



**pennsylvania**

DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

July 12, 2019

Mr. Edward Nesselbeck  
Erie Coke Corporation  
P.O. Box 6180  
Erie, PA 16512-6180

Re: Second Quarter 2019 Continuous Source Monitoring Report

Dear Mr. Nesselbeck:

Enclosed is a copy of the Quarterly Continuous Source Monitoring Report covering Second Quarter of 2019 for Erie Coke Corporation located in Erie, Erie County. In accordance with the information submitted, violations are identified in this report and summarized as follows:

| Source                        | Violation Type | Parameter | Unit Of Measure |
|-------------------------------|----------------|-----------|-----------------|
| Coke Battery Combustion Stack | Emission       | Opacity   | %               |

Please review the enclosed report for accuracy. If you would like to discuss this report, please contact me at 814.332.6634 within two weeks of receipt. Otherwise, the Department will contact you regarding resolution of these violations.

Sincerely,

Lori L. McNabb  
Environmental Group Manager  
Air Quality Program

Enclosure

cc: AQ/Fac/Case/25-000-00029 through K. Fleet and E. Painter <sup>KJ</sup> EP 7/18/19

# QUARTERLY CONTINUOUS SOURCE MONITORING REPORT

Department of Environmental Protection  
 Bureau of Air Quality  
 Harrisburg, PA 17105-8468

The Bureau prepared this report based on the Continuous Source Monitoring System (CSMS) data submitted by the company. The Facility Summary appears below. The individual Continuous Source Monitoring System Reports contain summary and daily data and appear on the remaining pages.

If you have any questions concerning the data summaries, please contact Natalie Russ (717-772-3944 or nruss@pa.gov). If you have questions concerning the enforcement information, please contact Douglas Haulik (717-772-4482 or dhaulik@pa.gov). If you have questions concerning any case settlement matters, please contact Lori L. McNabb (814-332-6634 or lmcnabb@pa.gov) from your regional office.

## FACILITY SUMMARY

Company: **ERIE COKE CORP**  
 Facility: **ERIE COKE CORP/ERIE PLT**  
 Municipality: **Erie**  
 Region: **Meadville**

Year: **2019** Quarter: **2**

| Monitored Parameter | Quarterly Average | Time Subject to Monitoring | Emission Violation Days | Excess Invalid Averages | Report Penalties |                   |      | Emission Result ID |
|---------------------|-------------------|----------------------------|-------------------------|-------------------------|------------------|-------------------|------|--------------------|
|                     |                   |                            |                         |                         | Emission         | Data Availability | Late |                    |

Source: **Coke Battery Combustion Stack**

|                |                  |                 |           |          |  |  |  |             |
|----------------|------------------|-----------------|-----------|----------|--|--|--|-------------|
| <b>Opacity</b> | <b>7.04289 %</b> | <b>100.00 %</b> | <b>81</b> | <b>0</b> |  |  |  | <b>1959</b> |
|                |                  |                 |           |          |  |  |  |             |
|                |                  |                 |           |          |  |  |  |             |
|                |                  |                 |           |          |  |  |  |             |

## COMMENTS

The CEMS at this facility will not be used to determine compliance with RACT2 requirements.

# CONTINUOUS SOURCE MONITORING REPORT

Department of Environmental Protection  
Bureau of Air Quality

Company: **ERIE COKE CORP**  
 Facility: **ERIE COKE CORP/ERIE PLT**  
 Municipality: **Erie**  
 Region: **Meadville**

Year: **2019** Quarter: **2**

Source: **Coke Battery Combustion Stack** Opacity ( % ) Emission Result ID: **1959** Certification: **08/29/2009**

## SUMMARY INFORMATION

### OPERATION

Time subject to monitoring: **2184** hours or **100.00 %** of quarter.  
 Valid CSMS time: **2161** hours or **98.95 %** of quarter

% Valid of time subject to monitoring: **98.95 %** Parameter average: **7.04289 % Opacity**

### COMPLIANCE

Report submittal postmark: **07/08/2019**

**Opacity Limit(s):**

No more than 3 min/hr >= 20% Opacity  
 No minutes >= 60% Opacity

Violations on **81** days

**Data Availability Standard:**

Valid Hours / Month >= 90 % or  
 Valid Hours / Quarter >= 95 %

Report indicates compliance with data availability standard

| Month           | Hours/ Month |       |          |                |
|-----------------|--------------|-------|----------|----------------|
|                 | % Valid      | Valid | Required | Excess-Invalid |
| April           | 100 %        | 720   | 648      | 0              |
| May             | 97.85 %      | 728   | 670      | 0              |
| June            | 99.03 %      | 713   | 648      | 0              |
| Hours/Quarter : | 98.95 %      |       | Total=   | 0              |

### ENFORCEMENT

"Compliance Assurance Policy for Continuous Emission Monitoring Systems (CEMS) on Combustion Units" for boilers, Revision 2, April 2009 applies.

