

Manila

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : EES COKE BATTERY LLC	SRN : P0408
Location : 1400 Zug Island Road	District : Detroit
	County : WAYNE
City : RIVER ROUGE State: MI Zip Code : 48218	Compliance Status : Non Compliance
Source Class : MEGASITE	Staff : Katherine Koster
FCE Begin Date : 8/1/2014	FCE Completion Date : 8/1/2017
Comments : Non compliance chosen due to outstanding VN related to monitor downtime issues for the CERMS	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/01/2017	Scheduled Inspection	Non Compliance	Targeted FY2017 inspection
07/31/2017	Excess Emissions (CEM)	Compliance	Quarterly CEMS and COMS excess emissions and downtime report for the 1st quarter of 2017 was received via mail on 5/1/2017. Data substitution outlined in 51-08C is in use during downtime. For the COMS, there were no periods of excess emissions (above 20%) were reported and monitor downtime was .016% of operating time. For the CERMS, monitor downtime was 1.5-1.7% for all pollutants. Monitor downtime for the CERMS and COMS was reviewed by TPU staff and determined to be acceptable. No excess emissions were reported for CO, NOx, or SO2.
07/31/2017	CO/CJ	Compliance	Quarterly fugitive dust report received for the 1st QTR 2017. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.
07/31/2017	CO/CJ	Compliance	CEMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the EER report. No corrective actions were required.

Activity Date	Activity Type	Compliance Status	Comments
07/27/2017	Excess Emissions (CEM)	Non Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report for the 2nd quarter of 2017 was received via email on 7/27/2017. Data substitution outlined in 51-08C is in use during downtime. For the COMS, there were no periods of excess emissions (above 20%) were reported and monitor downtime was 0.82% of operating time. For the CERMS, monitor downtime was 12.6% for all pollutants. Monitor downtime for the CERMS and COMS was reviewed by TPU staff and determined to be unacceptable. Also, one 3 hour period of excess emissions of SO2 were reported. A violation notice will be issued for this and the monitor downtime.</p>
07/07/2017	Other Non ROP	Unknown	<p>Quarterly report of the 1 hour average SO2 emissions in lbs SO2/1000 scf of COG was received for the 1st quarter of 2017 on May 1, 2017. This report is required through PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is 0.702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that there were no 1-hr exceedances of the limit. Note, there was some monitor downtime during this quarter which means hourly emissions are estimated.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/03/2017	Stack Test	Compliance	<p>Testing of the PECS baghouse stack was conducted the week of September 19, 2016. The test protocol was received on August 23, 2016. The approval letter was sent on September 12, 2016. The test results were received on November 22, 2016. Testing was performed by Clean Air. Test was not reviewed by TPU staff. Testing takes a long time to complete because sampling is only performed during pushing which is once every 15-20 minutes and a push only lasts 3-4 minutes. One run takes approximately 8 hours to complete. Also, there are PM10 and 2.5 limits on this stack. The facility chooses to use M5 in lieu of 201A to estimate filterable PM10 and 2.5.</p> <p>Results were as follows: PM (lb/ton coke pushed): 0.004 (0.02 permit limit); PM10/2.5 (lb/hr): 0.43 (0.69 permit limit); NOx (lb/hr): 2.26 (2.61 permit limit).</p> <p>Requested process data was included in the test report and appeared to be consistent throughout the runs. Compliance was chosen based on Clean Air reported results.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/31/2017	MAERS	Compliance	<p>EES COKE 2016 MAERS report submitted on time. Changes from the prior year are related to the following:</p> <ul style="list-style-type: none"> - SCC 30300306 was retired by EPA and replaced by 30300317 - Emission factors on a lb/MMBTU for the COG flare are based on an annual average derived from the CERMS data which fluctuates each year - Pushing emissions PM10 and 2.5 have new emission factors based on a 2016 stack test Decreased coal charge/decreased coke production - Quenching emissions based on average TDS content which is different from the prior year - Charging emissions are based on coking time and the average length of VE's to get a BSO value. These change each year. -Lid leaks and offtakes emissions are based on % found leaking throughout the year. This changes yearly and changes the equation. Same with door leaks. -SCC 30300361 is related to Byproduct Plant Equipment Leaks which are based on LDAR monitoring results. These results vary each year. - Coal unloading and truck traffic emission factor changed. See attached. It is due to less coke production, less vehicle miles travelled, and less unpaved roadways.
04/28/2017	NSPS (Part 60)	Compliance	2017 Annual COMS Certification Audit performed. Report states that unit passed the audit.

