



June 21, 2019

CERTIFIED MAIL No.: 91 7199 9991 7038 4331 7792

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

RE: Erie Coke's Response to DEP's Order dated February 4, 2019

Dear Mr. Nesselbeck,

On February 4, 2019, in response to Erie Coke's failure to adequately respond to and correct the existing and ongoing violations at Erie Coke's foundry coke production facility ("Facility") and Erie Coke's lack of commitment to install and operate a backup control device to remove hydrogen sulfide from the coke oven gas, the Department issued an administrative order ("Order") requiring Erie Coke to:

1. Conduct stack testing of the Coke Side Shed Baghouse; and,
2. Submit a Corrective Action Plan to correct the violations listed in the Order, including:
 - a. A report describing and determining the cause of the continuing opacity exceedances from the combustion battery stack and a list of corrective actions to prevent future exceedances;
 - b. An engineering evaluation of the Coke Side Shed Baghouse's ability to capture and control coke pushing emissions from the battery and a list of corrective actions to prevent future fugitive pushing emission exceedances;
 - c. An administratively complete plan approval for the construction and installation of a backup control device to prevent the flaring or combustion of coke oven byproduct gas with hydrogen sulfide concentrations greater than 50 grains/100 dry standard cubic feet when the primary control device is out of service; and
 - d. An updated work practice plan and operation and maintenance plan for the Facility.

On March 5, 2019, the Department and Erie Coke met to discuss the Order and the Department's expectations for Erie Coke's response to the Order. On April 9, 2019, Scott Thurston of JNE Consulting submitted to the Department on behalf of Erie Coke a document he referred to in his correspondence as a "Compliance Plan" purporting to address all of the violations identified in the Order ("Response").

Following Mr. Thurston's submission, the Department has had numerous discussions with Erie Coke's counsel and direct communications with Erie Coke's staff regarding the Department's concerns that the Response did not comply with the Order. Specifically, Lori McNabb and I informed Mr. Michael Durkin, Erie Coke's President, at the conclusion of the Department's inspection of the Facility on May 15, 2019, that the Response does not provide any conclusions regarding the root cause(s) of the violations, but only identifies potential causes, additional investigation, and potential work practice changes.

Ms. McNabb and I informed Mr. Durkin that Erie Coke must provide conclusions as to the actual root causes of opacity and operating issues with the coke oven batteries, pushing controls, and other violations along with a schedule for corrective action before the Department can consider re-issuance of the Title V Permit for Erie Coke.

Despite these discussions, inspections, and subsequent meetings, Erie Coke still claims the Department has not provided a sufficient reaction to the Response. Accordingly, I am writing to inform you that Erie Coke has not provided all information required by the Order. Specifically:

1. The Response does not determine the cause of the continuing opacity exceedances, as required by Paragraph 3.a of the Order. Instead of identifying the specific cause(s) of the current and continuing opacity violations, the Response includes an analysis tree of potential causes of opacity exceedances from the battery stack and a schedule to conduct investigations into those possible causes in the future. For example, Action Items 2, 3, 8, 13, 14, 15, 17, 18, 20, 22, 23, 25, 27, 28, 29, 30, 33, 34, 35, 36, 37, 38, 39, 43, 45, and 46 listed in the "Battery Stack Opacity Compliance Plan Table" include statements which indicate the required inspections/evaluations of the battery will not be fully implemented until December 20, 2019.

The Order required Erie Coke to complete the necessary evaluation and provide a report on the current operational condition of the battery along with a schedule to correct any required repairs by April 4, 2019. Erie Coke has not fully evaluated the battery, has not developed a comprehensive list of needed repairs, and has not submitted a schedule for completion of the repairs. Instead, the Response details a list of work practice and operation and maintenance procedures that Erie Coke represents would reduce the number of opacity exceedances, most of which are already required under Erie Coke's current work practice plan and operation and maintenance plan, or required under 40 C.F.R. §§ 63.6(e), 63.306, 63.310 and 63.7300. Put simply, the Response does not guarantee or end in compliance.

