



Proposed Project Summary

EES Coke Battery, LLC, River Rouge, MI

The Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), is asking for comments from the public on a proposed Permit to Install (PTI) for EES Coke Battery, LLC (EES Coke). The AQD will accept comments on the proposed PTI until the end of the comment period, August 18, 2017 or at the public hearing, if one is requested, on August 23, 2017. We will review all comments before we make a final decision on the proposed PTI.

What does the company do?

EES Coke is located at 1400 Zug Island Road on Zug Island in River Rouge, Michigan. The facility produces metallurgical coke by heating coal in ovens at high temperatures. This process also creates coke oven gas which contains tars and light oils that must be removed before the coke oven gas can be burned to heat the ovens. The metallurgical coke is sold and later used in steel making. The tars and light oils that are removed from the gas are stored in tanks and sold to outside customers.

What is a PTI and why is one needed?

A PTI, commonly referred to as an air use permit, is required for projects that involve installing, constructing, reconstructing, relocating, or modifying most process or process equipment that emits, or may emit, air contaminants. A new PTI is also required if a company wants to make changes to their current air permit.

EES Coke is currently operating under existing PTI No. 51-08C and a Renewable Operating Permit (ROP). The ROP for EES Coke contains emission limits, testing requirements, work practices, reporting requirements, and recordkeeping requirements to assure that all equipment at EES Coke operates in compliance with all federal regulations and state rules.

What does the company want to do under the PTI application?

EES Coke has applied for a temporary permit to allow an existing light oils storage tank (Tank 37) to be emptied for integrity testing. Before the tank can be tested, all of the liquid inside of the tank must be removed and any remaining vapors inside of the tank must also be removed using a process called de-gassing. During the removal of the vapors from the tank, EES Coke will use a

piece of equipment called thermal oxidizer (or vapor combustion unit) to reduce emissions of gasses from the tank. The thermal oxidizer is expected to control at least 98% of the vapors from Tank 37. The tank vapors consist of benzene, toluene, xylene, naphthalene, ethylbenzene, carbon disulfide, styrene, hexachloroethane, 2-methylnaphthalene, and 1,3,5-trimethylbenzene.

What else can you tell me about this change?

EES Coke has requested the temporary permit so that they can complete integrity testing on Tank 37 by December 29, 2017. The tank is required to be tested under a consent order with the United States Environmental Protection Agency (USEPA).

Before beginning the de-gassing of Tank 37, the light oil contained it will be routed to another light oil storage tank (Tank 38). Tank 38 uses a nitrogen blanket system to control emissions of vapors from it. Once the light oil is removed, the process of de-gassing Tank 37 will commence. The de-gassing of Tank 37 will last a maximum of 30 days.

The total project emissions from emptying Tank 37 are expected to be less than 30 pounds of volatile organic compounds (VOC's). Of the total VOCs, benzene emissions are projected to be 16.25 pounds.

After the venting is completed and any necessary repairs have been performed, EES Coke will once again store liquid in the tank and the temporary permit will be voided.

Will the facility continue to meet the air quality standards?

The proposed permit will have no significant impact on any of the National Ambient Air Quality Standards (NAAQS).

What is the current air quality in the area?

The facility is located in Wayne County, Michigan, where the AQD operates a number of air monitoring sites. Three of these sites measure VOCs.

Currently Wayne County is in compliance with the current NAAQS for all pollutants, except for Sulfur Dioxide (SO₂). The total SO₂ emissions associated with the proposed project are less than two pounds. Emissions of that size will have no adverse effect upon the area's non-attainment status.

Benzene, toluene, xylene, naphthalene, ethylbenzene, carbon disulfide, styrene, hexachloroethane, 2-methylnaphthalene, and 1,3,5-trimethylbenzene are VOCs which will be emitted from Tank 37. Each of these VOCs are also considered to be toxic air contaminants (TACs) under Michigan's air pollution control regulations and have health based screening levels associated with them.

Using a screening method (AER Table) contained in Michigan's Rules, the emissions of all TACs, except for benzene were determined to be meeting their allowed health based screening levels. Computerized dispersion modeling was used to evaluate the benzene emissions. That review showed that the highest ambient concentration of benzene will be 3% of its allowed health based screening level.

The location of highest benzene impact will be on Zug Island. This indicates there is not a health concern for noncancer effects. This amount of benzene emissions for the limited time period is also not a health concern for cancer.

Where can I find more information?

There are two ways to find more information about the PTI application: the Public Participation Fact Sheet has additional details about the project and how it will meet the rules and regulations, and AQD staff can provide additional information upon request. Here are some examples of information you may find useful:

- A summary of the reviews completed by the AQD staff.
- How the project will affect air quality and public health.
- A summary of what the proposed permit would require the company to do.
- A summary of the changes that are included in the proposed permit.
- The rules and regulations that apply to the project.
- Example emission calculations.

Summary:

The AQD has reviewed the PTI application for the requested change and prepared a proposed permit for the facility. If approved, the proposed permit will assure the facility meets the applicable air quality requirements. Therefore, we are proposing to approve the permit.

Before the AQD takes action on the proposed PTI, we are requesting comments from the public. The AQD will review all comments received during the public comment period and public hearing, if held, and will decide whether to approve or deny the proposed PTI. If approved, the AQD may decide to add or change permit conditions based on the comments.

Who can I contact?

For more information about the proposed PTI, please contact Mr. John Vial, AQD, at Vialj@michigan.gov or 517-284-6805.



Aerial View of Tank 37