Activity Date	Activity Type	Compliance Status	Comments
04/28/2017	Release Reports	Non Compliance	<p>I received an email from EES Coke on 3/28/17 regarding a bleeder event on 3/27/17. Also, the company called the NRC on 3/28/17 which forward the information to PEAS (Incident Report #1174239). Report states that raw COG emissions were released due to a malfunction on Bleeder 2A. One deviation was chosen because raw COG was released.</p> <p>A follow up report is due within 30 days per the MACT Subpart L. The report was received on April 27, 2017 via email and hard copy on April 28. Bleeder 2A was undergoing maintenance and when it was put back into service, it opened slightly. EES estimated that 10 pounds of raw COG were released for 30 seconds before it was remotely ignited. Cause was a check valve failed; the valve was replaced. The remaining check valves were validated as functioning. At this time, no further action is required. AQD will monitor to ensure this is not a recurring issue.</p>
03/17/2017	Excess Emissions (CEM)	Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report for the 4th Quarter of 2016 was received via mail on 2/6/2017. Data substitution outlined in 51-08C is in use during downtime. For the COMS, there were no periods of excess emissions (above 20%) were reported and monitor downtime was .05% of operating time. For the CERMS, monitor downtime was 3% for all pollutants. Monitor downtime for the CERMS and COMS was reviewed by TPU staff and determined to be acceptable. No excess emissions were reported for CO, NOx, or SO2.</p>
03/17/2017	CO/CJ	Compliance	<p>CEMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the EER report. No corrective actions were required.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/17/2017	CO/CJ	Compliance	Quarterly fugitive dust report received for the 4th QTR 2016. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.
03/17/2017	NESHAP (Part 61)	Compliance	<p>Quarterly and semi annual LDAR monitoring report to comply with Part 61 Subparts L and V was received on February 6, 2017. Semi annual monitoring is performed on the gas blanketing system and quarterly and semi annual monitoring for equipment leaks. Report states that between July - December 2016, two quarterly equipment leak monitoring, one semi annual equipment leak monitoring, and one semiannual gas blanketing monitoring was performed and no leaks were detected. Equipment leaks are defined as 10,000 ppm above background while the gas blanketing system is subject to a limit of 500 ppm above background. Siddock is performing the monitoring. Some components registered readings (as opposed to the prior contractor) but none were above the regulatory threshold that is considered leaking. The gas blanketing system is comprised of several different loops. Compliance was chosen based on the report indicating there were no leaks.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/25/2017	Release Reports	Non Compliance	<p>I received an email from EES Coke on 11/30/16 regarding a bleeder event on 11/29/16. All bleeders experienced a raw bleed due to loss of water seals on the bleeders. Total duration of all bleeds was 2 minute 57 seconds. The bleeders were manually ignited within 7 seconds. One deviation was chosen because raw COG was released.</p> <p>A follow up report is due within 30 days per the MACT Subpart L. The report was received on January 10, 2017 and is late. This counts as a deviation. Bleeders lost water seal due to loss of flushing liquor pumps. Pumps were lost due to a valve failure. Valve was repaired and "procedures were revised" to prevent recurrence. EES estimated that 0.1 pounds of raw COG were released. At this time, no further action is required. AQD will monitor to ensure this is not a recurring issue.</p>
01/20/2017	Excess Emissions (CEM)	Non Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report for the 3rd Quarter of 2016 was received via mail on 11/7/2016. Data substitution outlined in 51-08C is in use during downtime. For the COMS, there were two 6 minute periods of excess emissions (above 20%) were reported and monitor downtime was 4% of operating time. EES is substantively in compliance with the opacity limit. For the CERMS, monitor downtime was 5% for all pollutants. Monitor downtime for the CERMS and COMS was reviewed by TPU staff and determined to be acceptable. No excess emissions were reported for CO or NOx. There were no exceedances of the SO2 3 hour average limit, but there were 16 exceedances of the 1 hr lb SO2/1000 scf COG limit. A violation notice was issued on 1/20/16.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/20/2017	CO/CJ	Compliance	Quarterly fugitive dust report received for the 3rd QTR 2016. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.
01/20/2017	CO/CJ	Compliance	Quarterly PM activities on the CEMS were submitted with the EER report for the 3rd quarter 2016. This report is required per CO 57-2014. All parameters were within the acceptable ranges. No corrective actions were needed.
01/20/2017	Other Non ROP	Non Compliance	<p>Quarterly report of the 1 hour average SO₂ emissions in lbs SO₂/1000 scf of COG was received for the 3rd quarter of 2016 on November 7, 2016. This report is required through PTI 51-08C in order to demonstrate compliance with the new SO₂ limit in the permit which is 0.702 lb SO₂/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H₂S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that there were 16 1-hr exceedances of the limit. Note, there was some monitor downtime during this quarter which means hourly emissions are estimated. All of the exceedances occurred in July. An attachment to the report explains that the facility believes the CERMS was reporting falsely inflated numbers due to a dirty sample filter on the SO₂ analyzer which caused a delay in the calibration gas reaching the analyzer and could have resulted in a lean gas being used to set the calibration. This would cause the analyzer to over read the actual concentrations. Maintenance on the filter has been changed from quarterly to monthly. However, at this time, if the CERMS is providing data, passing daily calibrations, and passing RATA's, the data is considered valid and is treated as an excess emission.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/20/2017	Other Non ROP	Unknown	<p>Quarterly report of the 1 hour average SO2 emissions in lbs SO2/1000 scf of COG was received for the 4th quarter of 2016 on February 6, 2017. This report is required through PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is 0.702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that there were no 1-hr exceedances of the limit. Note, there was some monitor downtime during this quarter which means hourly emissions are estimated.</p>
01/12/2017	CEM RATA	Compliance	<p>A RATA was performed on the CERMS system including the CO, SO2, and NOx monitors as well as the scintillation flow monitor on October 21, 2016. The test protocol was received on August 16, 2016. The approval letter was sent on September 2. TPU staff completed review of the results on January 12, 2017. The RA in lb/hr for NOx, CO, and SO2 was acceptable (less than 20% difference, except for CO which is less than 10%) and the RA for flow in terms of scfm was also acceptable (less than 20% difference). An approval letter was sent by Mr. Tom Maza, TPU, on 1/17/17, stating that the monitors for NOx, CO, and SOx met the requirements of Part 60 and the flow monitor met the requirements of PS 6 in 40 CFR Part 60, Appendix B.</p>
11/03/2016	Other	Non Compliance	<p>Review of Title V semi annual (July - December 2015) and annual (2015) deviation report for EES Coke Battery. Report also includes separate semi annual compliance report for MACT CCCCC and L.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/03/2016	Other	Non Compliance	Review of Title V semi annual Jan - June 2016 deviation report for EES Coke Battery. Report also includes separate semi annual compliance report for MACT CCCCC and L
11/03/2016	ROP Semi 1 Cert	Non Compliance	See activity report CA_P040837460
11/03/2016	MACT (Part 63)	Compliance	ROP certification for MACT Subpart CCCCC and L was submitted with the deviation report. See activity report CA_P040837460.
11/03/2016	ROP SEMI 2 CERT	Non Compliance	See compliance activity report
11/03/2016	ROP Annual Cert	Non Compliance	See compliance activity report
09/14/2016	Stack Test Observation	Unknown	RATA
08/18/2016	Scheduled Inspection	Non Compliance	Targeted FY2016 Inspection
08/16/2016	Other Non ROP	Compliance	Quarterly report of the 1 hour average SO2 emissions in lbs SO2/1000 scf of COG was received for the 2nd quarter of 2016 on August 2, 2016. This report is required through PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is 0.702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that there were no exceedances of the limit. Note, there was some monitor downtime during this quarter which means hourly emissions are estimated.

