

EES Coke Battery, LLC

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SEP - 1 2017

Air Quality Division
Detroit Office

August 31, 2017

Mr. Jonathan Lamb
Air Quality Division, MDEQ
Cadillac Place
3058 West Grand Boulevard
Suite 2-300
Detroit, MI 48202

Re: Response to August 11, 2017 Violation Notice

Dear Mr. Lamb,

EES Coke Battery, L.L.C. (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 16, 2017 alleges that on April 16, 2017 EES Coke exceeded its one 3-hour block average limit on sulfur dioxide (SO₂) as reported in EES Coke's excess emission report for the second calendar quarter of 2017.

On April 16, 2017, EES Coke observed a single excess emission event of sulfur dioxide (SO₂) at a value of 556.1 lb/3-hr block average during 00:00-02:59. Permit No. 51-08C has a limit of 544.6 lb/3-hr block average. After an investigation, it was determined the excess emissions event was the result of a prolonged heat-up event at the EES Coke Byproducts Plant. This prolonged heat-up resulted in insufficient stripping of sulfur from the coke oven gas (COG), increasing SO₂ emissions from combustion of COG at the Battery's underfire. As a result of this event, EES Coke has modified its primary cooler heat-up procedure to limit the duration of a heat-up events to prevent future occurrences.

Please contact me at (313) 297-4183 if you have questions regarding this submittal.

Sincerely,



Brenna Harden
Senior Environmental Engineer
EES Coke Battery, L.L.C.

CC: M. Krchmar, EES Coke
Fadi Mourad, DTE Energy Resources
Robert Sanch, DTE Energy Resources
Elise Ciak, DTE Energy Resources
Rhiana Dornbos, NTH Consultants, Ltd.