

EES Coke Battery, LLC

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July 1, 2015

Ms. Katie Koster
Environmental Engineer
MDEQ - Air Quality Division
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

RE: Response to June 10, 2015 Violation Notice

Dear Ms. Koster:

EES Coke Battery, LLC (EES Coke) is in receipt of a Violation Notice (VN) issued by the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD). The VN, dated June 10, 2015 alleges that EES Coke exceeded the 1-hour limit on sulfur dioxide (SO₂) contained in PTI No. 51-08C as reported in EES Coke's excess emission report for the first calendar quarter of 2015.

During the 9:00 AM hour on January 16, 2015 the 1-hour SO₂ emission rate rose to a value of 1.034 pounds per thousand cubic feet of fuel. EES Coke calculated this value using information from its plant data system's (PI's) fuel flow totalizer which keeps a running total of the fuel flow measured by the flow monitor. The PI system's totalizer reported hourly fuel use of 346,604 scf. When combined with the SO₂ mass emission rate for the hour the resulting emission rate was 1.034 pounds per thousand cubic feet of fuel.

Fuel and emissions data for the three hour period 8:00 AM through 11:00 AM used to generate EES Coke's excess emission report are included in the table below:

January 16, 2015 Clock Hour	Fuel Use (scf)	SO ₂ Emissions (lb/hr)	SO ₂ (ppmv)	Stack Flow Rate (kscfm)	SO ₂ Emissions (lb/kft ³ fuel)
08:00 – 09:00	710,922	327.3	333.3	98.6	0.460
09:00 – 10:00	346,604	358.5	369.2	97.5	1.034
10:00 – 11:00	739,855	363.8	373.9	97.7	0.492

This data shows that even though fuel use was reduced by approximately half during the 9:00 AM hour, stack exhaust flow and stack concentration did not show a corresponding reduction. This incompatible set of data caused EES Coke to investigate the situation. The results of that investigation showed that the PI system's fuel flow totalizer stopped working during the 9:00 AM hour. Thus, it reported only a portion of the hour's actual fuel use.

Re-evaluating the fuel flow data for the 9:00 AM hour using the fuel flow meter data itself shows that fuel use was actually 749,795 scf. When combined with the data in the table above, this fuel use shows that the actual emission rate was 0.478 pounds per thousand cubic feet of fuel which is consistent with the emission rates for the previous and following hours.

January 16, 2015 Clock Hour	Fuel Use (scf)	SO2 Emissions (lb/hr)	SO2 (ppmv)	Stack Flow Rate (kscfm)	SO2 Emissions (lb/kft ³ fuel)
08:00 – 09:00	710,922	327.3	333.3	98.6	0.460
09:00 – 10:00	749,795	358.5	369.2	97.5	0.478
10:00 – 11:00	739,855	363.8	373.9	97.7	0.492

As a result of this event, EES Coke will no longer rely on the PI system's totalizer to obtain hourly fuel use data. EES Coke will base its fuel use data on the fuel flow meter itself.

Regarding the fuel flow monitoring plan and its reliance on a default coke oven gas heating value of 500 Btu/ft³, EES Coke has provided documentation to MDEQ to support its continued use. Use of this default value is a well-established practice on which EES Coke and MDEQ have relied in past regulatory decision-making. It provides a standardized basis for regulatory compliance akin to measuring concentration limits at a constant percent of excess oxygen or CO₂.

As expressed during our continuing discussions over the past seven months, EES Coke desires to resolve this matter with MDEQ and is willing to meet at your convenience. In the meantime, EES Coke will continue to follow its fuel flow monitoring plan as submitted.

If you have any questions, please feel free to call me at 313.216.2535.

Sincerely,



Mike Krchmar
Plant Manager

cc: Lynn Fielder, MDEQ-AQD
Brenna Harden, DTEES
Mina McLemore, MDEQ-AQD

Fadi Mourad, DTEES
Todd Richards, DTEES
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