Activity Date	Activity Type	Compliance Status	Comments
08/16/2016	Excess Emissions (CEM)	Non Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report for the 2nd Quarter of 2016 was received via mail on 8/4/2016. Data substitution outlined in 51-08C is in use during downtime. For the COMS, no periods of excess emissions (above 20%) were reported and monitor downtime was 0% of operating time. For the CERMS, monitor downtime was 10% for NOx, CO, and SO2. This was reviewed by TPU staff. Much of it was due to plugging of the pitot and problems with the flow panel. This is unacceptable; TPU will be issuing a violation notice. No excess emissions were reported for NOx, CO, or SO2. One deviation was chosen for monitor downtime.</p>
08/16/2016	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 2nd QTR 2016. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.</p>
08/16/2016	Release Reports	Non Compliance	<p>I received an email from EES Coke on 7/29/16 regarding a bleeder event on 7/28/16. Bleeder 1B failed to ignite for 1 minute, 2 seconds. One deviation was chosen because raw COG was released.</p> <p>A follow up report is due within 30 days per the MACT Subpart L.</p> <p>Report was received on 8/30/16. Maintenance was occurring on bleeder 1B which requires removing power to the bleeder. It has a back up battery for use when bleeder is being returned to service. A pressure swing occurred and battery was not fully charged to power the bleeder so some raw COG was released. Corrective action is rewrite of procedure to ensure all batteries are charged before returning bleeders to service. At this time, no further action is required. AQD will monitor to ensure this is not a recurring issue.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/16/2016	Other Non ROP	Compliance	Annual Combustion Stack COMS audit performed on 3/29/2016. Audit is required in PTI 51-08C. Report was reviewed by TPU staff. Report indicates that the unit passed the audit.
08/16/2016	Excess Emissions (CEM)	Compliance	Quarterly CEMS and COMS excess emissions and downtime report for the 1st Quarter of 2016 was received via mail on 5/6/2016. Data substitution outlined in 51-08C is in use during downtime. For the COMS, zero periods of excess emissions (above 20%, 6 min average) were reported and monitor downtime was 1.33% of operating time. For the CERMS, monitor downtime was 5% for NOx, CO, and SO2. This was reviewed by TPU staff. Majority of the downtime was related to computer software issues. This was considered to be borderline acceptable by TPU at this time. No excess emissions were reported for NOx, CO, or SO2.
08/16/2016	CO/CJ	Compliance	Quarterly fugitive dust report received for the 1st QTR 2016. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.
08/16/2016	Other Non ROP	Compliance	Quarterly report of the 1 hour average SO2 emissions in lbs SO2/1000 scf of COG was received for the 1st quarter of 2016 on May 6, 2016. This report is required through PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is 0.702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that there were no exceedances. However, there was monitor downtime so emissions are estimated for some portion of the time using the procedure outlined in 51-08C.

Activity Date	Activity Type	Compliance Status	Comments
08/03/2016	NESHAP (Part 61)	Compliance	<p>Quarterly and semi annual LDAR monitoring report to comply with Part 61 Subparts L and V was received on August 3, 2016. Semi annual monitoring is performed on the gas blanketing system and quarterly monitoring and semi annual monitoring for equipment leaks. Report states that between January - June 2016, two quarterly equipment leak monitoring, one semi annual equipment leak, and one semiannual gas blanketing monitoring was performed and no leaks were detected. Equipment leaks are defined as 10,000 ppm above background while the gas blanketing system is subject to a limit of 500 ppm above background. Siddock is performing the monitoring. Some components registered readings (as opposed to the prior contractor) but none were above the regulatory threshold that is considered leaking. The gas blanketing system is comprised of several different loops. Compliance was chosen based on the report indicating there were no leaks.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/25/2016	MAERS	Compliance	<p>EES COKE 2015 MAERS report submitted on time. Changes from the prior year are related to the following:</p> <ul style="list-style-type: none"> - New stack test for PM10 and VOC for underfire combustion performed in 2015 - Increase coal charge - Quenching emissions based on average TDS content which is different from the prior year - Charging emissions are based on coking time and the average length of VE's to get a BSO value. These change each year. -Lid leaks and offtakes emissions are based on % found leaking throughout the year. This changes yearly and changes the equation. Same with door leaks. -PECS new stack test data for PM in 2015 and NOx in 2014 (should have been used in prior MAERS report) <p>For the completeness check, errors for missing emission factors. However, the emission factor explanation is in the comment/notes section for the SCC in activity and emission form.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/24/2016	Release Reports	Non Compliance	<p>I received a PEAS call on Saturday, 5/21/16, from Bruce VanOtteren, at 11:00 a.m. EES Coke called the NRC at 10:30 a.m. to report equipment failure at 8:30 a.m. Coke oven gas was vented to atmosphere due to "loss of communication". Facility was back to normal operation by the time of the call.</p> <p>18 bleeds for a total of 5 minutes and 20 seconds. All bleeders ignited except for 4B. Facility estimates that 1000 pds COG was released.</p> <p>Two deviations were chosen because raw COG was released and because there was an exceedance of the visible emission limits on the flares.</p> <p>A follow up report is due within 30 days per the MACT Subpart L.</p> <p>Follow up report was received on June 21, 2016. The PLC in the Command Center lost power. The offtakes closed which built up pressure. This resulted in the activation of the bleeder flares. 4B did not ignite for 30 seconds.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/05/2016	Release Reports	Non Compliance	<p>On 5/5/16, I received a voicemail from EES Coke Battery, Ms. Brenna Harden, at 4:30 p.m. The message stated that at 3:40 p.m. the battery lost steam. USS lost power to the boilerhouse at USS. The battery has been "bleeding off and on" for at least 50 minutes. None of the bleeds are "raw" bleeds; i.e. the gas was ignited. Email was received and is attached.</p> <p>I spoke with EES on 5/6/16 at 10 a.m. Apparently, the battery lost steam from approximately 3:40 p.m. to 9:40 p.m. Steam powers the turbines which in turn power the exhausters that draw gas off of the battery. If down, pressure builds up and coke oven gas has to be released through the emergency bleeders (there are 8 total). The battery was "bottled up" and no charging or pushing was occurring during this time. However, when they went to start up, the gas in the collector main was very lean. When the battery is bottled up, there is air infiltration into the main and combined with COG can create a combustible atmosphere. As such, they had to charge the first oven to atmosphere (i.e. the charging lids are not in place and the standpipe is open). This is reportedly standard operating practice in the industry. So far, they are running smoothly on 5/6/16.</p> <p>I requested a Rule 912 report. While the facility did not believe this incident met the criteria for R912, they agreed to supply the report.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/09/2016	Excess Emissions (CEM)	Non Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report for the 4th Quarter of 2015 was received via mail on 2/4/2016. Data substitution outlined in 51-08C is in use during downtime. For the COMS, three 6 minute periods of excess emissions (above 20%) were reported (0.2% of operating time) and monitor downtime was 2% of operating time. EES is substantively in compliance with the opacity limit. For the CERMS, monitor downtime was 22.8% for NOx, CO, and SO2. This was reviewed by TPU staff. Majority of the downtime was related to the CERMS relocation and subsequent RATA which was required as part of AQD Consent Order 57-2014. Removing this activity from the total downtime results in a downtime of 1.4%. See attached email. No excess emissions were reported for NOx or CO. For SO2, 10 3-hr average blocks exceeded the 544.6 lb/hr limit and 19 hourly averages exceeded 0.702 lb/1000 scf coke oven gas. A violation notice will be issued. Non compliance was chosen for the SO2 exceedances.</p> <p>Note, documentation from EES claims that the stack flow "jumped". The stack flow should not be changing significantly. It may be the case that the measured stack flow became more accurate after the CERMS was moved closer to the stack (due to removal of condensation from the pitot tube perhaps.)</p>

