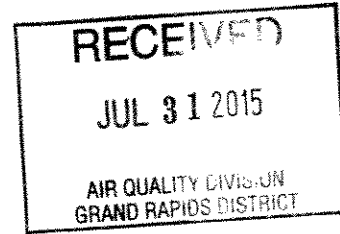




July 28, 2015



Mr. Eric Grinstern
Michigan Department of Environmental Quality
Grand Rapids District, Air Quality Division
350 Ottawa Avenue, N.M.
Unit 10
Grand Rapids, MI 49503

Re: NOV Letter Dated July 7, 2015

This letter is in response to the Violation Notice Letter dated July 7, 2015. In the letter Gerdau was asked to provide the actions that were taken to correct the cited violations, 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, the dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence. Please see below for an explanation on each incident.

On 1/24/15 and 1/25/15 Gerdau Monroe Mill experienced 48 incidents (288 minutes) of Opacity greater than 3% over a 6 minute average from the EAF baghouse stack. The incidents were due to the EAF baghouse conveying system malfunction. On 1/24/15, the baghouse dust stopped moving from the bottom of the hoppers to the dust silo. This led to a buildup of material in the hoppers which reached the bottom of the bags. The buildup caused excessive wear on the bags which produced the opacity exceedances. During this time the hoppers were continuously cleaned until the conveying system was fully repaired on 1/25/15 to correct the issue. There have been no opacity exceedances stemming from this issue since the system was repaired on 1/25/15.

On 1/8/15, 1/14/15, 1/16/15, 1/18/15, 2/5/15, and 2/13/15 Gerdau Monroe Mill experienced an incident of CO emissions greater than 2.4 lb/ton of steel melted on a 24-hr basis. On 1/8/15 Gerdau Monroe experienced one incident of CO tons per day greater than 2.85 tons. The cause of the CO lb/ton incidents on 1/8/15, 1/14/15, 1/16/15, 1/18/15, and 2/13/15 and the one tons per day incident were due to buildup in the elbow of the DEC evacuation system. Gerdau changed its procedure to clean the elbow multiple times during the week on 2/19/15. Since changing the procedure, there have been zero instances of CO above 2.4 lb/ton and zero instances above 2.85 tons per day. The cause of the CO lb/ton incident on 2/5/15 was due to a sudden power loss at the EAF. The heat was left in the furnace for over 24 hours, when the power was restored it took nearly 4 hours to process instead of the normal 90 minutes. The power was restored at the end of the day and only left 4.5 hours before the end of the day.

If there are any questions regarding this letter please contact me at 734/384-6544.

Sincerely,

Craig Metzger
Environmental Manager
Gerdau – Monroe Mill

Cc: File
Darrel Moore
Michael Gabor – MDEQ
Scott Miller – MDEQ