallout allegedly occurred during the overnight hours between September 11 and 12, 2020. Lab testing including Polarized Light Microscopy (PLM) was performed on two samples at Merit Laboratories.

LEVY COMMENT:

Levy is not aware of pollution control equipment failures during the times of the alleged fallout events.

Following EGLE's notification of this alleged fallout event, Levy improved grading and drainage around slag quenching areas to move water away from an area where hot slag is placed; if standing water was in this area, steam that could entrain particulate matter may be produced.

In addition to the corrective actions noted in the discussion of the three VNs above, Levy has also been working through a series of other improvements, including:

- Using a series of Connex boxes to build a windbreak along Levy's south fenceline and around portions of the pot knocking enclosure;
- Extensively using rental dust suppression equipment while working to install two new Dust Bosses which require extension of water and electric utilities;
- Upgrading the 2" water lines supplying the knock station Dust Bosses to a 4" water line for increased flow rate and water pressure;
- Adding sprinkler heads and water sprays to the stockpile areas to promote cooling and particulate control;
- Renting and staffing a water truck from September to November 2020 to provide additional particulate control on roads and spot treatment on material stockpiles as needed.

As we work through the changes noted above, we may identify other improvements or process changes that may cause this list to change. Upgrades to the site will be made in addition to, not in place of, the required process controls listed in the Levy Plant 6 ROP.

Levy will continue to monitor its facilities for opportunities to reduce potential emissions from our operations. We appreciate EGLE's commitment to alerting us to any concerns related to operations at AK Steel and Levy's other operating locations.

Please contact Matt Perko, Environmental Engineer (313-820-4057; mperko@edwclevy.net) or Tom Green, Director of EHS (313-690-0139, tgreen@edwclevy.net) if you have any questions or need additional information.

Sincerely,



Tom Green
Director, EHS
Edw. C. Levy Co.
tgreen@edwclevy.net
313-690-0139

cc: Ms. Jenine Camilleri
Supervisor, Enforcement Unit
EGLE, Lansing AQD
PO Box 30260
Lansing, MI 48909-7760

Randy Cullen, Operations Manager, Levy Plant 6
Keith Walker, General Operations Manager, Levy
Russ Burke, Director, Steel Mill Services, Levy
Brian Lasley, Vice President Steel Mill Services, Levy
Eliot Weiner, Executive Vice President, Levy
Matt Perko, Environmental Engineer, Levy
Jim Earl, Environmental Manager, AK Steel Dearborn Works