

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : EES COKE BATTERY L.L.C.	SRN : P0408
Location : 1400 Zug Island Road	District : Detroit
	County : WAYNE
City : RIVER ROUGE State: MI Zip Code : 48209	Compliance Status : Compliance
Source Class : MEGASITE	Staff : Katherine Koster
FCE Begin Date : 8/2/2020	FCE Completion Date : 8/2/2023
Comments : At this time, facility appears to be in compliance with conditions reviewed	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/02/2023	On-site Inspection	Compliance	FY23 Targeted Inspection
07/03/2023	CO/CJ	Compliance	Updated CEMS monitoring plan was submitted on 1/23/23. Cover letter states that plan was modified to incorporate changes due to OSI flow monitor and general administrative updates. Will provide copy of plan to TPU staff.
07/03/2023	NSPS (Part 60)	Compliance	2022 Annual COMS Certification Audit, per 40 CFR Part 60 Appendix B PS1, was performed on April 4, 2022 by Teledyne. Report states that unit passed the audit. The calibration error, zero compensation, and optical alignment all met the required specifications. ROP certification accompanied the results.

Activity Date	Activity Type	Compliance Status	Comments
07/03/2023	Excess Emissions (CEM)	Compliance	<p>1st Quarter 2023 CERMS and COMS excess emissions and downtime report (hard copy) was received. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, zero opacity exceedance were reported. COMS downtime was 1.7% (2,167 minutes).</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 34 hours (1.6% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p>
07/03/2023	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 1st Quarter 2023. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/16/2023	Other Non ROP	Unknown	<p>1st Quarter 2023 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on May 1, 2023 (hard copy). 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 1st Quarter 2023. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE -BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>
06/16/2023	Other Non ROP	Unknown	<p>2nd Quarter 2023 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on August 2, 2023 (hard copy). 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 1st Quarter 2023. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE -BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/12/2023	MAERS	Compliance	<p>MAERS report submitted electronically on 3/9/2023. ROP Certification received on 3/13/2023.</p> <p>MAERS certification form received on March 16, 2022. Section 7. MAERS report was submitted electronically on March 18, 2022. Coke Oven Gas estimates will be added to EU-COKEBATTERY activities by ERU</p> <p>Throughput to COGFLARE about the same as the prior year Coal throughput less than prior year Stack testing in 2022 changed some emission factors that were used in prior report.</p>
04/11/2023	NESHAP (Part 61)	Compliance	<p>Subpart L&V - Semi annual benzene monitoring Quarterly and semi-annual LDAR monitoring ("Benzene Monitoring Report") to comply with Part 61 Subparts L and V was received on January 23, 2023 for the time period July - Dec 2022.</p> <p>Monitoring is being performed by Alliance. Semi-annual monitoring is performed on the gas blanketing system of Loop "D" and quarterly and semi-annual monitoring for equipment leaks. Monitoring is conducted with an FID calibrated with methane. Report states that one valve was leaking in July and it was fixed on the same day. 5 calendar days for repair is the regulatory limit.</p> <p>Weekly pump inspection records are present. Calibration records are present. Report contains two quarterly equipment leak monitoring, one semi-annual equipment leak monitoring, and one semi-annual gas blanketing monitoring. Need follow up on component change history section.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/11/2023	Other Non ROP	Unknown	<p>This is the subject of a pending DOJ/EPA lawsuit with EES Coke; hence UNKNOWN chosen. Projected vs. actual emissions analysis for PTI 51-08C for 2022. No emissions were greater than projected. Also, letter states report is not required by permit condition or EGLE but being submitted due to EPA's assertion that they are required. Additionally memo states that 51-08C was issued to adjust the coke production limit and remove heat input at the underfire. It also presents a view that that excess gas produced due to production increase must still be burned off site and therefore the increase in coal charge does not and cannot result in additional COG burned at battery.</p>
03/14/2023	MACT (Part 63)	Compliance	<p>Subpart CCCCC, L compliance reports were submitted with the ROP semi annual report for the time period of July - December 2022. No deviations were reported for MACT 5C or MACT L.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/14/2023	ROP SEMI 2 CERT	Compliance	<p>#1 - Six opacity events exceeding 20% as measured by the COMS. As opacity is measured continuously, facility is substantively in compliance.</p> <p>#2 - COMS downtime. This was already reviewed by TPU staff in the excess emission reports and was determined to be acceptable.</p> <p>#3 - CEMS downtime. This was already reviewed by TPU staff in the excess emission reports and was determined to be acceptable.</p> <p>#4 - Push travel opacity exceedances. There were 2 exceedances of the instantaneous push/travel limit of 25%. This is an improvement from the prior 6 month period. Compliance chosen but will continue to monitor.</p> <p>#5 - Bleeder openings exceeding visible emission limit of 5 minutes per 2 hours. Five openings met this criteria. Compliance chosen but will continue to monitor for an uptick.</p> <p>#6 - Bleeder opacity. 4 assumed events of exceeding the 20% 6 min average - all on the same day (8/11/22). As this appears to be an isolated incident, compliance was chosen. Will continue to monitor.</p> <p>#7 - Failed PECS stack test for PM10. Facility was cited. Retest occurred and was passed. As such, compliance is current status.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/25/2023	Other Non ROP	Unknown	<p>4th Quarter 2022 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on January 24, 2023 (electronic copy). 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 4th Quarter 2022. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKOKE-BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/25/2023	Excess Emissions (CEM)	Compliance	<p>4th Quarter 2022 CERMS and COMS excess emissions and downtime report (hard copy) was received. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, two opacity exceedance were reported. As the length excess opacity (12 minutes) was a very small fraction of the total operating time (132,480 minutes), facility is substantively in compliance with the opacity limit. Ovens causing the problem were reportedly inspected and repaired. COMS downtime was 1.0% (1313 minutes).</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 52 hours (2.4% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p> <p>Changed status to Compliance for this report to align with similar reviews of other sources of EER's. Compliance is generally chosen if excess emissions and monitor downtime does not warrant a VN.</p>