**Opacity Emission Violation Penalty Adjustment Times**

Total adjustment available: 655 min Adjustment used for 20% = 557 min  
 Total 60% adjustment available: 98 min Adjustment used for 60% = 99 min

(Penalty Factor: 1 )

**Coke Battery Combustion Stack, Opacity (%)**

| Date       | Codes<br>PC MC |   | 20% Standard    |     |            |          | 60% Standard    |     |            |          | Valid<br>Hours | Down<br>Hours | Invalid<br>Hours |
|------------|----------------|---|-----------------|-----|------------|----------|-----------------|-----|------------|----------|----------------|---------------|------------------|
|            |                |   | Excess Minutes: |     | Penalties: |          | Minutes >= Std: |     | Penalties  |          |                |               |                  |
|            |                |   | (1)             | (2) | Unadjusted | Adjusted | (3)             | (4) | Unadjusted | Adjusted |                |               |                  |
| 04/01/2019 | 08             | - | 6               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/02/2019 | 08             | - | 4               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/03/2019 | 08             | - | 5               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/04/2019 | 08             | - | 5               | 0   |            |          | 1               | 0   |            |          | 24             | 0             | 0                |
| 04/05/2019 | -              | - | 0               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/06/2019 | 08             | - | 6               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/07/2019 | 08             | - | 18              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/08/2019 | 08             | - | 18              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/09/2019 | -              | - | 0               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/10/2019 | 08             | - | 175             | 55  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/11/2019 | 08             | - | 1               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/12/2019 | 08             | - | 17              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/13/2019 | 08             | - | 3               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/14/2019 | 08             | - | 5               | 0   |            |          | 3               | 0   |            |          | 24             | 0             | 0                |
| 04/15/2019 | 08             | - | 16              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/16/2019 | 08             | - | 4               | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/17/2019 | 08             | - | 16              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/18/2019 | 08             | - | 21              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/19/2019 | 08             | - | 36              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/20/2019 | 08             | - | 81              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/21/2019 | 08             | - | 117             | 0   |            |          | 6               | 0   |            |          | 24             | 0             | 0                |
| 04/22/2019 | 08             | - | 15              | 0   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/23/2019 | 08             | - | 203             | 160 |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/24/2019 | 08             | - | 201             | 201 |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/25/2019 | 08             | - | 212             | 212 |            |          | 3               | 0   |            |          | 24             | 0             | 0                |
| 04/26/2019 | 08             | - | 72              | 72  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/27/2019 | 08             | - | 359             | 359 |            |          | 22              | 0   |            |          | 24             | 0             | 0                |
| 04/28/2019 | 08             | - | 115             | 115 |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 04/29/2019 | 08             | - | 93              | 93  |            |          | 11              | 0   |            |          | 24             | 0             | 0                |
| 04/30/2019 | 08             | - | 29              | 29  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/01/2019 | 08             | - | 69              | 69  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/02/2019 | 08             | - | 12              | 12  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/03/2019 | 08             | - | 21              | 21  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/04/2019 | 08             | - | 104             | 104 |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/05/2019 | 08             | - | 14              | 14  |            |          | 3               | 0   |            |          | 24             | 0             | 0                |
| 05/06/2019 | 08             | - | 76              | 76  |            |          | 4               | 0   |            |          | 24             | 0             | 0                |
| 05/07/2019 | 08             | - | 99              | 99  |            |          | 0               | 0   |            |          | 23             | 0             | 1                |
| 05/08/2019 | 08             | - | 4               | 4   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/09/2019 | 08             | - | 34              | 34  |            |          | 0               | 0   |            |          | 20             | 0             | 4                |
| 05/10/2019 | 08             | - | 114             | 114 |            |          | 5               | 0   |            |          | 20             | 0             | 4                |
| 05/11/2019 | 08             | - | 4               | 4   |            |          | 4               | 0   |            |          | 21             | 0             | 3                |
| 05/12/2019 | 08             | - | 3               | 3   |            |          | 3               | 0   |            |          | 23             | 0             | 1                |
| 05/13/2019 | 08             | - | 25              | 25  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/14/2019 | 08             | - | 22              | 22  |            |          | 18              | 0   |            |          | 24             | 0             | 0                |
| 05/15/2019 | 08             | - | 19              | 19  |            |          | 0               | 0   |            |          | 21             | 0             | 3                |
| 05/16/2019 | 08             | - | 48              | 48  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/17/2019 | 08             | - | 1               | 1   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/18/2019 | 08             | - | 12              | 12  |            |          | 4               | 0   |            |          | 24             | 0             | 0                |
| 05/19/2019 | 08             | - | 11              | 11  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/20/2019 | 08             | - | 1               | 1   |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/21/2019 | 08             | - | 22              | 22  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/22/2019 | 08             | - | 15              | 15  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |
| 05/23/2019 | 08             | - | 29              | 29  |            |          | 0               | 0   |            |          | 24             | 0             | 0                |