2. The Response did not include an Engineering Evaluation and Compliance Plan for the Coke Side Shed Capture System, as required Paragraph 3.b of the Order. Similar to the "Battery Stack Opacity Compliance Plan Table", the "Coke-Side Shed Capture Compliance Plan Table" identifies potential causes of the emission exceedances and actions items, such as Action Items 1 - 12, 15, 17, 20, 22 - 26, 35, and 37 - 39 which describe the future inspections of the device which will not be fully implemented until January 2, 2020. No definite corrective action is identified to stop the repetitive violations associated with pushing emissions. A schedule to only investigate the cause within 8 months is not a compliance schedule that can be incorporated into a Title V permit pursuant to Section 7.2 of the Air Pollution Control Act. Erie Coke did not

provide a formal engineering evaluation which describes the current operating conditions of the Coke-Side Shed Baghouse system that are causing reduced capture of pushing emissions, nor did it provide a schedule to complete needed repairs/modification to the system – both of which are required under the Order.

Following Erie Coke's submission of the Response, the Department's inspection on May 15, 2019 revealed significant deterioration of the coke-side shed housing and the emission control system's ability to capture and control pushing emissions. This discovery indicates Erie Coke did no evaluation of the Coke Side Shed prior to submitting the Response.

In addition, several of the future inspection and maintenance Action Items listed in Erie Coke's Response are in direct conflict with the expired Title V Permit and federal requirements. For example, Action Items 3, 4, 5, 6, and 7 include inspection frequencies of Quarterly. Pursuant to the expired Title V Operating Permit 25-00029 (Section E, Group 7, Condition #012(a)) and 40 C.F.R. § 63.7330, inspections of these items are required either on a daily or weekly basis. Action Items 37 - 39 are proposed to be completed annually. However, expired Title V Operating Permit No. 25-00029 (Section E, Group 7, Conditions #017(b) and #032(c)) and 40 C.F.R. §§ 63.7335(b)(1) and 63.7300(c) require these inspections to be completed on a monthly basis.

Finally, the Response fails to provide a schedule for completing repairs to the pushing emission capture and control system. This system needs to be fully repaired and returned to a complaint status before the required stack testing can be completed.

3. The work practice and operation and maintenance plans submitted in the Response contain inconsistencies and oversights, which demonstrates that the submitted plans were not complete at the time of submission.

Moreover, the May 15, 2019 inspection revealed a significant lack of knowledge of or disregard for the inspection, maintenance, and recordkeeping requirements contained in expired Title V Operating Permit No. 25-00029, the existing work practice plans, and what was being proposed in the Response. Again, this indicates to the Department that the plans were not focused on the actual conditions and operations of the Facility.

The following list of inconsistencies and concerns have been identified in the plans. This list is not a comprehensive list of all inconsistencies or problems with the plans.

- a. Section 2 of the Work Practice Control Plan ("WPCP") includes a listing of employee classes at the Facility and their corresponding Work Practice Plan Training Requirements. The listing fails to identify the following employee classes which are listed later in the document: Coal Loader, Coal Operator, Coke Handler, Patcher.
- b. The plans fail to identify normal operating parameters, setpoints for required parameters, likely causes of excursions, and most typical corrective actions.

- i. For example, Section 3.F.2 requires the Heaterman to visually inspect the back pressure controller for proper set-point and control. The WPCP fails to identify what the proper set point is or how the Heaterman determines the proper set point.
 - ii. Section 3.F.3 discusses maintenance of the desired back pressure. However, the WPCP fails to identify what the desired back pressure set point or range is.
 - iii. Section 4.1.E.3 discusses turning on the front steam "slightly". No definition of "slightly" is established. An established point or visual key should be established on the steam valve to indicate the appropriate amount of steam into the system.
- c. Section 4.1.E includes the normal charging sequence. Procedures should be added to this section which prohibit the short charging of ovens during periods of increased charging emissions.
- d. Section 4.1.E.3 includes a bracketed comment of "[is it obvious what this mean?]". It is obvious from the comment that full analysis and review of the document is not complete.
- e. Combustion flue caps. The WPCP fails to include a discussion on the proper review and replacement of combustion flue caps. The Department has observed misaligned/unseated flue caps on numerous occasions. The WPCP should include a section which discusses the reasons flue caps can be removed, and how long flue caps can be removed at any one time.
- f. The Work Practices Plan for Soaking ("WPPS") does not list all of Erie Coke's typical processes when preparing an oven for pushing. For example, the Department has observed coke oven lids being pulled on numerous occasions resulting in combustion of coke oven gas from the oven lids rather than the standpipe. Pulling of coke oven lids and combustion from those lids is not described in the WPPS. If that is a prohibited practice, the WPPS should explicitly state it is prohibited.
- g. The Operations and Maintenance Plan ("O&M Plan") also includes several generic references to standard or minimum temperatures or operating ranges. See Section 3.4.1. A discussion of normal ranges for operating parameters, likely causes of excursions, and most typical corrective actions should be discussed. Section 3.4.3.1 includes a discussion about maintaining minimum oven temperatures; however, minimum temperatures are not identified or discussed in the document.
- h. O&M Plan Section 3.4.4. Undercharging an oven solely to avoid the observation of a violation during a Method 303 inspection should be specifically prohibited. See 40 CFR § 63.7300(b)(4).
- i. The O&M Plan is not complete with respect to performing all required inspection and maintenance procedures. For example, Section 3.5 discusses inspection and maintenance

