



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 19, 2021

Mr. Harvey Ghuman, General Manager
United States Steel Great Lakes Works
No. 1 Quality Drive
Ecorse, MI 48229

SRN: A7809, Wayne County

Dear Mr. Ghuman:

VIOLATION NOTICE

On July 14, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the No. 5 Pickle Line (EG5-PICKLE-LINE) at United States Steel Great Lakes Works ("U.S. Steel") located at No. 1 Quality Drive, Ecorse, Michigan. The purpose of this inspection 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 CCC; the conditions of Renewable Operating Permit (ROP) No. 199600132d; and AQD Consent Order No. 2020-11.

Based on AQD's inspection, the following violation was noted:

Process Description	Rule/Permit Condition Violated	Comments
New secondary fume scrubber servicing the 4 hydrochloric acid storage vessels at the EG5-PICKLE-LINE	40 CFR Part 63, Subpart CCC, §63.1160(b)(1); ROP No.199600132d, Section 1, Table E-01.08, Special Condition V.1	Failure to develop and implement an Operation and Maintenance Plan (OMP) upon startup of the new secondary fume scrubber.

According to U.S. Steel personnel, the new secondary fume scrubber servicing the four hydrochloric acid storage vessels at EG5-PICKLE-LINE was installed and operating in December 2020. Per the National Emission Standards for Hazardous Air Pollutants for Steel Pickling (40 CFR Part 63, Subpart CCC), 63.1160(b)(1), the "owner or operator shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date." The new scrubber is an emission control device, the hydrochloric acid storage vessels are part of the affected source at the facility as listed in 63.1155(b), and the compliance date was immediately upon startup per 63.1160(a).

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AQD received an updated copy of the OMP that included the new fume scrubber on June 18, 2021. AQD approved the plan via email on July 13, 2021. However, during the AQD inspection on July 14, 2021, it was determined that the plan had not been fully implemented. Specifically, monitoring and recording of pressure drop and water flow rates for the secondary fume scrubber which are outlined in the plan were not in place.

As such, the facility is not in compliance with the requirement to develop and implement an OMP for each control device by the compliance date as specified in Subpart CCC as well as ROP No.199600132d, Section 1, Table E-01.08, Special Condition V.1 that requires the permittee to comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR 63 Subparts A and CCC.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 10, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: 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.

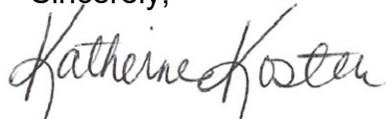
Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

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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,

A handwritten signature in cursive script that reads "Katherine Koster".

Katherine Koster
Environmental Engineer Specialist
Air Quality Division
313-418-0715

cc: Mr. Nathan Ganhs, U.S. Steel
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE