

2700-FM-BAQ0023 2/2015 pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program	
Date(s) of Inspection: 19 Aug 2016	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 25-000201	Expiration Date: 28 Feb 2018	Case #: 25-000-00029
Company Name: Erie Coke			Municipality: Erie City	PF ID #: S0751	
Plant Name: Erie Coke Corporation			Physical Location: 92 E Bay Drive	County: Erie	
Responsible Official: Anthony Nearhood			Mailing Address: PO Box 6180		
Title: Plant Superintendent			Federal ID - Plant Code #: 25-1547051-7		
Phone #(s): 814-454-0177			Erie PA 16512-6180		

Mark (X) All Inspection Types That Apply To This Inspection:

<input checked="" type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)
<input type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: YES NO N/A Date Received: 2 Nov 2015

AIMS Report Received: YES NO N/A Date Received: 29 Feb 2016

Mark (X) All Activities That Apply:

<input checked="" type="checkbox"/> File Review	<input checked="" type="checkbox"/> Pre-Inspection Briefing	<input checked="" type="checkbox"/> Exit Interview/Briefing
<input checked="" type="checkbox"/> Pre-Inspection Observations	<input checked="" type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input checked="" type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

I met with Tony Nearhood and Randy Wiler from Erie Coke to finish their FCE. See attached checklist to show compliance with their Air Quality Permit conditions. Also attached are examples of their record keeping. I found no violations during the time of my inspection. Partial inspection reports are also attached and the information is use to complete this FCE.

Compliance Status: In Out Pending Awaiting Co. Report

Needs a Follow-Up Inspection? Yes No

Company Representative: ANTHONY S. NEARHOOD	Title: PLANT SUPERINTENDENT	Signature: 	Date: 8/19/16
DEP Representative: Dan Brophy	Title: Air Quality Specialist	Signature: 	Date/Time: 19 Aug 2016



INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection: 8 Aug 2016	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 25-00029	Expiration Date: 28 Feb 2018	Case #: 25-000-0029	PF ID #: 50751
Company Name: Eric Coke			Municipality: Eric City		County: Eric	
Plant Name: Eric Coke Corporation			Physical Location: 92 E Bay Drive		Federal ID - Plant Code #: 25-1547051-7	
Responsible Official: Anthony Nearholt				Mailing Address: PO Box 6180		
Title: Plant Superintendent				Eric PA 15512-6180		
Phone #(s): 814-454-0177						

Mark (X) All Inspection Types That Apply To This Inspection:

<input type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)
<input checked="" type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: 2 Nov 2015
AIMS Report Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: 29 Feb 2016

Mark (X) All Activities That Apply:

<input type="checkbox"/> File Review	<input checked="" type="checkbox"/> Pre-Inspection Briefing	<input checked="" type="checkbox"/> Exit Interview/Briefing
<input checked="" type="checkbox"/> Pre-Inspection Observations	<input checked="" type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input checked="" type="checkbox"/> Other 303

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

I met with Tony Nearholt and Dave Stablin to conduct a 303 inspection of the battery. Attached are my results as Attachment J. Also attached are the DES 303 results completed by their consultant of the same day. No violations of Eric Coke's Air Quality permit on this day of inspection. This inspection is a part of their FCE.

Compliance Status: In Out Pending Awaiting Co. Report Needs a Follow-Up Inspection? Yes No

Company Representative: Anthony S. Nearholt	Title: Plant Superintendent	Signature: 	Date: 8/19/16
DEP Representative: Dan Brady	Title: Air Quality Specialist	Signature: 	Date/Time: 8 Aug 2016

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.



INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection: 10 Aug 2016	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 25-00029	Expiration Date: 28 Feb 2018	Case #: 25-000-0029	PF ID #: 50751
Company Name: Erle Coke		Municipality: Erle City		County: Erle		
Plant Name: Erle Coke Corporation		Physical Location: 92 E Bay Drive		Federal ID - Plant Code #: 25-1547051-7		
Responsible Official: Anthony Nearholt				Mailing Address: PO Box 6180		
Title: Plant Superintendent				Erle PA 15512-6180		
Phone #(s): 814-454-0177						

Mark (X) All Inspection Types That Apply To This Inspection:

<input type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)
<input checked="" type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: 2 Nov 2015
AIMS Report Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: 29 Feb 2016

Mark (X) All Activities That Apply:

<input checked="" type="checkbox"/> File Review	<input checked="" type="checkbox"/> Pre-Inspection Briefing	<input checked="" type="checkbox"/> Exit Interview/Briefing
<input checked="" type="checkbox"/> Pre-Inspection Observations	<input checked="" type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

I met with Randy Wiler from Erle Coke to conduct the file review portion of their FCE of Erle Coke's Air Quality permit. Attached are examples of their record keeping to show compliance with their permit conditions. I found no violations during this day of inspection. I will need to continue their record keeping review. Also attached is a checklist of their Air Quality permit conditions to show records needed.

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report	Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Company Representative: R.G. WILER	Title: ENVIRONMENTAL ENG.	Signature: <i>R.G. Wiler</i>	Date: 8-19-16
DEP Representative: Dan Brady	Title: Air Quality Specialist	Signature: <i>Dan Brady</i>	Date/Time: 10 Aug 2016

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.



INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection: <i>11 Aug 2016</i>	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): <i>25-00029</i>	Expiration Date: <i>28 Feb 2018</i>	Case #: <i>25-000-0029</i>	PF ID #: <i>50751</i>
Company Name: <i>Erie Coke</i>			Municipality: <i>Erie City</i>		County: <i>Erie</i>	
Plant Name: <i>Erie Coke Corporation</i>			Physical Location: <i>92 E Bay Drive</i>		Federal ID - Plant Code #: <i>25-1547051-7</i>	
Responsible Official: <i>Anthony Nearhood</i>				Mailing Address: <i>PO Box 6180</i>		
Title: <i>Plant Superintendent</i>				<i>Erie PA 16512-6180</i>		
Phone #(s): <i>814-454-0177</i>						

Mark (X) All Inspection Types That Apply To This Inspection:

<input type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)
<input checked="" type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: <i>2 Nov 2015</i>
AIMS Report Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: <i>29 Feb 2016</i>

Mark (X) All Activities That Apply:

<input checked="" type="checkbox"/> File Review	<input type="checkbox"/> Pre-Inspection Briefing	<input checked="" type="checkbox"/> Exit Interview/Briefing
<input type="checkbox"/> Pre-Inspection Observations	<input type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

Randy Winer from Erie Coke was unable to continue with the file review of their recent permit requirements of their Air Quality permit due to personal injury. Tony Nearhood and I discussed I would be back at a later date to finish the file review. There were no violations of their permit during this day of inspection.

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report	Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Company Representative: <i>[Signature]</i>	Title: <i>Plant Superintendent</i>	Signature: <i>Anthony S Nearhood</i>	Date: <i>8/19/16</i>
DEP Representative: <i>Dan Brady</i>	Title: <i>Air Quality Specialist</i>	Signature: <i>[Signature]</i>	Date/Time: <i>11 Aug 2016</i>

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.



INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection: <i>15 Aug 2016</i>	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): <i>25-00029</i>	Expiration Date: <i>28 Feb 2018</i>	Case #: <i>25-000-0029</i>	PF ID #: <i>50751</i>
Company Name: <i>Eric Coke</i>		Municipality: <i>Eric City</i>		County: <i>Eric</i>		
Plant Name: <i>Eric Coke Corporation</i>		Physical Location: <i>92 E Bay Drive</i>		Federal ID - Plant Code #: <i>25-1547051-7</i>		
Responsible Official: <i>Anthony Narkoot</i>				Mailing Address: <i>PO Box 6180</i>		
Title: <i>Plant Superintendent</i>				<i>Eric PA 15512-6180</i>		
Phone #(s): <i>814-454-0177</i>						

Mark (X) All Inspection Types That Apply To This Inspection:

<input type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)
<input checked="" type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: <i>2 Nov 2015</i>
AIMS Report Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: <i>29 Feb 2016</i>

Mark (X) All Activities That Apply:

<input checked="" type="checkbox"/> File Review	<input checked="" type="checkbox"/> Pre-Inspection Briefing	<input checked="" type="checkbox"/> Exit Interview/Briefing
<input checked="" type="checkbox"/> Pre-Inspection Observations	<input type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

I met with Randy Wiler to complete the file review portion of Eric Coke's FCE. Attached is examples of their record keeping to show compliance. Also attached is a checklist to verify compliance of their Air Quality permit. I found no violations during the time of my inspection.

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report	Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Company Representative: <i>R.G. WILER</i>	Title: <i>ENVIRONMENTAL ENG.</i>	Signature: <i>R.G. Wiler</i>	Date:
DEP Representative: <i>Dan Brophy</i>	Title: <i>Air Quality Specialist</i>	Signature: <i>[Signature]</i>	Date/Time: <i>15 Aug 2016</i>

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

ERIE COKE

PF ID: 50751

Title V Permit: 25-00029

Inspection Date(s) 8/8, 8/10, 8/11, 8/15, 8/19, 8/22 (method a)

Background: The Erie Coke Corporation plant is situated on approximately 60 acres along the shores of Lake Erie, in Erie, Pennsylvania and produces foundry coke. The facility operates 24 hours per day, 365 days a year.

How many employees? 115 How many days a week/shifts? 24 / 7 365

Asbestos/demo projects since last FCE inspection dated 2015? Y N

Any change to or unlisted sources Y / N PA sent for modification to the thionizer/absorber

Plans of change? Y / N Discussed RFD Process

Sample taken? Y / N Sample# _____ Seal # _____ Location: _____ MSDS Acquired

Recent stack test? Y / N Date: _____ Method 9 Done? Y / N (Attach results)

Enforcement since last inspection? Y / N NOV dated 21 July 2016 / NOV dated 25 July 2016

Section B. General Site Requirements:

Permit pages 8 - 17

- #002 AQ Operating permit due to expire 28Feb2018; (renewal app. Due 6 -18 mos. prior)
- #006 Inspection and entry; including access to records, ability to sample or monitor
- #016 Emission fees paid for: Tracking 2015 emission fees due 1 Sept 2016
- #018-020 Reporting; sampling, testing, & monitoring; recordkeeping: reports sent to Regional office w/truth & accuracy certification; records of monitored information and supporting documentation available & kept for 5 yrs.
see attach records for example

Section C. Site Level Requirements:

Permit pages 18 - 22

- #001, 007, 014 Reasonable actions shall be taken to prevent particulate matter to become airborne from demolition & construction activities, the grading & maintenance of roads, land clearing, stockpiles, etc.
- #002 No fugitives from sources should be visible outside the property.
- #003 No malodors detected outside the property
- #004 No emissions w/opacity equal to or greater than 20% for a period of more than 3 min in one hr or equal to or greater than 60% at any time are not permitted into the outdoor atmosphere.
- #008 (a) The permittee shall conduct daily monitoring of the facility property while the facility is operating, to observe for the presence of fugitive emissions and visible emissions, in excess of conditions # 001 and # 002 above, being emitted into the outdoor atmosphere.
(b) All detected fugitive emissions and visible emissions shall be reported to the Supervisor, Manager, or Engineer.

#001 Water truck onsite, contracted out sweeper twice a month pavement

#004 - see COMS Data Attachment G

#008A see Attachment A

**In compliance if condition is checked. Out of compliance if Circled.

#004 - see attached method 9 and COMS data for comparison Attachment P

Section C. Site Level Requirements (continued)

- #009 (a) The permittee shall maintain a record of the daily monitoring conducted to determine the presence of fugitive emissions and visible emissions
(b) This recordkeeping shall contain a listing or notation of any and all sources of fugitive emissions or visible emissions; the cause of the fugitive or visible emissions; duration of the emission; and the corrective action taken to abate the deviation and prevent future occurrences.

#010 Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with §§ 135.3 and 135.21 (relating to reporting; and emission statements).

#011(c), 012 Annual emission statements and source report (AIMS) are due by March 1 for the preceding calendar year.

#015 No person may permit air pollution as that term is defined in the APCA.

#016 No person may permit the open burning of material in an air basin. See permit page 21 #016(c) for exceptions to this condition.

Compliance Certification: The permittee shall submit within thirty days of 09/30/2006 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter. *Received*

Compliance Schedule:

#017 The pressure drop range for the Coke Shed baghouse (control device C802A) was established between 1" and 7" w.g.

#017 - control device measured by PD and RPMs - see Attachment B

SECTION D: SOURCE LEVEL REQUIREMENTS

SOURCE 031: Erie City BOILER #1 60,000 mmBTU/Hr Permit page 23

FML 03/05 → CU 031 → STAC S031

SOURCE 032: Erie City BOILER #2 77,200 mmBTU/Hr Permit page 25

FML 03/05 → CU 032 → STAC S032

SEE SECTION E.:

GROUP 1 – BOILERS (See below) Permit page 64

GROUP 10 - H2S TESTING OF COG (See checklist page 8) Permit page 68

GROUP 2 - NESHAP FOR BOILERS, SUBPART DDDDD (See checklist page 5) Permit page 69

SECTION E. GROUP 1: BOILERS

#001 Combustion Units: shall not emit particulate matter in excess of 0.4 ppm BTU heat input, when the heat input to the unit in millions of BUTs/Hr is >2.5 but <50 **Use 55,000 lb/hr steam load for the boiler size.** (The Dept. believes the facility is in compliance with this condition because there were no emissions visible)
At maximum heat input of 60 MMBTU/hr., the particulate matter limitation is 0.36 lbs./MMBTU for Source 031, Erie City Boiler #1.
At maximum heat input of 77.2 MMBTU/hr., the particulate matter limitation is 0.32 lbs./MMBTU for Source 032, Erie City Boiler #2.

#002 shall not emit SO2 in excess of 4 ppm Btu of heat input over a 1-hour period
(The Dept. believes the facility is in compliance with this condition because there were no emissions visible)

**In compliance if condition is checked. Out of compliance if Circled.

#003 Byproduct Coke Oven Gas
(a) no person shall permit the emission of byproduct coke oven gas (COG) unless the gas is first burned.
(b) shall not permit the flaring or combustion of COG which contains sulfur compounds in concentrations > 50 grains/100dscf.

#004 (a) when both boilers are operating, the NOx emissions from each boiler shall not exceed;
(1) 0.39 lbs/mmbtu
(2) 11.4 lbs/hr
(3) 49.82 tons/year
(b) the NOx emissions shall not exceed 22.8 lbs/hr. when one boiler is operating,
(c) the quarterly NOx emissions shall not exceed 24.9 tons for both boilers based on a 3-month consecutive period. *Received: July 2016*

#005 Only Natural gas or COG shall be burned as boiler fuel.

#006
(a) shall perform an annual stack test for NOx emissions (once per calendar year). *Normally done every Dec, this year will be Sept*
(b) submit the pretest protocol at least 30 days prior to the stack test.
(c) notify the Department of the date and time of the stack test at least 2 weeks prior to the test
(d) also test for CO at the time of the stack tests for NOx

#006(e) if after 3 consecutive annual tests, emission data shows compliance with the NOx limits the **testing frequency maybe be altered as determined by the department.** This alteration in testing frequency would not be applicable for any calendar year in which Erie Coke operates both boilers simultaneously.

