

EES Coke Battery L.L.C.

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River Rouge, Michigan 48218
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January 11, 2021

Ms. Katie Koster
Air Quality Division, EGLE
Cadillac Place
3058 West Grand Boulevard
Suite 2-300
Detroit, MI 48202

**Re: EES Coke Battery, L.L.C. Response to Department of Environment, Great Lakes and Energy
Violation Notice, dated December 21, 2020; PTI No. 51-08C; ROP No. 199600132d.**

Dear Ms. Koster,

EES Coke Battery, L.L.C. (EES Coke) is in receipt of a Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) on December 21, 2020 and received by EES Coke on December 28, 2020. The VN is based upon EGLE's review of the 2nd Quarter Excess Emission report submitted by EES Coke for the periods of April 1, 2020 through June 30, 2020. The VN alleges that EES Coke was not in compliance with the following limits:

- SO₂ emission limit of 0.702 lb/1,000 scf of coke oven gas (COG) on a 1-hour average for two 1-hour averages.

As stated in the 2nd Quarter Excess Emission report, on April 20, 2020 from 14:00-15:59 EES Coke inadvertently overheated battery when production was reduced to extended coking production and change from charging the battery from every other oven to every nine ovens. The After Action Review determined the actual underfire rate and oxygen levels were too high for anticipated production level. The corrective action is to modify SOPs to better anticipate manual heating adjustments to control overheating and increased oxygen levels when moving to extended coking time.

Please contact me at (734) 320-5255 if you have questions regarding this submittal or would like to discuss any of these responses in more detail.

Sincerely,



Brenna Harden
Senior Environmental Engineer
EES Coke Battery, LLC

CC: Todd Richards, DTE Energy Resources
Fadi Mourad, DTE Energy
Robert Sanch, DTE Energy Resources
M. Krchmar, EES Coke Battery, LLC
Elise Ciak, EES Coke Battery, LLC