Activity Date	Activity Type	Compliance Status	Comments
02/09/2016	Other Non ROP	Non Compliance	<p>Quarterly report of the 1 hour average SO2 emissions in lbs SO2/1000 scf of COG was received for the 4th quarter of 2015 on February 4, 2016. This report is required through PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is 0.702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that the facility exceeded the limit on 19 occasions. For approximately 23% of the remaining time, data substitution was used as the CERMS monitor was in downtime due to a relocation of the CERMS and waiting for the subsequent RATA to be performed so the compliance status is unknown during this time. A VN is being issued for the emission exceedances.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/02/2016	NESHAP (Part 61)	Compliance	<p>Quarterly and semi annual LDAR monitoring report to comply with Part 61 Subparts L and V was received on February 2, 2016. Semi annual monitoring is performed on the gas blanketing system and quarterly monitoring and semi annual monitoring for equipment leaks. Report states that between July - December 2015, two quarterly equipment leak monitoring, one semi annual equipment leak, and one semiannual gas blanketing monitoring was performed and no leaks were detected. Equipment leaks are defined as 10,000 ppm above background while the gas blanketing system is subject to a limit of 500 ppm above background. Siddock is performing the monitoring. Some components registered readings (as opposed to the prior contractor) but none were above the regulatory threshold that is considered leaking. The gas blanketing system is comprised of several different loops. Compliance was chosen based on the report indicating there were no leaks.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/14/2016	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 10/19/15 to report that they had released fugitive raw COG in the amount of 1.63 pounds. Bleeder flare 3B failed to open. The total flaring event was 13 minutes and 58 seconds and was caused by a heat up event at the byproducts plant. Notification was made to AQD within 24 hours as required by Subpart L and the the NRC (see attached). Follow up report is required within 30 days per Subpart L. Report requires is a description of the event.</p> <p>*****</p> <p>Follow up report was received on November 23, 2015. The letter states that 3B did not ignite (As opposed to did not open). After an investigation, it was determined that the igniter switch was in "hand" position instead of "auto" position. Operating procedures were revised to check igniter switch positions more frequently. Additionally , EES is in the process of acquiring sling back switches which will default to auto position. Actions appear sufficient at this time. However, issues with flares seems to be a recurring problem as of late. A violation notice was issued on October 29.</p> <p>Additionally, this is a violation of 40 CFR Part 63, Subpart L, §63.307(a)(2) Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system.</p>
12/21/2015	CO/CJ	Compliance	<p>Facility submitted an update to their evaluation of alternative flow monitoring technologies as required per Consent Order 57-2014. The letter states that an optical scintillation system has been installed and running concurrently with the existing flow monitor to evaluate its reliability. There are no plans to investigate any other type of flow monitor at the time.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/12/2015	Other Non ROP	Unknown	<p>Quarterly report of the 1-hour SO2 emissions in lbs SO2/1000 scf of COG was received for the 2nd quarter of 2015 on August 5, 2015. This report is required through the recently issued PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is 0.702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report is blank for all hours after 4/2/15 15:00 as the flow monitor entered a period of "monitor downtime." Pollutant concentrations measured by the CO, SO2, and NOx monitors are still valid (on a ppm level), but the conversions using stack flow data are not. Facility attributes this to drift in the backflow purge air which was not identified for months. A violation notice will be issued by TPU staff for monitor downtime. As such, compliance status of unknown was chosen as it relates to the emission limit.</p>
11/12/2015	Other Non ROP	Unknown	<p>REVISED - Quarterly report for the 1-hour SO2 emissions in lbs SO2/1000 scf of COG was received for the 2nd quarter of 2015 on August 5, 2015 and revised on September 14, 2015. This is the revised report writeup. The report was revised after a RATA was conducted in August 2015, and the monitor downtime provisions were applied. A RATA had not been conducted at the time of the original report submittal. Unknown was chosen as the compliance status since the majority of emissions are estimated due to the monitor downtime.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/12/2015	Stack Test	Unknown	<p>Stack test of the combustion stack for PM, PM10, PM2.5, and VOC's was performed in September 2015. Based on the results in the stack test report, facility is in compliance with the emission limits.</p> <p>However, TPU has not yet reviewed this report. As such, I have chosen unknown as the compliance status. Results were 0.111 lb/hr and 0.000095 gr/dscf PM (excluding sulfates), 0.078 lb/1000 lb exhaust gas PM, 50.8 lb/hr PM10, 50.5 lb/hr PM2.5, 19.5 lb/hr and 0.0391 lb/MMBTU heat input VOC.</p>
11/10/2015	Other Non ROP	Unknown	<p>Quarterly report of the 1 hour SO2 emissions in lbs SO2/1000 scf of COG was received for the 3rd quarter of 2015 on November 2, 2015. This report is required through PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is .702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that the facility was in compliance with the limit. However, data substitution was used for the majority of the hourly values due to downtime of the flow monitor until an acceptable RATA was performed in August 2015. A VN is being issued for the monitor downtime by TPU staff. Due to the excess downtime, unknown was chosen as the compliance status.</p>
11/10/2015	CO/CJ	Compliance	<p>Quarterly PM activities on the CEMS were submitted with the EER report for the 3rd quarter 2015. This report is required per CO 57-2014. All parameters were within the acceptable ranges. No corrective actions were needed.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/10/2015	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for 3rd QTR 2015. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.</p>
11/10/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 8/8/15 to report that they had released raw COG for two minutes and 52 seconds due to failure of all bleeders to open. Overpressure situation was caused by a heat up event at the byproducts plant. Notification was made to AQD within 24 hours as required by Subpart L and the the NRC (see attached). Follow up report is required within 30 days per Subpart L. Report requires is a description of the event. *****</p> <p>Follow up report was received on September 11, 2015. After an investigation, reason given for the failure was an electrical fault. Primary and backup electrical cables had been damaged. Temporary cable installed same day. Permanent replacements were installed on August 28. Back up cable was relocated to provide separation from main cable. Actions appear sufficient at this time. However, issues with flares seems to be a recurring problem as of late. More information is needed to determine whether they are being installed and maintained properly. AQD will follow up during the upcoming annual inspection.</p> <p>UPDATE: Non compliance was chosen as release of raw coke oven gas to the atmosphere is a violation of 40 CFR Part 63, Subpart L, §63.307 (a)(2) - coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. Issues with flare are a recurring problem based on review of semi annual deviation report. A VN was issued on 10/29/15.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/10/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 7/24/15 to report that they had released raw COG for 6 seconds on 7/23/15. Overpressure situation was caused by a heat up event at the byproducts plant. Flare 1A and 1B did not immediately ignite. Total duration of ignited bleeds was 25 minutes 4 seconds. Notification was made to AQD within 24 hours as required by Subpart L. Follow up report is required within 30 days per Subpart L. Report requires is a description of the event.</p> <p>*****</p> <p>Follow up report was received on August 26, 2015. After an investigation, reason given was that the gas concentration was not sufficient for ignition. No further actions were taken. However, issues with flares seems to be a recurring problem as of late. More information is needed to determine whether they are being installed and maintained properly. AQD will follow up during the upcoming annual inspection.</p> <p>UPDATE: This is a violation of 40 CFR Part 63, Subpart L, §63.307 (a)(2) - Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. Issues with flare are a recurring problem based on review of semi annual deviation report. A VN was issued on 10/29/15.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/10/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 6/26/15 to report that they had released raw COG for 2 seconds on 6/25/15. Overpressure situation was caused by a heat up event at the byproducts plant. Flare 2B did not immediately ignite. Total duration of ignited bleeds was 17 minutes 49 seconds. Notification was made to AQD within 24 hours as required by Subpart L. Follow up report is required within 30 days per Subpart L. Report requires is a description of the event. *****</p> <p>Follow up report was received on July 24, 2015. After an investigation, facility was unable to determine a reason. All bleeders were tested later in the day and all igniters activated. No further actions were taken. However, issues with flares seems to be a recurring problem as of late. More information is needed to determine whether they are being installed and maintained properly. While the quick response time is commendable, facility should not have to rely on manual bleeder ignition in case future staff and/or circumstances are not as responsive. AQD will follow up during the upcoming annual inspection.</p> <p>UPDATE This a violation of 40 CFR Part 63, Subpart L, §63.307(a)(2) - Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. Issues with flare are a recurring problem based on review of semi annual deviation report. A VN was issued on 10/29/15.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/02/2015	Excess Emissions (CEM)	Non Compliance	Quarterly CEMS and COMS excess emissions and downtime report for the 3rd Quarter of 2015 was received on 11/2/2015. Data substitution outlined in 51-08C is already being implemented. For the COMS, 18 6-minute periods of excess emissions (above 20%) were reported (0.01% of operating time) and monitor downtime was 6.5% of operating time. EES is substantively in compliance with the opacity limit. For the CERMS, monitor downtime was 56% for NOx,CO, and SO2. Downtime was reviewed by TUP staff and non compliance was chosen.
10/28/2015	MACT (Part 63)	Non Compliance	Subpart L See compliance activity report CA_P040833914
10/28/2015	ROP Semi 1 Cert	Non Compliance	See compliance activity report CA_P040833914
10/20/2015	CEM RATA	Compliance	RATA was performed on the CERMS system on October 20,2015. A prior RATA was performed in August 2015. However, adjustments were made to the CERMS in the meantime which prompted the October 2015. RATA. See quarterly Excess Emission Report cover pages. TPU reviewed the RATA and determined that the CERMS "passed".
10/08/2015	CO/CJ	Compliance	A letter was received from EES COKE requesting an extension related to CO 57-2014. See attached. However, the letter also states that EES does not believe the request is necessary. AQD agrees as well as AQD did not tell the facility to submit the request. Regardless, the request was approved. See attached.
09/15/2015	Other	Non Compliance	Review of Title V semi annual (Jan - June 2015) deviation report for EES Coke Battery. Report also includes separate semi annual compliance report for MACT CCCCC and L.

