



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



DAN WYANT
DIRECTOR

June 10, 2015

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 June 9, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), completed review of the 1st Quarter 2015 Excess Emission Report and the 1-hour average SO₂ Emission Rate Report for EES Coke Battery, LLC, located at 1400 Zug Island Road, River Rouge. The reports were received by AQD via mail on May 6, 2015, and covered the reporting time period for January 1, 2015, through March 31, 2015. 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 reports, the following violation was noted:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Coke Battery (EUCCOKE-BATTERY)	PTI 51-08C, EUCCOKE-BATTERY, Table I, Condition 18 R 336.1205(1)(a) and (1)(b) Section 110 of the CAA	Facility exceeded the SO ₂ emission rate of 0.702 lb SO ₂ /1,000 scf of coke oven gas (COG) per 1-hour average for 1 hour during the 1 st quarter 2015.

PTI No. 51-08C limits the emissions of sulfur dioxide (SO₂) from the No. 5 Coke Battery to 0.702 lbs/1,000 scf of COG, based on a one-hour average. The limit exists, in part, because EES Coke Battery LLC is located within an area of Wayne County designated on July 25, 2013, as nonattainment for the 1-hour SO₂ National Ambient Air Quality Standard. In the reports, EES Coke indicated that SO₂ was emitted in excess of the permitted limit for 1 hour during the reporting period of January 1, 2015, through March 31, 2015.

Mr. Marion Krchmar
Page 2
June 10, 2015

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 1, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include, at a minimum, the dates the violation occurred, an explanation of the causes and duration of the violation, whether the violation is ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

Additionally, PTI 51-08C requires the facility to submit a fuel flow monitoring plan per Appendix C for review and approval. Please consider this formal notification that AQD has not approved the plan received on December 26, 2014 nor the methodology for calculating emissions using a default COG heating value of 500 Btu/scf. AQD has not received adequate *site specific* test data to support the use of a default value of 500 at all times from EES Coke Battery. AQD has discussed this with your staff and requested a meeting in March 2015. To date, the request has not been accepted. Please include your proposal for providing an acceptable fuel monitoring plan in your response.

If EES Coke believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation 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: Mr. Steve Zervas, DTE
Ms. Brenna Harden, DTE
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