of the Coke Side Shed daily and states that observations of the inspections are recorded on the form in Appendix A of the O&M Plan. There is no Appendix A included with the O&M Plan. In addition, a Department inspection on May 15, 2019 revealed that inspection of the Coke Side Shed revealed extensive degradation of the metal sheeting on the shed and company inspection records indicated the inspections of the Coke Side Shed are not being completed.

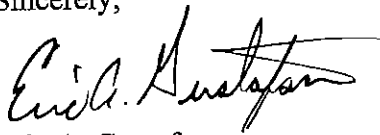
- j. Section 3.2.f describes that the Pusherman and Backman are to clean the oven sill of any spillage so that doors can be replaced and latched securely. However, the WPCP fails to identify the procedure to do that or where the spillage is placed. The WPCP should specifically identify that spilled coal or coke should not be shoveled back into the open oven.

Since the Response was submitted, the Department has identified violations of the terms and conditions of the expired Title V Permit at the Facility during each of its recent inspections. A complete list of violations is attached to this letter. This indicates that Erie Coke is either not implementing its revised work practices or the revised practices are ineffective.

In addition to the inadequacy of the Response, to date Erie Coke has not submitted a complete plan approval application for the construction and installation of a backup control device to prevent the flaring or combustion of coke oven byproduct gas with hydrogen sulfide concentrations greater than 50 grains/100 dry standard cubic feet when the primary control device is out of service. Erie Coke indicated it needed more than 60 days to develop and submit a plan approval for the backup control device. Over twice that much time has now elapsed without a submission.

The Department continues to be unable to process Erie Coke's Title V renewal application because Erie Coke has not addressed the numerous continuing violations at its Facility nor provided a schedule to correct the violations.

