



SunCoke Energy

Indiana Harbor Coke Company
3210 Watling Street
East Chicago, IN 46312

April 28, 2020

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 90-5-2-1-08555/1

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Air Enforcement Division
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bzlatos@idem.in.gov

**RE: Consent Decree, *United States, et al. v. Indiana Harbor Coke Company, et al.*
Indiana Harbor Coke Company, LLC (TV Permit T089-36982-00382)
Submission of the 1st 2020 Semi-Annual Report**

To Whom It May Concern,

The United States, the State of Indiana, Indiana Harbor Coke Company (IHCC), SunCoke Energy, Inc. (SunCoke), and Cokenergy, LLC (Cokenergy) are parties to a Consent Decree (CD) lodged in federal court on January 25, 2018 with an Effective Date of October 25, 2018.

Pursuant to the CD, IHCC is submitting the 1st 2020 Semi-Annual Report for IHCC. IHCC and SunCoke prepared the enclosed Report in accordance with Paragraph 51 of the CD. This Report contains the information required by Paragraphs 51.a. through q. of the CD, with respect to the time period from October 1, 2019 through March 31, 2020.



SunCoke Energy

Indiana Harbor Coke Company
3210 Watling Street
East Chicago, IN 46312

If you have any questions regarding this report, please contact me at (219) 378-3903 or email me at nestrada@suncoke.com.

Sincerely,

Nancy Estrada
Environmental Engineer

cc:

East Chicago Public Library
2401 E. Columbus Drive
East Chicago, IN 46312

East Chicago Public Library
1008 W. Chicago Avenue
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**Indiana Harbor Coke Company
SunCoke Energy, Inc.**

**Consent Decree
Semi-Annual Report**

Reporting Period: October 1, 2019 – March 31, 2020

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1.0 Introduction

The United States, the State of Indiana, Indiana Harbor Coke Company (IHCC), SunCoke Energy, Inc., and Cokenergy, LLC (Cokenergy), are parties to a Consent Decree (CD) lodged in the U.S. District Court for the Northern District of Indiana with an Effective Date of October 25, 2018. *See United States, et al. v. Indiana Harbor Coke Company, et al.*, Civil Action No. 2:18-cv-35.

This report is being submitted pursuant to Paragraph 51 of the CD, and includes all information required to be submitted. This report covers the period of October 1, 2019 – March 31, 2020.

2.0 Work performed and progress made toward implementing the requirements of Section IV of the CD (Compliance Requirements), including completion of any milestones;

A. Coke Oven Rebuild Requirements, pursuant to Section IV.A. of the CD

Milestone Time	Milestone Description	Status
On or about March 31, 2017	Complete five (5) Oven Rebuilds for Battery B ("Initial Oven Rebuilds")	Complete
On or before March 31, 2018	Evaluation of the five rebuilt Ovens in Battery B	Complete - Evaluation period 3/31/2017 - 2/28/2018
By April 30, 2018	Notify EPA and IDEM regarding Battery B Oven Rebuilds success	Complete - Notification of Oven Rebuild success submitted 3/21/2018
December 31, 2018	Complete all Oven Rebuilds for Batteries A, C, and D, or Idle any Ovens that will not be rebuilt	Complete – All ovens rebuilt on Batteries A, C, and D
By November 30, 2019	Complete all Oven Rebuilds for Battery B, or Idle any Ovens that will not be rebuilt	Complete – All ovens rebuilt on Battery B

B. Coke Oven Leak Requirements

Please see section 6.0 for more information regarding compliance with emissions minimization requirements for Coke Oven Leaks from Rebuilt Ovens during the reporting period, pursuant to Paragraph 12 of the Consent Decree. Please see section 8.0 for a list of all Coke Oven Leak RCFAs performed during the reporting period, pursuant to Paragraph 13 of the Consent Decree. A copy of each RCFA report for Coke Oven Leaks from Rebuilt Ovens (as defined in Paragraph 8.k. of the CD) that occurred during the reporting period, if any, is included in Attachment A1.

Paragraph 11 of the Consent Decree contains compliance requirements for Coke Oven Leaks from Non-rebuilt Ovens. There were no Coke Oven Leaks from Non-rebuilt Ovens during the reporting period. IHCC completed all oven rebuilds by November 30, 2019.

