



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

December 21, 2020

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 July 31, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the 2<sup>nd</sup> Quarter 2020 Excess Emission Report for EES Coke Battery, LLC, located at 1400 Zug Island Road, River Rouge, Michigan. The report covers the reporting time period from April 1, 2020 through June 30, 2020. 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 report, 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. Special Condition 18;  R 336.1205(1)(a);  Section 110 of the CAA	On April 20, 2020, facility exceeded the SO <sub>2</sub> emission limit of 0.702 lb/1,000 scf of coke oven gas (COG) on a 1-hour average for two 1-hour averages. The SO <sub>2</sub> 1-hour average exceedances were 0.711 lb/1,000 scf of COG and 0.728 lb/1,000 scf of COG.

PTI No. 51-08C limits the emissions of sulfur dioxide (SO<sub>2</sub>) from the No. 5 Coke Battery underfire combustion stack to 0.702 lb/1,000 scf of COG, based on a 1-hour average and 544.6 pounds per hour based on a 3-hour block average. The lb. SO<sub>2</sub>/1000 scf of COG 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 SO<sub>2</sub> National Ambient Air Quality Standard.

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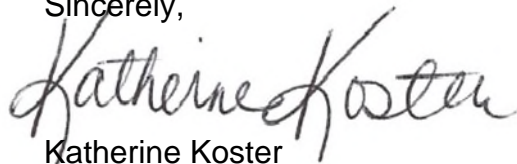
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 11, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include, at a minimum, the dates the violation occurred, an explanation 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.

Please submit the written response to the EGLE, 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 EGLE, 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 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,



Katherine Koster  
Environmental Engineer Specialist  
Air Quality Division  
(313) 418-0715

cc: Ms. Brenna Harden, DTE  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Dr. April Wendling, EGLE  
Mr. Jeff Korniski, EGLE  
Mr. Jonathan Lamb, EGLE