Sincerely,



Eric A. Gustafson
Regional Air Quality Program Manager

cc: File AQ/Facilities/FAC OP/25-00029

Enclosure

Exhibit A

Violation or CEM Report Date	Regulatory Violation	Brief Description
4/1/2015	25 Pa. Code § 123.31	Malodors detected outside Property
8/11/2015	25 Pa. Code § 139.103	2Q2015 COMS
10/16/2015	25 Pa. Code § 139.103	3Q2015 COMS
1/20/2016	25 Pa. Code § 139.103	4Q2015 COMS
4/12/2016	25 Pa. Code § 139.103	1Q2016 COMS
7/6/2016	25 Pa. Code § 139.103	2Q2016 COMS
7/14/2016	25 Pa. Code § 127.11	Install cover on thionizer without approval
7/14/2016	25 Pa. Code § 127.443	Operate thionizer with cover w/o permit
10/20/2016	25 Pa. Code § 139.103	3Q2016 COMS
1/17/2017	25 Pa. Code § 139.103	4Q2016 COMS
5/1/2017	25 Pa. Code § 139.103	1Q2017 COMS
6/3/2017	25 Pa. Code § 123.44	offtakes > 5%
6/17/2017	25 Pa. Code § 123.44	sum of charges >75 sec
7/24/2017	25 Pa. Code § 123.44	offtakes > 5%
7/24/2017	25 Pa. Code § 127.444	offtakes > 5%
7/25/2017	25 Pa. Code § 139.103	2Q2017 COMS
7/26/2017	25 Pa. Code § 123.44	offtakes > 5%
7/26/2017	25 Pa. Code § 127.444	offtakes > 5%
7/29/2017	25 Pa. Code § 123.44	offtakes > 5%
7/29/2017	25 Pa. Code § 127.444	offtakes > 5%
8/7/2017	25 Pa. Code § 123.44	sum of charges >75 sec
8/11/2017	25 Pa. Code § 123.44	offtakes > 5%
8/11/2017	25 Pa. Code § 123.44	doors > 10%
8/26/2017	25 Pa. Code § 123.44	offtakes > 5%
8/27/2017	25 Pa. Code § 123.44	doors>10%
9/4/2017	25 Pa. Code § 123.44	sum of charges >75 sec
10/10/2017	25 Pa. Code § 123.44	offtakes > 5%
10/10/2017	25 Pa. Code § 127.444	offtakes > 5%
10/14/2017	25 Pa. Code § 123.44	doors > 10%
10/14/2017	25 Pa. Code § 127.444	doors > 10%
10/15/2017	25 Pa. Code § 123.44	sum of charges >75 sec
10/15/2017	25 Pa. Code § 127.444	sum of charges >75 sec
10/16/2017	25 Pa. Code § 139.103	3Q2017 COMS
11/26/2017	25 Pa. Code § 123.44	offtakes > 5%
12/11/2017	25 Pa. Code § 123.44	offtakes > 5%
1/5/2018	25 Pa. Code § 139.103	4Q2017 COMS
4/16/2018	25 Pa. Code § 139.103	1Q2018 COMS
4/20/2018	25 Pa. Code § 123.44	>5% offtakes
4/20/2018	25 Pa. Code § 123.44	>2% lid leaks
4/21/2018	25 Pa. Code § 123.44	>5% offtakes
5/17/2018	25 Pa. Code § 123.44	offtakes >5%
5/21/2018	25 Pa. Code § 127.444	Bypassed H2S Absorber: May 21-24, 2018
5/22/2018	25 Pa. Code § 127.444	Bypassed H2S Absorber: May 21-24, 2018
5/23/2018	25 Pa. Code § 127.444	Bypassed H2S Absorber: May 21-24, 2018
5/24/2018	25 Pa. Code § 127.444	Bypassed H2S Absorber: May 21-24, 2018
5/29/2018	25 Pa. Code § 123.44	doors >10%

Exhibit A

6/20/2018	25 Pa. Code § 123.2	Pushing fugitive emissions crossing off property
7/1/2018	25 Pa. Code § 123.44	offtakes >5%
7/1/2018	25 Pa. Code § 123.44	lids > 2%
7/20/2018	25 Pa. Code § 139.103	2Q2018 COMS
7/25/2018	25 Pa. Code § 127.444	Bypassed H2S Absorber 7/25-7/26/2018
7/26/2018	25 Pa. Code § 127.444	Bypassed H2S Absorber 7/25-7/26/2018
7/26/2018	25 Pa. Code § 123.44	offtakes >5%
7/27/2018	25 Pa. Code § 123.44	offtakes >5%
7/28/2018	25 Pa. Code § 123.44	offtakes >5%
7/29/2018	25 Pa. Code § 123.44	offtakes >5%
8/1/2018	25 Pa. Code § 123.44	offtakes >5%
8/2/2018	25 Pa. Code § 123.2	Pushing FE xing property
8/2/2018	25 Pa. Code § 127.444	Pushing FE xing property
8/7/2018	25 Pa. Code § 123.44	offtakes >5%
8/8/2018	25 Pa. Code § 123.44	offtakes >5%
8/13/2018	25 Pa. Code § 129.15	Pushing >20% from coke shed
8/13/2018	25 Pa. Code § 127.444	Pushing >20% from coke shed
9/11/2018	25 Pa. Code § 129.15	Pushing >20% from coke shed
9/11/2018	25 Pa. Code § 127.444	Pushing >20% from coke shed
9/13/2018	25 Pa. Code § 129.15	Pushing >20% from coke shed
9/13/2018	25 Pa. Code § 127.444	Pushing >20% from coke shed
9/16/2018	25 Pa. Code § 123.44	doors>10%
9/23/2018	25 Pa. Code § 123.44	offtakes >5%
9/25/2018	25 Pa. Code § 127.444	Not monitor RPM every 8 hours
9/25/2018	25 Pa. Code § 127.444	not have continuous records of RPM's
9/25/2018	127.444 and 40 CFR 63.7333	Not meet min RPM in West
9/25/2018	25 Pa. Code § 127.444	Failed to stack test coke shed baghouse
9/25/2018	25 Pa. Code § 127.444	daily records of baffle wash temp recorded until exceeds 30 degree threshold
9/25/2018	25 Pa. Code § 127.444	boiler annual adjustment - no records of annual adjustment pg 67 of permit
9/25/2018	25 Pa. Code § 129.93	boiler annual adjustment - no records of annual adjustment pg 67 of permit
10/11/2018	25 Pa. Code § 139.103	3Q2018 COMS
12/10/2018	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
12/11/2018	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
12/12/2018	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
12/13/2018	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
12/14/2018	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates

