



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

October 29, 2015

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

SRN: P0408, Wayne County

Dear Mr. Krchmar:

VIOLATION NOTICE

On October 28, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), completed review of the Title V semi annual deviation report for January through June 2015, and the additional records and information provided by your staff via email on July 24, August 20, September 25, and October 19, 2015, for EES Coke Battery, LLC, located at 1400 Zug Island Road, River Rouge, Michigan. 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.

Based on the review of this information, the following violations were noted:

| Process Description | Rule/Permit Condition Violated | Comments |
|-------------------------------------|---|---|
| No. 5 Coke Battery (EUCOKE-BATTERY) | 40 CFR Part 63, Subpart L, §63.307(a)(2) | Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. |
| No. 5 Coke Battery (EUCOKE-BATTERY) | PTI 51-08C, EUCOKE-BATTERY, Condition IV.2 | Failure to install, maintain, and/or operate the automatic ignition system for the overpressure bleeder flares in a satisfactory manner. |
| No. 5 Coke Battery (EUCOKE-BATTERY) | PTI 51-08C, FGMACTL, Condition I.2 40 CFR Part 63, Subpart L, §63.307(c) | Visible emissions from flares exceeded a total of 5 minutes during any 2 consecutive hours on 16 separate occasions as reported by EES between January and June 2015. |

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| No. 5 Coke Battery (EUCCOKE-BATTERY) | PTI 51-08C, FGMACTCCCCC, Condition III.5 and VI.6(b) 40 CFR Part 63, Subpart CCCCC, §63.7300(c) | Failure to correct noted defects and/or deficiencies identified during the monthly capture system inspections within 30 days from the date of discovery. |
|---|---|--|

From January through October 2015, the electronic igniters on the overpressure bleeder stack system failed to automatically ignite on nine occasions as reported by EES Coke. As such, raw coke oven gas was vented to the atmosphere. This is prohibited via 40 CFR Part 63, Subpart L §63.307(a). Additionally, these incidents indicate a failure to properly install, maintain, and operate the automatic ignition system for the overpressure bleeder flares as required per PTI 51-08C, EUCCOKEBATTERY, Condition IV.2.

Also, 40 CFR Part 63, Subpart CCCCC, §63.7300(c) requires an affected facility to adhere to a written O&M plan at all times which includes a requirement to repair all defects or deficiencies found in the capture system within 30 days. Based on the monthly capture system inspection records provided for June 2014 through May 2015, the same deficiencies (holes/leaks) appear to continue for multiple consecutive inspections during the time periods of July through October 2014 and January through May 2015. This exceeds the 30 day repair window.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 19, 2015 (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.

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.

Mr. Marion Krchmar
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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,



Katie Koster
Senior Environmental Engineer
Air Quality Division
(313) 456-4678

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
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