C. Bypass Venting Requirements

Please see section 19.0 for more information regarding compliance with bypass venting limits and SO₂ limits during the reporting period, pursuant to Paragraphs 14, 15 and 16 of the Consent Decree. Please see section 7.0 for more information regarding emissions minimization during Bypass Venting Incidents during the reporting period, pursuant to Paragraph 17 of the Consent Decree. Please see section 8.0 for a list of all Bypass Venting Incident RCFAs performed during the reporting period, pursuant to Paragraph 18 of the Consent Decree. A copy of the RCFA report for each Bypass Venting Incident (as defined in Paragraph 8.d. of the CD) that occurred during the reporting period, if any, is included in Attachment A2.

D. Enhanced Monitoring Requirements

Please see section 5.0 for more information regarding emissions monitoring and stack testing that occurred during the reporting period, pursuant to Paragraphs 19 - 22 of the Consent Decree.

E. Preventative Maintenance and Operation ("PMO") Plan

Please see section 10.0 for more information regarding the PMO plan required by Paragraph 23 of the Consent Decree. Please see section 11.0 for more information regarding submittal of the Compliance Assurance Plan (CAP) under section 23.c. of the Consent Decree.

F. Mitigation Measures

Please see section 20.0 for more information regarding Mitigation Measures required by Paragraph 24 of the Consent Decree.

G. Permit Requirements

Please see section 12.0 for more information regarding the status of permit applications, pursuant to Paragraphs 27 through 29 of the Consent Decree.

3.0 Any significant modifications to previously-submitted design specifications of any pollution control system, or to monitoring equipment, required to comply with the requirements of Section IV (Compliance Requirements);

At this time, no significant modifications to previously submitted design specifications of any pollution control system or to monitoring equipment are required for compliance with Section IV of this Consent Decree.

4.0 Any significant problems encountered or anticipated in complying with the requirements of Section IV (Compliance Requirements), including implemented or proposed solutions;

No significant problems have been encountered in complying with Section IV of this Consent Decree.

Any non-conformances to the PMO plan required under section IV.D are included in Section 10.0.

5.0 A summary of the emissions monitoring and testing data collected to demonstrate compliance with a requirement of the Consent Decree;

A. Permanent Flow Monitor (Paragraph 19)

Paragraph 19 of the CD requires installation of a permanent flow monitor to continuously measure the flow rate in the Main Stack within ninety (90) days of the Effective Date of the CD.

The required flow monitor was installed and calibrated within 90 days of the Effective Date as required by the CD. Copies of the Relative Accuracy Test Audit (RATA) report were included in the first semi-annual report submitted on April 30, 2019. Cokenergy conducted subsequent RATA testing in December 2019. The flow monitor report was submitted to the EPA and IDEM by Cokenergy on January 16, 2020, and a copy of that report has been included in this semi-annual report.

B. Meteorological Station (Paragraph 20)

Paragraph 20 of the CD requires installation of a meteorological station at the Facility or purchase of a handheld weather device within thirty (30) days of the Effective Date of the CD.

IHCC purchased twelve (12) new handheld weather devices to monitor and record wind speed and wind direction. These devices were ordered on March 29, 2018 and were received in April of 2018. The wind meters (HoldPeak 866B-WM Digital Anemometers) are being operated and maintained as required.

C. Emissions Tracking System (ETS) Updates (Paragraph 21)

Paragraph 21 of the CD requires IHCC to modify ETS in order to report emissions using the actual flow data from the Main Stack flow monitor within one hundred eighty (180) days of the installation of the Permanent Flow Monitor pursuant to Paragraph 19 of the CD.

ETS was modified to incorporate the new Main Stack flow monitor and began using actual flow data from the new flow monitor on November 28, 2018.

D. Bypass Vent Stack and Main Stack Testing (Paragraph 22)

Paragraph 22 of the CD requires stack testing measuring the emission rate of lead and VOCs from the Main Stack and at least one Bypass Vent Stack within five (5) years of the Effective Date of the CD. Two stack tests, separated by at least eighteen (18) months, are required for measuring the lead emissions and one test is required for VOCs.