#007 the permittee shall record each annual adjustment or tune-up on the combustion process in a permanently bound log book. This log shall contain, at a minimum, the following:
1. The date of the tuning procedure
2. The name of the service company and technicians
3. The final operating rate or load
4. The final CO and NOx emission rates
5. The final excess oxygen rate
Recorded during each annual stack test

#008 maintain on site the total nitrogen oxide (NOx) emissions of each boiler on a monthly basis and the corresponding quarterly (3-month) rolling totals and 12-month rolling totals.

#009 calculate the SOx emissions whenever the sulfur content of the coke oven gas exceeds 3% by weight to show compliance with Condition #002, above.

#010 (a) submit quarterly NOx emission reports to the Department.
(b) The permittee shall submit, within 60 days after completion of the stack test, two copies of the complete test reports, including all operational parameters, to the Department for approval.

#011 compile and submit a semi-annual compliance certification report to the Department within thirty (30) days of the end of each semi-annual period for the coke oven gas testing during the preceding six (6) months.

Received: April 2016

#012 (a) perform an annual adjustment or tune-up on the combustion process. This adjustment shall include, at a minimum, the following:

1. Inspection, adjustment, cleaning or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
2. Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx, and to the extent practicable minimize emissions of CO.
3. Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

(b) the source shall be operated and maintained in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

*#012 completed during annual stack test, last tune up
completed Dec 2015
See Attachment M for Boiler Maintenance Log*

SECTION E: GROUP 2 – NESHAP FOR BOILERS

Permit page 69

40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart DDDDD

National Emission Standards for ICI Boilers and Process Heaters: Sources are 2 Existing Boilers.

Must be in compliance with this Subpart no later than January 31, 2016.

#001 For the following pollutants, the emissions must not exceed the following emission limits, except during periods of startup and shutdown And the emissions must not exceed the following output- based limits (lb per MMBtu of steam output) Using the specified sampling volume or test run duration . . .

(a) Particulate Matter:

Emission Limit of 0.043 lb per MMBtu of heat input (30-day rolling average for units 250 MMBtu/hr or greater, 3-run average for units less than 250 MMBtu/hr)

Output-based limit of 0.026 lb per MMBtu of steam output; (30-day rolling average for units 250 MMBtu/hr or greater, 3-run average for units less than 250 MMBtu/hr)

Collect a minimum of 1 dscm per run

(b) Hydrogen Chloride:

Emission Limit of 0.0017 lb per MMBtu of heat input

Output-based limit of 0.001 lb per MMBtu of steam output

For M26A, collect a minimum of 1 dscm per run; for M26, collect a minimum of 60 liters per run

(c) Mercury:

Emission Limit of 1.3E-05 lb per MMBtu of heat input

Output-based limit of 7.8E-06 lb per MMBtu of steam output

For M29, collect a minimum of 1 dscm per run; for M30A or M30B, collect a minimum sample as specified in the method; for ASTM D6784 (Incorporated by reference, see § 63.14.) collect a minimum of 2 dscm

(d) Carbon Monoxide:

Emission Limit of 9 ppm by volume on a dry basis corrected to 3 percent oxygen

Output-based limit of 0.005 lb per MMBtu of steam output

1 hr minimum sampling time, use a span value of 20 ppmv

(e) Dioxins/Furans:

Emission Limit of 0.08 ng/dscm (TEQ) corrected to 7 percent oxygen

Output-based limit of 3.9E-11 (TEQ) lb per MMBtu of steam output

Collect a minimum of 4 dscm per run

#002 Performance Testing Requirements:

Refer to regulation [76 FR 15664] for Table 5 to 40 CFR Part 63 Subpart DDDDD

For Item 5 of Table 5, refer to regulation [76 FR 15664] for Table 11 to 40 CFR Part 63 Subpart DDDDD -- Toxic Equivalency Factors for Dioxins/Furans

#003 Establishing Operating Limits

Refer to regulation [Federal Register Vol. 76, No. 54, pages 15695 - 15697] for Table 7 to 40 CFR Part 63 Subpart DDDDD

- #004 Demonstrate Initial Compliance: The compliance date for these 2 boilers is specified in §63.7595 to be March 21, 2014. **Initial compliance must be demonstrated no later than September 17, 2014.** *Received*
- #005, 006, 007 Performance Tests and Procedures / Fuel Analyses and Frequency
(a) You must conduct all applicable performance tests according to §63.7520 on an annual basis, except those for dioxin/furan emissions, unless you follow the requirements listed in paragraphs (b) through (e) of this section. Annual performance tests must be completed no more than 13 months after the previous performance test, unless you follow the requirements listed in paragraphs (b) through (e) of this section. Annual performance testing for dioxin/furan emissions is not required after the initial compliance demonstration. See Permit pages 71- 73 for Conditions. *completed during annual Stack test*
- #009, 010 demonstrate initial and continuous compliance with emission limits and work practice standards; see Permit page 75 – 77 for requirements.
- #011 (a) install, operate, and maintain a continuous oxygen monitor. The oxygen level shall be monitored at the outlet of the boiler or process heater.
(d) Continuous Emission Monitor:
CEMS for oxygen (O2CEMS) must be installed, operated, and maintained. See page 78 of the Permit for specific requirements.
- #012 (a) You must monitor and collect data according to this section. (See page 79 of the Permit.)
(b) You must operate the monitoring system and collect data at all required intervals at all times that the affected source is operating, except for periods of monitoring system malfunctions or out of control periods.
(c) You must use all the data collected during normal operations in assessing the operation of the control device and associated control system. (No malfunctions, calibration checks, out of control periods.)
(d) Failure to collect required data during normal operating periods is a **deviation** of the requirements.
- #013 demonstrate continuous compliance with each emission limit, operating limit, and work practice standard in Tables 1 through 3 to this subpart that applies to you according to the methods specified in Table 8
(1) Operating limits must be confirmed or reestablished during performance tests.
(2) Keep records of the type and amount of all fuels burned in each boiler or process heater during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would either result in lower emissions of hydrogen chloride and mercury than the applicable emission limit for each pollutant or result in lower fuel input of chlorine and mercury.
- #014 (a) (1) Keep a copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report
(2) Keep records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations
(b) (1) Keep records for the CMS including records of all monitoring data and calculated averages for applicable operating limits, such as opacity, pressure drop, pH, and operating load, to show continuous compliance with each emission limit and operating limit that apply to you.

- See Attachment C*
- #014 (d) (1) Keep records of monthly fuel use by each boiler or process heater, including the type(s) of fuel and amount(s) used.
 (3) Keep records of monthly hours of operation by each boiler or process heater that meets the definition of limited-use boiler or process heater.
 (4) Calculate chlorine fuel input, or hydrogen chloride emission rate, for each boiler and process heater.
 (5) Keep a copy of all calculations and supporting documentation of maximum mercury fuel input,
 (6) If you stack test less frequently than annually, keep annual records that document that your emissions in the previous stack test(s) were less than 75 percent of the applicable emission limit, and document that there was no change in source operations including fuel composition and operation of air pollution control equipment that would cause emissions of the relevant pollutant to increase within the past year.
 (7) Keep records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment.
 (8) Keep records of actions taken during periods of malfunction to minimize emissions
 (9) Keep records of the total hours per calendar year of either natural gas or COG fuel burned.

 - #015 Keep records suitable for review; keep for 5 years; keep records **on site** for at least 2 years.

 - #016 Submit a Compliance report semiannually. *Received April 2016*
 (b) If no deviations occurred during the reporting period, a statement of such on the report.

 - #017 Performance tests or fuel analyses: (g) Report the results of performance tests and the associated initial fuel analyses within 90 days after the completion of the performance tests.

 - #020 Submit the Notification of Compliance Status; including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations
 - (1) A description of the affected units,
 - (2) A summary of the results of performance tests and fuel analyses,
 - (3) A summary of the maximum carbon monoxide emission levels recorded during the performance test,
 - (4) Plans to demonstrate compliance with each applicable emission limit through performance testing or fuel analysis,
 - (5) Plans to demonstrate compliance by emissions averaging and demonstrate compliance by using emission credits through energy conservation,
 - (6) A signed certification that you have met all applicable emission limits and work practice standards.
 - (7) Description of any deviations, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report.
 - (8) Notification of compliance must include:
 "This facility has had an energy assessment performed according to §63.7530(e)."
 "No secondary materials that are solid waste were combusted in any affected unit."
- Energy Assessment completed: Oct 2015

 - #021 (b) (3) Submit the compliance reports for the semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
 (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

 - #027 (b) *completed semiannual report Received Apr. 1 2016*
 If you have an existing boiler or process heater, you must comply with this subpart no later than 31Jan2016

**In compliance if condition is checked. Out of compliance if Circled.

SECTION E: GROUP 2 – NESHAP FOR BOILERS Subpart DDDDD (continued)

Permit page 89

- #028 (3) At all times, you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Good working order

**SECTION E: GROUP 10 - H2S TESTING OF COG
(Hydrogen Sulfide testing of Coke Oven Gas)**

Permit page 68

- #001 Perform monthly tests of the COG for H2S content and maintain records of the testing

see attachment D

SOURCE 101 PARTS CLEANER

PROC 101 → STAC Z101

Permit page 27

- #001 shall not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or combination of these halogenated HAPS solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.

- #002 applies to cold cleaning machines that use 2 gallons or more containing > 5% VOC by weight
 - (a) (2) (i) shall have a label summarizing: (1) cleaned parts should drain for at least 15 sec or until dripping ceases. Parts shall be tipped and rotated. During draining parts shall be located over the cold cleaning machine. (2) with a pump-agitated bath, the agitator shall produce a rolling motion of solvent with no splashing of solvent against walls or parts. (3) fans shall not blow across openings of the degreaser unit
 - (a) (2) (ii) shall be equipped with a cover that is closed at all times degreaser is not in use. Degreasers with a remote reservoir shall be equipped with a perforated drain no larger than 6" in diameter
 - (3) (i) waste solvent shall be stored in closed containers with pressure reliefs
 - (iii) absorbent materials may not be cleaned in degreaser
 - (5) Seller must provide to buyer the name of solvent supplier, type of solvent, vapor pressure of solvent measured in mmHg at 20C
 - (6) Maintain records of MSDS, bill of sale, invoice to comply with this section for at least 5 years

see attachment K - Top page for example of SDS

SOURCE 801: COKE OVEN BATTERY CHARGING OPERATIONS

Permit page 30

PROC 801 → STAC Z801

- SEE SECTION E. GROUP 10 - H2S TESTING OF COG (See checklist page 8) Permit page 68
- SEE SECTION E. GROUP 3 - NESHAP FOR COKE OVEN BATTERIES (See below) Permit page 95
- SEE SECTION E. GROUP 4 - NESHAP VE WORK PLAN (See checklist page 10) Permit page 101
- SEE SECTION E. GROUP 5 - METHOD 303 TESTING (See checklist page 10) Permit page 106

- #001 Coke Oven Gas (COG)
 - (a) no person shall permit the emission of byproduct coke oven gas unless the gas is first burned.
 - (b) shall not permit the flaring or combustion of COG which contains sulfur compounds in concentrations > 50 grains/100dscf.
 - (a) & (b) do not apply to COG from (1) dampened oven, prior and during pushing, because of some malfunction of the oven, (2) unavoidable oven leakage during the coking cycle.

**In compliance if condition is checked. Out of compliance if Circled.

- #002 open charging emissions of 4 consecutive charges shall be ≤ 75 seconds
- #003 shall not emit coke oven emissions that exceed the emission limitation of 12 seconds of visible emissions per charge for the 30 day logarithmic rolling avg.

#004 refers to observations of open and closed charging emissions from the topside of the battery
 #002 see attached 303 Report - July Avg 17.7 second per daily
 - July Avg 4.4 per charge

SECTION E. GROUP 3 - NESHAP FOR COKE OVEN BATTERIES
NESHAP for Coke Oven Batteries, 40 CFR Part 63 Subpart L

Permit page 95

- #001 Emission limitations as stated in Sources 801, 806, and 807.
- #002 (f) Recordkeeping – Maintain files of all required information in a permanent form suitable for inspection at an onsite location for at least 1 year.
- #004 (d) Semi-annual compliance certification *Received April 2016*
- #007 (a) Inspect the collecting main for leaks at least once daily.
 (b) Record the time and date a leak is first observed, the time and date the leak is temporarily sealed, and the time and date of repair.
 (c) Temporarily seal any leak in the collecting main as soon as possible after detection, but no later than 4 hours after detection of the leak.
 (d) The owner or operator shall initiate a collecting main repair as expeditiously as possible, but no later than 5 calendar days after initial detection of the leak. The repair shall be completed within 15 calendar days after initial detection.

#007 completed during 303 inspection daily

- #011 Requirements for Startups, Shutdowns, and Malfunctions (SSM):
 If there is a malfunction, the company must:
 - (c) Malfunctions shall be corrected as soon as practicable after their occurrence.
 - (d) In order for the provisions of paragraph (i) of this section to apply with respect to the observation (or set of observations) for a particular day, notification of a startup, shutdown, or a malfunction shall be made by the owner or operator:
 - (1) If practicable, to the certified observer if the observer is at the facility during the occurrence;
 - (2) Or to the enforcement agency, in writing, within 24 hours of the occurrence first being documented by a company employee, and if the notification under paragraph (d)(1) of this section was not made, an explanation of why no such notification was made.
 - (e) Within 14 days of the notification made under paragraph (d) of this section, or after a startup or shutdown, the owner or operator shall submit a written report to the applicable permitting authority that:
 - (1) Describes the time and circumstances of the startup, shutdown, or malfunction; and
 - (2) Describes actions taken that might be considered inconsistent with the startup, shutdown, or malfunction plan.

- ENE Coke is aware to inform the Dept of a malfunction within 24 hrs

SECTION E. GROUP 4 – NESHAP VE WORK PLAN

Permit page 101

#002 Work Practice Plan – The facility has one and can be found in Lynn Khalife’s supporting documentation in the AQ Fac Op File #25-00025.

