

EES Coke Battery, LLC

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River Rouge, MI 48218
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February 7, 2019

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

Re: Response to January 11, 2019 Violation Notice

Dear Ms. Koster,

EES Coke Battery, L.L.C. (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 January 11, 2019 alleges that on September 13, 2018 EES Coke exceeded twice the 3-hour block average limit on sulfur dioxide (SO₂) as reported in EES Coke's excess emission report for the third calendar quarter of 2018. The VN also alleges that stack testing results for EES Coke's Pushing Emission Control System (PECS) baghouse performed in September 2018 did not meet the permit limits for fine particulates (PM₁₀ and PM_{2.5}) established under PTI No. 51-08C.

Concerning the September 2018 PECS stack test, upon receiving the draft test results EES Coke immediately initiated an investigation. The investigation did not indicate any abnormal operating conditions adversely impacting compliance performance. Since there were no indications of any operational issues with the baghouse, a diagnostic assessment was initiated in November to compare EPA Methods 5F/202 and 201A/202 against the results from September that used Methods 5/202. The November results were below the permit limits using both EPA Methods 5F/202 and 201A/202. Finally, a retest to demonstrate compliance was completed in December using EPA Methods 201A/202. The results of the retest were below the permit limits.

With respect to the two 3-hr block SO₂ exceedances and as reported, EES Coke observed on September 13, 2018 two excess emission events of sulfur dioxide (SO₂) at a value of 555.4 lb/3-hr block average during 15:00-17:59 and 551.9 lb/3-hr block at 18:00-20:59. Permit No. 51-08C has a limit of 544.6 lb/3-hr block average. These events occurred during, and immediately following the relative accuracy test audit (RATA) on the continuous emissions monitoring system (CEMS). During the RATA, the oxygen sensor is removed to access the necessary test ports. During the time the Oxygen sensor was removed from the process for RATA purposes, process conditions developed which required a counter control response that was prevented by the absence of the oxygen sensor. The corrective action for the excess emission events is to install an oxygen sensor in an effective alternate location. The alternate location for the oxygen sensor will allow adequate control of the process during combustion stack testing procedures going forward. The sensor has been physically installed, however EES Coke is still working on verifying the data from the sensor. Additionally, 734 of the 736 3-hr block averages monitored by EES Coke were in compliance resulting in a 99.7% compliance rate for the third quarter of 2018.

Ms. Katie Koster
February 7, 2019

Please contact me at (313) 216-2535 or Rob Sanch at robert.sanch@dteenergy.com or (734) 834-4117 if you have questions regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Krchmar", with a long horizontal flourish extending to the right.

Mike Krchmar
Plant Manager
EES Coke Battery, L.L.C.

CC: M. Krchmar, EES Coke
Fadi Mourad, DTE Energy Resources
Robert Sanch, DTE Energy Resources