01/25/2023	CO/CJ	Compliance	<p>4th Quarter 2022 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report.</p> <p>NOx pump and CO pump rebuilt. This appears to be an ongoing issue. Need further review and info.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/09/2023	CO/CJ	Compliance	<p>EES Coke submitted an amended fugitive dust control plan which includes, in part, the conditions from SIP CO 27-1993. Facility claims the dust suppressant that has been in use currently has little to no availability and the company is using a different product. AQD needs to obtain further information from facility about the new product and application rate. Regardless, required weekly and five day per week (depending on time of year) inspections will continue which will provide an evaluation of the sufficiency of the new product.</p>
12/22/2022	Stack Test	Non Compliance	<p>Company performed a stack test on the Pushing Emissions Control baghouse stack for PM, PM10, PM2.5 and NOx. Report indicates the test was failed for PM10. TPU reviewed the PM, PM10 and PM2.5 values and arrived at the following results which are slightly higher than the reported results: PM (lbs/ton coke pushed) 0.008, limit is 0.02; PM10 0.82 lbs/hr, limit is 0.69 lb/hr; PM2.5 0.69 lb/hr; limit is 0.69 lb/hr. A violation notice will be issued for PM10.</p> <p>At this time, the NOx results are still under review. Reported NOx emissions were 2.25 lb/hr. Permit limit is 2.61 lb/hr. Stack test company and EES Coke did not provide sufficient information for TPU to calculate a value. See attached email from Gina Angellotti. AQD is still waiting for a resubmission of the results.</p> <p>Process data: fan amps were at 110, pressure drop went up to 7 in wc except for Run 3 when there was a period where it went up to 9. Coke volatile matter ranged from 0.48 to 0.74%. Run 1 was 24 pushes, Run 2 was 28 pushes, Run 3 was 32 pushes.</p>
11/14/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 3rd Quarter 2022. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/14/2022	CO/CJ	Compliance	<p>3rd Quarter 2022 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report.</p> <p>Blow back pressure 44 psi before and after. AGC intensity after value appears to be a mistake</p>
11/14/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 4th Quarter 2022. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements. Need more information on dust suppressant in use as it has changed due to supply issues according to company.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/02/2022	Excess Emissions (CEM)	Compliance	<p>3rd Quarter 2022 CERMS and COMS excess emissions and downtime report (hard copy) was received. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, four opacity exceedance were reported. As the length excess opacity (24 minutes) was a very small fraction of the total operating time (132,480 minutes), facility is substantively in compliance with the opacity limit. Ovens causing the problem were reportedly inspected and repaired. COMS downtime was 0.1% (103 minutes).</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 70 hours (3.2% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p> <p>Changed status to Compliance for this report to align with similar reviews of other sources of EER's. Compliance is generally chosen if excess emissions and monitor downtime does not warrant a VN.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/02/2022	Other Non ROP	Unknown	<p>3rd Quarter 2022 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on October 26, 2022 (hard copy). 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 3rd Quarter 2022. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE-BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>
10/20/2022	ROP Semi 1 Cert	Non Compliance	<p>#1 - Eight opacity events exceeding 20% as measured by the COMS. #2 - COMS downtime. This was already reviewed by TPU staff in the excess emission reports and was determined to be acceptable. #3 - CEMS downtime. This was already reviewed by TPU staff in the excess emission reports and was determined to be acceptable. #4 - Push travel opacity exceedances. There were 10 exceedances of the instantaneous push/travel limit of 25%. NON COMPLIANCE. This is an ongoing issue. Facility was cited via a VN. #5 - TDS sample was lost for one week between collection and the lab. This is also a MACT CCCC deviation. #6 - Bleeder openings exceeding visible emission limit of 5 minutes per 2 hours. Two openings met this criteria. #7 - Charging emissions exceeded the 55 seconds for 5 charges for one day.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/20/2022	MACT (Part 63)	Compliance	Subparts CCCCC & L One deviation for 5C was reported related to missing weekly samples for one week. Appears to be an isolated incident and procedures were put in place to prevent recurrence. No deviations were reported related to MACT L.
10/20/2022	CO/CJ	Compliance	Quarterly fugitive dust report received for the 3rd Quarter 2022. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.
10/17/2022	Other Non ROP	Unknown	Test schedule related to EPA ICR request was submitted to EPA with a cc to AQD.
09/28/2022	Stack Test Observation	Compliance	PECS stack testing
09/12/2022	On-site Inspection	Non Compliance	FY2022 - Targeted Inspection

Activity Date	Activity Type	Compliance Status	Comments
08/22/2022	Excess Emissions (CEM)	Compliance	<p>2nd Quarter 2022 CERMS and COMS excess emissions and downtime report (hard copy) was received. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, three opacity exceedance were reported. As the length excess opacity (18 minutes) was a very small fraction of the total operating time (131,040 minutes), facility is substantively in compliance with the opacity limit. Ovens causing the problem were reportedly inspected and repaired. COMS downtime was 3.5% (4585 minutes).</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 59 hours (2.7% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary. Downtime for the COMS was 3.5% which was mostly attributable to the annual RATA.</p> <p>Changed status to Compliance for this report to align with similar reviews of other sources of EER's. Compliance is generally chosen if excess emissions and monitor downtime does not warrant a VN.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/22/2022	Other Non ROP	Unknown	<p>2nd Quarter 2022 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on July 28, 2022 (hard copy). 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 2nd Quarter 2022. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE -BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>
08/22/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 2nd Quarter 2022. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>
08/22/2022	CO/CJ	Compliance	<p>2nd Quarter 2022 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report.</p> <p>Blow back pressure is at 45 psi (was 55 psi before?) .</p>

