



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

January 20, 2017

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 January 18, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), completed review of the 3rd Quarter 2016 1-hour average SO₂ Emission Rate Report for EES Coke Battery, LLC, located at 1400 Zug Island Road, River Rouge. The report was received by AQD via mail on November 7, 2016 and covered the reporting time period of July 1, 2016, through September 30, 2016. 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 the report, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Coke Battery (EUCCOKE-BATTERY)	PTI 51-08C, EUCCOKE-BATTERY, Table I, Condition 18 R 336.1205(1)(a) Section 110 of the CAA	Facility exceeded the SO ₂ emission rate of 0.702 lb/1000 scf of coke oven gas (COG) on a 1-hour average on 16 occasions during the 3 rd quarter of 2016. The highest SO ₂ emission rate recorded was 0.733 lb/1000 scf of COG on July 11.

PTI No. 51-08C limits the emissions of sulfur dioxide (SO₂) from the No. 5 Coke Battery underfire combustion stack to 0.702 lb/1,000 scf of COG, based on a 1-hour average and 544.6 pounds per hour based on a 3-hour block average. The lb. SO₂/1000 scf of COG limit exists, in part, because EES Coke Battery LLC is located within an area of

Mr. Marion Krchmar
Page 2
January 20, 2017

Wayne County designated on July 25, 2013, as nonattainment for the 1-hour SO₂ National Ambient Air Quality Standard.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 10, 2017 (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.

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