



SunCoke Energy™

March 21, 2018

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611, Ben Franklin Station
Washington, DC 20044-7611
Re: DOJ No. 90-5-2-1-08555/1

Compliance Tracker
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency - Region 5
77 West Jackson Blvd. AE-18J
Chicago, Illinois 60604-3590
Including an electronic copy to:
r5airenforcement@epa.gov

Phil Perry
Indiana Department of Environmental Management
Chief, Air Compliance and Enforcement Branch
100 North Senate Avenue
MC-61-53, IGCN 1003
Indianapolis, IN 46204-2251

RE: Consent Decree, *United States et. al. v. Indiana Harbor Coke Company, LLC, et. al.*
Indiana Harbor Coke Company, LLC (TV Permit #089-36826-00382)
B Battery Evaluation

To Whom It May Concern:

Pursuant to the proposed Consent Decree (CD) lodged in federal court on January 25, 2018, Indiana Harbor Coke Company (IHCC) is submitting this evaluation of the B Battery oven rebuilds. CD paragraph 10 requires that IHCC complete five oven rebuilds on B Battery by

RECEIVED

APR 02 2018

Katie Batten
Director
Health, Safety and Environmental

IDEM-OLC

SunCoke Energy, Inc.
1011 Warrenville Rd
Suite 600
Lisle, IL 60532
740-370-8710 (Direct dial)
630-824-1000 (General)

Air Enforcement Division Director
U.S. Environmental Protection Agency
Office of Civil Enforcement
Air Enforcement Division
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW Mail Code: 2242A
Washington, DC 20460

Susan Tennenbaum
U.S. Environmental Protection Agency
Region 5
C-14J
77 West Jackson Blvd. Chicago, IL 60640
Including an electronic copy to:
tennenbaum.susan@epa.gov

Elizabeth A. Zlatos
Indiana Department of Environmental Management
Office of Legal Counsel
100 North Senate Avenue
MC-60-01 IGCN 1307
Indianapolis, IN 46204-2251
Including an electronic copy to:
bzlatos@idem.in.gov



SunCoke Energy™

March 31, 2017 and then conduct an evaluation to determine whether the rebuilds were successful. For the rebuilds to be considered successful, the CD requires that “at least two of the Battery B Initial Oven Rebuilds have not experienced Coke Oven Leaks resulting in a Full RCFA that requires an Oven Rebuild during the preceding nine consecutive months” as assessed during the evaluation period. To trigger a Full RCFA, an oven would be required to have Coke Oven Leaks occurring in two consecutive coking cycles or occurring four or more times in one calendar month. The CD defines Coke Oven Leaks as either door leaks that do not comply with the MACT limitation found at 40 C.F.R. § 63.303(b)(1) or (c)(2), or visible emissions from an oven crown that last longer than 30 minutes and exceed a limit of 20% opacity over a 3-minute average.

The five oven rebuilds were completed by the required deadline of March 31, 2017. The five rebuilt ovens are ovens B1 through B5 and these ovens have operated continuously since that date. The five rebuilt ovens have been undergoing an evaluation that began on March 31, 2017 lasting through February 28, 2018 (the “Evaluation Period”), to determine whether the rebuilds were successful.

To conduct this evaluation, IHCC personnel started a rigorous monitoring program on the five ovens. Each oven was evaluated regularly throughout each day for the presence of any visible emissions from the door holes, top of the oven door, or the oven crown. The evaluation was conducted by IHCC personnel and training was provided for all personnel conducting the evaluation.

Only a few Coke Oven Leaks occurred during the Evaluation Period, and all were responded to, recorded on an evaluation form, and reported as required. As shown by the data in Table 1 below and the forms in Attachment 1, there were only six non-consecutive Coke Oven Leaks at three ovens that exceeded the MACT limitation for door leaks or the 30-minute period for visible emissions from oven crowns during the evaluation period. These were corrected by adjusting the uptakes, sole flues, or door dampers. Of the six, one of these occurred during a lightning stand down and three experienced adverse wind conditions. None of the ovens experienced Coke Oven Leaks requiring a Full RCFA.



SunCoke Energy™

Table 1 – Coke Oven Leaks During the Evaluation Period

Date	Battery	Oven #	Time Observed	Push Side/Coke Side/Crown	Duration	Cause(s)	Wind Speed/Direction	Corrective Action(s)
4/4/2017	B	3	11:00 PM	PS	33 min	Low draft during charge	N/A	Increase draft and sole flue adjustment
7/13/2017	B	2	11:40 PM	PS	> 15 min	Unsafe to make adjustments due to lightning stand down	18.9 mph	Increased draft, C/S sole flue adjustment
				Crown	35 min			Increased draft, C/S sole flue adjustment, no sun compliance for Method 9
9/17/2017	B	2	5:24 AM	PS	3 h 36 min	Operator communication error during shift change/ Oven draft / need an adjustment	5 mph; SSE	Contacted Central Control Room, adjusted sole flues, uptakes, door dampers and / or draft
10/8/2017	B	3	11:30 PM	PS	45 min	Oven draft / need an adjustment	>39 mph; NW	Adjusted sole flues
11/26/2017	B	2	8:43 AM	PS	> 15 min	Oven draft / need an adjustment	5 mph; W	Contacted Central Control Room, adjusted sole flues, uptakes, door dampers and / or draft
2/16/2018	B	1	6:20 AM	PS	> 15 min	Oven draft / need an adjustment	15-20 mph; N	Adjusted sole flues