Activity Date	Activity Type	Compliance Status	Comments
07/28/2022	NESHAP (Part 61)	Compliance	<p>Subpart L&V - Semi annual benzene monitoring Quarterly and semi-annual LDAR monitoring ("Benzene Monitoring Report") to comply with Part 61 Subparts L and V was received on July 28, 2022 for time period Jan - June 2022. Monitoring is being performed by Alliance. Semi-annual monitoring is performed on the gas blanketing system of Loop "D" and quarterly and semi-annual monitoring for equipment leaks. Monitoring is conducted with an FID calibrated with methane. Report states that two leaks were detected in June 2022 and were repaired that day or the following day. 5 calendar days for repair is the regulatory limit.</p> <p>Weekly pump inspection records are present. Calibration records are present. Report contains two quarterly equipment leak monitoring, one semi-annual equipment leak monitoring, and one semi-annual gas blanketing monitoring. Need follow up on component change history section.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/22/2022	CEM RATA	Compliance	<p>RATA was performed on the CERMS system for the Underfire Combustion Stack, including the CO, SO2, and NOx monitors and the scintillation flow monitor, on April 7 2022 (prior RATA was on April 7, 2021) Results were received by AQD on June 3, 2022. Protocol was received on February 24, 2022. TPU staff observed the RATA. AQD field staff was not available to observe.</p> <p>Reported results show the RA in lb/hr for NOx, CO, and SO2 was acceptable (less than 20% difference from RM, except for CO which is less than 1.0% of abs. difference) and the RA for flow was also acceptable (less than 20% difference). RA was 10.4% for SO2 (prior was 7.1 and 11.5%), 3.8% for NOx (prior was 5.2% and 14.5% for NOx), 10% for CO (prior was 9.3 and 7.9% for CO), and 8.3% for flow (prior was 4.3 and 5.4% for flow). Coefficient changed from 0.973 to 0.879.</p> <p>Facility operational data was 114 ovens pushed/day and approx.320 kscf COG used per run.</p> <p>TPU issued a letter on July 22, 2022 stating that the SO2, NOx, CO, and flow monitors passed the annual RATA requirement</p>
05/18/2022	MAERS	Compliance	<p>MAERS certification form received on March 16, 2022. Section 7. MAERS report was submitted electronically on March 18, 2022. Coke Oven Gas estimates will be added to EU-COKEBATTERY activities by ERU</p> <p>Very large increase in throughput to COGFLARE - almost 2.5 times Significant increase in coal throughput Stack testing in 2021 changed some emission factors that were used in prior report.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/16/2022	Other Non ROP	Unknown	<p>1st Quarter 2022 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on April 26, 2022. 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 1st Quarter 2022. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE -BATTERY, SC VI.9. Hence, the compliance status of Unknown. It should be noted that the hours immediately preceding the downtime and immediately after were not near the 0.702 lb SO2 limit.</p>
05/16/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 1st Quarter 2022. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>
05/16/2022	CO/CJ	Compliance	<p>1st Quarter 2022 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report. There was an issue with blowback pressure. Alerted TPU.</p>
05/16/2022	NSPS (Part 60)	Compliance	<p>2022 Annual COMS Certification Audit, per 40 CFR Part 60 Appendix B PS1, was performed on April 4, 2022 by Teledyne. Report states that unit passed the audit. The calibration error, zero compensation, and optical alignment all met the required specifications. ROP certification accompanied the results.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/14/2022	ROP Annual Cert	Non Compliance	<p>Non compliance. Push/travel exceedances are ongoing throughout the annual period. Facility was cited in December 2021. Non compliance was chosen until subsequent semi annual periods return to baseline levels.</p> <p>No new deviations were reported for period of Jan - Jun 2021. A copy of the previously submitted report was included with the annual certification.</p>
03/14/2022	ROP SEMI 2 CERT	Non Compliance	<p>Some of the push travel opacity exceedances were already cited before this report was received. However, non compliance was chosen because they were in a VN.</p> <p>#1 - 12 events where the 6 min average opacity as measured by COMS was above 20%. All on separate days.</p> <p>#2 - COMS downtime. This was previously reviewed by TPU staff in the EER quarterly reports. No further action necessary.</p> <p>#3 - CEMS downtime. This was previously reviewed by TPU staff in the EER quarterly reports. No further action necessary.</p> <p>#4 - Exceedances of the 20% instantaneous opacity limit during push/travel VE readings. This was mentioned above and has partially been cited.</p> <p>#5 - 6 bleeder openings that exceeded 5 minutes of open time in a 2 hour period. Since the facility has refused to conduct VE readings for bleeder openings, any opening is assumed to have visible emissions for the entire time it is open.</p> <p>5C - One "malfunction" was reported but it did not result in any deviations of 5C according to report submitted.</p> <p>L - One incident of coke oven gas vented other than through a flare. Date is not provided.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/14/2022	MACT (Part 63)	Compliance	<p>Subpart CCCCC, L For CCCCC, malfunction was reported and all actions taken were reportedly consistent with SSM plan. No other deviations were reported. Company needs to include the date of SSM occurrence in the report. For L, raw coke oven gas was released due to "malfunction" reported in 5C. Malfunction lasted 6 minutes. Actions taken were consistent with SSM plan. Notifications were received in a timely manner and as required by the regulation. One deviation was chosen as raw coke oven gas was released which is prohibited in MACT L.</p>
03/02/2022	Other Non ROP	Unknown	<p>This is the subject of a pending DOJ/EPA lawsuit with EES Coke; hence UNKNOWN chosen. Projected vs. actual emissions analysis for PTI 51-08C for 2021 SO₂, VOC, and H₂S actual emissions were greater than projected by more than significant levels. The reasons given by the facility via NTH consultants was that U.S. Steel stopped burning coke oven gas in several areas of their facility so EES had to direct the gas to their flare and that this increase was wholly excludable. Facility did not exceed projections at the underfire stack. Additional information was provided on April 15, 2022.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/17/2022	Excess Emissions (CEM)	Compliance	<p>3rd Quarter 2021 CERMS and COMS excess emissions and downtime report (hard copy) was received. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, eight opacity exceedance were reported. As the length excess opacity (48 minutes) was a very small fraction of the total operating time (132,480 minutes), facility is substantively in compliance with the opacity limit. However, most of the exceedances were due to "loss of carbon in an oven which resulted in cracks" but "no repairs were needed." AQD will monitor future reports to ensure this is not causing increasing numbers of exceedances.</p> <p>COMS monitor downtime was 2640 minutes (2.0% of total operating time) during the reporting period. Downtime was due to preventative maintenance and stack testing.</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 46 hours (2.1% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p> <p>Note, blow back pressure is listed as 55 psi before and after maintenance.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/17/2022	Other Non ROP	Unknown	<p>4th Quarter 2021 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on January 28, 2022. 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 4th Quarter 2021. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCOKE-BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/17/2022	Excess Emissions (CEM)	Compliance	<p>4th Quarter 2021 CERMS and COMS excess emissions and downtime report (hard copy) was received. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, four opacity exceedance were reported. As the length excess opacity (24 minutes) was a very small fraction of the total operating time (132,480 minutes), facility is substantively in compliance with the opacity limit. However, most of the exceedances were due to "loss of carbon in an oven which resulted in cracks" but "no repairs were needed." AQD will monitor future reports to ensure this is not causing increasing numbers of exceedances.</p> <p>COMS monitor downtime was 283 minutes (0.2% of total operating time) during the reporting period. Downtime was due to preventative maintenance.</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 18 hours (0.8% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p> <p>Note, blow back pressure is listed as 45 psi (prior was 55 psi) before and after maintenance.</p>
01/28/2022	NESHAP (Part 61)	Compliance	<p>Subpart L&V. One valve leak was detected in July 2021. Leak was corrected within 24 hours by tightening the valve. Report also notes that Alliance was able to remove 5 components on the C loop from difficult to monitor status and has transitioned them to monthly monitoring.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/12/2022	ROP Other	Unknown	Facility submitted a letter with ROP forms for an "off permit change" to inform AQD of the installation of a RICE engine for emergency purposes only. Engine is reportedly exempt from PTI requirements per R336.1285(2) (g). Unknown was chosen because AQD needs to determine whether an initial notification was also due. Specifications are one 470 hP natural gas RICE with a heat input of 4.6MMBTU/hr to be used for backup purposes for the general office building.
01/12/2022	CO/CJ	Compliance	Submission of revised Fugitive Dust Plan. EES Coke is now managing fugitive dust on portions of Zug Island where they are operating as US Steel has ceased operations on the island. Plan has reportedly been updated to reflect those changes. Changes were implemented as of October 2021. Need more info about stacker booms. Will review with facility during the next on site inspection.