Stack testing on the Bypass Vent Stack for lead and VOCs , pursuant to Paragraph 22, is expected to be conducted in conjunction with stack testing required under IHCC's Title V permit in August of 2020. Stack testing on the Main Stack for lead and VOCs, pursuant to Paragraph 22, was conducted in December 2019 by Cokenergy. The report was submitted to EPA and IDEM by Cokenergy on January 16, 2020, and a copy of that report has been included in this semi-annual report.

6.0 A list of all violations of Paragraph 12.a and 12.b, with the date, time and location of visible emissions and the status of any Coke Oven RCFA conducted;

Paragraph 12.a requires that visible emissions from a Rebuilt Oven Coke Oven door must be stopped within fifteen (15) minutes on the push side and forty-five (45) minutes on the coke shed side. Visible emissions from a Coke Oven door may be stopped from the push side within forty-five (45) minutes from the time the visible emissions are first observed for a maximum of two times per Battery in any semi-annual reporting period.

Paragraph 12.b requires that visible emissions from a Rebuilt Coke Oven crown, or from any other part of the Coke Oven that is not the Coke Oven door, must be stopped within thirty (30) minutes. If visible emissions from a Coke Oven crown continue longer than thirty (30) minutes, a Method 9 observation must be conducted no later than one-hundred twenty (120) minutes from the time the visible emissions are first observed provided conditions identified in Method 9 allow for an observation pursuant to Method 9.

The following table lists all instances where visible emissions were not stopped within the time periods set forth in Paragraph 12.a or 12.b of the Consent Decree during this reporting period:

Battery	Oven #	Leak Location	Date	Time Noticed	Time Ended	Duration (hours:minutes)	Coke Oven Leak Y/N
C	37	Crown	10/3/2019	4:24 AM	5:33 AM	1:09	N
C	53	Crown	10/3/2019	9:00 AM	1:35 PM	4:35	N
D	37	Push Side Door	10/5/2019	6:45 AM	2:00 PM	7:15	Y
C	2	Crown	10/13/2020	7:03 AM	7:40 AM	0:37	N
C	35	Crown	10/13/2020	7:03 AM	7:40 AM	0:37	N
D	31	Crown	10/22/2020	7:15 AM	8:15 AM	1:00	N
C	16	Crown	10/29/2020	7:58 AM	9:00 AM	1:02	N
C	67	Push Side Door	11/7/2019	6:00 AM	2:00 PM	8:00	Y
D	13	Crown	12/1/2019	9:15 AM	10:25 AM	1:10	N
D	65	Crown	12/3/2019	6:57 AM	1:00 PM	6:03	N
B	5	Crown	12/30/2019	7:20 AM	10:00 AM	2:40	N
B	7	Crown	12/30/2019	7:20 AM	10:00 AM	2:40	Y
B	11	Crown	12/30/2019	7:20 AM	10:00 AM	2:40	Y
B	5	Crown	12/31/2019	7:27 AM	1:00 PM	5:33	N
D	65	Push Side Door	1/3/2020	7:32 AM	8:45 AM	1:13	Y
D	65	Crown	1/16/2020	12:19 PM	1:55 PM	1:36	N
D	66	Push Side Door	1/17/2020	8:25 AM	9:30 AM	1:05	Y
D	66	Crown	1/17/2020	8:25 AM	9:30 AM	1:05	N
C	67	Crown	1/18/2020	7:17 AM	11:11 AM	3:54	N
B	6	Crown	1/21/2020	7:55 AM	8:32 AM	0:37	N
B	4	Crown	1/26/2020	7:08 AM	7:55 AM	0:47	N
B	4	Crown	1/28/2020	7:37 AM	8:30 AM	0:53	N
D	31	Push Side Door	1/29/2020	7:25 AM	8:30 AM	1:05	Y
B	2	Crown	2/3/2020	8:26 AM	11:00 AM	2:34	N
B	3	Crown	2/3/2020	8:26 AM	11:00 AM	2:34	N
B	4	Crown	2/3/2020	8:26 AM	11:00 AM	2:34	N
C	16	Crown	2/5/2020	7:03 AM	8:35 AM	1:32	N
C	16	Crown	2/21/2020	6:42 AM	10:05 AM	3:23	N
C	16	Crown	2/23/2020	6:30 AM	9:15 AM	2:45	N
A	34	Crown	3/10/2020	7:21 AM	9:20 AM	1:59	N
D	22	Crown	3/18/2020	7:08 AM	10:15 AM	3:07	N