Activity Date	Activity Type	Compliance Status	Comments
08/03/2015	NESHAP (Part 61)	Compliance	<p>Quarterly and semi annual LDAR monitoring report to comply with Part 61 Subparts L and V was received on August 3, 2015. Semi annual monitoring is performed on the gas blanketing system and quarterly monitoring for equipment leaks. Report states that between January - June 2015, two quarterly equipment leak monitoring and one semiannual gas blanketing monitoring was performed and no leaks were detected. Equipment leaks are defined as 10,000 ppm above background while the gas blanketing system is subject to a limit of 500 ppm above background. Siddock is performing the monitoring. Some components registered readings (as opposed to the prior contractor) but none were above the regulatory threshold that is considered leaking. The gas blanketing system is comprised of several different loops. Compliance was chosen based on the report indicating there were no leaks.</p>
06/06/2015	Stack Test	Compliance	<p>This was a retest of the PECS baghouse stack for PM10 pph, PM2.5 pph, and PM lb/ton of coke pushed. Method 5 was used for the PM10 and 2.5 filterable portion which will over estimate emissions. Some bags in the baghouse have been changed since the prior test. A violation notice was sent for the prior failed stack test. TPU reviewed the results and district staff received a memo from Mr. Tom Gasloli on 7/6/15. Results were .003 lbPM/ton of coke; limit is 0.02; 0.62 lb/hr PM10 and PM2.5; limit is 0.69 lb/hr for each.</p>
06/03/2015	Scheduled Inspection	Non Compliance	Targeted 2015 Inspection

Activity Date	Activity Type	Compliance Status	Comments
05/26/2015	Other Non ROP	Compliance	<p>An updated fugitive dust control plan was received on 5/26/15. Under PTI 51-08C, a revised plan to include EUMATERIALS was required within 180 days of permit issuance. The permit was issued November 21, 2014. Portions of the plan related to EUMATERIALS were approved by default after 90 days as the condition states. However, the facility also made changes to part of the fugitive dust plan that are from SIP CO No 27-1993. AQD has informed EES that changes require SIP approval from EPA and a demonstration needs to be made that the request change is at least equivalent to the level of control that is currently being met. The May 26, 2015 document does not contain this level of detail. At this time, the proposed changes have not been accepted by AQD and AQD is awaiting further information from the facility. This conversation occurred with Brenna Harden while on site for an inspection on June 3, 2015. Kerry Kelly of AQD was also present.</p>
05/26/2015	Other Non ROP	Compliance	<p>Annual Combustion Stack COMS audit performed on 4/22/2015. Audit is required in PTI 51-08C. Report was reviewed by TPU staff. Report indicates that the unit passed the audit.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/26/2015	Excess Emissions (CEM)	Non Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report for the 1st Quarter of 2015 was received on 5/6/2015. Data substitution outlined in 51-08C is already being implemented. For the COMS, two 6 minute periods of excess emissions (above 20%) were reported (0.01% of operating time) and monitor downtime was 0.05% of operating time. EES is substantively in compliance with the opacity limit. For the CERMS, monitor downtime was 4.54% for NOx, 2.97% for CO, and 0.88% for SO2. This is a dramatic reduction from the prior quarter. There was one one-hour exceedance of the new SO2 limit of .702 lbs/1000 scf of COG. As this limit is related to the SO2 non attainment designation, a violation notice will be issued. AQD and EES are still in discussions related to the fuel flow monitoring plan; the current submittal is not acceptable.</p> <p>Non compliance was chosen for the SO2 exceedance.</p>
05/26/2015	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for 1st QTR 2015. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/20/2015	MAERS	Compliance	Reviewed all emission factors and compared them to the factors used in the most recent permit (51-08C). Factors were consistent except for the PECS stack. As explained by NTH, they modified the factor to be based on actual sample time per run versus an assumed 60 minutes per run. This approach is acceptable and increased slightly emissions resulting in a more "conservative" estimate. See attached email and responses from EES regarding the 2014 MAERS report. All answers were acceptable. EUMATERIALS is a new/reorganized emission unit in the recently issued PTI 51-08C. Changes in the underfire emissions from the prior year are due to updated stack testing results and CEMS data. At this time, I have not reviewed the raw CERMS data in detail.
05/20/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
05/18/2015	Other	Non Compliance	Review of Title V Annual and Semi Annual 2014 deviation report for EES Coke Battery. Report also includes separate semi annual compliance report for MACT CCCCC and L.

