



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



DAN WYANT
DIRECTOR

November 7, 2014

Mr. Ronald Burnette, Plant Manager
EES Coke Battery LLC
P.O. Box 18309, Zug Island
River Rouge, MI 48218

SRN: P0408, Wayne County

Dear Mr. Burnette:

VIOLATION NOTICE

On November 6, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), completed review of the 3rd Quarter Excess Emission Report for EES Coke Battery, LLC, located at 1400 Zug Island Road, River Rouge. The report was received by AQD via email on October 30, 2014, and covered the reporting time period for July 1, 2014, through September 30, 2014. The purpose of this review was to determine EES Coke Battery'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 administrative rules; the conditions of Permit to Install (PTI) No. 51-08; and the conditions of Renewable Operating Permit (ROP) No. 199600132d, Section 7.

Based on the review of the report, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Coke Battery (EUCOKE-BATTERY)	ROP No. 199600132d, Section 7, Table E-07.01, Condition II.B.2b.1 PTI 51-08, Table E-07.01, Condition II.B.2b.1	Facility exceeded the SO ₂ emission rate of 544.6 pounds per hour for 64 hours during the 3 rd quarter 2014 (July 1 through September 30, 2014).
No. 5 Coke Battery (EUCOKE-BATTERY)	PTI No. 51-08, Table E-07.01, Condition III.A.1.2 and Appendix A 40 CFR Part 60.7(c) and (d)	Failure to install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the SO ₂ , CO, and NO _x emissions and flow from the combustion stack of the EUCOKE-BATTERY. Proper operation includes using the CERMS data for determining compliance with

		SO ₂ , CO, and NO _x emission limits and proper reporting per Appendix A and 40 CFR Part 60.7(c) and (d). Facility reported 100% CERMS downtime for the 3 rd quarter 2014 (July 1 through September 30, 2014).
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ROP No. 199600132d, Section 7, and PTI No. 51-08 limit the emissions of sulfur dioxide (SO₂) from the No. 5 Coke Battery to 544.6 pounds per hour, based on a three-hour average. In the report, EES Coke indicated that indicated that SO₂ was emitted in excess of the permitted limit for 64 hours during the reporting period of July 1, 2014, through September 30, 2014.

PTI No. 51-08 requires EES Coke to monitor and record emissions of oxides of nitrogen (NO_x), carbon monoxide (CO) and SO₂ from the No. 5 Coke Battery combustion stack on a continuous basis in a manner and with instrumentation acceptable to the AQD. In the report, the downtime of the NO_x, CO and SO₂ continuous emission rate monitoring system (CERMS) was reported at 100 percent of the operating time for the reporting period of July 1, 2014, through September 30, 2014.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 28, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include, at a minimum, the dates the violations occurred, an explanation of the causes and duration of the violations, whether the violations are ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

In addition, the response should include any changes in methodology that EES Coke proposes to use during all subsequent relative accuracy test audits of the CERMS to assure proper operation of the continuous emissions monitor and reliability of the reported emission data.

If EES Coke 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.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Mr. Ronald Burnette
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Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
(313) 456-4683

cc: Mr. Steve Zervas, DTE
Ms. Brenna Harden, DTE
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Mr. Thomas Maza, DEQ
Ms. Katie Koster, DEQ
Mr. Jason Wolf, DEQ
Ms. Jenine Camilleri, DEQ