**Coke Battery Combustion Stack, Opacity (%)**

| Date       | Codes |    | 20% Standard    |      |            |          | 60% Standard    |     |            |          | Valid Hours | Down Hours | Invalid Hours |
|------------|-------|----|-----------------|------|------------|----------|-----------------|-----|------------|----------|-------------|------------|---------------|
|            | PC    | MC | Excess Minutes: |      | Penalties: |          | Minutes >= Std: |     | Penalties  |          |             |            |               |
|            |       |    | (1)             | (2)  | Unadjusted | Adjusted | (3)             | (4) | Unadjusted | Adjusted |             |            |               |
| 05/24/2019 | 08    | -- | 45              | 45   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 05/25/2019 | 08    | -- | 15              | 15   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 05/26/2019 | 08    | -- | 37              | 37   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 05/27/2019 | 08    | -- | 24              | 24   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 05/28/2019 | 08    | -- | 62              | 62   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 05/29/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 05/30/2019 | 08    | -- | 2               | 2    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 05/31/2019 | 08    | -- | 1               | 1    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/01/2019 | 08    | -- | 92              | 92   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/02/2019 | 08    | -- | 9               | 9    |            |          | 5               | 0   |            |          | 24          | 0          | 0             |
| 06/03/2019 | 08    | -- | 5               | 5    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/04/2019 | 08    | -- | 25              | 25   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/05/2019 | 08    | -- | 37              | 37   |            |          | 2               | 0   |            |          | 24          | 0          | 0             |
| 06/06/2019 | 08    | -- | 30              | 30   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/07/2019 | 08    | -- | 2               | 2    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/08/2019 | 08    | -- | 10              | 10   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/09/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/10/2019 | 08    | -- | 6               | 6    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/11/2019 | 08    | -- | 4               | 4    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/12/2019 | 08    | -- | 45              | 45   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/13/2019 | 08    | -- | 10              | 10   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/14/2019 | 08    | -- | 41              | 41   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/15/2019 | 08    | -- | 31              | 31   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/16/2019 | 08    | -- | 7               | 7    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/17/2019 | 08    | -- | 111             | 111  |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/18/2019 | 08    | -- | 71              | 71   |            |          | 6               | 1   |            |          | 24          | 0          | 0             |
| 06/19/2019 | 08    | -- | 8               | 8    |            |          | 0               | 0   |            |          | 21          | 0          | 3             |
| 06/20/2019 | 08    | -- | 17              | 17   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/21/2019 | 08    | -- | 2               | 2    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/22/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/23/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/24/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/25/2019 | 08    | -- | 3               | 3    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/26/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 20          | 0          | 4             |
| 06/27/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/28/2019 | --    | -- | 0               | 0    |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| 06/29/2019 | 08    | -- | 11              | 11   |            |          | 4               | 4   |            |          | 24          | 0          | 0             |
| 06/30/2019 | 08    | -- | 14              | 14   |            |          | 0               | 0   |            |          | 24          | 0          | 0             |
| Totals:    |       |    | 3389            | 2832 |            |          | 104             | 5   |            |          | 2161        | 0          | 23            |

(1) For all hours (less 3 min/hr)

(3) Hours when 1st max > standard plus applicable tolerances

(2) Column (1) adjusted re Policy

(4) Column (3) adjusted re Policy

|                    |                                 |                                    |                                 |
|--------------------|---------------------------------|------------------------------------|---------------------------------|
| PROCESS CODES (PC) | 01 = Changing Fuels             | 02 = Control Equipment Malfunction | 03 = Starting Up                |
|                    | 04 = Shutting Down              | 05 = Changing Operating Level      | 06 = Cleaning Process Equipment |
|                    | 07 = Cleaning Control Equipment | 08 = Normal Operation              | 09 = Other                      |
|                    | 0M = Process Malfunction        |                                    |                                 |

|                       |                                   |                                     |                                       |
|-----------------------|-----------------------------------|-------------------------------------|---------------------------------------|
| MONITORING CODES (MC) | 10 = Required Adjustment Not Made | 11 = Excess Drift Primary Analyzer  | 12 = Excess Drift Ancillary Analyzer  |
|                       | 13 = Process Down                 | 14 = Recalibration                  | 15 = Preventative Maintenance         |
|                       | 16 = Primary Analyzer Malfunction | 17 = Ancillary Analyzer Malfunction | 18 = Data Handling System Malfunction |
|                       | 19 = Sample Interface Malfunction | 20 = Corrective Maintenance         | 21 = Other                            |
|                       | 23 = Insufficient Data Available  |                                     |                                       |

**Coke Battery Combustion Stack, Opacity (%)**

Received Calibration Error Test Results:

| Analyzer | Description | Test Date | Test Index | % of Reference |        |        | Absolute |     |      |
|----------|-------------|-----------|------------|----------------|--------|--------|----------|-----|------|
|          |             |           |            | Low            | Mid    | High   | Low      | Mid | High |
| 6730     | Opacity %   | 19-JUN-19 | 1          | 0.30 %         | 0.50 % | 0.30 % |          |     |      |