Activity Date	Activity Type	Compliance Status	Comments
05/13/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 5/13/15 to report that they had released raw COG for four seconds on 5/12/2015 due to failure of bleeder 4A to open resulting in fugitive emissions. Reason for bleeder failure to open was a broken liquor seal. Notification was made to AQD within 24 hours as required by Subpart L and the the NRC (see attached). Follow up report is required within 30 days per Subpart L. Report requires is a description of the event. Awaiting report as 30 days has not passed. *****</p> <p>Follow up report was received on June 15, 2015. The letter states that a heat up event occurred on May 12 and that bleeder 4A did not ignite resulting in fugitive emissions. Damper seal was broken because the liquor line that is used to create the seal was plugged. Plugged section of line was replaced and thermal imagery of lines is now conducted on a weekly basis.</p> <p>Status of PENDING was chosen as issues with #3 and #4 flares seems to be a recurring problem as of late. More information is needed to determine whether they are being installed and maintained properly. AQD will follow up during the upcoming annual inspection. *****</p> <p>UPDATE This is a violation of 40 CFR Part 63, Subpart L, §63.307(a)(2) - Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. Furthermore, issues with the flare system seem to be a recurring problem based on review of semi annual deviation report. As such, a VN was issued on October 29, 2015</p>

Activity Date	Activity Type	Compliance Status	Comments
05/11/2015	CO/CJ	Compliance	Consent Order 54-2014 required EES Coke to evaluate and submit the result of alternate flow monitoring technologies and CERMS DAHS upgrades. Report was received on May 11, 2015. Results were that facility decided to retain their existing pitot tube pressure drop technology for flow but continue to evaluate other options such as optical scintillation. The letter also states that they chose a vendor to replace the DAHS. I requested that the facility submit the results of the other flow monitor options by the end of the year.
05/06/2015	Other Non ROP	Non Compliance	Quarterly report of the 1 hour SO2 emissions in lbs SO2/1000 scf of COG was received for the 1st quarter of 2015 on May 5, 2015. This report is required through the recently issued PTI 51-08C in order to demonstrate compliance with the new SO2 limit in the permit which is .702 lb SO2/1000 scf COG on a 1-hr average. This limit is related to the 2.64 grain H2S/dscf that was in the prior permit. Also, this limit exists, in part, because EES Coke is located in an area that has been designated as non attainment for sulfur dioxide. The quarterly report indicates that the limit was exceeded for one hour. Due to the non attainment area, a violation notice will be issued.
04/28/2015	CO/CJ	Compliance	CO 57-2014, effective January 8, 2015, requires EES Coke to develop standard work instructions for each operating and maintenance task associated with the CERMS within 60 days (Condition 9.B.7). A letter certifying that this was complete along with a list of tasks was received on 3/13/2015.

Activity Date	Activity Type	Compliance Status	Comments
04/28/2015	CO/CJ	Compliance	A letter fulfilling the terms of CO 57-2014, Conditions 9.A.1, 9.B.1, 9.B.3, and 9.B.6 was received on 4/13/2015. Consent Order was effective January 8, 2015. Letter included a CERMS monitoring plan, CERMS relocation evaluation, dilution air system improvements, and internal diagnostics.
04/28/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 4/10/15 to report that they had released raw COG for several seconds on 4/9/2015 due to failure of bleeder 4B to ignite. Reason for bleeder opening was battery outage. Notification was made to AQD within 24 hours as required by Subpart L. Follow up report is required within 30 days per Subpart L. Report requires a description of the event. Awaiting report as 30 days has not passed. *****</p> <p>Follow up report was received on May 11, 2015. The letter states that the battery was "bottled up" to complete minor repairs and when coming back on line, the flares were activated. 4B did not ignite. Reason given was that a power cell, critical to the igniter function, had faulted even though it was recently installed on April 3. A check of this cell is included in the weekly bleeder checks which has been increased to daily. The cell was replaced.</p> <p>This is a violation of 40 CFR Part 63, Subpart L, §63.307(a)(2) - Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. Furthermore, issues with #3 and #4 flares seems to be a recurring problem as of late. More information is needed to determine whether they are being installed and maintained properly. AQD will follow up during the upcoming annual inspection.</p>
04/28/2015	ROP SEMI 2 CERT	Non Compliance	See Compliance Activity Report.

Activity Date	Activity Type	Compliance Status	Comments
04/28/2015	MACT (Part 63)	Non Compliance	<p>Subpart CCCCC compliance report was submitted with the ROP deviation report. No deviations were reported. However, report is incomplete as it does not include a statement addressing whether there were deviations from 63.7333 through 63.7335 per 63.7341(a)(5). I discussed this with EES on 4/21. I also explained that deviations from the MACT need to be clearly identified in the ROP deviation report. EES will update and resubmit.</p>
04/25/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 4/25/15 and again on 5/5/15 to report that they had released raw COG on 4/25/2015 due to failure of bleeders 3 and 4 to open resulting in fugitive emissions for about 9 minutes. Notification was made to AQD within 24 hours as required by Subpart L. Follow up report is required within 30 days per Subpart L. Report requires is a description of the event. Awaiting report as 30 days has not passed. *****</p> <p>Follow up report was received on May 27, 2015. The letter states that no signal was sent to the bleeders to activate. Estimated amount of coke oven gas released was 411 pounds. Issues with #3 and #4 flares seems to be a recurring problem as of late. More information is needed to determine whether they are being installed and maintained properly. AQD will follow up during the upcoming annual inspection.</p> <p>UPDATE This is a violation of 40 CFR Part 63, Subpart L, §63.307(a)(2) - Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. Furthermore, issues with the flare system seem to be a recurring problem based on review of semi annual deviation report. As such, a VN was issued on October 29, 2015</p>

