

# EES Coke Battery, LLC

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April 16, 2015

Mr. Thomas Maza  
Environmental Quality Analyst  
MDEQ - Air Quality Division  
Cadillac Place  
3058 West Grand Boulevard, Suite 2-300  
Detroit, MI 48202-6058

## **RE: Response to February 24, 2015 Violation Notice**

Dear Mr. Maza:

EES Coke Battery, LLC (EES Coke) is in receipt of a Violation Notice issued by the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD). The Notice, dated February 24, 2015 alleges that EES failed to continuously monitor the emission rates of CO, NOX and SO2 during the fourth quarter of calendar year 2014.

EES Coke has entered into Consent Order No. 57-2014 which became effective January 8, 2015. This Consent Order establishes a schedule of corrective actions for EES Coke to improve the operational performance of its continuous emissions rate monitoring system (CERMS). This compliance schedule includes:

Due 60 days from Order Effective Date:

- Develop standard work instructions for CERMS operating and maintenance tasks.

Due 90 days from Order Effective Date:

- Develop and submit an updated CERMS monitoring plan.
- Evaluate and potentially relocate the CERMS shelter location.
- Evaluate and upgrade the CERMS dilution air system.
- Evaluate and identify potential beneficial CERMS internal diagnostics (examples include: orifice pressure monitors, blowback and purge parameter adjustments).

Due 120 days from Order Effective Date:

- Evaluate and implement alternative flow monitoring technology.
- Evaluate and implement upgrades to the CERMS data acquisition and handling software.
- Implement enhanced quarterly excess emissions reports.

All elements of this compliance plan are expected to be completed, installed and operational in compliance with this schedule.

EES Coke believes the completion of this compliance plan will minimize CERMS downtime going forward.

If you have any questions, please feel free to call me at 313.297.4258.

Sincerely,



Ronald K. Burnette,  
Operations Director

cc: Lynn Fielder, MDEQ-AQD  
Brenna Harden, DTEES  
Thomas Hess, MDEQ-AQD  
Mina McLemore, MDEQ-AQD  
Fadi Mourad, DTEES  
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