SunCoke Energy™

IHCC completed the B Battery Evaluation on February 28, 2018. All five of the B Battery test ovens were successful; none of the ovens experienced Coke Oven Leaks resulting in a Full RCFA. Therefore, pursuant to section IV.A.10.a.i. of the proposed Consent Decree, IHCC has the option to rebuild B Battery ovens.

If you have any questions or need additional information, please contact me via email at kmbatten@suncoke.com or via phone at (740) 370-8710.

Sincerely,

Katie Batten
Director of Health, Safety, and Environmental

KB/cfs

B Battery Ovens 1-5 OVEN LEAK RECORD

Supervisor Shift 1 Signature _____
 Supervisor Shift 2 Signature _____
 Supervisor Shift 3 Signature _____

Your signature indicates that all door and crown leaks observed on ovens B1, B2, B3, B4, and B5 were recorded during your shift and all Method 9 readings were collected as required.

DATE: 4-5-17

1. For every Door/Crown Leak, you must record the oven #, the times the Door Leak was noticed and corrected, & the corrective actions.
2. If a Crown Leak lasts more than 30 minutes, you must take a Method 9 Reading immediately (Refer to Method 9 sheet for instructions).
3. All Team Leaders must initial for each Door/Crown Leak recorded and sign in the designated area.

OVEN #	TIME FIRE NOTICED	INITIALS	PUSHER SIDE		COKE SIDE		CROWN		Wind Related?	Uptake Open?	Method 9 Reading Conducted?	Corrective Actions What was done to correct the Door/Crown Leak? Method 9 reading - Sun Compliance
			Leak End Time Target: <15 minutes	Leak End Time Target: <45 minutes	Leak End Time Target: <30 minutes	Leak End Time Target: <30 minutes						
B-3	11:00pm	VC	11:30pm					Y	Y	Y	Sole flue adjustment/Draft	
B-1	11:10pm	Sun	11:30pm			11:36pm		Y	Y	Y	Crown Leak c/s No Sun Compliance	
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		
								Y	Y	Y		

Wind Speed: 11 - " calm
 Wind Direction: no wind.

Submit to the Environmental Department at the end of the day

Battery Ovens 1-5 OVEN LEAK RECORD

Supervisor Shift 1 Signature
 Supervisor Shift 2 Signature
 Supervisor Shift 3 Signature

DATE:

7-13-17

Your signature indicates that all door and crown leaks observed on ovens B1, B2, B3, B4, and B5 were recorded during your shift and all Method 9 readings were collected as required.

1. For every Door/Crown Leak, you must record the oven #, the times the Door Leak was noticed and corrected, & the corrective actions.
2. If a Crown Leak lasts more than 30 minutes, you must take a Method 9 Reading immediately (Refer to Method 9 sheet for instructions).
3. All Team Leaders must initial for each Door/Crown Leak recorded and sign in the designated area.

OVEN #	TIME FIRE NOTICED (AM or PM)	INITIALS	PUSHER SIDE Leak End Time Target: <15 minutes	COKE SIDE Leak End Time Target: <45 minutes	CROWN		Wind Related?	Uptake Open?	Method 9 Reading Required?	Method 9 Reading Conducted?	Reasons for not conducting Method 9 in compliance	Corrective Actions What was done to correct the Door/Crown Leak?
					Leak End Time Target: <30 minutes	Coke Side						
# 2	11:40 AM		7:15 AM		12:15 AM		DOWN	DOWN	Y AND	Y AND	sun exposure	increase draft. 2/5 set flow Adj. make to meter adjustment due to 18% turbine stand down.

Wind Speed: 18.9 mph
 Wind Direction:

Submit to the Environmental Department at the end of the day

B Battery Ovens 1-5 OVEN LEAK RECORD

Your signature indicates that all door and crown leaks observed on ovens B1, B2, B3, B4, and B5 were recorded during your shift and all Method 9 readings were collected as required

Supervisor Shift 1 Signature
 Supervisor Shift 2 Signature
 Supervisor Shift 3 Signature

DATE:
 09-17-2017

- For every Door/Crown Leak, you must record the oven #, the times the Door Leak was noticed and corrected, & the corrective actions.
- If a Crown Leak lasts more than 30 minutes, you must take a Method 9 Reading immediately (Refer to Method 9 sheet for instructions).
- All Team Leaders must initial for each Door/Crown Leak recorded and sign in the designated area.