Activity Date	Activity Type	Compliance Status	Comments
01/06/2022	NESHAP (Part 61)	Unknown	<p>Subpart L&V Quarterly and semi-annual LDAR monitoring ("Benzene Monitoring Report") to comply with Part 61 Subparts L and V was received on August 3, 2021 for time period Jan - June 2021. Semi-annual monitoring is performed on the gas blanketing system of Loop "D" and quarterly and semi-annual monitoring for equipment leaks. Monitoring is conducted with an FID calibrated with methane. Report states that one leak was detected. Once company was aware, plant personnel inspected.</p> <p>As this incident only involved one leak, and company investigation showed no leak upon re-check, enforcement discretion is being applied as it relates to the time that passed between the leak and follow up activity (24 days). 5 calendar days for repair is the regulatory limit.</p> <p>Pump inspection records are missing for February, March, and April. Difficult to monitor components are in the table, they are supposed to be monitored annually but table indicates they were not monitored in 2020. Also, semi annual ROP deviation report does not mention any of these deficiencies. Need more information from facility.</p> <p>Report contains two quarterly equipment leak monitoring, one semi-annual equipment leak monitoring, and one semi-annual gas blanketing monitoring was performed by Sidock Group, Inc.</p> <p>Note, Siddock performed monitoring in January and then they were replaced by Alliance Emission Monitoring in February 2021.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/04/2022	Other Non ROP	Unknown	<p>3rd Quarter 2021 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on November 2, 2021. 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 3rd Quarter 2021. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE-BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>
01/04/2022	CO/CJ	Compliance	<p>3rd Quarter 2021 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report. It appears that none or minor adjustments were made.</p> <p>Blow back pressure remained unchanged at 55 psi.</p>
01/04/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 3rd Quarter 2021. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/04/2022	Excess Emissions (CEM)	Compliance	<p>2nd Quarter 2021 CERMS and COMS excess emissions and downtime report (hard copy) was received on August 3, 2021. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, fifteen opacity exceedance was reported. As the length of excess opacity (90 minutes) was a very small fraction of the total operating time (131,040 minutes), facility is substantively in compliance with the opacity limit. Reasons were hole in two ovens, reversing system panel failure, and plugged flue.</p> <p>COMS monitor downtime was 5629 minutes (4.3% of total operating time) during the reporting period. Downtime was due to preventative maintenance and stack testing.</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 38 hours (1.7% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p> <p>Note, blow back pressure is listed as 55 psi before and after maintenance.</p>
01/04/2022	CO/CJ	Compliance	<p>2nd Quarter 2021 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report. It appears that none or minor adjustments were made.</p> <p>Blow back pressure remained unchanged at 55 psi.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/04/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 2nd Quarter 2021. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>
01/04/2022	Excess Emissions (CEM)	Compliance	<p>1st Quarter 2021 CERMS and COMS excess emissions and downtime report (hard copy) was received on May 6, 2021. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, two opacity exceedance were reported. As the length excess opacity (12 minutes) was a very small fraction of the total operating time (129,600 minutes), facility is substantively in compliance with the opacity limit.</p> <p>COMS monitor downtime was 442 minutes (0.3% of total operating time) during the reporting period. Downtime was due to preventative maintenance.</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 33 hours (1.5% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p> <p>Note, blow back pressure is listed as 55 psi before and after maintenance.</p>
01/04/2022	CO/CJ	Compliance	<p>1st Quarter 2021 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report. It appears that none or minor adjustments were made. Blow back pressure remained at 55 psi.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/04/2022	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 1st Quarter 2021. Report submitted with the quarterly Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>
01/04/2022	Other Non ROP	Unknown	<p>1st Quarter 2021 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on May 6, 2021. 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 1st Quarter 2021. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE -BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>
12/02/2021	Other	Non Compliance	<p>Review of Title V semi annual (January - June 2021) deviation report for EES Coke Battery. Report also includes separate semi annual compliance report for MACT CCCC and L.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/10/2021	Stack Test	Compliance	<p>Results of emissions testing for PM, PM10, PM2.5, and VOC of the EU-COKEBATTERY Underfire Combustion Stack were received on November 10, 2021. Testing was performed by CleanAir Engineering on September 14-15, 2021. Test protocol was received on August 12, 2021. Approval letter was sent on August 27, 2021. Based on the reported results as I did not receive a TPU memo, results were as follows which are presented as average of three runs. Note, each run appeared to have results same order of magnitude as the other runs:</p> <p>Non sulfate PM - 2.1 pph (prior 1.62 pph; 25.7 limit); 0.0018 gr/dscf (prior 0.001 gr/dscf; 0.012 limit)</p> <p>FPM - 0.031 lbs/1000 lbs dry at 50% excess O2 (0.027 prior; 0.095 limit)</p> <p>PM 10 and 2.5 - 30 .0 pph (prior 33.1 pph; 73.3 limit)</p> <p>VOC - 30.6 pph (prior 27.8 pph; 43.1 limit); 0.0589 (prior 0.0632 lb/MMBTU heat input; 0.0956 limit)</p> <p>Note a fourth run had to be performed for method 5F because the leak check was failed during Run 1. Also test report states that test ports are not adequate size to accommodate Method 201A cyclone head as it was tried in 2015 and due to narrow and long test ports there were numerous issues with broken glass. Based on the test results, facility appears to be in compliance with the permit limits. Process data submitted indicates 10,14, and 11 ovens per pushed per run, respectively. HHV of COG was 532 BTU/dscf, and F-factor was 8.020 based on samples taken on 9/15.</p>