A	2	Push Side Door	3/20/2020	7:25 AM	8:00 AM	0:35	Y
A	10	Crown	3/20/2020	7:25 AM	8:20 AM	0:55	N
D	30	Crown	3/21/2020	7:01 AM	10:00 AM	2:59	N
D	6	Push Side Door	3/21/2020	7:01 AM	10:00 AM	2:59	Y
C	26	Push Side Door	3/30/2020	6:30 AM	8:35 AM	2:05	Y
C	36	Push Side Door	3/30/2020	6:30 AM	8:35 AM	2:05	Y

In accordance with Paragraph 12.b.i, a Method 9 reading was conducted, provided conditions permitted, on each oven where visible emissions were observed from the Coke Oven crown and continued for longer than 30 minutes, except for the following:

- On October 3, 2019, IHCC did not conduct a Method 9 reading for visible emissions from a Coke Oven (oven C53) crown lasting longer than 30 minutes. This was due to a lack of communication between the operators and the contractor performing the Method 9 readings. IHCC personnel have been retrained on proper communication and the Method 9 reading requirements.

Any visible emissions qualifying as Coke Oven Leaks were evaluated to determine if they met the RCFA Trigger Level as discussed in Section 8.0.

7.0 All failures to comply with the emissions minimization requirements of Paragraph 17 of the Consent Decree;

Emissions Minimization Actions:

- (1) IHCC shall reduce coal charge at each Oven from which gases are being bypassed to no more than a forty (40) ton average on a wet basis, if practicable.

There were no Bypass Venting Incidents, as defined in Paragraph 8.d. of the CD, during the reporting period.

8.0 All RCFAs required by Paragraphs 13 and 18 of this Consent Decree;

- A. Coke Oven Leaks were evaluated to determine if any met the RCFA Trigger Level, as shown below. Note, Coke Oven Leaks caused by high winds, if any, are listed in Attachment D.

Battery	Oven #	Leak Location	Date	Time Noticed	Time Ended	Duration (hours:minutes)	RCFA Triggered?
D	37	Push Side Door	10/5/2019	6:45 AM	2:00 PM	7:15	N
C	67	Push Side Door	11/7/2019	6:00 AM	2:00 PM	8:00	N
B	7	Crown	12/30/2019	7:20 AM	10:00 AM	2:40	N
B	11	Crown	12/30/2019	7:20 AM	10:00 AM	2:40	N
D	65	Push Side Door	1/3/2020	7:32 AM	8:45 AM	1:13	N
D	66	Push Side Door	1/17/2020	8:25 AM	9:30 AM	1:05	N
D	31	Push Side Door	1/29/2020	7:25 AM	8:30 AM	1:05	N
A	2	Push Side Door	3/20/2020	7:25 AM	8:00 AM	0:35	N
D	6	Push Side Door	3/21/2020	7:01 AM	10:00 AM	2:59	N
C	26	Push Side Door	3/30/2020	6:30 AM	8:35 AM	2:05	N
C	36	Push Side Door	3/30/2020	6:30 AM	8:35 AM	2:05	N

- B. The following table provides a summary of the Coke Oven RCFAs completed during this reporting period, pursuant to Paragraph 13. Please see Attachment A1 for all Coke Oven RCFAs completed during this reporting period. Additionally, a table showing the status of all corrective actions identified from each RCFA is included in Attachment A3.

RCFA #	Start Date	Battery	Oven #	Leak Location	Duration	RCFA Status
No Coke Oven RCFAs required during this reporting period.						

- C. The following table provides a summary of the Bypass Venting Incident RCFAs completed during this reporting period, pursuant to Paragraph 18. Please see Attachment A2 for all Bypass Venting Incident RCFAs completed during this reporting period. Additionally, a table showing the status of all corrective actions identified from each RCFA is included in Attachment A4.

RCFA #	Start Date	Description	RCFA Status
No Bypass Venting Incidents, as defined in Paragraph 8.d., occurred during this reporting period.			

