



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 11, 2017

Ms. Brenna Harden
Senior Environmental Engineer
EES Coke Battery, LLC
1400 Zug Island Road
River Rouge, MI 48209

SRN: P0408, Wayne County

Dear Ms. Harden:

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 1400 Zug Island Road, River Rouge, MI. The Renewable Operating Permit number 199600132d requires the facility to monitor and record oxides of nitrogen (NOx), sulfur dioxide (SO2), and carbon monoxide (CO) emissions from the No. 5 Coke Battery combustion stack on a continuous basis in a manner and with instrumentation acceptable to the AQD.

The second quarter 2017 excess emissions report indicated that there was an extended period of monitor downtime. Specifically, the monitor downtime of the NOx continuous emission rate monitoring system (CERMS) was reported at 12.6% of the operating time for the quarter; the monitor downtime of the SO2 CERMS was reported at 12.6% of the operating time for the quarter; and the monitor downtime of the CO CERMS was reported at 12.6% of the operating time for the quarter.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Coke Oven Battery	EUCOKE-BATTERY VI(3)	Failure to continuously monitor.
No. 5 Coke Oven Battery	EUCOKE-BATTERY VI(4)	Failure to continuously monitor.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 1, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: 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.

Ms. Brenna Harden
Page 2
August 11, 2017

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 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,



Mark Dziadosz
Environmental Quality Analyst
Air Quality Division
586-753-3745

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Ms. Katie Koster, DEQ