



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

May 7, 2019

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 April 30, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), completed review of the 4th Quarter 2018 Excess Emission Report for EES Coke Battery, LLC, located at 1400 Zug Island Road, River Rouge, Michigan. The report was received by AQD via mail on February 5, 2019 and covers the reporting time period from October 1, 2018 through December 31, 2018. 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)	ROP No. 199600132d, Section 7, Table E-07.01, Condition II.B.2b.1	<p>Facility exceeded the SO<sub>2</sub> emission limit of 544.5 lb/hr from the coke battery combustion stack based on a 3-hour average for five 3-hour averages during the 4<sup>th</sup> quarter of 2018.</p> <p>The SO<sub>2</sub> 3-hour average exceedances were:            553.3 lb/hr on 10/16/18            547.6 lb/hr on 10/17/18            546.4 lb/hr on 10/24/18            551.1 lb/hr on 11/20/18            561.8 lb/hr on 12/13/18</p>

Mr. Marion Krchmar

Page 2

May 7, 2019

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 28, 2019 (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.

Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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: Ms. Brenna Harden, DTE  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE  
Mr. Jonathan Lamb, EGLE