

# EES Coke Battery, LLC

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May 28, 2019

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

**Re: Response to May 7, 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 Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD). The VN, dated May 7, 2019 alleges that on multiple dates EES Coke exceeded the 3-hour block average limit on sulfur dioxide (SO<sub>2</sub>) as reported in EES Coke's excess emission report for the fourth calendar quarter of 2018.

During the fourth quarter of 2018, EES Coke observed five (5) excess emission events of the sulfur dioxide (SO<sub>2</sub>) emission limit of 544.6 lb/hr on a 3-hr block average. The excess emission events occurred due to various events at the Battery or the CERMS that were identified and resolved in an expedited manner to maintain compliance with the emission limits. The causes and corrective actions are listed below:

- On October 6, a buildup of residual sulfur was observed on the sampling probe resulting in an artificially high reading. The corrective action was to clean the sampling probe, which took place upon discovery of the buildup. Preventive maintenance for the CERMS was modified to include semi-annual cleaning of the CERMS sample probe.
- On October 17, EES personnel observed a change in the air-to-fuel ratio. As soon as this was noticed an adjustment to the air-to-fuel ratio was performed to bring the Battery into compliance. Combustion was immediately improved and the excess emission event ceased.
- On October 24, the excess emission was the result of excess drift of the monitor. Trouble shooting procedures cite conducting a manual calibration of the CERMS. After completing this step of trouble shooting, observed excess emissions ceased.
- On November 20, the excess emission was a result of improper balance of air to fuel ratio due to the oxygen probe being removed for an engineering study. As soon as EES Coke had the oxygen probe back in place the air to fuel ratio was corrected. Additional oxygen probes were installed in alternate locations to prevent reoccurrence.
- On December 13, high SO<sub>2</sub> ppm was noticed, an investigation resulted in needed adjustment in the by-product's process, which ceased the excess emission event.

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EES Coke takes these events seriously and put forth great effort to mitigate these exceedances and to ultimately achieve greater compliance. Additionally, 731 of the 736 3-hr block averages monitored by EES Coke were in compliance resulting in a 99.3% compliance rate for the fourth quarter of 2018.

Please contact me at (313) 297-4183 or [brenna.harden@dteenergy.com](mailto:brenna.harden@dteenergy.com), if you have questions regarding this submittal.

Sincerely,



Brenna Harden  
Senior Environmental Engineer  
EES Coke Battery, L.L.C.

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