OVEN #	TIME FIRE NOTICED	INITIALS	PUSHER SIDE Leak End Time Target: <15 minutes	COKE SIDE Leak End Time Target: <45 minutes	CROWN Leak End Time Target: <30 minutes	Wind Related?	Uptake Open?	Method 9 Reading Conducted?	Corrective Actions What was done to correct the Door/Crown Leak? Method 9 reading - Sun Compliance
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	
						Y H N	Y H N	Y H N	

Wind Speed: 5mph
 Wind Direction: SSE

Submit to the Environmental Department at the end of the day

Battery Ovens 1-5 OVEN LEAK RECORD

Your signature indicates that all door and crown leaks observed on ovens B1, B2, B3, B4, and B5 were recorded during your shift and all Method 9 readings were collected as required.

Supervisor Shift 1 Signature
 Supervisor Shift 2 Signature
 Supervisor Shift 3 Signature

DATE: 10-08-17

- For every Door/Crown Leak, you must record the oven #, the times the Door Leak was noticed and corrected, & the corrective actions.
- If a Crown Leak lasts more than 30 minutes, you must take a Method 9 Reading immediately (Refer to Method 9 sheet for instructions).
- All Team Leaders must initial for each Door/Crown Leak recorded and sign in the designated area.

OVEN #	TIME FIRE NOTICED (AM or PM)	INITIALS	PUSHER SIDE		CROWN		Wind Related?	Uptake Open?	Method 9 Reading Required?	Method 9 Reading Conducted?	Reasons for not conducting Method 9 - sun compliance	Corrective Actions What was done to correct the Door/Crown Leak?
			Leak End Time Target: <15 minutes	Leak End Time Target: <45 minutes	Leak End Time Target: <30 minutes	Leak End Time Target: <30 minutes						
B3	11:40 AM	Kevin	45 min				Y	Y	Y	NO DAYLIGHT	NO DAYLIGHT	NO DAYLIGHT
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			
							Y	Y	Y			

Wind Speed: 7.39 mph
 Wind Direction: NW

Submit to the Environmental Department at the end of the day

B Battery Ovens OVEN LEAK RECORD

DATE: 11-26-2017

SHIFT: 2

Supervisor Signature 

1. For every Door/Crown Leak, you must record the oven #, the times the Door Leak was noticed and corrected, & the corrective actions.
2. If a Crown Leak lasts more than 30 minutes, you must take a Method 9 Reading Immediately (Refer to Method 9 sheet for instructions).
3. All Team Leaders must initial for each Door/Crown Leak recorded and sign in the designated area.

OVEN #	TIME FIRE NOTICED (AM or PM)	INITIALS	PUSHER SIDE		COKE SIDE		CROWN		Uptake Open?	Method 9 Reading Required?	Method 9 Reading Conducted?	Reasons for not conducting Method 9 - sun compliance	Corrective Actions What was done to correct the Door/Crown Leak?
			Leak End Time Target: <15 minutes	Leak End Time Target: <45 minutes	Leak End Time Target: <30 minutes	Leak End Time Target: <30 minutes	Push Side	Coke Side					
E50	11:54 AM	JEB	12:05 PM	---	12:45 PM			Y // N	Y // N	Y // N	Sun compliance	Sole flue dampers adjusted, Increase draft Crown not properly sealed	
B2	6:43 AM	JEB	7:15 AM					Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N			

Wind Speed: 5 mph
Wind Direction: West

Submit to the Environmental Department at the end of the day

B Battery Ovens OPEN LEAK RECORD

DATE: 2-16-18 SHIFT: 2

Supervisor Signature [Signature]

1. For every Door/Crown Leak, you must record the oven #, the times the Door Leak was noticed and corrected, & the corrective actions.
2. If a Crown Leak lasts more than 30 minutes, you must take a Method 9 Reading immediately (Refer to Method 9 sheet for instructions).
3. All Team Leaders must initial for each Door/Crown Leak recorded and sign in the designated area.

OVEN #	TIME FIRE NOTICED (AM or PM)	INITIALS	PUSHER SIDE		COKE SIDE		CROWN		Wind Related?	Uptake Open?	Method 9 Reading Required?	Method 9 Reading Conducted?	Reasons for not conducting Method 9 - sun compliance	Corrective Actions What was done to correct the Door/Crown Leak?
			Leak End Time Target: <15 minutes	Leak End Time Target: <45 minutes	Leak End Time Target: <30 minutes	Leak End Time Target: <45 minutes	Push Side	Coke Side						
E50	11:54 AM	JEB	12:05 PM	-	12:45 PM			Y // N	Y // N	Y // N	Y // N	Sun compliance	Sole flue dampers adjusted, increase draft Crown not properly sealed	
B1	1:20	JM	> 15 min					Y // N	Y // N	Y // N	Y // N		12-57 to 20 method 9	
								Y // N	Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N	Y // N			
								Y // N	Y // N	Y // N	Y // N			

Wind Speed: winds gusting 15-20 mph
 Wind Direction: South to North

SUBMIT TO THE ENVIRONMENTAL DEPARTMENT AT THE END OF SHIFT