9.0 The status of any corrective actions required under Paragraphs 13 and 18 that were not completed at the time of the submission of any previous report required under Paragraphs 13 and 18;

Paragraph 51(h) requires reporting in this semi-annual report the status of all corrective actions not completed prior to the submission of the previous semi-annual report. Attachments A3 and A4 outline the status of all corrective actions identified from each Coke Oven Leak and Bypass Venting Incident RCFA in this semi-annual reporting period. Attachment A5 outlines the status of all corrective actions not completed prior to the submission of the previous semi-annual report.

10.0 Any updated PMO Plan required by Paragraph 23 of this Consent Decree or any failure to follow a PMO Plan;

The PMO Plan was submitted to EPA and IDEM on June 28, 2018. The PMO Plan was accepted by the agency on February 14, 2019.

There have been no failures to follow the PMO Plan requirements during this reporting period.

11.0 Submittal of the CAP when required by Paragraph 23.c of this Consent Decree, any updates to the CAP, and any instances when the CAP had to be implemented to ensure compliance with PM or SO₂ limits;

Paragraph 23.c of the CD requires IHCC to evaluate monthly production and monthly sulfur content of the dry coal to identify when they exceed the levels specified in the CD for “High Production Level Months” in two consecutive months. This requirement has been included in the PMO Plan. As outlined in the table below, IHCC did not experience High Production Levels during two consecutive months during the reporting period.

Month/Year	Average Monthly Tons of Dry Coal Charged	Average Monthly Sulfur Content of Dry Coal	High Production Level Month?
October 2019	125,837	0.88%	N
November 2019	126,022	0.88%	N
December 2019	141,272	0.87%	N
January 2020	142,029	0.93%	Y
February 2020	128,629	0.88%	N
March 2020	137,636	0.85%	N

12.0 Status of permit applications and a summary of all permitting activity pertaining to compliance with this Consent Decree;

IHCC permitting status and compliance:

- The permit application to incorporate the required elements of the CD into the facility operating permit was submitted within ninety (90) days of the effective date on January 4, 2019 as required by Paragraph 27.a. A copy of the submitted application was included in the semi-annual report submitted on April 30, 2019.
- The application seeking a site-specific revision to the Indiana State Implementation Plan (“SIP”) was submitted within ninety (90) days of the effective date on December 19, 2018 as required by Paragraph 27.b. A copy of the submitted application was included in the semi-annual report submitted on April 30, 2019.

13.0 A description of all noncompliance with the requirements in Section VII (Supplemental Environmental Projects);

This is a Cokenergy-only obligation; therefore, details are not included in this report.

14.0 All failures to comply with the reporting requirements in Paragraphs 51 through 55;

There were no failures to comply with the reporting requirements set forth in Paragraphs 51 through 55 of the Consent Decree during this reporting period.

15.0 Copies of all Quarterly Deviation and Compliance Monitoring Reports and semi-annual and annual compliance certifications required under the Defendants’ Permits to both EPA and IDEM;

For the IHCC facility, quarterly deviation and compliance monitoring reports submitted for the time period covered by this report are included in Attachment B1. All semi-annual and annual compliance certifications submitted during the reporting period are included in Attachment B2.

16.0 The dates, times, and duration of any Lightning Stand-Downs during the reporting period;

IHCC is not asserting that any Lightning Stand-Downs resulted in Coke Oven Leaks during the current reporting period. The dates, times, and duration of Lightning Stand-Downs during the reporting period can be found in Attachment C.

17.0 The dates, times, and duration of any power outages during the reporting period;

There were no instances of power outages during the reporting period

18.0 The dates, times, and duration of any Coke Oven Leaks caused by high winds and wind speed and direction data for the time of the Coke Oven Leaks;

The dates, times, and duration of all coke oven leaks caused by high winds during the reporting period can be found in Attachment D. For each coke oven leak caused by high winds, wind speed and direction data is also included.

19.0 Compliance with Bypass Venting Limits

Paragraph 14.a of the CD limits annual bypass venting to a maximum of 12% from January 1, 2017, through December 31, 2019, and a maximum of 13% beginning January 1, 2020. Paragraph 15 of the CD limits daily bypass venting to a maximum of 19% on a twenty-four (24) hour basis.

No exceedances of the annual or daily bypass venting limits occurred during the reporting period. The table below lists the actual annual venting for calendar years 2017, 2018 and 2019. Actual daily bypass venting percentages for each day during the reporting period are included in Attachment E.