SECTION E. GROUP 5 – METHOD 303 TESTING

Permit page 106

- see attached 303 reports Attachment J

SOURCE 802: COKE OVEN BATTERY PUSHING OPERATIONS

Permit page 33

PROC 802→CNTL C802A→STAC S802A

SEE SECTION E. GROUP 7 - NESHAP FOR COKE OVENS (See below)

Permit page 115

SEE SECTION E. GROUP 9 - COKE SHED REQUIREMENTS (See cklst. pg. 14)

Permit page 151

- #001 (a) No person may permit the pushing of coke from a coke oven unless the pushing operation is enclosed during the removal of coke from a coke oven and pushing emissions are contained, except for such fugitive pushing emissions that are allowed by subsections (c) and (e).
- (c) Visible fugitive air contaminants in excess of 20% opacity from an air cleaning device installed for the control of pushing emissions under a plan approval from the Department shall be prohibited unless the Department finds that:
 - (1) The emissions are of minor significance with respect to causing air pollution.
 - (2) The emissions will not prevent or interfere with the attainment or maintenance of any ambient air quality standard.
- (e) No person may transport hot coke in the open atmosphere during the pushing operation, unless the visible fugitive air contaminants from the coke do not exceed 10% opacity.

see attachment E

SECTION E. GROUP 7 - NESHAP FOR COKE OVENS

Permit page 115

SUBPART CCCCC - National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks (Includes Sources 802, 803, and 805)

- #001(a)(1) Cannot exceed 0.01 grain per dry standard cubic foot (gr/dscf) if a cokeside shed is used to capture emissions.
- #002(1) (i) Quenching hot coke: cannot exceed 1,100 mg/L; *see attachment F*
- (2) Use acceptable makeup water for quenching.
- #003 No opacity greater than:
 - (b) Daily average of 20 percent opacity for a battery on batterywide extended coking. *see example in attachment G*
 - The opacity is verified through the COMS report.
- #004 Conduct performance tests:
 - The Coke Shed was put into operation on May 25, 2012. This condition was met when the performance testing was performed on the coke shed baghouse on December 19, 2012.
- #005 Conduct performance tests for PM in accordance with the annual testing requirement of Plan Approval 25-029C Section E Group 2 Condition 001(n) on Permit Page 152. **Perform 2 tests / 5 year period.**
- #006 Test Methods for PM emission limit testing: Permit Pages 116 & 117

- #007 Demonstrate initial compliance with the opacity limits: - see attachment G
 - (a) You must conduct each performance test that applies to your affected source according to the requirements in paragraph (b) of this section.
 - (b) To determine compliance with the daily average opacity limit for stacks of 20 percent for a by-product coke oven battery on batterywide extended coking, follow the test methods and procedures in paragraphs
 - (b) (1) through (3) of this section.
 - (b) (1) Using the continuous opacity monitoring system (COMS) required in §63.7330(e), measure and record the opacity of emissions from each battery stack for a 24-hour period.
 - (2) Reduce the monitoring data to hourly averages as specified in §63.8(g)(2).
 - (3) Compute and record the 24-hour (daily) average of the COMS data.

 - #008 TDS limit for quench water - see attachment F

 - #009 Establish an operating limit: 1" - 7" baghouse 1-7 absorber

 - #010 (f) (1) Maintain the TDS content of the quench water at 1,100 mg/L or less > see attachment F
 - (2) Determine the TDS content of the quench water at least weekly

 - #011 Monitoring for fugitive pushing emissions: See permit pages 119 - 121 for all conditions.
 - (a) (1) Observe and record the opacity of fugitive pushing emissions from each oven at least once every 90 days. (Erie Coke must do this and keep records)
 - (2) If two or more batteries are served by the same pushing equipment and total no more than 90 ovens, the batteries as a unit can be considered a single battery.
 - (3) Observe and record the opacity of fugitive pushing emissions for at least four consecutive pushes per battery each day
 - (4) Do not alter the pushing schedule to change the sequence of consecutive pushes to be observed on any day. Keep records indicating the legitimate operational reason for any change in your pushing schedule which results in a change in the sequence of consecutive pushes observed on any day.
 - (5) If the average opacity for any individual push exceeds 30 percent opacity for any short battery, you must take corrective action and/or increase coking time for that oven. see attachment E

 - #012 Monitoring
 - (a) Use a bag leak detection system for the coke oven battery baghouse
 - (1) Monitor the pressure drop across each baghouse cell each day to ensure pressure drop is within the normal operating range identified in the manual;
 - (2) Confirm that dust is being removed from hoppers through weekly visual inspections or equivalent means of ensuring the proper functioning of removal mechanisms;
 - (3) Check the compressed air supply for pulse-jet baghouses each day;
 - (4) Monitor cleaning cycles to ensure proper operation using an appropriate methodology;
 - (5) Check bag cleaning mechanisms for proper functioning through monthly visual inspection or equivalent means;
 - (6) Make monthly visual checks of bag tension on reverse air and shaker-type baghouses to ensure that bags are not kinked (knead or bent) or laying on their sides. You do not have to make this check for shaker-type baghouses using self-tensioning (spring-loaded) devices;
 - (7) Confirm the physical integrity of the baghouse through quarterly visual inspections of the baghouse interior for air leaks; and
 - (8) Inspect fans for wear, material buildup, and corrosion through quarterly visual inspections, vibration detectors, or equivalent means.
 - (d) For each capture system applied to pushing emissions, you must at all times monitor the volumetric flow rate, the fan motor amperes, OR the static pressure or the fan RPM.
 - (e) For each by-product coke oven battery, you must monitor at all times the opacity of emissions exiting each stack using a COMS.
- #02 - see attachment B

**In compliance if condition is checked. Out of compliance if Circled.

SECTION E. GROUP 7 - NESHAP FOR COKE OVENS (continued)

- #013 Must maintain a bag leak detection system: *Alarm controls inside baghouse; Alarm sounds in room as well as super. office*
 - (a)(1) The system must be certified by the manufacturer to be capable of detecting emissions of particulate matter at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less;
 - (2) The system must provide output of relative changes in particulate matter loadings;
 - (3) The system must be equipped with an alarm that will sound when an increase in relative particulate loadings is detected over a preset level. The alarm must be located such that it can be heard by the appropriate plant personnel;
 - (4) Each system that works based on the triboelectric effect must be installed, operated, and maintained in a manner consistent with the guidance document, "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015, September 1997). You may install, operate, and maintain other types of bag leak detection systems in a manner consistent with the manufacturer's written specifications and recommendations;
- (b) Install a CPMS sampling probe. See permit page 123 for the conditions.
- (j) Continuous Opacity Monitoring System (COMS)

- #015 Demonstrate continuous compliance by meeting requirements listed on permit page 124 for one of the following:
 - (d) (1) Volumetric Flow Rate; OR
 - (2) Fan Motor Amperes; OR
 - (3) Static Pressure or Fan RPM *As well as PD: 1-7 range RPM Low Limit: 1035*
 - (e) Demonstrate continuous compliance with the opacity limit by
 - (1) Maintaining the daily average opacity at or below 20 percent for a battery on batterywide extended coking; and *see attachment E*
 - (2) Operating and maintaining COMS and collecting and reducing the COMS data. *see attachment G*
- See permit page 126 - 127 for conditions #016, #017 for Subpart CCCCC.

#018, 019 Recordkeeping *see attached examples of recordkeeping*
 See permit page 128 - 130 for conditions #020, #021, #022, #023, #024, #025 for Subpart CCCCC.

- #026 Reporting requirements:
 - (a) (1) Quarterly compliance reports *Received: July 2016*
 - (2) Semi-annual compliance report *April 2016*
 - (3) Quarterly reports due no later than 1 month following the end of the quarter
 - (c) Semi-annual compliance report contents (Deviation Report): company name; certification of truth & accuracy, reporting period dates, any malfunctions, any deviations and statement of such, COMS down time, total operating time of each source, see permit page 131 and 132 for all report requirements.

#030 Work Practice Plan for soaking: see permit page 135. *see EC Work practice Plan see AQ FAC OP File #25-00025*

#031(b)(2) Do maintenance on the Quench Tower Baffles.
 Wash the coke quench tower baffles: *see attachment F*

See permit pages 136 - 139 for Condition #032, #033, #034, #035, #036, #037, #038, #039.

Good working order

SECTION E. GROUP 9 - COKE SHED REQUIREMENTS
Plan Approval 25-029C

Permit page 151

- #001(a) Conduct a stack test at the outlet of the Coke Side Shed Baghouse (C802A) for PM
Tested 3 years in a row when first operation started of the baghouse

See permit pages 151 – 152 for all testing requirements of (b) through (m).

(n) A stack test shall be performed on an annual basis, in accordance with the provisions of Chapter 139. The stack test shall be performed while the aforementioned source is operating at the maximum or normal rated capacity as stated on the application. The stack test shall be conducted for PM, PM10 and PM2.5, including condensable particulate matter, at the outlet of the Coke Side Shed Baghouse (C802A). The testing shall be conducted in accordance with parts (a)-(m), see permit pages 151 – 152.

Done annually in Dec; this year Sept

- #002 Establish a pressure drop operating range for the Coke Side Shed Baghouse.
1.7 is PD range

SOURCE 803: COKE QUENCHING OPERATIONS

Permit page 34

PROC 803 → STAC Z803

- #001 The source shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

SOURCE 804: COAL UNLOADING

Permit page 36

PROC 804 → STAC Z804

- #001 The source shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

SOURCE 805: COKE OVEN BATTERY UNDERFIRING SYSTEM

Permit page 37

FML03 → PROC 805 → CNTL C805A → STAC S805A

- #001 (a) applies to coke oven battery waste heat stacks:
(1) Particulate matter emissions exceed .04 grain per dry standard cubic feet (gdscf) when the effluent gas volume is less than 150,000 dry standard cubic feet (dscf) per minute.
- #002 (a) No person may permit the emission of byproduct coke oven gas into the outdoor atmosphere unless the gas is first burned.
(b) No person may permit the flaring or combustion of a coke oven byproduct gas which contains sulfur compounds, expressed as equivalent hydrogen sulfide, in concentrations greater than 50 grains per 100 dry standard cubic feet.
(c) Subsections (a) and (b) do not apply to emissions of coke oven gas from:
(1) An oven which is dampered off (i) Prior to and during the pushing operation of the oven.
(ii) Because of some malfunction associated with the oven.
(2) Unavoidable oven leakage occurring during the coking cycle.

#003, 004 NOx emissions from the Battery Underfire Operation System shall not exceed the following:

- (1) 19.9 lbs/hr
- (2) 87.16 tpy based on a 12-month consecutive period
- (3) 21.8 tons/quarter

see NOx report from July 2016

#005 Compliance Assurance Monitoring (CAM) requirements:

- (a) The permittee shall maintain a manometer or similar device to measure the pressure drop across the control device. The manometer or similar device shall be mounted in an accessible area and maintained in good operating conditions at all times.
- (b) The permittee shall maintain a rotometer or similar device to monitor the liquid flow rate of the scrubber. The flow gauge or similar device shall be mounted in an accessible area and maintained in good operating conditions at all times.
- (c) The permittee shall conduct daily observations of the pressure drop and of the liquid flow rate of the scrubber.

see attachment I

#006 more (CAM) requirements:

- (a) The permittee shall record the following operational data from the control device (these records may be done with strip charts recorders, data acquisition systems, or manual log entries):
 - (i) Pressure drop of the scrubber at least once daily; and
 - (ii) Liquid flow rate of the scrubber at least once daily.
- (b) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.
- (c) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, probable causes and corrective actions taken for the incidents.
- (d) The permittee shall record all inspections, repairs, and maintenance performed on the monitoring equipment.
- (e) All required records shall be kept for a period of 5 years and shall be made available to the Department upon request.

see attachment I

#007 (a) Maintain monthly records of the NOx emissions. The emissions shall be determined by emission results from the most recent stack test performed and operating hours.

- (b) Maintain onsite a record of the NOx emissions of the Coke Oven Battery underfire based on 12-month rolling totals.
- (c) Maintain a record of the daily pressure drop and liquid flow rate readings of the scrubber.
- (d) Maintain a record of all preventive maintenance inspections of the control device. The records of the maintenance inspections shall include, at a minimum, the dates of the inspections, any problems or defects identified, any actions taken to correct the problems or defects, and any routine maintenance performed.
- (e) Maintain a record of the results of the testing that is required by this permit.

#008 (a) Submit quarterly NOx emission reports to the Department.

- (b) Submit, within 60 days after completion of the stack test, two copies of the complete test reports, including all operational parameters, to the Department for approval.

Received on a timely basis.

X

#009 More CAM requirements:

- (a) The permittee shall report all excursions and corrective actions taken, the dates, times, durations and probable causes, every 6 months.
- (b) The permittee shall report all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable), their dates, times and durations, probable causes and corrective actions taken, every 6 months.
- (c) The permittee shall report the following information to the Department every 6 months:
 1. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 2. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable)
 3. A description of the actions taken to implement a quality improvement plan (QIP) during the semi-annual reporting period. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

X

#010 The source shall be operated and maintained in accordance with:

- 1. Good heating practices
- 2. The manufacturer's specifications
- 3. Good air pollution control practices

Erne Cobe notifies the Dept during downtime by email

X

#011 More CAM requirements:

- (a) The permittee shall develop and implement a Quality Improvement Plan (QIP) as expeditiously as practicable if any of the following occur:
 1. Six (6) excursions occur in a 6-month reporting period.
 2. The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion.

(SEE PERMIT PAGE 40 & 41 FOR QIP REQUIREMENTS)

EC has not had issues since last FCE with these requirements

X

#012 More CAM requirements:

- (a) Pressure drop was determined to be at an optimum operating setting between 1" to 7" w.g.
- (b) Scrubber inlet liquid flow rate should be see prior inspection
- (c) QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the control devices.
 1. Install detectors or sensors at a Department approved location for obtaining data that is representative of the monitored indicator.
 2. Develop verification procedures to confirm that the operational status of the monitoring devices is within the expected range.
 3. **Annually calibrate** and check the accuracy of the monitoring equipment according to the manufacturer's recommended procedures.
- (d) Maintain all monitoring equipment and stock spare parts as necessary for routine onsite repairs.
- (e) Ensure that at least 90% of the approved monitoring data has been properly and accurately collected.
- (f) Submit an implementation plan and schedule if the approved monitoring requires the installation, testing or other necessary activities. The schedule for completing installation and beginning operation of the monitoring may not exceed 180 days after startup of source.

X

#013 Scrubber Operational Requirements for Control Device C805A:

- (a) The permittee shall operate the control device at all times that the source is in operation.
- (b) The permittee shall conduct a weekly preventive maintenance inspection of the control device.

#014 Stack (S805A) Emission Observation Work Practices:

(a) Upon observing visible emissions from the Coke Oven Battery Stack (S805A), the permittee shall perform the following actions:

- (1) Record the date and time of the visible emission observation and the results of all subsequent investigations and corrective actions on the Stack Emission Observation form.
- (2) Investigate the cause of the visible emission and identify the coke oven believed to be the source of any observed visible emission from the Coke Oven Battery Stack. This investigation must include a visible observation and determination of the operational condition of the coke oven believed to be the source of the visible emissions prior to the next charge of that oven.
- (3) Identify any needed repairs and/or maintenance activities needed to a coke oven identified under paragraph (a)(2), above, prior to the next charge of the coke oven. These repairs shall include, but not be limited to: spray patching, Guniting patching, ceramic welding, dusting, and/or jamb repairs.

