



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

September 1, 2016

Mr. Marion Kirchmar
EES Coke Battery, LLC
P.O. Box 18309, Zug Island
River Rouge, Michigan 48218

SRN: P0408, Wayne County

Dear Mr. Kirchmar:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), reviewed the quarterly excess emission report submitted by EES Coke Battery, LLC located at Zug Island in River Rouge. Permit to Install 51-08C requires the facility to monitor and record the emission rate of carbon monoxide (CO), oxides of nitrogen (NOx) and sulfur dioxide (SO₂) from EUCKE-BATTERY on a continuous basis in a manner and with instrumentation acceptable to the AQD.

The second quarter 2016 excess emissions report indicated that there was an extended period of monitor downtime. Specifically, as a percentage of the operating time during the quarter the CO monitor downtime was reported at 10%; the NOx monitor downtime was reported at 10% and the SO₂ monitor downtime was reported at 10%.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCKE-BATTERY	EUCKE-BATTERY VI (3)	Failure to continuously monitor emissions of CO.
EUCKE-BATTERY	EUCKE-BATTERY VI (3) R 336.2803	Failure to continuously monitor emissions of NOx
EUCKE-BATTERY	EUCKE-BATTERY VI (3)	Failure to continuously monitor emissions of SO ₂

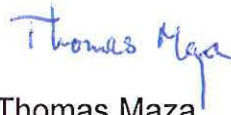
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 22, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Thomas Maza
Environmental Quality Analyst
Air Quality Division
313-456-4709

cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Ms. Katie Koster, DEQ