Year	Annual Bypass Venting
2017	7.72%
2018	6.01%
2019	5.46%

20.0 Mitigation Measures

Paragraph 25 of the CD requires IHCC to maintain two rebuilt quench towers equipped with 1.5" thick, 2" x 6" wooden baffles placed 30 degrees to the gas stream, and placed 3" apart.

IHCC has maintained the two rebuilt quench towers as required during the reporting period.

CERTIFICATION OF DOCUMENT

I certify under penalty of law that this information was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my directions and my inquiry of the person(s) who manage the system, or the person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


Patrick Nigl
General Manager – Indiana Harbor and Coke Company

04/28/2020

Date

Attachment A1
Coke Oven Leak RCFAs Completed

No Coke Ovens Leaks meeting the Coke Oven Leak RCFA Trigger Level, as defined in Paragraph 8.I. of the CD, occurred during the reporting period.

Attachment A2
Bypass Venting RCFAs Completed

No Bypass Venting Incidents, as defined in Paragraph 8.d. of the CD, occurred during the reporting period.

Attachment A3
Coke Oven Leak RCFA Corrective Actions

Corrective Actions for Current Reporting Period Coke Oven Leak RCFAs

Site	Description of Corrective Action	RCFA Report No.	Reporting Period	Status	Estimated Completion Date	Actual Completion Date
	N/A – No coke oven leaks requiring an RCFA this reporting period.					

Corrective Action Status for Prior Reporting Period Coke Oven Leak RCFAs

Site	Description of Corrective Action	RCFA Report No.	Reporting Period	Status	Estimated Completion Date	Actual Completion Date
IHCC	Rebuild Oven B6.	9089	October 2018 - March 2019	Completed	11/30/2019	11/30/2019

Attachment A4
Bypass Venting RCFA Corrective Actions

No Bypass Venting Incidents, as defined in Paragraph 8.d. of the CD, occurred during the reporting period, therefore, there are no corrective actions to report.

Attachment B

Quarterly Deviation and Compliance Monitoring Reports

&

Semi-annual and Annual Compliance Certifications



SunCoke Energy™

Indiana Harbor Coke Company, L.P.
3210 Watling Street, MC 2-990
East Chicago, IN 46312
(219) 378-3949 FAX (219) 397-4590

January 29, 2020

Mr. Phil Perry
Compliance and Enforcement Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Mail Code 61 – 53 IGCN – 1003
Indianapolis, IN 46204 – 2551

RE: Quarterly Report for Q4 2019; Title V Permit No. 089-36982-000382

Dear Mr. Perry:

Please find attached Indiana Harbor Coke Company's (IHCC's) Part 70 Operating Permit Certification and Quarterly Report for Coal Charged, and the Quarterly Deviation and Compliance Monitoring Report for the 4th Quarter of 2019.

Sincerely,

Nancy Estrada
Environmental Engineer

cc:

Clifford Yukawa w/attachments
IDEM/Northwest Regional Office
330 US Highway 30, Suite F
Valparaiso, IN 46385

Attachments:

Part 70 Operating Permit Certification
Q4 Quarterly Report for Coal Charged
Q4 Quarterly Deviation & Compliance Monitoring Report

3

3

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indiana Harbor Coke Company L.P., a contractor of ArcelorMittal
Source Address: 3210 Watling Street, East Chicago, Indiana 46312
Part 70 Permit Renewal No.: T089-36982-00382

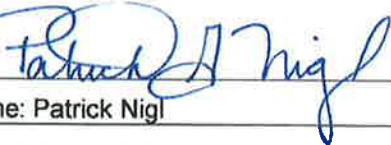
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Quarterly Report for 4th Quarter 2019
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:



Printed Name: Patrick Nigl

Title/Position: General Manager

Phone: (219) 378-3902

Date: January 29, 2020

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT SECTION**

Part 70 Quarterly Report

Source Name: Indiana Harbor Coke Company L.P., a contractor of ArcelorMittal
 Source Address: 3210 Watling Street, East Chicago, Indiana 46312
 Part 70 Permit Renewal No.: T089-36982-00382
 Source/Facility: IHCC
 Limit: 2,040,000 tons of dry coal charged per twelve (12) consecutive month period with compliance determined at the end of each month