(b) The permittee shall prioritize, promptly schedule and perform all coke oven repairs and/or maintenance activities recommended under paragraph (a)(3), above. *If any of the repairs identified in paragraph (a)(3) cannot be completed within five (5) days of the initial determination that a repair is needed, the permittee will immediately notify the Department of the delayed repair, the reason for the delayed repair, and the planned date by which the repair will be completed.*

*All emissions checked through COMS data
By Products Maintenance Log - Attachment O*

SOURCE 806: COKE OVEN BATTERY OVEN / DOOR LEAKS

Permit page 45

PROC 806→CNTL C802A→STAC S802A

SECTION E. GROUP 3 - NESHAP FOR COKE OVEN BATTERIES

(See cklst pg. 9)

Permit page 95

SECTION E. GROUP 4 - NESHAP VE WORK PLAN (See checklist page 10)

Permit page 101

SECTION E. GROUP 5 - METHOD 303 TESTING (See checklist page 10)

Permit page 106

SECTION E. GROUP 6 - COKE SHED ALT STD (See checklist page 20)

Permit page 110

SECTION E. GROUP 9 - COKE SHED REQUIREMENTS (See cklst. pg. 14)

Permit page 151

#001 Byproduct coke oven gas (COG)

(a) No person shall permit the emission of byproduct coke oven gas unless the gas is first burned.

(c) (a) does not apply to COG from:

- (1) An oven which is dampered off:
 - (i) Prior to and during pushing of an oven,
 - (ii) Because of some malfunction of the oven,
- (2) Unavoidable oven leakage during the coking cycle.

#002 Visible fugitive air contaminants *Checked with daily 303*

(a) No person may permit the operation of a coke oven battery in such a manner that visible fugitive air contaminants are emitted in excess of the emissions allowed by the following limitations:

- (2) At no time may door area emissions from any coke oven exceed 40% opacity 15 minutes or longer after the last charge to that oven.
- (3) At no time shall there be any visible door area emissions from more than 10% of the door area of operating coke ovens, excluding the two-door area representing the last oven charged on any battery and any door areas obstructed from view.

#003(a)(3)(i) Cannot allow coke oven emissions to be discharged to the atmosphere from each affected existing byproduct coke oven battery that exceed 4.0 percent leaking coke oven doors for each by-product coke oven battery owned or operated by a foundry coke producer. *checked with daily 303*

#004 Limitations of visible fugitive air contaminants from operation of any coke oven battery
The measuring and recording techniques based on 25 Pa Code §123.44 are on permit pages 46 & 47.

#005 Coke Shed Inspection techniques: When batteries have sheds to control emissions, conduct the inspection from outside the shed unless the doors cannot be adequately viewed. In this case, conduct the inspection from the bench. Be aware of special safety considerations.
WORK PRACTICE REQUIREMENTS. Permit page 47

#006 The source shall be operated and maintained in accordance with good air pollution control practices.

#007 Door maintenance, adjustment and replacement practices:

- (1) Implement the following work practices in the event of a coke oven battery failure:
 - (ii) Luted doors. Work practices for luted doors shall conform to the following:
 - (A) Luted doors leaking 15 minutes after the charge shall be immediately reluted.
 - (B) Doors which fail to seal after the first reluting shall be recorded.
 - (C) Leaks appearing after the first reluting shall be immediately reluted.
 - (iii) Chuck doors. Work practices for chuck doors shall conform to the following:
 - (A) Within 1 hour after the charge of each oven, the chuck door shall be inspected, and any door found leaking shall be recorded.
 - (B) Chuck doors leaking 1 hour after the charge shall be gasketed prior to the next charge to that oven.
 - (C) If a freshly gasketed door is leaking 1 hour after the charge, it or the oven door shall be replaced prior to the next charge to that oven.
 - (iv) Cleaning. Doors and jambs shall be completely cleaned prior to each charge.
- (2) Keep and maintain records of the inspections required by paragraph (1), including the names of inspectors, the date and time of each door inspection and ovens observed leaking.
- (3) Within 90 days following a determination by the Department or the battery operator that this section is applicable, the person responsible for the operation of a coke oven battery shall submit to the Department for approval a **work practice and maintenance manual** which shall include, but not be limited to, the job titles of persons having responsibility for the various tasks required by paragraph (1), specify procedures to be followed to assure implementation of the requirements of paragraph (1), and state the numbers of replacement doors and jambs to be kept on site for each battery.

#007 These are standards of EC work practices
shown compliance with daily 303 inspections

SECTION E. GROUP 6: COKE SHED ALT STD

The company has to apply and receive approval for an alternate standard for coke oven doors that equipped with coke sheds. Therefore, this NESHAP, 40 CFR Part 63 Subpart L §63.305 is being eliminated from this checklist.

SOURCE 807: COKE OVEN BATTERY TOPSIDE LEAKS

Permit page 49

PROC 807 → STAC Z807

SEE GROUP 3 - NESHAP FOR COKE OVEN BATTERIES (See cklst. pg. 9)

Permit page 95

SEE GROUP 4 - NESHAP VE WORK PLAN (See checklist page 10)

Permit page 101

SEE GROUP 5 - METHOD 303 TESTING (See checklist page 10)

Permit page 106

- #001
- (a) No person may permit the emission of byproduct coke oven gas into the outdoor atmosphere unless the gas is first burned.
 - (c) Subsection (a) does not apply to emissions of coke oven gas from:
 - (1) An oven which is dampered off:
 - (i) Prior to and during the pushing operation of the oven.
 - (ii) Because of some malfunction associated with the oven.
 - (2) Unavoidable oven leakage occurring during the coking cycle.

- #002 (a) No person may permit the operation of a coke oven battery in such a manner that visible fugitive air contaminants are emitted in excess of the emissions allowed by the following limitations:
 - (4) At no time may there be visible topside emissions from more than 2.0% of the charging port seals on operating coke ovens in any battery, excluding visible emissions from no more than three ovens which may be dampered off.
 - (5) At no time may there be topside emissions from more than 5.0% of the offtake piping on operating coke ovens in any battery, excluding visible emissions from open standpipe caps on no more than three ovens which may be dampered off.
 - (6) At no time shall there be topside emissions from any point on the topside other than allowed emissions from charging port seals and offtake piping under paragraphs (4) and (5).
 - (7) At no time may there be any visible emissions from the coke oven gas collector main.

Shown compliance through 303 inspections

- #003 Subpart L--National Emission Standards for Coke Oven Batteries
 - (a) No owner or operator shall cause to be discharged or allow to be discharged to the atmosphere, coke oven emissions from each affected existing byproduct coke oven battery that exceed any of the following emission limitations or requirements:
 - (iii) 0.4 percent leaking topside port lids;
 - (iv) 2.5 percent leaking offtake system(s)

- #004 Limitations of visible fugitive air contaminants from operation of any coke oven battery:
 - (b) (4) Observations of visible emissions from a coke oven topside - See permit page 50 & 51 for the formula used to calculate these emissions.

- #005 The source shall be operated and maintained in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

Compliance with these conditions shown through the daily 303 reports

SOURCE 808: COKE DUMPING, SCREENING, & LOADING INTO TRUCKS Permit page 52
PROC 808→CNTL C808→STAC Z808

- #001 Maintain a record of all preventative maintenance inspections of the Foam Dust Suppression System. These records shall, at a minimum, contain the dates of the inspections, the name of the inspector, any problems or defects, the actions taken to correct the problem or defects, and any routine maintenance performed.
- #002 Maintain a set of sprays at the screening stations and shall operate the sprays as necessary to achieve compliance with 25 Pa. Code 123.1.
- #003 (a) The permittee shall perform a weekly preventative maintenance inspection of the foam dust suppression system.
 (b) The permittee shall maintain and operate the source and control device in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

See attachment N

SOURCE 809: COKE OVEN BATTERY EMERGENCY FLARES

Permit page 54

FML03→PROC 809→STAC Z809

SEE SECTION E. GROUP 3 - NESHAP FOR COKE OVEN BATTERIES (See checklist page 9)

Permit page 95

- #001 Byproduct coke oven gas (COG)
- (a) No person may permit the emission of byproduct coke oven gas into the outdoor atmosphere unless the gas is first burned.
 - (b) No person may permit the flaring or combustion of a coke oven byproduct gas which contains sulfur compounds, expressed as equivalent hydrogen sulfide, in concentrations greater than 50 grains per 100 dry standard cubic feet. The sulfur compounds, expressed as equivalent hydrogen sulfide, emitted into the outdoor atmosphere from any tail gas sulfur recovery equipment utilized in a coke oven gas desulfurization system approved by the Department shall be included in the determination of these concentrations.
 - (c) Subsections (a) and (b) do not apply to emissions of coke oven gas from:
 - (1) An oven which is dampered off:
 - (i) Prior to and during the pushing operation of the oven.
 - (ii) Because of some malfunction associated with the oven.
 - (2) Unavoidable oven leakage occurring during the coking cycle.
- #002 Subpart L Standards for bypass/bleeder stacks:
- (c) Each flare installed to meet the requirements of this section shall be operated with no visible emissions, as determined by the methods specified in 63.309(h)(1), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- #003 Subpart L Performance tests and procedures
- (h) For a flare installed to meet the requirements of §63.307(b):
 - (1) Compliance with the provisions in §63.307(c) (visible emissions from flares) shall be determined using Method 22 in appendix A to part 60 of this chapter, with an observation period of 2 hours; and
 - (2) Compliance with the provisions in §63.307(b)(4) (flare pilot light) shall be determined using a thermocouple or any other equivalent device.
 - (i) No observations obtained during any program for training or for certifying observers under this subpart shall be used to determine compliance with the requirements of this subpart or any other federally enforceable standard.
- #004 The permittee shall operate this source at all times that the coke oven battery is operational.

#005 Subpart L Standards for bypass/bleeder stacks:

- (a) (1) Install a bypass/bleeder stack flare system that is capable of controlling 120 percent of the normal gas flow generated by the battery, which shall thereafter be operated and maintained.
- (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.
- (b) Each flare installed pursuant to this section shall meet the following requirements:
 - (1) Each flare shall be designed for a net heating value of 8.9 MJ/scm (240 Btu/scf) if a flare is steam-assisted or air assisted, or a net value of 7.45 MJ/scm (200 Btu/scf) if the flare is non-assisted.
 - (2) Each flare shall have either a continuously operable pilot flame or an electronic igniter that meets the requirements of paragraphs (b)(3) and (b)(4) of this section.
 - (3) Each electronic igniter shall meet the following requirements:
 - (i) - (iv) Erie Coke does not have electronic igniters.
 - (4) Each flare installed shall be operated with a pilot flame present at all times
- (d) As an alternative to the installation, operation, and maintenance of a flare system as required in paragraph (a) of this section, the owner or operator may petition the Administrator for approval of an alternative control device or system that achieves at least 98 percent destruction or control of coke oven emissions vented to the alternative control device or system.
- (f) Any emissions resulting from the installation of flares (or other pollution control devices or systems approved pursuant to paragraph (d) of this section) shall not be used in making new source review determinations under part C and part D of title I of the Act.

Each Flare has visible and audible alarms if the pilot light goes out; Natural gas pilot lights

SOURCE 901: TAR DECANTERS (2): BY-PRODUCT RECOVERY	Permit page 57
PROC 901→CNTL C805A→STAC S805A	
→CNTL C805B→STAC Z901	
SOURCE 902: TAR DEHYDRATORS (2): BY-PRODUCT RECOVERY	Permit page 58
PROC 902→CNTL C805A→STAC S805A	
→CNTL C805B→STAC Z902	
SOURCE 903: TAR STORAGE TANK: BY-PRODUCT RECOVERY	Permit page 59
PROC 903→CNTL C805A→STAC S805A	
→CNTL C805B→STAC Z903	
SOURCE 904: WEAK LIQUOR CIRCULATION TANK: BY-PROD RCVRY	Permit page 60
PROC 904→ CNTL C805A→STAC S805A	
→CNTL C805B→STAC Z904	
SOURCE 905 : EXHAUSTERS BY-PRODUCT RECOVERY (3)	Permit page 61
PROC 905→CNTL C805A→STAC S805A	
→CNTL C805B→STAC Z905	
SOURCE 908: HOT DRAIN TANK	Permit page 63
PROC 908→STAC Z908	

There are no Source Level Requirements for Sources 902, 903, 904, 905, and 908 other than Group 8 Restrictions for By-Product Recovery in Section E.

**In compliance if condition is checked. Out of compliance if Circled.

SECTION E. GROUP 8 - BY-PRODUCT RECOVERY

Permit page 140

Includes sources 901, 902, 903, 904, 905, & 908

#001 (b) To determine whether or not a piece of equipment is in benzene service, the methods in 61.245(d) shall be used, except that, for exhausters, the percent benzene shall be 1 percent by weight, rather than the 10 percent by weight

#002 Subpart V Equipment Leaks (fugitive emissions) Test methods & procedures:

- (b) (1) Monitoring shall comply with Method 21
- (3) The instrument shall be calibrated before use on each day of its use
- (4) Calibration gases shall be:
 - (i) Zero air (less than 10 ppm of hydrocarbon in air); and
 - (ii) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.
- (5) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible
- (c) When equipment is tested for compliance with or monitored for no detectable emissions, the owner or operator shall comply with the following requirements: follow Method 21
 - (4) The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance.

#003 Equipment Leaks:

- (c) Each piece of equipment in benzene service to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment in benzene service.
- (d) Each exhauster shall be monitored quarterly to detect leaks
 - (1) **If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.**
 - (2) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after it is detected. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (g) Any exhauster that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of paragraph (d) of this section if the exhauster:
 - (1) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background
 - (2) Is tested for compliance with paragraph (g)(1) of this section initially upon designation, annually, and at other times requested by the Administrator.

#004 Alternative means of emission limitation.

- (d) (2) When the Administrator evaluates requests for permission to use alternative means of emission limitation for sources subject to §§ 61.132 and 61.133 (except tar decanters) the Administrator shall compare test data for the means of emission limitation to a benzene control efficiency of 98 percent. For tar decanters, the Administrator shall compare test data for the means of emission limitation to a benzene control efficiency of 95 percent.

#005 Alternative standards for valves in VHAP service - **allowable percentage of valves leaking**

- (a) An owner or operator may elect to have all valves within a process unit to comply with an allowable percentage of valves leaking of equal to or less than 2.0 percent.
- (b) The following requirements shall be met if an owner or operator decides to comply with an allowable percentage of valves leaking:
 - (1) An owner or operator must notify the Administrator that the owner or operator has elected to have all valves within a process unit to comply with the allowable percentage of valves leaking before implementing this alternative standard, as specified in § 61.247(d).
 - (2) A performance test as specified in paragraph (c) of this section shall be conducted initially upon designation, annually, and at other times requested by the Administrator.
 - (3) If a valve leak is detected, it shall be repaired in accordance with § 61.242-7(d) and (e).
- (c) Performance tests shall be conducted in the following manner:
 - (1) All valves in VHAP service within the process unit shall be monitored within 1 week by the methods specified in § 61.245(b).
 - (2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
 - (3) The leak percentage shall be determined by dividing the number of valves in VHAP service for which leaks are detected by the number of valves in VHAP service within the process unit.
- (d) Owner or operators who elect to have all valves comply with this alternative standard shall not have a process unit with a leak percentage greater than 2.0 percent.