10/20/2021	Release Reports	Non Compliance	<p>AQD received an email on 10/14/21 at 3:50 PM from Brenna Harden, EES, which read, in part: "we had unflared bleeds as part of a battery malfunction. I am still getting more detail. I have been told the issue has been resolved for now. I will check in the morning and complete the reports as required."</p> <p>Next, an NRC report was filed in on 10/15/21 at 12:23. NRC # 1319561 reads "CALLER IS REPORTING THE RELEASE OF 26 POUNDS OF COKE OVEN EMISSIONS FROM THE BATTERY STANDPIPE WATER SEALS AT THE FACILITY. THE RELEASED MATERIALS WENT INTO THE AIR AND ATMOSPHERE. THE CAUSE OF THE RELEASE IS DUE TO EQUIPMENT FAILURE."</p> <p>On 10/15/21, an email with the attached letter was received as a follow up to the incident. Hard copy letter was received on 10/20/21. At 9:05 am on 10/14/21, a UPS (uninterrupted power supply) supporting the battery experienced "abnormal voltage" faults which affected several control system servers. As such, pressure began to build up and blew out the water seals for the standpipes. Water seals are needed to prevent standpipe leaks. Servers were off line from approx. 9:09-9:15 a.m. and leaks were observed beginning at 9:09 a.m.</p> <p>Additionally, AQD received another letter on November 16, 2021 (hard copy). This letter contained additional information related to an "after action review" that was conducted. Reason for the abnormal voltage fault was due to a test of the emergency generator that was happening at the same time. A supplier noted that the generator was being fed by the UPS and improper wiring on the eater created a short. These observations were corrected on October 20, test, and found to correct the issue.</p>
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10/20/2021	Release Reports	Non Compliance	Non compliance was chosen due to release of raw COG. However, facility is in compliance with the reporting requirements when this type of release happens.
10/12/2021	Other Non ROP	Unknown	<p>2nd Quarter 2021 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on August 3, 2021. 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 2nd Quarter 2021. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE -BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>
09/29/2021	ROP Semi 1 Cert	Non Compliance	Non compliance due to push/travel instantaneous opacity exceedances. See compliance activity report CA_P040861016
09/29/2021	MACT (Part 63)	Unknown	Subparts CCCCC & L - EES COKE - Compliance certifications for MACT L and MACT CCCCC for January - June 2021 were received on September 15, 2021 as part of the ROP semi annual deviation report. See Compliance Activity Report P040861016. Unknown was chosen for MACT L due to not enough information provided related to the no more than 5 minutes of VE's over 2 hours.
09/14/2021	Stack Test Observation	Compliance	Underfire combustion stack test
07/28/2021	On-site Inspection	Non Compliance	Non compliance due to push/travel instantaneous opacity exceedance observed on 7/28/21

