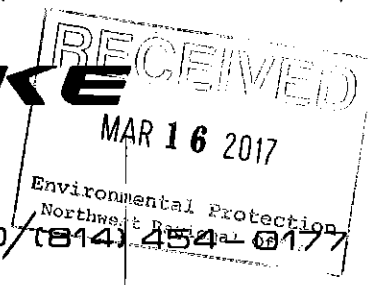


AG/Facilities/Case 25-000-00029



March 15, 2017

Mr. Matthew M. Williams *MW*  
Environmental Group Manager  
Pennsylvania Department of Environmental Protection  
230 Chestnut Street  
Meadville, Pa. 16335

RE: Erie Coke Title V Permit Modification

Dear Mr. Williams:

Paragraph 18 (b) of the Consent Decree with EPA requires Erie Coke to apply for modifications to its Title V Permit that will incorporate the following:

- "Applicable requirements" contained in 40 C.F.R. Part 61, Subpart L
- "Applicable requirements" contained in 40 C.F.R. Part 61, Subpart V
- "Applicable requirements" contained in 40 C.F.R. Part 61, Subpart FF

In addition, Paragraph 18 (b) requires Erie Coke to apply for a modification to its Title V Permit to incorporate certain specific obligations contained in Paragraph 16 of the Consent Decree. These obligations are as follows:

- ECC shall submit to EPA no later than 180 Days after December 16, 2016 a design plan to replace the cover on the West tar decanter. The cover shall be designed to operate with no detectable emissions and minimize emissions as effectively as the cover on the East Tar Decanter.
- ECC shall submit to EPA no later than 180 Days after December 16, 2016 a design plan to improve the general tightness of the tar sludge collection system of the tar decanters. This plan will require enclosure of the tar sludge collection system when not in use and ensure that no liquid is dripping when no sludge is being removed.
- **WAL tanks.** Within 120 Days of the December 16, 2016, ECC shall undertake such measures as ECC deems necessary to control benzene emissions from each tank, including at any valve or drain location. Within 150 Days of the December 16, 2016, ECC shall conduct Method 21 monitoring ("Initial Monitoring") at each tank. Such monitoring shall include the following locations, at a minimum: any drain or valve and the top of each tank. If the results of the Initial Monitoring demonstrate THC emissions greater than 500 ppm above background concentration at any location, ECC shall have 30 Days to attempt to manually seal the unit (caulk, fixing holes, etc.) and shall then conduct Method 21 monitoring ("Follow Up Monitoring") to evaluate whether such manual attempt was successful. The results of the Initial Monitoring and, if necessary, the Follow Up Monitoring, shall be submitted to EPA

*TVOP expires 2/28/18 see...*

*(mw) Facility will submit TVOP Mod or inspect with results App due 8/31/17*

within 15 Days of ECC's receipt of the results. If the Follow Up Monitoring demonstrates THC emissions greater than 500 ppm above background concentration, ECC shall, within 60 Days, submit a plan to EPA for operating the tank or tanks under negative pressure. If either the Initial Monitoring or the Follow Up Monitoring demonstrate that THC emissions at each location monitored do not exceed 500 ppm above background concentration, ECC shall continue to schedule Method 21 monitoring of the tanks on an annual basis in accordance with 40 C.F.R. 61.132(c). Nothing in this subparagraph shall be construed to require ECC to fully enclose any tank if the results of either the Initial Monitoring or the Follow Up Monitoring demonstrate that THC emissions do not exceed 500 ppm above background concentration at the top of that tank."

Erie Coke recognizes that the decision as to whether to include these requested modifications is PADEP's to make, and that certain of these requests may not be considered appropriate as modifications to the Title V Permit. As an example, per our recent discussion and your directive, Erie Coke is in the process of filing a Request For Determination (RFD) for the cover on the West Decanter and the Tar Sludge Collection System. Nevertheless, to fulfill its obligation under the Consent Decree, Erie Coke is applying for the above described modifications to its Title V Permit.

If you need any additional information, please contact the undersigned.

Sincerely

Erie Coke Corporation



R.G. Wiler

Environmental Manager

c.c. Chief, Air Branch (3RC10)  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Chief, Environmental Enforcement Section  
Environmental and Natural Resources Division  
U.S. Department of Justice  
Box 7611 Ben Franklin Station  
Washington, D.C. 20044-7611  
Re: DOJ No. 90-5-2-1-09614/1

Associate Director, Air Enforcement and Compliance Assistance Branch (3AP20)  
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