



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

January 11, 2019

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 January 10, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), completed review of the Pushing Emissions Control System (PECS) baghouse stack test results received on November 20, 2018, and the 3rd Quarter 2018 Excess Emission Report for EES Coke Battery, LLC, located at 1400 Zug Island Road, River Rouge, Michigan. 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 Air Pollution Control 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 violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
No. 5 Coke Battery (EUCCOKE-BATTERY)	PTI 51-08C, Table I., Emission Limits, Conditions 13 and 15	Facility exceeded the emission limits of 0.69 lb/hr of PM10 and 0.69 lb/hr of PM2.5 from the PECS baghouse stack. The stack test results were 1.15 lb/hr of PM10 and 1.15 lb/hr of PM2.5.
No. 5 Coke Battery (EUCCOKE-BATTERY)	ROP No. 199600132d, Section 7, Table E-07.01, Condition II.B.2b.1	Facility exceeded the SO ₂ emission limit of 544.5 lb/hr from the coke battery combustion stack based on a 3-hour average for two 3-hour averages during the 3rd quarter of 2018. On 9/13/18, between 15:00 and 20:59, the SO ₂ 3-hour averages were 555.4 lb/hr and 551.9 lb/hr, respectively.

Mr. Marion Krchmar

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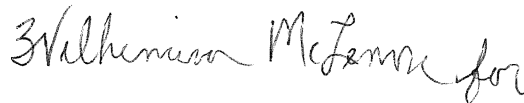
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 1, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include, at a minimum, the dates the violations occurred, an explanation 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.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If EES Coke 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,



Katie Koster
Senior Environmental Engineer
Air Quality Division
(313) 456-4678

cc: Ms. Brenna Harden, DTE
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Jonathan Lamb, DEQ