



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

March 31, 2015

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

SRN: P0408, Wayne County

Dear Mr. Burnette:

VIOLATION NOTICE

On February 6, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received the stack test results for the Pushing Emission Control System (PECS) baghouse test performed on December 16, 17, and 18, 2014. The AQD completed its review of the test results on March 11, 2015. 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. 51-08C; and the conditions of Renewable Operating Permit (ROP) No. 199600132d, Section 7.

The results of the Particulate Matter (PM), PM₁₀ and PM_{2.5} emissions were reported incorrectly. Based on AQD's review and analysis of the test report, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Coke Battery	PTI 51-08C, EUCKE-BATTERY, Table I, Condition 13 40 CFR 52.21(c) and (d)	The AQD calculated PM ₁₀ emissions were 0.89 lb/hr (based on a 3 run average). The PM ₁₀ limit in PTI 51-08C is 0.69 lb/hr.
No. 5 Coke Battery	PTI 51-08C, EUCKE-BATTERY, Table I, Condition 15 40 CFR 52.21(c) and (d)	The AQD calculated PM _{2.5} emissions were 0.89 lb/hr (based on a 3 run average). The PM _{2.5} limit in PTI 51-08C is 0.69 lb/hr.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 21, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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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.

If EES Coke Battery, LLC 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.

Sincerely,



Katherine Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc: Mr. Steve Zervas, DTE
Ms. Brenna Harden, DTE
cc via email: Mr. Thomas Hess, DEQ
Ms. Teresa Seidel, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