Exhibit A

12/15/2018	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
12/15/2018	25 Pa. Code § 127.44	doors >10%
12/16/2018	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
12/31/2018	25 Pa. Code § 123.1	Did not take reasonable action to prevent particulate matter from becoming airborne by promptly removing earth or other material from paved streets
12/31/2018	25 Pa. Code § 127.444	Did not take reasonable action to prevent particulate matter from becoming airborne by promptly removing earth or other material from paved streets
1/10/2019	25 Pa. Code § 123.44	offtakes >5%
1/16/2019	25 Pa. Code § 139.103	4Q2018 COMS
1/29/2019	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
1/29/2019	25 Pa. Code § 123.23	Failed to prevent the flaring or combustion of coke oven by-product gas with hydrogen sulfide concentrations greater than 50 grains per 100 dry standrad cubic feet
2/1/2019	25 Pa. Code § 123.44	sum of charges >75 sec
2/2/2019	25 Pa. Code § 123.44	sum of charges >75 sec
2/4/2019	Air Pollution Control Act; Sections 8 and 10.1	Order
2/15/2019	25 Pa. Code § 121.7	Fugitive particulate matter emitted outside property
2/15/2019	25 Pa. Code § 123.1	Fugitive particulate matter emitted outside property
2/15/2019	25 Pa. Code § 127.444	Fugitive particulate matter emitted outside property
2/17/2019	25 Pa. Code § 127.444	Failed to operate H2S Absorber and thionizer at all times the source operates
2/17/2019	25 Pa. Code § 123.12	Failed to prevent the flaring or combustion of coke oven by-product gas with hydrogen sulfide concentrations greater than 50 grains per 100 dry standrad cubic feet
2/18/2019	25 Pa. Code § 127.444	Failed to prevent the flaring or combustion of coke oven by-product gas with hydrogen sulfide concentrations greater than 50 grains per 100 dry standrad cubic feet
2/18/2019	25 Pa. Code § 127.444	Failed to prevent the venting of the thionizer directly to atmosphere
2/26/2019	25 Pa. Code § 121.7	Coke off property

Exhibit A

2/26/2019	25 Pa. Code § 123.1	Coke off property
2/26/2019	25 Pa. Code § 123.444	Coke off property
3/9/2019	25 Pa. Code § 123.31	Malodors detected outside Property
3/27/2019	25 Pa. Code § 123.31	Malodors detected outside Property
3/30/2019	25 Pa. Code § 123.44	doors>10%
3/30/2019	25 Pa. Code § 123.44	sum of charges >75 sec
4/5/2019	Air Pollution Control Act; Sections 8 and 10.1	Failing to comply with Order issued by the Department
4/8/2019	25 Pa. Code § 139.103	1Q2019 COMS
5/5/2019	25 Pa. Code § 123.31	Malodors detected outside Property
5/5/2019	25 Pa. Code § 127.444	Malodors detected outside Property
5/15/2019	25 Pa. Code § 127.444	Failed to monitor and maintain records of liquid flow rate through the H ₂ S adsorber
5/15/2019	25 Pa. Code § 127.444	43 identified excursions of the permitted pressure drop range (1" - 7" inches) across the H ₂ S adsorber in February 2019, and 36 excursions in April 2019
5/15/2019	25 Pa. Code § 127.444	Stack Emission Observation Form including documentation of occurrences, causes, and repairs associated with visible emission exceedances is not being maintained
5/15/2019	25 Pa. Code § 127.444	Exceedances of the permitted pressure drop range for Coke Side baghouse on February 2, 3, 5, 6, and 27, 2019
5/15/2019	25 Pa. Code § 127.444 40 CFR 63.7333	On April 5 – 9 and April 17 - 22, the daily average fan RPMs of the West baghouse were not at or above minimum requirements
5/15/2019	25 Pa. Code § 127.444 40 CFR 63.7335 40 CFR 63.7300	Records maintained for the Coke Side baghouse for February and April 2019 fail to document the inspection criteria and requirements required by the NESHAP nor do they show that the capture system (Coke Side shed) has been inspected
5/15/2019	25 Pa. Code § 127.444 40 CFR 63.7334	The daily quench tower rinse cycle report for February 2019 was missing and not provided