Activity Date	Activity Type	Compliance Status	Comments
04/21/2015	MACT (Part 63)	Compliance	Subpart L compliance report, submitted with the ROP deviation report. No deviations reported.
04/13/2015	CO/CJ	Compliance	EES Coke Battery entered into CO 57-2014 on January 8, 2015. Paragraph 9.B.7 requires the facility to develop written Standard Work Instructions that include step by step instructions for each O&M task for the CERMS within 60 days. Report was received on March 13,2015 which is before the 60 day deadline (March 16). The report included a table with each task listed, the frequency of each task, and an indication of which tasks are scheduled and tracked through the Maximo system. At this time, this is sufficient to meet the criteria in the consent order.
04/13/2015	CO/CJ	Compliance	Facility submitted a report to satisfy the following conditions of Consent Order 57-2014: Paragraph 9.A.1, 9.B.1, 9.B.3, and 9.B.6. The report included revised monitoring plan, evaluation results for relocation of the CERMS shelter, evaluation results for upgrades to the CERMS dilution air system, and results for the beneficial internal diagnostics which can be installed on the CERMS. In summary, facility chose to relocate CERMS shelter to the base of the stack, install a new, dedicated dilution air compressor, installation of emission rate and high flow alarms,
03/24/2015	ROP Annual Cert	Non Compliance	Failure to report all deviations. Also, unresolved excess monitor downtime. See Compliance Activity report.
03/21/2015	Other	Non Compliance	December 2014 PECS Baghouse stack test review
03/16/2015	Stack Test	Non Compliance	Failed PECS stack test. See activity report CA P040828989. Zero deviations are listed as these emission limits have not been incorporated into the ROP.

Activity Date	Activity Type	Compliance Status	Comments
03/13/2015	Other Non ROP	Compliance	<p>Records required within 60 days of the expiration of temporary permit 71-13 were received per condition FG FACILITY VII.</p> <p>Records are related to the A2A analysis performed for this PTI and are to demonstrate that the change did not trigger NSR. Actual emissions of H₂SO₄ exceeded the baseline by a significant amount for the one year time period but did not exceed the projected actual emissions according to the spreadsheet. No supporting emissions calculations were provided. Compliance determination is based solely on the information presented in the table.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/10/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 2/17/15 to report that they had released an unknown amount of raw COG. Reason given failure of a bleeder to ignite. Notification was made to AQD within 24 hours as required by Subpart L. AQD received the PEAS report on March 2 (attached; PEAS 12394, NRC #1109266). Date and time stamp of PEAS call was 2/27/15. PEAS mistakenly sent report to SEMI district. Regardless, AQD had already received the notification from EES on the day of the event as described above.</p> <p>Follow up report is required within 30 days per Subpart L. Report requires is a description of the event. Awaiting report as 30 days has not passed. *****</p> <p>Follow up report was received on April 13, 2015. Report was late as it was not received within 30 days. Bleeder 3B did not ignite. A and B igniters on 3B were replaced. All eight igniter tubes were cleaned and all igniters are scheduled to be replaced. Report was late. No violation notice will be sent at this time. However, a violation notice will be sent if this is an ongoing event. Also, AQD is monitoring frequency of igniter fails to determine whether a violation notice may be warranted in the future.</p> <p>UPDATE: This is a violation of 40 CFR Part 63, Subpart L, §63.307(a)(2) - Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. It also appears to be a recurring problem. After a review of the semi annual deviation report for Jan - June 2015, a violation notice was issued on October 29, 2015.</p>

