



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

November 21, 2018

Ms. Alexis Piscitelli, Environmental Manager
United States Steel Great Lakes Works
No. 1 Quality Drive
Ecorse, MI 48229

SRN: A7809, Wayne County

Dear Ms. Piscitelli:

VIOLATION NOTICE

On July 26, 2018, and July 30, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted certified Method 9D and Method 9 visible emissions readings of the slag loading operations at the D4 Blast Furnace slag pits and the D4 Blast Furnace backdraft stack, respectively, at U.S. Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. The purpose of these readings was to determine U.S. Steel'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 Air Pollution Control Rules; 40 CFR Part 63, Subpart FFFFF; and the conditions of Renewable Operating Permit (ROP) number 199600132d.

During the visible emissions (VE) readings, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
D4 Blast Furnace slag pits (FG-SLAG-PITS)	ROP No. 199600132d, Table B-1, Sourcewide Requirements, Section II.B. Act 451 Section 324.5524(2)	On July 26, 2018, the 3-minute average opacity observed was 50%. 5% opacity on a 3-minute average is the limit for material handling activities at a storage pile.
D4 Blast Furnace backdraft stack (EGBLAST-FCE-D)	ROP No. 199600132d, A-1, General Condition 2.a. Rule 336.1301(1)(a)	On July 30, 2018, the 6-minute average opacity observed was 55%. 20% opacity on a 6-minute average, except for one 6-minute average of not more than 27% per hour, is the limit.

AQD staff performed Method 9D VE readings from 12:10:00 PM to 12:13:15 PM on July 26, 2018, of the slag loading operations at the D4 Blast Furnace slag pits. Slag was being transferred from a storage pile outside of the pit into a truck by a front end loader. During the time the Method 9D readings were performed, the 3-minute average opacity exceeded the 5% opacity limit allowed in Act 451 Section 324.5524(2) which states, in part: "a person responsible for any fugitive dust source regulated under this section shall not cause or allow the emission of fugitive dust from any road, lot, or storage pile, including any material handling activity at a storage pile, that has an opacity greater than 5% as determined by reference test method 9d. Except as otherwise provided in subsection (8) or this section, a person shall not cause or allow the emission of fugitive dust from any other fugitive dust source that has an opacity greater than 20% as determined by test method 9d."

AQD staff also performed Method 9 VE readings from 10:05:00 AM to 10:11:00 AM on July 30, 2018, of the D4 Blast Furnace backdraft stack. During the time the Method 9 readings were performed, the 6-minute average opacity exceeded the 20% opacity limit allowed in Rule 336.1301(1)(a). Rule 301(1)(a) states, in part: "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emissions of a density greater than...a 6-minute average of 20% opacity, except for 1 6-minute average per hour of not more than 27% opacity."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 12, 2018 (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. Copies of the Method 9 and 9D visible emissions readings are included with this letter.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If U.S. Steel 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.

Ms. Alexis Piscitelli
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Thank you for your attention to resolving the violations cited above. 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,



Katherine Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

Enclosures

cc: Mr. Bruce Black, U.S. Steel
Mr. Nathan Ganhs, U.S. Steel
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