Activity Date	Activity Type	Compliance Status	Comments
06/28/2021	CEM RATA	Compliance	<p>RATA was performed on the CERMS system for the Underfire Combustion Stack, including the CO, SO₂, and NO_x monitors and the scintillation flow monitor, on April 7 and 8 2021. Results were received by AQD on May 13, 2021. Protocol was received on February 11, 2021. TPU staff observed the RATA. AQD field staff was not available to observe. The RATA was failed during the first attempt on April 7. Reason given was error in the spreadsheet used to calculate the coefficient factor.</p> <p>Based on the results, the Coefficient Factor was changed from 0.969 to 0.973 (prior change was from 0.967 based on the May 2019 testing to 0.969 based on the April 15, 2020 RATA).</p> <p>Reported results show the RA in lb/hr for NO_x, CO, and SO₂ was acceptable (less than 20% difference from RM, except for CO which is less than 1.0% of abs. difference) and the RA for flow in terms of kscfh (??double check) was also acceptable (less than 20% difference). RA was 7.1% for SO₂ (prior was 11.5% for SO₂), 5.2% for NO_x (prior was 14.5% for NO_x), 9.3% for CO (prior was 7.9% for CO), and 4.3% for flow (prior was 5.4% for flow)</p> <p>Facility operational data was 114 ovens pushed/day (prior was 88 during beginning of COVID) and 329 kscf COG used (prior was 279.4 to 342.8 kscf of fuel consumed).</p> <p>TPU issued a letter on June 28, 2021 stating that the SO₂, NO_x, CO, and flow monitors passed the annual RATA requirement</p>
05/26/2021	ROP SEMI 2 CERT	Unknown	<p>Facility did not provide sufficient information in the certification report. AQD requested more. It was provided. Compliance method with Rule 301 during bleeder openings is still unclear. Needs further information/discussion from facility. See CA_P040861509</p>

Activity Date	Activity Type	Compliance Status	Comments
05/26/2021	ROP Annual Cert	Unknown	No new deviations were reported in the 2020 Annual report. 17 deviations total were reported from the two semi annual reports. However, reports are incomplete related to bleeder opening exceedances of the 5 minutes of VE per 2 hours and Rule 301.

05/06/2021	MACT (Part 63)	Compliance	<p>Subparts CCCCC & L - EES COKE - Compliance certifications for MACT L and MACT CCCCC for July - December 2020 were received on March 15, 2021 as part of the ROP semi annual deviation report.</p> <p>MACT CCCCC semiannual report – One power loss occurred from 7/3/20 to 7/4/20 that the facility classified as an SSM event. Report states that there were no deviations from continuous compliance requirements for pushing, quenching, and soaking, and there were no periods where CMS was out of control, and no deviations from an emission limit or work practice standard.</p> <p>MACT L semiannual report – Report states coke oven gas was vented through something other than the bypass/bleeder flare system during the reporting period. Report states it was an SSM event; according to letters from company, power outage was caused by faulty equipment from public utility so it could meet the criteria for a malfunction. Regardless, notification and written reporting requirements outlined in the MACT were met. The MACT language does not require a statement about whether there were visible emission exceedances of the 5 minutes over a consecutive two hour period. Report also certifies that work practices were implemented according to the work plan. There is still a deviation as it relates to the release of raw COG because 63.307 of MACT L states "Standards for bypass/bleeder stacks.</p> <p>(a) (2) Coke oven emissions shall not be vented to the atmosphere through bypass/bleeder stacks, except through the flare system or the alternative control device as described in paragraph (d) of this section."</p> <p>However, based on information provided, it seems that this could meet the definition of a malfunction as power loss was due to an issue with public utility cable. From Subpart L, i) If the</p>
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05/06/2021	MACT (Part 63)	Compliance	<p>owner or operator demonstrates to the satisfaction of the Administrator that a startup, shutdown, or malfunction has occurred, then an observation occurring during such startup, shutdown, or malfunction shall not:</p> <p>(1) Constitute a violation of relevant requirements of this subpart;</p> <p>(2) Be used in any compliance determination under § 63.309; or</p> <p>(3) Be considered for purposes of § 63.306, until the Administrator has resolved the claim that a startup, shutdown, or malfunction has occurred. If the Administrator determines that a startup, shutdown, or malfunction has not occurred, such observations may be used for purposes of § 63.306, regardless of whether the owner or operator further contests such determination. The owner's or operator's receipt of written notification from the Administrator that a startup, shutdown, or malfunction has not occurred will serve, where applicable under § 63.306, as written notification from the certified observer that an exceedance has occurred.</p> <p>As such, violation notice is not warranted at this time due to language in L exempting incident from a compliance determination as it relates to the MACT.</p>
05/03/2021	NSPS (Part 60)	Compliance	<p>2021 Annual COMS Certification Audit, per 40 CFR Part 60 Appendix B PS1, was performed on March 24, 2021 by Teledyne. Report states that unit passed the audit. The calibration error, zero compensation, and optical alignment all met the required specifications. Regarding calibration error, for the low opacity standard, error was 0.64%, mid-range was 0.93%, and high was 0.96%. ROP certification accompanied the results.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/03/2021	Other	Unknown	Review of Title V semi annual (July - December 2020) deviation report for EES Coke Battery. Report also includes separate semi annual compliance report for MACT CCCCC and L.
03/17/2021	Excess Emissions (CEM)	Compliance	<p>4th Quarter 2020 CERMS and COMS excess emissions and downtime report (hard copy) was received on February 3, 2021. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, one opacity exceedance was reported. As the excess opacity was a very small fraction of the total operating time, facility is substantively in compliance with the opacity limit. COMS monitor downtime was 180 minutes (0.1% of total operating time) during the reporting period. Downtime was due to preventative maintenance.</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 35 hours (1.6% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary.</p> <p>Note, blow back pressure is listed as 55 psi before and after maintenance.</p>
03/17/2021	CO/CJ	Compliance	<p>4th Quarter 2020 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report. It appears that none or minor adjustments were made. Note, blow back pressure is listed as 55 psi before and after maintenance.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/17/2021	CO/CJ	Compliance	Quarterly fugitive dust report received for the 4th Quarter 2020. Report submitted with the 4th Quarter Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.
03/12/2021	MAERS	Compliance	MAERS report was submitted electronically on March 12, 2021. Coke Oven Gas estimates will be added to EU-COKEBATTERY activities by ERU Very large increase in throughput to COGFLARE Stack testing changed some emission factors that were used in prior report.
03/04/2021	Other Non ROP	Compliance	Projected vs. actual emissions analysis for PTI 51-08C for 2020. None of the actual emissions were above the projected according to the memo.
03/01/2021	Other	Unknown	This is the subject of a pending DOJ/EPA lawsuit with EES Coke; hence UNKNOWN chosen. Emission reports related to 51-08C projections, actual emissions, and "reasonable possibility"