#006 Alternative standards for valves in VHAP service--**skip period leak detection and repair.**

- (b) (2) After 2 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, an owner or operator may begin to skip one of the quarterly leak detection periods for the valves in VHAP service.
- (3) After five consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, an owner or operator may begin to skip three of the quarterly leak detection periods for the valves in VHAP service.

#007 Recordkeeping and reporting:

- (a) Design of control equipment shall be recorded and kept in a readily accessible location:
 - (1) Detailed schematics, design specifications, and piping and instrumentation diagrams.
 - (2) The dates and descriptions of any changes in the design specifications.
- (b) Record and maintain the following information for 5 years following each semiannual (and other) inspection and each annual maintenance inspection:
 - (1) The date of the inspection and the name of the inspector.
 - (2) A brief description of each visible defect in the source or control equipment and the method and date of repair of the defect.
 - (3) The presence of a leak, as measured using the method described in 61.245(c). The record shall include the date of attempted and actual repair and method of repair of the leak.
 - (4) A brief description of any system abnormalities found during the annual maintenance inspection, the repairs made, the date of attempted repair, and the date of actual repair.
- (d) For foundry coke by-product recovery plants, the annual coke production of both furnace and foundry coke shall be recorded and maintained for 5 years following each determination.

#008 Recordkeeping for equipment leaks (fugitive emissions)

- (b) When each leak is detected:
- (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
 - (2) The identification on a valve may be removed after it has been monitored for 2 successive months and no leak has been detected during those 2 months.
 - (3) The identification on equipment, except on a valve, may be removed after it has been repaired.
- (c) Each leak shall be recorded in a log and kept for 5 years
- (1) The instrument and operator identification numbers and the equipment identification number.
 - (2) The date the leak was detected and the dates of each attempt to repair the leak.
 - (3) Repair methods applied in each attempt to repair the leak.
 - (4) "Above 10,000" if the maximum instrument reading measured by the methods specified in 61.245(a) after each repair attempt is equal to or greater than 10,000 ppm.
 - (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - (6) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.
 - (7) The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days unrepaired.
 - (8) Dates of process unit shutdowns that occur while the equipment is unrepaired.
 - (9) The date of successful repair of the leak.
- (e) The following information pertaining to all equipment to which a standard applies shall be recorded in a log that is kept in a readily accessible location:
- (1) A list of identification numbers for equipment (except welded fittings) subject to the requirements of this subpart.
 - (2)
 - (i) A list of identification numbers for equipment that the owner or operator elects to designate for no detectable emissions as indicated by an instrument reading of less than 500 ppm above background.
 - (ii) The designation of this equipment for no detectable emissions shall be signed by the owner or operator.
 - (4)
 - (i) The dates of each compliance test required
 - (ii) The background level measured during each compliance test.
 - (iii) The maximum instrument reading measured at the equipment during each compliance test.
 - (5) A list of identification numbers for equipment in vacuum service.
- (f) Valves & pumps information shall be recorded in a log:
- (1) A list of identification numbers for valves and pumps that are designated as unsafe to monitor, an explanation for each valve or pump stating why the valve or pump is unsafe to monitor, and the plan for monitoring each valve or pump.
 - (2) A list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve.
- (g) Record the following for valves
- (1) A schedule of monitoring.
 - (2) The percent of valves found leaking during each monitoring period.
 - (i) The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in the applicability section of this subpart and other specific subparts:
 - (1) An analysis demonstrating the design capacity of the process unit, and
 - (2) An analysis demonstrating that equipment is not in VHAP service.

#008 (j) Information and data used to demonstrate that a piece of equipment is not in VHAP service shall be recorded in a log that is kept in a readily accessible location.

A #009 Subpart L Recordkeeping & Reporting requirements - See permit pages 145 & 146

- (e) (3) In the case of a new source the statement shall be submitted with the plan application
 (4) The statement is to contain the following information for each source:
 (i) Type of source (e.g., a light-oil sump or pump).
 (ii) For equipment in benzene service, equipment identification number and process unit identification: percent by weight benzene in the fluid at the equipment; and process fluid state in the equipment (gas/vapor or liquid).
 (iii) Method of compliance with the standard (e.g., "gas blanketing," "monthly leak detection and repair," or "equipped with dual mechanical seals").
- (f) Submit a semiannual report including:
 (1) (i) A brief description of any visible defect in the source or ductwork,
 (ii) The number of leaks detected and repaired, and
 (iii) A brief description of any system abnormalities found during each annual maintenance inspection that occurred in the reporting period and the repairs made.
 (3) For exhausters during the semiannual reporting period
 (i) The number of exhausters for which leaks were detected
 (ii) The number of exhausters for which leaks were repaired
 (iii) The results of performance tests conducted within the semiannual reporting period.
 (4) A statement signed by the owner or operator stating whether all provisions of 40 CFR part 61, subpart L, have been fulfilled during the semiannual reporting period.
 (5) For foundry coke by-product recovery plants, the annual coke production of both furnace and foundry coke, if determined during the reporting period.
- (g) In the first report submitted, the report shall include a reporting schedule stating the months that semiannual reports shall be submitted. Subsequent reports shall be submitted according to that schedule unless a revised schedule has been submitted in a previous semiannual report.

#010 Process vessels, storage tanks, and tar-intercepting sumps

- (a) (1) Enclose and seal all openings on each process vessel, tar storage tank, and tar-intercepting sump.
 (2) The owner or operator shall duct gases from each process vessel, tar storage tank, and tar-intercepting sump to the gas collection system, gas distribution system, or other enclosed point in the by-product recovery process where the benzene in the gas will be recovered or destroyed to less than 500 ppm above background and visual inspections. See permit page 147 for exceptions to (2).
- (b) Monitoring and inspection shall be conducted on a semiannual basis and at any other time after the control system is repressurized with blanketing gas following removal of the cover or opening of the access hatch.
 (1) If an instrument reading indicates an organic chemical concentration more than 500 ppm above a background concentration, a leak is detected.
 (2) If visible defects such as gaps in sealing materials are observed during a visual inspection, a leak is detected.
 (3) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.
 (4) A first attempt at repair of any leak or visible defect shall be made no later than 5 calendar days after each leak is detected.

SECTION E. GROUP 8 - BY-PRODUCT RECOVERY (continued)

Permit page 148

(c) Following the installation of any control system used to meet the requirements of paragraph (a) of this section, the owner or operator shall conduct a maintenance inspection of the control system on an annual basis for evidence of system abnormalities, such as blocked or plugged lines, sticking valves, plugged condensate traps, and other maintenance defects that could result in abnormal system operation. The owner or operator shall make a first attempt at repair within 5 days, with repair within 15 days of detection.

A #011 Delay of repairs:

(a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

(b) Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process and that does not remain in VHAP service.

*See attached Leak Detection Report - Attachment L
(Just cover page, see file for full report)*

**SOURCE 907: BET WASTEWATER TREATMENT PLANT
PROC 907→STAC Z907**

Permit page 62

There are no AQ Conditions listed for this source.

Erie Coke Corporation

Daily Monitoring - Fugitive Emissions and Malodors

Results are from daily walk-arounds and visual observations

Date 2014	Fugitive Emissions		Malodor		Cause of Emissions	Cause of Malodor
	Yes	No	Yes	No		
1/1/2016		X		X		
1/2/2016		X		X		
1/3/2016		X		X		
1/4/2016		X		X		
1/5/2016		X		X		
1/6/2016		X		X		
1/7/2016		X		X		
1/8/2016		X		X		
1/9/2016		X		X		
1/10/2016		X		X		
1/11/2016		X		X		
1/12/2016		X		X		
1/13/2016		X		X		
1/14/2016		X		X		
1/15/2016		X		X		
1/16/2016		X		X		
1/17/2016		X		X		
1/18/2016		X		X		
1/19/2016		X		X		
1/20/2016		X		X		
1/21/2016		X		X		
1/22/2016		X		X		
1/23/2016		X		X		
1/24/2016		X		X		
1/25/2016		X		X		
1/26/2016		X		X		
1/27/2016		X		X		
1/28/2016		X		X		
1/29/2016		X		X		
1/30/2016		X		X		
1/31/2016		X		X		
2/1/2016		X		X		
2/2/2016		X		X		
2/3/2016		X		X		
2/4/2016		X		X		
2/5/2016		X		X		
2/6/2016		X		X		
2/7/2016		X		X		
2/8/2016		X		X		

Duration	Corrective Action
----------	-------------------

2/9/2016	X	X
2/10/2016	X	X
2/11/2016	X	X
2/12/2016	X	X
2/13/2016	X	X
2/14/2016	X	X
2/15/2016	X	X
2/16/2016	X	X
2/17/2016	X	X
2/18/2016	X	X
2/19/2016	X	X
2/20/2016	X	X
2/21/2016	X	X
2/22/2016	X	X
2/23/2016	X	X
2/24/2016	X	X
2/25/2016	X	X
2/26/2016	X	X
2/27/2016	X	X
2/28/2016	X	X
2/29/2016	X	X
3/1/2016	X	X
3/2/2016	X	X
3/3/2016	X	X
3/4/2016	X	X
3/5/2016	X	X
3/6/2016	X	X
3/7/2016	X	X
3/8/2016	X	X
3/9/2016	X	X
3/10/2016	X	X
3/11/2016	X	X
3/12/2016	X	X
3/13/2016	X	X
3/14/2016	X	X
3/15/2016	X	X
3/16/2016	X	X
3/17/2016	X	X
3/18/2016	X	X
3/19/2016	X	X
3/20/2016	X	X
3/21/2016	X	X
3/22/2016	X	X
3/23/2016	X	X
3/24/2016	X	X
3/25/2016	X	X

3/26/2016	X	X
3/27/2016	X	X
3/28/2016	X	X
3/29/2016	X	X
3/30/2016	X	X
3/31/2016	X	X
4/1/2016	X	X
4/2/2016	X	X
4/3/2016	X	X
4/4/2016	X	X
4/5/2016	X	X
4/6/2016	X	X
4/7/2016	X	X
4/8/2016	X	X
4/9/2016	X	X
4/10/2016	X	X
4/11/2016	X	X
4/12/2016	X	X
4/13/2016	X	X
4/14/2016	X	X
4/15/2016	X	X
4/16/2016	X	X
4/17/2016	X	X
4/18/2016	X	X
4/19/2016	X	X
4/20/2016	X	X
4/21/2016	X	X
4/22/2016	X	X
4/23/2016	X	X
4/24/2016	X	X
4/25/2016	X	X
4/26/2016	X	X
4/27/2016	X	X
4/28/2016	X	X
4/29/2016	X	X
4/30/2016	X	X
5/1/2016	X	X
5/2/2016	X	X
5/3/2016	X	X
5/4/2016	X	X
5/5/2016	X	X
5/6/2016	X	X
5/7/2016	X	X
5/8/2016	X	X
5/9/2016	X	X

5/10/2016	X	X
5/11/2016	X	X
5/12/2016	X	X
5/13/2016	X	X
5/14/2016	X	X
5/15/2016	X	X
5/16/2016	X	X
5/17/2016	X	X
5/18/2016	X	X
5/19/2016	X	X
5/20/2016	X	X
5/21/2016	X	X
5/22/2016	X	X
5/23/2016	X	X
5/24/2016	X	X
5/25/2016	X	X
5/26/2016	X	X
5/27/2016	X	X
5/28/2016	X	X
5/29/2016	X	X
5/30/2016	X	X
5/31/2016	X	X
6/1/2016	X	X
6/2/2016	X	X
6/3/2016	X	X
6/4/2016	X	X
6/5/2016	X	X
6/6/2016	X	X
6/7/2016	X	X
6/8/2016	X	X
6/9/2016	X	X
6/10/2016	X	X
6/11/2016	X	X
6/12/2016	X	X
6/13/2016	X	X
6/14/2016	X	X
6/15/2016	X	X
6/16/2016	X	X
6/17/2016	X	X
6/18/2016	X	X
6/19/2016	X	X
6/20/2016	X	X
6/21/2016	X	X
6/22/2016	X	X
6/23/2016	X	X
6/24/2016	X	X

6/25/2016	X	X
6/26/2016	X	X
6/27/2016	X	X
6/28/2016	X	X
6/29/2016	X	X
6/30/2016	X	X
7/1/2016	X	X
7/2/2016	X	X
7/3/2016	X	X
7/4/2016	X	X
7/5/2016	X	X
7/6/2016	X	X
7/7/2016	X	X
7/8/2016	X	X
7/9/2016	X	X
7/10/2016	X	X
7/11/2016	X	X
7/12/2016	X	X
7/13/2016	X	X
7/14/2016	X	X
7/15/2016	X	X
7/16/2016	X	X
7/17/2016	X	X
7/18/2016	X	X
7/19/2016	X	X
7/20/2016	X	X
7/21/2016	X	X
7/22/2016	X	X
7/23/2016	X	X
7/24/2016	X	X
7/25/2016	X	X
7/26/2016	X	X
7/27/2016	X	X
7/28/2016	X	X
7/29/2016	X	X
7/30/2016	X	X
7/31/2016	X	X
8/1/2016	X	X
8/2/2016	X	X
8/3/2016	X	X
8/4/2016	X	X
8/5/2016	X	X
8/6/2016	X	X
8/7/2016	X	X
8/8/2016	X	X

8/9/2016

X

X

8/10/2016

X

X

ECC SHED BAGHOUSE LOG

DATE	7-22-16
------	---------

Circle Operating Baghouse: WEST EAST

Fan Motor Amperage (max 350 amps)

10 am	227	Amps	69	% Motor Current
6 pm	231	Amps	69	% Motor Current
2 am	228	Amps	69	% Motor Current
Motor RPM	1045			

Pressure Drop	Operating Range
3.2 "wc	1 to 7"wc

Dust Hopper Level for Operating Baghouse

<u>1/4</u> full	About 1/4, About 1/2, About 3/4 - empty hopper when 3/4 full
-----------------	---

Compressed Air Pressure and Supply Check

psi	Flow Strong and Dry:	Y	N
-----	----------------------	---	---

Date and Time Cleaning Cycle Last Conducted (look back)

6-17-16	AM PM
---------	-------

MONTHLY BAGHOUSE INSPECTION

Conducted During First Week of Each Month

1. Bag Cleaning Mechanisms: Solenoid, Screws, Rotary Valves
2. Visual Check of Bag Tension

Monthly Check Conducted	Date: 7-22-16
Notes: <u>INSPECTED WEST BAG-HOUSE AND ALL EQUIPMENT.</u> <u>EVERYTHING O.K.</u>	
Inspector: <u>R.R.</u>	

COMMENTS:

Date	COG Reading 12:00 AM # 2 Boiler	Days Usage	COG Reading 12:00 AM # 1 Boiler	Days Usage	Date	Natural Gas 12:00 AM # 2 Boiler	Days Usage	Natural Gas 12:00 AM # 1 Boiler	Days Usage	Total Cu Ft	Percent COG	Percent Natural Gas
7/1/2016			15863241	996781				127582813	500759	1497540	66.6%	33.4%
7/2/2016			16754303	891062				128159922	577109	1468171	60.7%	39.3%
7/3/2016			17676146	921843				128662759	502837	1424680	64.7%	35.3%
7/4/2016			18574670	898524				129267562	604803	1503327	59.8%	40.2%
7/5/2016			19552957	978287				129770239	502677	1480964	66.1%	33.9%
7/6/2016			20667377	1114420				130273176	502937	1617357	68.9%	31.1%
7/7/2016			21647909	980532				130802825	529649	1510181	64.9%	35.1%
7/8/2016			22743078	1095169				131317450	514625	1609794	68.0%	32.0%
7/9/2016			23614805	871727				131965684	648234	1519961	57.4%	42.6%
7/10/2016			24545458	930653				132601048	635364	1566017	59.4%	40.6%
7/11/2016			25397422	851964				133179409	578361	1430325	59.6%	40.4%
7/12/2016			26163622	766200				134057366	877957	1644157	46.6%	53.4%
7/13/2016			27048527	884905				134411122	353756	1238661	71.4%	28.6%
7/14/2016			27779020	730493				134825083	413961	1144454	63.8%	36.2%
7/15/2016			28923885	1144865				135259620	434537	1579402	72.5%	27.5%
7/16/2016			29659721	735836				136195184	935564	1671400	44.0%	56.0%
7/17/2016			30444148	784427				137118445	923261	1707688	45.9%	54.1%
7/18/2016			31393801	949653				137853047	734602	1684255	56.4%	43.6%
7/19/2016			32277498	883697				138518697	665650	1549347	57.0%	43.0%
7/20/2016			33349520	1072022				138844636	325939	1397961	76.7%	23.3%
7/21/2016			34420731	1071211				139205053	360417	1431628	74.8%	25.2%
7/22/2016			35361674	940943				139596353	391300	1332243	70.6%	29.4%
7/23/2016			36243381	881707				140054932	458579	1340286	65.8%	34.2%
7/24/2016			37010201	766820				140630690	575758	1342578	57.1%	42.9%
7/25/2016			37768539	758338				141273219	642529	1400867	54.1%	45.9%
7/26/2016			38653352	884813				141744707	471488	1356301	65.2%	34.8%
7/27/2016			39661456	1008104				142207638	462931	1471035	68.5%	31.5%
7/28/2016			40595550	934094				142601567	393929	1328023	70.3%	29.7%
7/29/2016			41475178	879628				143122735	521168	1400796	62.8%	37.2%
7/30/2016			42571596	1096418				143210046	87311	1183729	92.6%	7.4%
7/31/2016			43635711	1064115				143418406	208360	1272475	83.6%	16.4%
Total		0		28769251			0		16336352	45105603	63.8%	36.2%

Attachment C

Attachment D

Erie Coke Corporation

Daily Laboratory Report

Sample Date: 8/3/2016

Bin # & Sample	Moisture	V.M.	F.C.	Ash	Sulfur	Pulverization			Gieseler		Bulk Density	% Trans.
						+ 1/4"	+ 1/8"	- 1/8"	MDDPM	@ °C		
Foundry Mix	8.5	22.66	71.29	6.05	0.833	3.6	12.2	87.8	238	461	49.0	
SMC Mix	N/A											
B-1 Rhino	5.2	35.16	60.41	4.43	0.759							
B-2 Sewell	10.3	19.55	72.67	7.78	0.628							
B-3 Firecreek	5.2	18.58	75.93	5.49	0.824				194	484		
B-4 Robin	6.0	24.83	68.08	7.09	1.075							
B-5 LCT	4.7	18.86	74.52	6.62	1.129							
B-6 Breeze	8.8	1.87	88.69	9.44	0.712							
Stock Breeze	7.1	2.25	87.67	10.08	0.670							

Sample	Moisture	V.M.	F.C.	Ash	Sulfur	Shatter Test			Tumbler Test		
						+ 4"	+ 3"	+ 2"	Stab.	Hard.	
Foundry Coke	0.2	0.36	92.13	7.51	0.768	89.0	94.9	95.8			
Industrial Coke	N/A								***	***	
1 x 2 Coke	N/A										
2 x 4 Coke	2.6	0.49	91.58	7.93	0.770	+ 4"	+ 3"	+ 2"	+ 1 3/8"	+ 1"	- 1"
						N/A	***	***	***	***	***

Mesh Size	%
+ 20 Mesh	17.7
+ 60 Mesh	59.1
+ 100 Mesh	71.4
+ 200 Mesh	88.5
- 200 Mesh	11.5

Size	+ 6"	+ 5"	+ 4"	+ 3"	+ 2"	+ 1"
6 x 9	94.4	100.0	100.0	100.0	100.0	***
2 x 4	***	***	***	***	***	***
1 x 2	***	***	***	***	***	***

Car / Truck #	Tank	Date	Moist.	Sp. Gr.	Q.I.	Ash
Decantur		7/30/16	1.5	1.163	4.37	0.16

	FDY.	IND.
Appearance OK	Yes	
Size OK	Yes	N/A
Specifications OK	No	
Sample Date	8/3/16	
Samplers Initials	RL & WS	

H ₂ S	10	gr./100 ft. ³
------------------	----	--------------------------

W. Senyo

8/4/2016

Approval Signature

Date

* Note: Any result that does not meet required specifications will be shaded in yellow or gray

Distribution: Server, TCC, Coal Handling Supervisor and By-Products Supervisor

LR8.0

Revision Date: 2/11/09

D1

Erie Coke Corporation
Quench Water Analysis & Baffle Inspection
DEP Limit is 1100 mg/L
2015

Water Analysis**Baffle Inspection**

Date **Results** **Ave/Month**
 mg/L

1/6/2016 223 233
 1/13/2016 219
 1/20/2016 247
 1/27/2016 243
 Total 932

North East corner is plugged up

2/3/2016 243 241
 2/10/2016 246
 2/17/2016 247
 2/24/2016 229
 Total 965

North East corner is plugged up

3/2/2016 228 235
 3/8/2016 244
 3/16/2016 216
 3/23/2016 225
 3/30/2016 261
 Total 1174

North East corner has been repaired

4/5/2016 262 249
 4/13/2016 242
 4/20/2016 244
 4/27/2016 247
 Total 995

No damaged or missing baffels

5/4/2016 237 224
 5/10/2016 231
 5/17/2016 266
 5/25/2016 162
 Total 896

No damaged or missing baffels

6/1/2016 245 241
 6/7/2016 230
 6/15/2016 240
 6/22/2016 256
 6/29/2016 236

No damaged or missing baffels

Total 1207

7/6/2016 229 253

7/13/2016 262

7/20/2016 280

7/27/2016 240

Total 1011

No damaged or missing baffels

Erie Coke Corporation
 Quench Tower Rinse Cycle

NOTE: We are not required to rinse the baffles if the ambient temperature is below 30 degrees fahrenheit during the 24 hour period. If the temperature rises above 30 degrees fahrenheit during the 24 hour period the rinse cycle must be completed.

Date	Time	Provide Signature if rinse cycle is completed	Initial and record temperature if it is below 30 degrees		
			12:00 am - 8:00 am	8:00 am - 4:00 pm	4:00 pm - 12:00 am
APR 1	0915	James E. Janson			
2	1140	James E. Janson			
3	1020	James E. Janson			
4	0840	James E. Janson			
5	0825	James E. Janson			
6	1320	James E. Janson			
7	1140	James E. Janson			
8	0825	James E. Janson			
9	0900	James E. Janson			
10	0820	James E. Janson			
11	1050	James E. Janson			
12	1530	James E. Janson			
13	0750	James E. Janson			
14					
15	1520	James E. Janson			
16	1115	James E. Janson			
17	0915	James E. Janson			
18	0910	James E. Janson			
19	0820	James E. Janson			
20	1350	James E. Janson			
21	6:30	James E. Janson			
22	1140	James E. Janson			
23	1125	James E. Janson			
24					
25	0930	James E. Janson			
26	1050	James E. Janson			
27	1230	James E. Janson			
28					
29	1030	James E. Janson			
30	1730	James E. Janson			



Daily Summary Report

Stack 1 - Opacity

From: 08/01/2016 00:00 To: 08/05/2016 23:59 Facility Name: Erie Coke Corporation
 Generated: 08/10/2016 13:41 Location: Erie, PA

Red = Invalid or Excluded data | Green = Edited Status | Blue = Edited Value | * = Excess Emission

Const. Value/Limit Tag:	Stack 1 Opac, Pct 1 Hour(s)	Stack 1 Opac/101, Num 1 Hour(s)	Stack 1 Uniton, TF 1 Hour(s)
	08/01/2016 00:00	7.12	0
	08/01/2016 01:00	7.51	0
	08/01/2016 02:00	11.04	4*
	08/01/2016 03:00	12.16	4*
	08/01/2016 04:00	10.66	6*
	08/01/2016 05:00	13.80	5*
	08/01/2016 06:00	13.86	4*
	08/01/2016 07:00	10.44	0
	08/01/2016 08:00	9.29	1
	08/01/2016 09:00	8.24	0
	08/01/2016 10:00	8.34	0
	08/01/2016 11:00	6.98	0
	08/01/2016 12:00	14.40	11*
	08/01/2016 13:00	8.91	0
	08/01/2016 14:00	11.76	4*
	08/01/2016 15:00	13.93	8*
	08/01/2016 16:00	13.71	8*
	08/01/2016 17:00	9.36	5*
	08/01/2016 18:00	9.29	3
	08/01/2016 19:00	8.02	0
	08/01/2016 20:00	14.74	13*
	08/01/2016 21:00	8.02	0
	08/01/2016 22:00	9.66	4*
	08/01/2016 23:00	6.44	0
Average/Sum#:	10.32	80 #	24 #
Minimum:	6.44	0	1
Maximum:	14.74	13	1
%SI	0.00	0	0

GI

Attachment G



Daily Summary Report

Stack 1 - Opacity

From: 08/01/2016 00:00 To: 08/05/2016 23:59 Facility Name: Erie Coke Corporation
 Generated: 08/10/2016 13:41 Location: Erie, PA

Red = Invalid or Excluded Data | Green = Edited Status | Blue = Edited Value | * = Excess Emission

Const. Value/Limit Tag:	Stack 1 Opac, Pct 1 Hour(s)	Stack 1 OpacVio1, Num 1 Hour(s)	Stack 1 Uniton, TF 1 Hour(s)
08/02/2016 00:00	8.92	1	1
08/02/2016 01:00	8.88	3	1
08/02/2016 02:00	8.47	0	1
08/02/2016 03:00	11.96	6*	1
08/02/2016 04:00	14.58	15*	1
08/02/2016 05:00	15.20	4*	1
08/02/2016 06:00	13.12	3	1
08/02/2016 07:00	7.40	0	1
08/02/2016 08:00	6.65	0	1
08/02/2016 09:00	7.49	1	1
08/02/2016 10:00	8.79	0	1
08/02/2016 11:00	10.71	1	1
08/02/2016 12:00	9.31	0	1
08/02/2016 13:00	10.46	0	1
08/02/2016 14:00	8.16	0	1
08/02/2016 15:00	11.31	3	1
08/02/2016 16:00	9.19	1	1
08/02/2016 17:00	7.12	0	1
08/02/2016 18:00	12.84	12*	1
08/02/2016 19:00	11.55	4*	1
08/02/2016 20:00	13.05	7*	1
08/02/2016 21:00	9.84	1	1
08/02/2016 22:00	8.00	0	1
08/02/2016 23:00	4.92	0	1
Average/Sum#:	9.91	62 #	24 #
Minimum:	4.92	0	1
Maximum:	15.20	15	1
%SI	0.00	0	0

62



Daily Summary Report

Stack 1 - Opacity

From: 08/01/2016 00:00 To: 08/05/2016 23:59 Facility Name: Erie Coke Corporation
Generated: 08/10/2016 13:41 Location: Erie, PA

Red = Invalid or Excluded data | Green = Edited Status | Blue = Edited Value | * = Excess Emission

Const. Value/Limit Tag:	Stack 1	Stack 1	Stack 1	Stack 1
	Opac, Pct	Opac/101, Num	UnitOn, TF	1 Hour(s)
	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)
08/03/2016 00:00	5.49	0	1	1
08/03/2016 01:00	5.14	0	1	1
08/03/2016 02:00	7.55	1	1	1
08/03/2016 03:00	9.31	2	1	1
08/03/2016 04:00	9.00	2	1	1
08/03/2016 05:00	9.06	1	1	1
08/03/2016 06:00	9.08	2	1	1
08/03/2016 07:00	10.80	4*	1	1
08/03/2016 08:00	12.28	5*	1	1
08/03/2016 09:00	11.92	9*	1	1
08/03/2016 10:00	12.03	8*	1	1
08/03/2016 11:00	10.65	0	1	1
08/03/2016 12:00	11.70	0	1	1
08/03/2016 13:00	9.76	3	1	1
08/03/2016 14:00	6.45	0	1	1
08/03/2016 15:00	6.93	0	1	1
08/03/2016 16:00	7.51	0	1	1
08/03/2016 17:00	10.87	4*	1	1
08/03/2016 18:00	13.77	8*	1	1
08/03/2016 19:00	8.25	0	1	1
08/03/2016 20:00	14.81	13*	1	1
08/03/2016 21:00	9.34	3	1	1
08/03/2016 22:00	8.66	1	1	1
08/03/2016 23:00	12.20	5*	1	1
Average/Sum#:	9.69	71 #	24 #	
Minimum:	5.14	0	1	
Maximum:	14.81	13	1	
%SI	0.00	0	0	

63



Daily Summary Report

Stack 1 - opacity

From: 08/01/2016 00:00 To: 08/05/2016 23:59 Facility Name: Erie Coke Corporation
Generated: 08/10/2016 13:41 Location: Erie, PA

Red = Invalid or Excluded Data | Green = Edited status | Blue = Edited Value | * = Excess Emission

Const. Value/Limit Tag:	stack 1 Opac, Pct 1 Hour(s)	stack 1 OpacVio1, Num 1 Hour(s)	stack 1 UnitOn, TF 1 Hour(s)
08/04/2016 00:00	10.95	0	1
08/04/2016 01:00	13.06	1	1
08/04/2016 02:00	13.34	3	1
08/04/2016 03:00	11.97	3	1
08/04/2016 04:00	15.15	15 *	1
08/04/2016 05:00	14.34	11 *	1
08/04/2016 06:00	10.04	0	1
08/04/2016 07:00	7.53	0	1
08/04/2016 08:00	6.66	0	1
08/04/2016 09:00	8.42	0	1
08/04/2016 10:00	6.85	0	1
08/04/2016 11:00	9.78	0	1
08/04/2016 12:00	11.00	0	1
08/04/2016 13:00	6.71	0	1
08/04/2016 14:00	7.75	0	1
08/04/2016 15:00	10.30	2	1
08/04/2016 16:00	10.84	3	1
08/04/2016 17:00	11.27	4 *	1
08/04/2016 18:00	15.51	14 *	1
08/04/2016 19:00	14.41	2	1
08/04/2016 20:00	11.52	2	1
08/04/2016 21:00	11.12	0	1
08/04/2016 22:00	16.09	21 *	1
08/04/2016 23:00	9.32	0	1
Average/sum#:	11.00	81 #	24 #
Minimum:	6.66	0	1
Maximum:	16.09	21	1
%ST	0.00	0	0