03/10/2015	Release Reports	Non Compliance	<p>EES COKE contacted AQD via email on 3/9/15 to report that they had released approximately 6 pounds of raw COG. Reason given was failure of bleeders 3A and 4B to ignite for "a couple of seconds" as they had to be manually ignited. Notification was made to AQD within 24 hours as required by Subpart L. AQD received the PEAS report on March 9 as well (attached; NRC #1110066).</p> <p>Follow up report is required within 30 days per Subpart L. Report requires is a description of the event. Awaiting report as 30 days has not passed. *****</p> <p>Follow up report was received on April 13. Report was late as it was not received within 30 days. 3A and 4B did not ignite. It is unclear whether this incident occurred after 3A was purportedly replaced. No root cause was identified. I spoke with Brenna Harden on 4/21 and she informed by the 4B was taken out of service because EES has not been able to identify a problem with it. This should not cause any problems, according to EES, because there are more than enough bleeders to accommodate over pressure events. All eight bleeders are available any time there is an increase in pressure and the gas goes to the bleeder with the least resistance (i.e. bleeders serve all ovens; one set is not designated to a certain bank of ovens). Report was late. AQD will monitor and send a VN if this becomes a recurring event.</p> <p>UPDATE This is a violation of 40 CFR Part 63, Subpart L, §63.307(a)(2) - Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system. It also appears to be a recurring problem. After a review of the semi annual deviation report for Jan - June 2015, a violation notice was issued on October 29, 2015.</p>
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Activity Date	Activity Type	Compliance Status	Comments
03/06/2015	Other Non ROP	Compliance	<p>PTI 182-05C was issued in November 21, 2015 and contains a new SO2 limit of .702 lbs SO2/1000 scf COG on an hourly basis. The PTI also specifies that emission during downtime shall be the average of the hour before and after the downtime. Condition VII.2 requires the submission of quarterly reports of the SO2 emissions. No exceedances of the limit were reported. AQD is currently in discussions with EES regarding the appropriate methodology for calculating these emissions; hence the compliance status of pending. ***** UPDATE: Pending is no longer allowed as a compliance status. Compliance was chosen based on no excess emissions reported.</p>
03/05/2015	Excess Emissions (CEM)	Non Compliance	<p>Revised excess emission report submitted for 3rd quarter SO2 emissions. Based on the VN response received on December 8, 2014, facility claims that there were no SO2 exceedances. The readings were false due to abnormally high flow readings. See December letter for more detail. Non compliance was still chosen for excess downtime.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/05/2015	NESHAP (Part 61)	Compliance	<p>Quarterly and semi annual LDAR monitoring report received to comply with Part 61 Subparts L and V. Semi annual monitoring is performed on the gas blanketing system. Report states that between July - December 2014, two quarterly equipment leak monitoring and one semiannual gas blanketing monitoring was performed and no leaks were detected. Siddock is performing the monitoring. Many components registered readings (as opposed to the prior contractor) but none were above the regulatory threshold that is considered leaking. I spoke with Brenna Harden, EES Coke, on 3/2. She informed me that there is a book on site with a picture of each component to be monitored and the tag and the applicable regulatory citation. Gas blanketing system is comprised of several different loops. She stated that the monitoring of loop D mentioned in the cover letter is not new; it has always been performed. Compliance was chosen based on the report indicating there were no leaks.</p>
03/02/2015	Other Non ROP	Non Compliance	<p>Fuel monitoring plan required per PTI 51-08C, Appendix C, Condition 1 was submitted for review and approval. Current version of the plan is inadequate. On going discussions with EES to obtain additional information. An additional information request has been sent to the company via email on 3/2/2015.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/04/2015	Excess Emissions (CEM)	Non Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report was received on 1/28/2015. For the COMS, no excess emissions were reported and monitor downtime was 2.14% of operating time. For the CERMS, monitor downtime was 15.63% for NOx, 15.58% for CO, and 13.41% for SO2. TPU staff issued a violation notice for excessive downtime. PTI 51-08C was recently issued to EES Coke and it contains a new SO2 limit of .702 lbs/1000 scf of COG on a 1 hour average and 1.25 lbNOx/MMBTU on a 24 hour average. No exceedances of these emission limits were reported. However, a fuel flow monitor is to be used in conjunction with the CERMS to calculate emissions in units of the new limits. At this time, AQD is in discussions with EES as to the appropriate way to calculate the emissions. The methodology for calculating emissions during downtime is also new in PTI 51-08C. At this time, facility is using the lb/hr SO2 from the CERMS and dividing it by the scf per hour of COG used. For the NOx, the lb/hr is used along with an assumed value for the BTU content of COG (500 BTU/scf) and the scf per hour of COG. AQD has requested that this calculation be based on the actual heat content of the gas on site determined through testing. Depending on the variability, this may require frequent sampling and updating of the calculation. At this time, facility does not agree with this approach and wants to use 500.</p> <p>*****</p> <p>UPDATE: After a discussion with EES staff regarding the opacity limits in 51-08C, a revised report was hand delivered on March 17, 2015 for the COMS. One exceedance of the 20%, 6 minute average opacity limit was reported (as opposed to zero in the prior report). See attached emails.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/03/2015	CO/CJ	Compliance	Quarterly fugitive dust report received for 4th QTR 2014. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.
01/22/2015	Malfunction Abatement Plan	Compliance	MAP revised on 1/22/15 to include the mixing building baghouse as required by PTI 51-08C. MAP was required within 60 days of PTI issuance, or within 60 days of November 21, 2014. It was approved by AQD.
01/09/2015	CEM RATA	Compliance	Annual CERMS RATA Test Report, dated December 3, 2014. Testing was performed on October 8, 2014, by Clean Air Engineering, Inc., and United Science and Testing, Inc. Test was observed by Tom Gasloli, AQD-TPU. TPU staff (T. Gasloli) sent a letter to EES on December 22, 2014 stating that upon review of the test report, the CEMS passed the Part 60 RATA criteria in terms of wet ppm and lb/hr for SO ₂ , NO _x , and CO and scfm for the flow rate monitor and wet ppm for CO ₂ .
11/13/2014	Stack Test	Compliance	No. 5 Coke Battery Combustion Stack Particulate Emission Test Report, dated Sept. 15, 2014. Testing performed on Aug. 20-21, 2014, by Air/Compliance Consultants, Inc, and observed by Tom Maza, AQD-TPU. Results show PM emission rates of 6.29 lb/hr and 0.013 lb/1000 lb @ 50% EA, both below the permitted limits of 25.7 lb/hr and 0-095 lb/1000 lb @ 50% EA, respectively.
11/13/2014	Excess Emissions (CEM)	Non Compliance	Additional information regarding EES Coke's 2nd Quarter 2014 Excess Emissions report and June 12, 2014 RATA.
11/13/2014	ROP Semi 1 Cert	Non Compliance	ROP Semi-Annual 1 Certification. Facility reported 8 deviations, plus Bleeder Stack openings. Facility has been referred to Enforcement and is negotiating a Consent Order which will address some of the deviations reported in this certification.

Activity Date	Activity Type	Compliance Status	Comments
11/13/2014	MACT (Part 63)	Compliance	Subpart CCCCC compliance report, submitted with the ROP deviation report. No deviations reported.
11/13/2014	MACT (Part 63)	Compliance	Subpart L compliance report, submitted with the ROP deviation report. No deviations reported.
11/07/2014	Excess Emissions (CEM)	Non Compliance	Quarterly CEMS and COMS excess emissions and downtime report received on 11/3/2014. For the COMS, no excess emissions were reported and monitor downtime was 0.04% of operating time (53 minutes) for maintenance and QA/QC. For the CERMS, facility reported monitor downtime at 100% of operating time due to an invalid RATA performed in June 2014. Facility reported 64 hours where the SO2 limit of 544.4 lbs/hr were exceeded during the quarter. Facility reported no excess NOx emissions. Operating hours reported were 2,208 hours on 100% COG and 0 hours for lean burn and 0 hours for rich burn. A Violation Notice was issued to EES Coke on November 7, 2014, due to exceeding the hourly SO2 limit and monitor downtime. Note: TPU reports are logged under USS SRN A7809.
08/18/2014	CEM RATA	Compliance	Certification Audit for the Coke Oven Battery Combustion Stack COMS, performed on April 11, 2014, by Teledyne Monitor Labs, Inc., as required per 40 CFR Part 63 Subpart CCCCC - NESHAP for Coke Ovens: Pushing, Quenching, and Battery Stacks. Audit was reviewed by AQD-TPU on Aug. 18, 2014.
08/14/2014	CO/CJ	Compliance	Quarterly fugitive dust report received for 2nd QTR 2014. Report submitted with the EER report for the CEMS. Facility reported no deviations from fugitive dust requirements.

Activity Date	Activity Type	Compliance Status	Comments
08/13/2014	NESHAP (Part 61)	Compliance	<p>Semi Annual LDAR Monitoring - Facility is now using appropriate cal gas as required in 61.245 (since June 2013). Report states no detectable concentrations were measured. Also included is monitoring of the Loop D of the gas blanketing system. AQD did not fully review this report and has chosen pending as the compliance status at this time. *****</p> <p>UPDATE: Pending was chosen but is no longer allowed as a compliance status. Compliance was chosen based solely on the information in the report stating that no leaks were measured.</p>
08/01/2014	Excess Emissions (CEM)	Non Compliance	<p>Quarterly CEMS and COMS excess emissions and downtime report received on 8/1/2014 for the second quarter of 2014. For the COMS, there was 0.11% downtime. The CEMS recorded no excess emissions for SO₂, NO_x, or CO. Monitor downtime was approximately 23% for all pollutants. TPU staff reviewed monitor downtime. Operating hours reported were 100% COG and 0 hours for lean burn and 0 hours for rich burn. Compliance status of UNKNOWN was chosen due to monitor downtime. Note: TPU reports are logged under USS SRN A7809. Non compliance was chosen for excess monitor downtime.</p>

Name: *Kate Anne*

Date: 8/10/17

Supervisor: W.M.