

EES Coke Battery, LLC

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September 16, 2015

Mr. Tom Maza
Environmental Quality Analyst
MDEQ - Air Quality Division
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

RE: Response to August 28, 2015 Violation Notice

Dear Ms. Koster:

EES Coke Battery, LLC (EES Coke) is in receipt of a Violation Notice (VN) issued by the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD). The VN, dated August 28, 2015 alleges that EES Coke's continuous emission rate monitoring system (CERMS) had excess down time during the second quarter of 2015.

For unknown reasons, beginning in early April 2015, backflow purge air drifted from the settings established during the October 2014 RATA. This condition persisted through the end of the calendar quarter. The problem wasn't identified and corrected until July 23, 2015. The change in backflow purge air flow rates renders invalid the stack flow readings beginning April 2, 2015 through the revised RATA performed August 12, 2015.

Because the drift was gradual, EES Coke did not recognize the problem for several weeks. Once the problem was identified, EES Coke initiated a vigorous effort to identify the cause of the erroneous stack flow measurements. An outline of those efforts was provided with our second quarter excess emissions report.

After correcting the backflow purge air settings, EES Coke performed a RATA and certified that the system is reporting accurate data. Certified data began being reported on August 14, 2015 at 11:00 am and EES Coke submitted a revised excess emission report September 15, 2015 based on data obtained utilizing the permit-required data substitution procedures.

EES Coke and MDEQ entered into Consent Order No. 57-2014 which became effective January 8, 2015. This Consent Order establishes an agreement and schedule to improve the operational performance of EES Coke's CERMS. EES Coke has timely met all schedule milestones included in the Consent Order and will complete the required upgrades in October 2015. EES

Coke has every expectation that the upgrades underway will eliminate the problem of excessive monitor downtime as cited by this VN.

If you have any questions, please feel free to call me at 313.216.2535.

Sincerely,



Mike Krchmar
Plant Manager

cc: Katie Koster, MDEQ-AQD
Brenna Harden, DTEES
Mina McLemore, MDEQ-AQD

Fadi Mourad, DTEES
Todd Richards, DTEES
Steve Zervas, DTEES