64



Daily Summary Report

Stack 1 - Opacity

From: 08/01/2016 00:00 To: 08/05/2016 23:59 Facility Name: Erie Coke Corporation
 Generated: 08/10/2016 13:41 Location: Erie, PA

Red = Invalid or Excluded Data | Green = Edited status | Blue = Edited Value | * = Excess Emission

Const. Value/Limit Tag:	Stack 1	Stack 1	Stack 1	Stack 1
	Opac, Pct	OpacViol, Num	Uniton, TF	1 Hour(\$)
	1 Hour(\$)	1 Hour(\$)	1 Hour(\$)	1 Hour(\$)
08/05/2016 00:00	11.73	2	1	1
08/05/2016 01:00	9.41	0	1	1
08/05/2016 02:00	8.67	0	1	1
08/05/2016 03:00	7.78	0	1	1
08/05/2016 04:00	13.26	14*	1	1
08/05/2016 05:00	7.95	0	1	1
08/05/2016 06:00	7.31	0	1	1
08/05/2016 07:00	7.92	0	1	1
08/05/2016 08:00	8.11	0	1	1
08/05/2016 09:00	8.05	0	1	1
08/05/2016 10:00	17.91	23*	1	1
08/05/2016 11:00	7.09	0	1	1
08/05/2016 12:00	10.00	2	1	1
08/05/2016 13:00	14.19	6*	1	1
08/05/2016 14:00	13.63	7*	1	1
08/05/2016 15:00	15.07	17*	1	1
08/05/2016 16:00	12.12	13*	1	1
08/05/2016 17:00	8.76	2	1	1
08/05/2016 18:00	7.63	0	1	1
08/05/2016 19:00	6.63	0	1	1
08/05/2016 20:00	9.75	2	1	1
08/05/2016 21:00	6.69	0	1	1
08/05/2016 22:00	10.34	3	1	1
08/05/2016 23:00	7.86	0	1	1
Average/Sum#:	9.91	91 #	24 #	
Minimum:	6.63	0	1	
Maximum:	17.91	23	1	
%SI	0.00	0	0	

65

**ENERGY ASSESSMENT
OF
ON-GOING OPERATIONS
FOR**



**Erie Coke Corporation
Foot of East Avenue
Erie, PA 16507**

October, 2015

Prepared By:

Environmental Compliance, Inc.
Elma, New York
(716) 655-6120

And

BJ Muirhead Company
Orchard Park, New York
(716) 667-7100

	At 4:00 pm Pressure Before	Pressure After	Pressure Drop
	10	8	2
	10	8	2
	11	9	2
	9	8	1
	12	9	3
	11	9	2
	11	9	2
	10	8	2
	14	10	4
	11	8	3
	10	8	2
	11	9	2
	11	9	2
	11	9	2
	10	9	1
	9	8	1
	10	9	1
	11	9	2
	11	9	2
	10	9	1
	9	8	1
	10	9	1
	11	9	2
	11	9	2
	10	9	1
	10	9	1
	11	10	1
	10	9	1
	9	8	1
	11	9	2
	10	9	1
	10	9	1
	11	8	2
	10	9	1
	10	9	1
	9	8	1
	10	9	1
	10	9	1
	11	8	2
	10	9	1
	9	8	1
	10	9	1
	10	8	2
	10	8	2
	10	8	2

	At 12:00 pm Pressure Before	Pressure After	Pressure Drop
	9	8	1
	10	8	2
	9	8	1
	11	9	2
	10	9	1
	11	10	1
	10	9	1
	10	8	2
	10	9	1
	10	9	1
	9	7	2
	9	8	1
	11	9	2
	10	9	1
	11	9	2
	9	8	1
	9	8	1
	11	10	1
	11	10	1
	10	9	1
	10	9	1
	10	9	1
	9	9	0
	9	8	1
	10	9	1
	10	9	1
	10	9	1
	9	8	1
	10	9	1
	10	9	1
	10	9	1
	10	9	1
	10	9	1
	10	7	3
	10	8	2
	10	8	2

Date	At 8:00 am Pressure Before	Pressure After	Pressure Drop
7/1/2016	10	8	2
7/2/2016	10	9	1
7/3/2016	10	8	2
7/4/2016	10	8	2
7/5/2016	11	8	3
7/6/2016	10	9	1
7/7/2016	10	9	1
7/8/2016	10	9	1
7/9/2016	12	9	3
7/10/2016	10	9	1
7/11/2016	10	9	1
7/12/2016	9	8	1
7/13/2016	12	9	3
7/14/2016	10	9	1
7/15/2016	11	9	2
7/16/2016	10	9	1
7/17/2016	10	9	1
7/18/2016	11	9	2
7/19/2016	10	9	1
7/20/2016	10	9	1
7/21/2016	10	9	1
7/22/2016	9	8	1
7/23/2016	10	9	1
7/24/2016	10	9	1
7/25/2016	10	9	1
7/26/2016	10	9	1
7/27/2016	10	8	2
7/28/2016	9	7	2
7/29/2016	10	8	2
7/30/2016	10	8	2

10	8	2
----	---	---

10	9	1
----	---	---

7/31/2016	10	9	1
-----------	----	---	---

USEPA Method 303

PA DEP Inspector: Dan Brophy

Erie Coke
92 E Bay Drive
Erie PA 16512

Date: 8 Aug 2016

Offtakes & Lids Certification

Total Number Ovens: 58 Total Inoperable Ovens: 0
Start Time: 12:08 End Time: 12:13

Valid Run: (Y) N

A Battery: :39
B Battery: 1:37
Total: 136 sec

Oven Lids Coke Side Offtakes
33 - Flange
0

% Leaking Lids: 0%
% Leaking Offtakes: 1.75%

Door Certification

Total Number Ovens: 58 Total Inoperable Ovens: 0
Push Side Start Time: 9:36 Coke Side Start Time: 9:43
Push Side End Time: 9:39 Coke Side End Time: 9:47
Push Side Traverse Time: 65 sec Coke Side Traverse Time: 120 sec

Valid Run: (Y) N

Oven Location Oven Location
None 1 D
18 D
40 D
47 M

Percent Leaking Doors: .5%

Charging Certification

Charge	Oven	Start	End	VE
1	43	7:54	8:02	5
2	53	9:28	9:34	10
3	55	10:30	10:40	6
4	21	11:48	11:58	5
5	26	1:16	1:27	6

Collecting Main Certification

Start Time: 1:30 End Time: 1:40
A Pressure: 7.65
B Pressure: 7.25 No leaks

Dan Brophy 8 Aug 2016
PA DEP Inspector Signature Date

Erie Coke - Method 303 Charging Report

Date: 8/8/16

Representative: S. McClain

Notes: _____

DES, LLC Inspector: E. Kiefer

Operating Conditions: 42%

BATTERY A/B		Clock Time		VE	BL	DL	AL	Lids
Charge #	Oven #	Start	Stop					
1	40	6:37	6:45	11.0	10.66	—	11.08	1, 2, 5
2	43	7:53	8:02	5.5	4.55	—	5.38	1, 2, 3, 5
3	53	9:25	9:34	8.5	6.97	—	8.37	1, 5
4	55	10:31	10:40	8.5	7.32	—	8.34	1, 3, 5
5	21	11:48	11:57	3.0	2.20	—	2.78	1, 2, 3

Sum of 4 Charges: 33.5 Sec

Doors Leaking

PS CS
 A φ φ
 B φ φ

Lids Leaking

A ~~φ~~ φ
 B φ

Offtakes Leaking

A ~~φ~~ φ
 B φ

Doors Not Observed

A φ
 B φ

Lids Not Observed

A 48
 B 30

Offtakes Not Observed

A 8
 B 5

Out of Service Ovens

A Battery φ

B Battery φ

% Doors Leaking

A φ
 B φ

% Lids Leaking

A φ
 B φ

% Offtakes Leaking

A φ
 B φ

Time In: 5:10 AM

Time Out: 12:20 PM

Erie Coke - Topside Report

Battery A

Date: 8/8/16

Representative: S. Mulwin

Operating Conditions: 42%

DESLIC Inspector: E. Kater

Notes: _____

Collecting Main Pressure: 7.18

B - Base

Collecting Main Inspection Time: 11:59 *CK*

TC - Top Cap

G - Gooseneck

Fl - Flange

C - Collars

O - Other

Start: 6:19 Stop: 6:20

Start: 6:17 Stop: 6:18

Time: 44 Sec Valid: Y-S

Time: 67 Sec Valid: yes

Oven

Lids

Offtakes

	1	2	3	4	5	6		B	TC	G	Fl	C	O
1							1						
2							2						
3							3						00
4							4						00
5							5						
6							6						
7							7						00
8							8						
9							9						
10							10						00
11							11						
12							12						
13							13						00
14							14						
15							15						
16							16						
17							17						00
18							18						
19							19						
20							20						00
21							21						00
22							22						
23							23						

8/48

Count 0 Lids

Count 0 Offtakes

$$\% \text{ Leaking Lids} = \frac{\text{Lids Leaking}}{\text{Lids Observed}} * 100$$

$$\% \text{ Leaking Offtakes} = \frac{\text{Offtakes Leaking}}{\text{Offtakes Observed}} * 100$$

0

0

Erie Coke - Topside Report

Battery B

Date 8/2/16

Representative S. Mulwin

Operating Condition 42%

DESLOC Inspector: F. K. Lee

Notes _____

Collecting Main Pressure: 6.58

B - Base
TC - Top Cap
G - Gooseneck
FI - Flange
C - Corfiss
O - Other

Collecting Main Inspection Time: 12:41 *OK*

Start: 7:10 Stop: 7:11

Start: 7:07 Stop: 7:08

Time: 51 Sec Valid Yes

Time: 67 Sec Valid Yes

Oven

Lids

Offtakes

	1	2	3	4	5	6
24						
25						
26						
27						
28						
29						
30						
31						
32						
33						
34						
35						
36						
37						
38						
39						
40						
41						
42						
43						
44						
45						
46						
47						
48						
49						
50						
51						
52						
53						
54						
55						
56						
57						
58						

	B	TC	G	FI	C	O
24						
25						
26						
27						
28						
29						
30						
31						
32						
33						
34						
35						
36						
37						
38						
39						
40						
41						
42						
43						
44						
45						
46						
47						
48						
49						
50						
51						
52						
53						
54						
55						
56						
57						
58						

00

00

00

00

00

5/30

00 ϕ Lids

00 ϕ Offtakes

Leading Lids = Lids Looking
= Lids Observed

Leading Offtakes = Offtakes Looking
= Offtakes Observed

ϕ

ϕ

Erie Coke - Door Report

Date: 8/8/16

Representative: S. Melvin

Operating Conditions: 42%

DESInc. Inspector: E. Kuten

Notes: _____

Battery A

PS Start: 7:15 Stop: 7:16

Time: 31.5 sec Valid: 4-5

CS Start: 5:52 Stop: 5:53

Time: 38 Sec Valid: 4-5

Oven PS CS (FB)

1	_____	_____
2	_____	_____
3	_____	_____
4	_____	_____
5	_____	_____
6	_____	_____
7	_____	_____
8	_____	_____
9	_____	_____
10	_____	_____
11	_____	_____
12	_____	_____
13	_____	_____
14	_____	_____
15	_____	_____
16	_____	_____
17	_____	_____
18	_____	_____
19	_____	_____
20	_____	_____
21	_____	_____
22	_____	_____
23	_____	_____
24	_____	_____
25	_____	_____
26	_____	_____
27	_____	_____
28	_____	_____
29	_____	_____
30	_____	_____
31	_____	_____
32	_____	_____
33	_____	_____
34	_____	_____
35	_____	_____
36	_____	_____
37	_____	_____
38	_____	_____
39	_____	_____
40	_____	_____
41	_____	_____
42	_____	_____
43	_____	_____
44	_____	_____
45	_____	_____
46	_____	_____
47	_____	_____
48	_____	_____
49	_____	_____
50	_____	_____
51	_____	_____
52	_____	_____
53	_____	_____
54	_____	_____
55	_____	_____
56	_____	_____
57	_____	_____
58	_____	_____
59	_____	_____
60	_____	_____
61	_____	_____
62	_____	_____
63	_____	_____
64	_____	_____
65	_____	_____
66	_____	_____
67	_____	_____
68	_____	_____
69	_____	_____
70	_____	_____
71	_____	_____
72	_____	_____
73	_____	_____
74	_____	_____
75	_____	_____
76	_____	_____
77	_____	_____
78	_____	_____
79	_____	_____
80	_____	_____
81	_____	_____
82	_____	_____
83	_____	_____
84	_____	_____
85	_____	_____
86	_____	_____
87	_____	_____
88	_____	_____
89	_____	_____
90	_____	_____
91	_____	_____
92	_____	_____
93	_____	_____
94	_____	_____
95	_____	_____
96	_____	_____
97	_____	_____
98	_____	_____
99	_____	_____
100	_____	_____

% Leaking Doors: $\frac{\# \text{ of Doors Leaking}}{\# \text{ of Doors Observed}} \times 100$

Last Oven Charged: 11

Count: 4

D-Door

C-Check

B-Both

J-Jamb

M-Masonry

FB-From Bench

Battery B

PS Start: 7:17 Stop: 7:17

Time: 44.5 sec Valid: 4-5

CS Start: 5:54 Stop: 5:55

Time: 48 Sec Valid: 4-5

Oven PS CS (FB)

24	_____	_____
25	_____	_____
26	_____	_____
27	_____	_____
28	_____	_____
29	_____	_____
30	_____	_____
31	_____	_____
32	_____	_____
33	_____	_____
34	_____	_____
35	_____	_____
36	_____	_____
37	_____	_____
38	_____	_____
39	_____	_____
40	_____	_____
41	_____	_____
42	_____	_____
43	_____	_____
44	_____	_____
45	_____	_____
46	_____	_____
47	_____	_____
48	_____	_____
49	_____	_____
50	_____	_____
51	_____	_____
52	_____	_____
53	_____	_____
54	_____	_____
55	_____	_____
56	_____	_____
57	_____	_____
58	_____	_____
59	_____	_____
60	_____	_____
61	_____	_____
62	_____	_____
63	_____	_____
64	_____	_____
65	_____	_____
66	_____	_____
67	_____	_____
68	_____	_____
69	_____	_____
70	_____	_____
71	_____	_____
72	_____	_____
73	_____	_____
74	_____	_____
75	_____	_____
76	_____	_____
77	_____	_____
78	_____	_____
79	_____	_____
80	_____	_____
81	_____	_____
82	_____	_____
83	_____	_____
84	_____	_____
85	_____	_____
86	_____	_____
87	_____	_____
88	_____	_____
89	_____	_____
90	_____	_____
91	_____	_____
92	_____	_____
93	_____	_____
94	_____	_____
95	_____	_____
96	_____	_____
97	_____	_____
98	_____	_____
99	_____	_____
100	_____	_____

Last Oven Charged: 33

Count: 4



Safety Data Sheet

Material Name: SAFETY-KLEEN PREMIUM SOLVENT (VIRGIN AND RECYCLED)

SDS ID: GHS 82658

*** Section 1 - Identification ***

Product Identifier

SAFETY-KLEEN PREMIUM SOLVENT (VIRGIN AND RECYCLED)

Product Code

None.