Activity Date	Activity Type	Compliance Status	Comments
02/24/2021	Stack Test	Compliance	<p>PECS baghouse stack test -- Test protocol was received on August 21, 2020. Approval letter was sent on September 9, 2020. Stack test company had some questions which AQD district staff answered (see attached emails). AQD TPU and field staff were not able to observe this test. Testing was conducted by CleanAir Engineering. Electronic copy of results was received on 11/6/20; hard copy was received on 11/12/20. Testing takes a long time to complete because sampling is only performed during pushing which is about once every 20 or so minutes (as battery is on extended coking) and a push only lasts 3-4 minutes so each run took 7-9 hours of clock time to complete. Only one run could be completed per day which exceeded the 36 hour limit but was acceptable to AQD. 22 ovens pushed in Run 1, 18 ovens in Run 2, 19 ovens in Run 3. Also, there are PM10 and 2.5 limits on this stack. The facility chose to use 201A for filterable PM10 and 2.5 as this method size sorts the particles. The facility has used M5 in the past.</p> <p>TPU staff Gina Angelotti reviewed the results and generated the attached memo. She also identified one issue which did not change the results and is described in her memo. Results were as follows: PM (lb/ton coke pushed): 0.007 (0.02 permit limit); PM10(lb/hr): 0.33 (0.69 permit limit); PM 2.5 (lb/hr): 0.29 (0.69 permit limit); NOx (lb/hr): 1.39 (2.61 permit limit).</p> <p>Requested process data was included in the test report. Baghouse fan amps were around 92 amps (98 amps during prior test) throughout the testing. The high end of the pressure drop was around 6 in. H2O throughout the testing (same as prior). Coke pushed per day was between 1109 and 1143 tons).</p>

Activity Date	Activity Type	Compliance Status	Comments
02/24/2021	NESHAP (Part 61)	Compliance	<p>Subpart L&V Quarterly and semi-annual LDAR monitoring ("Benzene Monitoring Report") to comply with Part 61 Subparts L and V was received on February 3, 2021 (hard copy). Semi-annual monitoring is performed on the gas blanketing system of Loop "D" and quarterly and semi-annual monitoring for equipment leaks. Monitoring is being performed by Alliance. Report states that one valve was leaking in July and it was fixed the next day. 5 calendar days for repair is the regulatory limit.</p> <p>Weekly pump inspection records are present. Calibration records are present. Report contains two quarterly equipment leak monitoring, one semi-annual equipment leak monitoring, and one semi-annual gas blanketing monitoring. Changed 5 components from Difficult to monitor to monthly monitor schedule in C loop.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/24/2021	Excess Emissions (CEM)	Compliance	<p>3rd Quarter 2020 CERMS and COMS excess emissions and downtime report (hard copy) was received on November 4, 2020. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, two opacity exceedances were reported. As the excess opacity was a very small fraction of the total operating time, facility is substantively in compliance with the opacity limit. COMS monitor downtime was 71 minutes (0.1% of total operating time) during the reporting period. Downtime was due to preventative maintenance.</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 34 hours (1.5% of total operating time) for each pollutant during the reporting period.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary. Note, blow back pressure is listed as 55 psi before and after maintenance. CO purge air pressure was 30 psi before and 22 after maintenance.</p>
02/24/2021	CO/CJ	Compliance	<p>Quarterly fugitive dust report received for the 3rd Quarter 2020. Report submitted with the 3rd Quarter Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.</p>
02/24/2021	CO/CJ	Compliance	<p>3rd Quarter 2020 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report. It appears that none or minor adjustments were made. Note, blow back pressure is listed as 55 psi before and after maintenance. CO purge air pressure was 30 psi before and 22 after maintenance.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/24/2021	Other Non ROP	Unknown	<p>4th Quarter 2020 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on February 3, 2021. 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 4th Quarter 2020. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE-BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/25/2021	CEM RATA	Compliance	<p>RATA was performed on the CERMS system for the Underfire Combustion Stack, including the CO, SO₂, and NO_x monitors and the scintillation flow monitor, on April 15, 2020 (prior RATA was on May 2, 2019). Results were received by AQD on May 19, 2020. TPU staff observed the RATA. AQD field staff was not available to observe. 12 runs were performed; runs 1,4 and 5 were excluded, as allowed by the test method.</p> <p>Based on the results, the Coefficient Factor was changed from 0.967 based on the May 2019 testing to 0.969 based on the April 15, 2020 RATA. Reported results show the RA in lb/hr for NO_x, CO, and SO₂ was acceptable (less than 20% difference from RM, except for CO which is less than 1.0% of abs. difference) and the RA for flow in terms of scfm was also acceptable (less than 20% difference). RA was 11.5% for SO₂, 14.5% for NO_x, 7.9% for CO, and 5.4% for kscfm.</p> <p>Facility operational data was between 117,515 and 143,050 SCFM wet, 279.4 to 342.8 kscf of fuel consumed, and 88 ovens are being pushed per day.</p>
01/13/2021	ROP Semi 1 Cert	Compliance	See Complaint Activity Report CA_P040856655
01/13/2021	MACT (Part 63)	Compliance	Subpart CCCCC & L. See Compliance Activity Report CA_P040856655
01/13/2021	Other	Compliance	Review of Title V semi annual (January - June 2020) deviation report for EES Coke Battery. Report also includes separate semi annual compliance report for MACT CCCCC and L.
12/11/2020	CO/CJ	Compliance	Quarterly fugitive dust report received for the 2nd Quarter 2020. Report submitted with the 2nd Quarter Excess Emission Report for the CERMS and COMS. Facility reported no deviations from fugitive dust requirements.

