

# EES Coke Battery L.L.C.

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RECEIVED

JAN 19 2022

Air Quality Division  
Detroit Office

January 12, 2022

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 2, 2021; PTI No. 51-08C; ROP No. 199600132d, Section 7.**

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 2, 2021 and received by EES Coke on December 3, 2021 by email. The VN is based upon EGLE's: review of the Title V deviation report submitted by EES Coke for the period of January through June 2021; site visit on July 28, 2021; and additional information request by email on October 19, 2021 that covered July through September 2021. The VN alleges that on multiple dates within these periods, EES Coke was not in compliance with the instantaneous opacity limit of 20% for fugitive visible emissions during push/travel operations (PTI 51-08C, EUCKE-BATTERY, Special Condition I.25).

EES Coke previously reported sixteen (16) occurrences, between the Title V deviation report submitted, July 2021 site visit and response to the October 2021 additional information request. EES Coke would like to remind EGLE that compliance for instantaneous opacity for fugitive visible emissions during push/travel operations exceeded 99%. Regardless of compliance status, EES Coke believes in the efforts of True North of 100% compliance and would like to highlight status of after-action reviews. The following table identifies the deviations, reason, and corrective actions taken.

Date	Oven Number	Duration of Deviation	Description of Deviation	Reason for Deviation	Corrective Action Taken
4/26/2021	4	30 seconds	40% & 25% on Push	Low flues	Punched risers and swabbed orifices
4/28/2021	45	15 seconds	25% on Push	Low flues	Punched risers and swabbed orifices
4/29/2021	36	15 seconds	30% on Travel	Low span temperature	Raise span temperature, punched risers, and swabbed orifices
5/4/2021	16	15 seconds	40% on Push	Low span temperature	Raise span temperature and swabbed gas cocks
6/25/2021	12	15 seconds	35% on Travel	Low flues	Punched risers and swabbed orifices
6/25/2021	18	15 seconds	30% on Travel	Low flues	Punched risers and swabbed orifices

Date	Oven Number	Duration of Deviation	Description of Deviation	Reason for Deviation	Corrective Action Taken
7/13/2021	32	15 seconds	30% on Push	Low flues	During burning cycle, was in neutral for east stack damper closing. Off gas for 20 minutes, Raise span temperature on heating walls
7/15/2021	61	15 seconds	30% on Travel	Low flues	Raise span temperature on heating walls
7/19/2021	17	15 seconds	50% on Push	Low flues	Raise span temperature on heating walls and adjusted downdraft settings
7/24/2021	47	15 seconds	30% on Push	Low flues	Raise span temperature, checked risers, and swabbed orifices
7/25/2021	82	15 seconds	25% on Travel	Low flues	Raise span temperature, checked risers, and swabbed orifices
7/26/2021	24	15 seconds	35% on Travel	Low flues	Raise span temperature, cleaned flues, coal moisture was high
8/19/2021	19	15 seconds	30% on Travel	Low flues	Raise span temperature on heating walls, checked risers and swabbed orifices, adjusted waste heat quadrants, and adjusted downdraft settings
8/19/2021	23	15 seconds	40% on Travel	Low flues	Checked risers and swabbed orifices, adjusted waste dampers
9/26/2021	14	15 seconds	25% on Travel	Low flues	Raise span temperature

*During Site Inspection - Not Method 303 Reading*

7/28/2021	10	Undetermined	>20%	High Coal Moisture	Additional heating adjustments made to account for high water values in coal.
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The semi-annual certification/deviation report highlighted that the seven (7) instances identified were as a result of low flue or span temperatures. There was no repeating of ovens in this time frame and corrective actions reported were to complete coke oven gas inlet cleaning such as punching risers and swabbing orifices and gas cocks.

Since then, EES Coke migrated maintenance of the heater department into MAXIMO. This standardized and improved maintenance and cleaning of the coke oven gas feed to the ovens (e.g., punching risers, flex hose cleaning/observation, inspection and cleaning of orifices, cleaning, and inspection of gas cocks, etc.).

Ms. Katie Koster  
January 12, 2022

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: Jenine Camillari, EGLE Enforcement Unit Supervisor  
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