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MAY 20 2024

Air Quality Division
Detroit Office**DTE VANTAGE**

May 13, 2024

Katie Koster
Air Quality Division, EGLE
Cadillac Place
3058 West Grand Boulevard
Detroit, MI 48202

Re: Response to April 23, 2024 Violation Notice
EES Coke Battery, L.L.C., River Rouge, Michigan
Renewable Operating Permit No. 199600132 (SRN: P0408)

Dear Ms. Koster:

EES Coke Battery, L.L.C. (EES Coke) is in receipt of a Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD). The VN, dated April 23, 2024, cites EES for allegedly exceeding the permitted 1-hour average of sulfur dioxide (SO₂) pounds per 1,000 standard cubic feet (kscf) of coke oven gas (COG) as well as a failure to report exceedances from Q3 2015 in a satisfactory manner.

On March 13, 2024, based on information recently discovered during a review of historical (over eight years old) data, EES Coke voluntarily updated its third quarter 2015 excess emission report to identify four instances of SO₂ levels in COG that exceeded the permit specified in PTI-51-08C, EUCKE-BATTERY, Special Condition (SC) I.18. However, EES Coke believes at the time of reporting in 2015, reports were prepared using the best data available and reported in a satisfactory manner, per SC VII.2 and ROP No. 199600132d Section 7, General Conditions 24 and 28. At the time of the original reports, EES Coke was unaware of the calculation mistake and believed all reported values to be true, accurate, and complete. EES Coke contacted AQD in a timely manner once the error was recognized and all affected reports were resubmitted.

Four previously unreported 1-hour average of SO₂ lbs / kscf of COG, which exceeded the permitted value of 0.702 SO₂ lbs / kscf, were discovered upon a review of historical data. The exceedances are summarized below:

Date of Exceedance	Duration of Exceedance	SO ₂ lb / kscf COG (Permit limit 0.702)
9/2/2015	1-hour	0.767
9/12/2015	1-hour	1.097
9/23/2015	1-hour	0.754
9/25/2015	1-hour	0.705

These exceedances were originally unaccounted for due to a discrepancy in the procedure that was used for data retrieval of the COG flowrate. This data retrieval resulted in erroneously high COG flowrates, which in turn lowered the SO₂ lb / kscf COG calculated value. EES Coke thoroughly reviewed flow data and the discrepancy affected July 2015, August 2015, and September 2015 data. The above-mentioned 1-hour averages are the only additional exceedances that weren't previously reported.

This type of error will not occur again because in October of 2015, the COG flow meter was integrated into the Continuous Emission Monitoring System (CEMS) server. The input of real-time flows are used to calculate SO₂ lb /kscf COG, removing human error with data retrieval and calculations.

Please contact Laura Harris at 313.216.2548 should you have any further questions.

Sincerely,



M. Krchmar
Plant Manger
EES Coke Battery, L.L.C.

Cc: J. Camilleri, EGLE
R. Sanch, DTE Vantage for EES Coke
L. Harris, P.E., EES Coke
K. Janis, EES Coke