Synonyms

Safety-Kleen Premium Gold Solvent; Safety-Kleen Continued Use Product Solvent (CUP); High Flash Degreasing Solvent; Parts Washer Solvent; Petroleum Distillates; Petroleum Naphtha; Naphtha, Solvent; Mineral Spirits

Recommended Use

Cleaning and degreasing metal parts. If this product is used in combination with other products, refer to the Safety Data Sheets for those products.

Restrictions on Use

None known.

Manufacturer Information

Safety-Kleen Systems, Inc.
2600 North Central Expressway
Suite 400
Richardson, TX 75080
www.safety-kleen.com

Phone: 1-800-669-5740

Emergency # 1-800-468-1760

Issue Date

September 2, 2014

Supersedes Issue Date

November 8, 2012

Original Issue Date

January 26, 1995

*** Section 2 - Hazard(s) Identification ***

Classification in Accordance with 29 CFR 1910.1200.

Flammable Liquids, Category 4
Specific Target Organ Toxicity - Single Exposure, Category 3 (central nervous system)
Aspiration Hazard, Category 1

GHS LABEL ELEMENTS

Symbol(s)



Signal Word

DANGER!

Hazard Statement(s)

Combustible liquid
May cause drowsiness and dizziness
May be fatal if swallowed and enters airways

Attachment L

April 11, 2016

To: Mr. Randy Wiler

From: K. Thrun

Re: Semi-Annual LDAR Monitoring Results, Report #1 - 2016

The following report represents the results for the 2015 LDAR Semi-Annual monitoring, which was performed on March 29, 2016 and April 5, 2016.

Semi-Annual Control System Monitoring

<i>Citation</i>	<i>Affected Components</i>	<i>Leak Definition (ppm-v)</i>	<i>Number of Components Screened</i>	<i>Number of Leaking Components</i>	<i>Leaking Component Identification Number(s)</i>
61.132(b)	Valves	500	80	0	0
61.132(b)	Control System Connections and Seals	500	301	0	0
61.135(d)	Exhausters	500	3	0	0
Total Components			384	0	0

RESULTS: No components were identified as leaking during this survey period.

Note: The total component count takes into account the number of components added or removed from each category.

Either the component was not accessible in some fashion (i.e. covered by insulation, removed from service, etc.) and is not represented in the final counts. Or there were new components added or un-covered by insulation that was removed.

- 6-1-16 Replaced valves on Think Tank
- 6-2-16 8" main leak repaired
- 6-2-16 Big blue motor has been changed out
- Inspection Prep.
6-1-16 Boiler # 2 Fire Box repair and patch work
- To
7-7-16 ~~Repaired~~ cleaned and washed tubes
- 7-12-16 Inspector - Found ^{a little} sand in water/steam drum - was removed
- 7-13-16 Replace Sight Glass Assy.
- 7-14-16 - Hydro # 2 Boiler found leak in # 6 Super heat tube
- 7-15-16 - Repaired made Re hydro found leak in # 5 Super heat tube
- 7-16-16 - Repaired made Re hydro found # 6 Super heat tube leaking
- 7-18-16 - Repaired made Re hydro # 6 Super heat tube leaking
- 7-19-16 - Repaired made Re hydro - no Leaks Boiler Ready for service
- 7-25-16 Shut down Raw water pumps and clean out well found about 2 1/2 to 3 Ft of sand and silt in well.
- 7-26-16 Turbidimeter system shut down and cleaned out due to sand. System was re-calibrated and placed back in service
- 7-26-16 New control valve installed on lake water to well Feed line and calibrated
- 8-1-16 Big Blue cleaned out

BOILER HOUSE MAINTENANCE LOG

71

1-28-16 Replace safety valve on #1 Steam turbine for Boiler Feed water
 1-29-16 2.5 Mega watt Turbine Generator off line and out of service
 Due to schedule Rebuilt and clearing. Est time 6-8 weeks

2-9-16 Replaced steam traps on chemical Room Heater & Boiler Storage area
 Heating units

2-16-16 Replaced 1" ball valve on #1 COG line drain to tote
 3-4-16 Repair steam leak on heater in Chemical Room

3-11-16 Replaced safety valve on #1 Boiler steam & water drum 205 psi

3-17-16 Repack all valves & steam Gate valves in Generator Rm
 3-18-16 Replaced Ejector main steam Isolation valve

3-22-16 Repack ~~8" IN~~ valve main steam stop #1 Boiler, Replaced
 #1 Boiler ID Fan main steam Isolation valve

4-7-16 2.5 Mega watt Turbine Generator Back in Service

4-12-16 Replaced safety 205 valve on #1 Boiler drum Last
 one on drum

~~5-6-16~~
 5-13-16 Re installed Baffles, Repair and cleaned COG main,
 Burners, Replace 2 valves (COG burner valves), ~~Replaced~~
~~Re did~~ Re did the Burner placement on #1 Boiler

5-16 #1 Boiler online

5-25-16 Replaced #2 Boiler safety valve - 200 psi

5-26-16 ID Fan Trip Test - Fan Tripped @ 553
 5-26-16 #2 Boiler maint cont. Burner Inspection

M2

TRUCK STATION
DUST SUPPRESSION MAINT. CHECK LOG

Attachment N

11/7/14 OK

11/14/14 OK

11/19/14 WATER TURNED OFF AND WINTERIZED (JR)

4/6/15 SYSTEM BACK ON LINE, NEW SPRAYS & LINES

4/17/15 OK

4/24/15 OK

4/30/15 OK

5/8/15 OK

5/15/15 OK

5/22/15 OK

5/27/15 OK

By-Products MAINTENANCE LOG

Attachment 0

- 5-1-15 Replaced 75HP Ziq Pump Pc#3 Bed Barring
- 5-13-15 Cleaned water side Pc#3
- 7-6-15 Changed VFD cooling Fan Electric Exhaust
- 7-30-15 New AIR COMPRESSOR + AIR DRYER in service
- 9-8-15 8 PM ABSORBEN off line for Maint
- 9-9-15 10:30 AM ABSORBEN on line
- 9-13-15 noon ABSORBEN off line - cleaning
- 9-14-15 11 AM ABSORBEN on line
- 11-19-15 ABSORBEN off line cleaning
- 11-20-15 " on line
- 01-14-16 ABSORBEN off line cleaning
- 01-15-16 " on " cleaning
- 01-22-16 Change FILTERS SOL-AIR
- 02-25-16 ABSORBEN Down for Piston Valve Gate
- " " " Replacement transfer pump Discharge line
- 2-29-16 Back on line - off line x 1HR
- 2-29-16 VFD for x for pump on line
- 3-11-16 Rebuilt north Flushing Ziq PUMP
- 3-25-16 Changed pre + post filter on AIR DRYER
- 5-17-16 Precipitation off Low Voltage ALARM
- 5-18-16 Precipitation cleaned + on line
- 5-20-16 R+R PC Large Ziq Pump 01

By-Products Maintenance Log

- 5-26-16 P+R #11 Water Reversal Valve
- 6-15-16 Wal Tank out of Service
- 6-30-16 Changed oil + Filters SOLAIR COMPRESSOR (new)
- 7-26-19 ABSORBER SYSTEM DOWN FOR CLEANING AND MAINTENANCE — JOB CANCELLED
- 8-12-16 Changed oil + filter on both Bolen House GAS Boosters ALSO Changed oil grade from S100 TO 220. per Ron Rombo
- 8-15-16 $\phi 73\phi$ ABSORBER DOWN FOR MAINT

DATE: 8-18-16 OPERATOR: 12M JM 8A H 4P MK	ABSORBER FLOW (g.p.m.)	ABSORBER MAKE-UP WATER FLOW (g.p.m.)	ABSORBER GAS TEMP.		ABSORBER LEVEL (INCHES)	THIONIZER LIQUID OUT TEMP.	TRANSFER PUMP DISCHARGE TEMP.	BACKWASH PUMP DISCHARGE TEMP.	P.S.I.
			C.O. INLET	C.O. OUTLET					
12 MIDNIGHT	447	3.5	90	97	50.1	98	98	98	30
2AM	449	3.6	90	96	50.1	97	97	97	30
4AM	449	3.4	89	95	50.1	96	97	97	30
6AM	448	3.5	88	97	50.0	95	96	96	30
8AM	446	4.0	87	92	50.1	93	93	93	30
10AM		Busy							
12 NOON	450	4.2	88	92	50.1	93	94	93	30
2PM	449	3.9	90	93	50.1	95	95	95	30
4PM	448	4.0	90	95	50.1	98	96	96	30
6PM	448	4.0	93	97	50.0	102	99	99	30
8PM	446	4.0	91	96	50.0	100	99	99	30
10PM	448	4.0	90	95	50.0	97	95	97	30

NOTES:

shadow →



ave. ↘

2700-FM-AQ0039 Rev. 3/2006



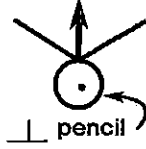
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

Attachment P

File ID:

VISIBLE EMISSION OBSERVATION RECORD

Description of Source: *Erie Coke Stack*
Owner of Source: *Erie Coke*
Location of Source: *Bayfront*



Observers Name: *Dan Brophy*
Title: *Air Quality specialist*
Date: *22 Aug 2016*
Time interval: from *11:50* to *12:50*

PART OF MINUTES

	0	¼	½	¾		0	¼	½	¾		0	¼	½	¾	Distance to Source:			
0	15	15	15	15	20	5	5	5	5	40	5	5	5	5	300m			
1	15	10	10	10	21	10	10	10	10	41	5	5	5	5	Wind Speed and Direction: <i>0-5 mph NW</i>			
2	10	10	5	10	22	5	5	5	5	42	5	5	5	5	Sky Conditions: <i>Clear</i>			
3	10	10	15	15	23	5	5	5	5	43	10	10	10	10	Plume Color: <i>White</i>			
4	15	15	15	10	24	5	5	5	5	44	10	10	10	15	Plume Background: <i>Blue</i>			
5	10	10	10	10	25	5	5	5	5	45	25	25	20	20	Sketch with source, observer, and north indicated: 			
6	10	10	10	10	26	5	5	5	5	46	15	15	15	10				
7	10	10	5	5	27	5	5	5	5	47	10	10	10	10				
8	5	5	5	5	28	5	5	5	5	48	5	5	5	5				
9	5	5	5	5	29	5	5	5	5	49	5	5	5	5				
10	5	5	5	5	30	5	10	10	5	50	5	5	5	5				
11	5	5	5	5	31	10	10	10	10	51	5	5	5	5				
12	5	5	5	5	32	10	10	5	10	52	10	5	5	5				
13	5	0	5	0	33	5	10	10	5	53	5	5	5	5				
14	5	5	5	5	34	5	5	5	5	54	5	5	10	5				
15	5	5	5	5	35	5	5	5	5	55	10	5	5	5				
16	5	5	5	5	36	5	5	5	5	56	5	5	5	5				
17	5	5	5	10	37	5	5	5	5	57	5	10	5	5				
18	5	5	5	5	38	5	5	5	5	58	5	5	5	5				
19	5	5	5	5	39	5	5	5	5	59	5	5	5	5				
																Opacity	No. of Readings	Total Time Minutes
																<20%	236	59:00
																>20%	4	1:00
																>60%	0	0

Other Comments:

White - Region

Yellow - Central Office

Pink - Facility

P1



Opacity Filter Audit Report Stack 1

From: 08/22/2016 10:50 To: 08/22/2016 11:50 Facility Name: Erie Coke Corporation
Generated: 08/22/2016 13:16 Location: Erie, PA

Red = Sample Invalid

Date/Time	Stack 1 Opac, Pct 1 Minute(s)
08/22/2016 10:50	13.36
08/22/2016 10:51	12.53
08/22/2016 10:52	12.41
08/22/2016 10:53	13.16
08/22/2016 10:54	13.17
08/22/2016 10:55	13.56
08/22/2016 10:56	13.25
08/22/2016 10:57	12.95
08/22/2016 10:58	13.09
08/22/2016 10:59	13.09
08/22/2016 11:00	13.08
08/22/2016 11:01	13.37
08/22/2016 11:02	14.34
08/22/2016 11:03	14.98
08/22/2016 11:04	14.61
08/22/2016 11:05	15.31
08/22/2016 11:06	14.98
08/22/2016 11:07	11.33
08/22/2016 11:08	12.33
08/22/2016 11:09	21.61
08/22/2016 11:10	11.33
08/22/2016 11:11	9.69
08/22/2016 11:12	9.58
08/22/2016 11:13	9.62
08/22/2016 11:14	9.56
08/22/2016 11:15	9.29
08/22/2016 11:16	9.00
08/22/2016 11:17	9.02
08/22/2016 11:18	9.72
08/22/2016 11:19	9.76

Stack1_1minuteData

P2

Erie coke clock is one hour behind.

Opacity Filter Audit Report

Stack 1



From: 08/22/2016 10:50 **To:** 08/22/2016 11:50 **Facility Name:** Erie Coke Corporation
Generated: 08/22/2016 13:16 **Location:** Erie, PA

Red = Sample Invalid

Date/Time	1 Minute(s)	Opac, Pct
08/22/2016 11:20	10.10	
08/22/2016 11:21	10.42	
08/22/2016 11:22	10.64	
08/22/2016 11:23	10.76	
08/22/2016 11:24	11.21	
08/22/2016 11:25	11.80	
08/22/2016 11:26	12.25	
08/22/2016 11:27	8.59	
08/22/2016 11:28	12.63	
08/22/2016 11:29	17.13	
08/22/2016 11:30	11.75	
08/22/2016 11:31	10.61	
08/22/2016 11:32	10.53	
08/22/2016 11:33	10.75	
08/22/2016 11:34	10.97	
08/22/2016 11:35	11.49	
08/22/2016 11:36	10.89	
08/22/2016 11:37	10.81	
08/22/2016 11:38	10.82	
08/22/2016 11:39	11.12	
08/22/2016 11:40	11.23	
08/22/2016 11:41	11.55	
08/22/2016 11:42	11.98	
08/22/2016 11:43	12.09	
08/22/2016 11:44	12.17	
08/22/2016 11:45	12.87	
08/22/2016 11:46	13.21	
08/22/2016 11:47	9.62	
08/22/2016 11:48	10.41	
08/22/2016 11:49	21.88	

Opacity Filter Audit Report

Stack 1



From: 08/22/2016 10:50 To: 08/22/2016 11:50 Facility Name: Erie Coke Corporation
Generated: 08/22/2016 13:16 Location: Erie, PA

Red = Sample Invalid

Date/Time	Stack 1 Opac, Pct I Minute(s)
08/22/2016 11:50	11.93

Valid Data Points 61
Average: 12.09