Activity Date	Activity Type	Compliance Status	Comments
12/11/2020	Excess Emissions (CEM)	Non Compliance	<p>2nd Quarter 2020 CERMS and COMS excess emissions and downtime report was received on July 31, 2020. Data substitution outlined in PTI 51-08C is in use during downtime.</p> <p>For the COMS, zero opacity exceedances. COMS monitor downtime was 4723 minutes (3.6% of total operating time) during the reporting period. Downtime was due to preventative maintenance.</p> <p>For the CERMS, no exceedances of NOx or CO, or SO2 were reported. Monitor downtime for the CERMS was 28 hours (1.3% of total operating time) for each pollutant during the reporting period.</p> <p>There were two exceedances of the 1b SO2/1000 scf of coke oven gas limit. A violation notice will be issued.</p> <p>Monitor downtime for the COMS and CERMS was reviewed by Regina Angellotti, AQD-TPU, and compliance was chosen. No further action is necessary. Note, blow back pressure is listed as 55 psi before and after maintenance and 53 after.</p>
12/11/2020	CO/CJ	Compliance	<p>2nd Quarter 2020 CERMS parameter report per CO 57-2014 Paragraph A.2 was submitted with the quarterly Excess Emissions Report. It appears that none or minor adjustments were made.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/11/2020	NESHAP (Part 61)	Non Compliance	<p>Quarterly and semi-annual LDAR monitoring ("Benzene Monitoring Report") to comply with Part 61 Subparts L and V was received on July 31, 2020. Semi-annual monitoring is performed on the gas blanketing system of Loop "D" and quarterly and semi-annual monitoring for equipment leaks. Monitoring is conducted with an FID calibrated with methane. Report states that one leak was detected at a pressure relief valve on the tar tank but was not reported to EES in a timely manner due to COVID issues. Once company was aware, plant personnel inspected the valve and used their own benzene meter which did not indicate any detectable emissions. The next day an FID was used to confirm no detectable emissions. As this incident only involved one leak, and company investigation showed no leak upon re-check, enforcement discretion is being applied as it relates to the time that passed between the leak and follow up activity (24 days). 5 calendar days for repair is the regulatory limit.</p> <p>Report contains two quarterly equipment leak monitoring, one semi-annual equipment leak monitoring, and one semi-annual gas blanketing monitoring was performed by Sidock Group, Inc.</p>
12/11/2020	Other	Unknown	Request to void CO AQD No. 57-2014

Activity Date	Activity Type	Compliance Status	Comments
12/07/2020	Other Non ROP	Unknown	<p>3rd Quarter 2020 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on November 6, 2020. 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 grains 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.</p> <p>The report indicates that there were no 1-hr exceedances of the SO2 limit during the 3rd Quarter 2020. However, the facility reported some monitor downtime during this quarter which means hourly emissions are estimated as allowed per the methodology specified in PTI 51-08C, EUCKE-BATTERY, SC VI.9. Hence, the compliance status of Unknown.</p>
12/07/2020	Other Non ROP	Non Compliance	<p>2nd Quarter 2020 1-hour average SO2 emissions in lbs SO2/1000 scf of COG report was received by AQD on July 31, 2020. 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 grains 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.</p> <p>The report indicates that there were two 1-hr exceedances of the SO2 limit during the 2nd Quarter 2020. Hence, the compliance status of Non compliance. A violation notice was issued.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/25/2020	Other Non ROP	Unknown	<p>This is the subject of a pending DOJ/EPA lawsuit with EES Coke; hence UNKNOWN chosen.</p> <p>Projected vs. actual emissions analysis for PTI 51-08C for 2018 and 2019. SO2 actual emissions were greater than projected by more than significant levels (40 tons for SO2) for both years. The reasons given by the facility via NTH consultants was that U.S. Steel stopped burning coke oven gas in several areas of their facility so EES had to direct the gas to their flare. There is no emission limit or material limit on the COG flare. Additionally, it is required by MACT Subpart L to have a flare designed to accommodate 120% of the maximum amount of the gas that can be generated. As such, the flare was designed to accommodate all of the excess COG generated by the Coke Oven battery and this method of operation is one that the battery was fully capable of accommodating before and after the issuance of PTI 51-08C. As such, the emissions increase at the flare was not related to the project (for 51-08C) and the flare was "capable of accommodating" all of these emissions. Note, the battery did not achieve that level of emissions during the look back baseline period. However, since the battery is oversized for safety purposes, AQD accepted this as capable of accommodating even though the battery did not operate at this level. Also, AQD evaluated actual vs. projected emissions on a calendar year basis and not a 12 month rolling based on language in Part 18/19 rules. Facility did not exceed projections at the underfire stack.</p>
08/27/2020	On-site Inspection	Non Compliance	FY2020 Scheduled Inspection

Name: Kahlu

Date: 11/28/23

Supervisor: April L. Wainwright
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