Exhibit A

5/15/2019	40 CFR 63.7334 25 Pa Code §127.444	The daily quench tower rinse cycle records are also not completed correctly on days on which the temperature appears to be below 30 degrees F. On January 10 – 14, 19-21, 25-26, and 30-31, 2019 and March 1-6, 8-9, 18, 22, 25-26, 2019, only one temperature was recorded. The entire day needs to be monitored to be exempt from baffle washing and the temperatures each shift that day should be entered into the form. On days when the temperature was less than 30 degrees F, the employee signed in the column indicating that the baffles had been washed instead of the columns for when the temperature is less than 30 degrees F.
5/15/2019	25 Pa. Code § 123.44 25 Pa. Code § 127.444	Visible emissions observed from coke oven gas collector main near Oven #32.
5/15/2019	25 Pa. Code § 123.23 25 Pa. Code § 127.444	Visible emissions of unburned coke oven gas were leaking from the Battery A liquor pot.
5/15/2019	25 Pa. Code § 129.15(c) 25 Pa. Code § 127.444	Emissions of greater than 20% opacity were observed escaping from around the edges of the coke shed, from the joints of the coke shed and through smaller holes in the coke shed
5/15/2019	40 CFR 63.7290 25 Pa Code §127.444	West side of the coke side shed baghouse was operating below the RPM level established during last stack test.
5/15/2019	25 Pa. Code § 127.444 25 Pa. Code § 127.25	Fugitive emissions were observed being emitted to atmosphere from holes in the coke side shed and between the two batteries.
10/1/2018-12/31/2018	40 CFR 63.7334 25 Pa Code §127.444	There were thirteen (13) days where pushed ovens were not observed during the reporting period.
10/1/2018-12/31/2018	40 CFR 63.7334 25 Pa Code §127.444	There were eleven (11) ovens that were not pushed and observed during the reporting period.
10/1/2018-12/31/2018	40 CFR 63.7333 25 Pa Code §127.444	There were sixty-five (65) days where the daily average fan RPMs were not at or above minimum requirements.
10/1/2018-12/31/2018	40 CFR 63.7333 25 Pa Code §127.444	There were forty-eight (48) days where checks of the baghouse fan RPM's every 8 hours were not recorded.

Exhibit A

10/1/2018-12/31/2018	40 CFR 63.7334 25 Pa Code §127.444	There were fifty-three (53) days daily washing of the Quench Tower baffles were not recorded.
1/1/2019-3/31/2019	40 CFR 63.7333 25 Pa Code §127.444	There were seven (7) days where daily average opacity exceeded 15%.
1/1/2019-3/31/2019	40 CFR 63.7333 25 Pa Code §127.444	There were forty-four (44) days where the daily average fan RPMs were not at or above minimum requirements.
1/1/2019-3/31/2019	40 CFR 63.7334 25 Pa Code §127.444	There were nine (9) days where pushed ovens were not observed during the reporting period.
1/1/2019-3/31/2019	40 CFR 63.7334 25 Pa Code §127.444	There were thirteen (13) ovens that were not pushed and observed during the reporting period.
6/3/2019	25 Pa. Code § 123.44 25 Pa. Code § 127.444	Visible emissions observed from coke oven gas collector main near Oven #39.
6/7/2019	25 Pa. Code § 123.23 25 Pa. Code § 127.444	Visible emissions of unburned coke oven gas were leaking from the Battery A liquor pot.
6/7/2019	25 Pa. Code § 129.15(c) 25 Pa. Code § 127.444	Emissions of greater than 20% opacity were observed escaping from the coke side shed.
6/7/2019	25 Pa. Code § 123.44(a)(3) 25 Pa. Code § 123.444	doors>10%
6/7/2019	25 Pa. Code § 123.44(a)(5) 25 Pa. Code § 127.444	offtakes >5%
6/11/2019	25 Pa. Code § 129.15(c) 25 Pa. Code § 127.444	Emissions of greater than 20% opacity were observed escaping from the coke side shed.
6/12/2019	25 Pa. Code § 123.44(a)(5) 25 Pa. Code § 127.444	offtakes >5%
6/13/2019	25 Pa. Code § 123.2 25 Pa. Code § 127.444	Emissions from the battery observed crossing property line