Quarter: 4th Year: 2019

Month	12 Month Rolling Sum Tons of Coal Charged	1st Quarter Tons	2nd Quarter Tons	3rd Quarter Tons	4th Quarter Tons
January	1,330,357	121,424			
February	1,341,953	109,227			
March	1,351,139	120,331			
April	1,364,225		116,342		
May	1,379,196		118,587		
June	1,383,206		109,499		
July	1,387,758			111,821	
August	1,398,760			119,409	
September	1,407,136			118,237	
October	1,534,768				125,837
November	1,540,563				126,022
December	1,557,393				141,272

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by: Patrick Nigl
 Title / Position: General Manager

Signature: 

Date: January 29, 2020
 Phone: (219)-378-3902
 Attached a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE and ENFORCEMENT BRANCH**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indiana Harbor Coke Company L.P., a contractor of ArcelorMittal
 Source Address: 3210 Watling Street, East Chicago, Indiana 46312
 Part 70 Permit Renewal No.: T089-36982-00382

Reporting Period: October 31, 2019 – December 31, 2019

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>
<p><input checked="" type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>

Permit Requirement (specify permit condition #): D.1.6 (a)(4)	
Dates of Deviation: 10/16, 10/20, 10/27, 11/3, 11/10, 11/17, 11/24, 12/1, 12/15, 12/29	Duration of Deviation: 16, 3-minute averages
Number of Deviations: 16	
Probable Cause of Deviation: IHCC's certified Method 9 observer recorded 16 fugitive visible emissions from pushing and charging operations exceeding the twenty percent (20%) opacity standard as a three (3) minute average. 3 of the 16 visible emissions were from pushing operations.	
Response Steps Taken: IHCC is continuing to implement an on-going oven maintenance and repair program, in addition to implementing better burning practices. Additionally, IHCC is replacing certain sections of D common tunnel in Q1 and Q2 of 2020.	

Permit Requirement (specify permit condition #): D.1.13(b)	
Dates of Deviation: 10/21	Duration of Deviation: Please see Table 1 (attached)
Number of Deviations: 1	
<p>Probable Cause of Deviation: IHCC personnel recorded that on one-occasion oven dampers on oven D (62) did not properly function to fully open when the charging process was initiated. Thus, they were not positioned to maximize draft (i.e. at the minimum position) during charging activities on this occasion during the reporting period. The uptake dampers are programmed to open fully once the charging sequence on an oven is initiated; however, in this instance, the dampers malfunctioned and were not able to fully open.</p>	
<p>Response Steps Taken: Personnel inspect all uptakes prior to pushing ovens to maximize proper operation. IHCC maintenance personnel execute a daily oven damper maintenance and repair program to ensure dampers are functional</p>	
Permit Requirement (specify permit condition #): D.1.19	
Dates of Deviation: 10/1- 12/28, 12/31	Duration of Deviation: Please see Table 2 (attached)
Number of Deviations: 90	
<p>Probable Cause of Deviation: For a total of 90 days, IHCC was unable to maintain a temperature of 1200 to 2400 degrees Fahrenheit temperature in the common tunnels on A, B, C, and D Batteries at various times.</p> <p>For A Battery, the low common tunnel temperature readings are a result of HRSGs being down for scheduled maintenance by Coke Energy.</p> <p>For B Battery, the low common tunnel temperature readings are a result of multiple ovens that were out of service as part of a rebuild process, and therefore, the overall heat load to the common tunnel is reduced.</p> <p>For C Battery, the low common tunnel temperature readings are a result of draft issues, common tunnel repairs to remedy those draft issues, a charging conveyor that was jammed causing production delays and inlet transition repairs.</p> <p>For D Battery, the common tunnel temperature readings are a result of HRSGs being down for scheduled maintenance by Coke Energy, common tunnel repairs, a charging conveyor that was jammed causing production delays and inlet transition repairs.</p>	
<p>Response Steps Taken: IHCC has taken several response measures to increase the common tunnel temperatures including installing gas lances in the ovens. IHCC is continuing to implement its on-going common tunnel repair program with certain repairs on C common tunnel completed in October 2019, and repairs scheduled for D common tunnel in 2020; all of which will help to maintain common tunnel temperatures.</p>	

Permit Requirement (specify permit condition #) E.2.2 (c)	
Dates of Deviation: 10/4-10/6, 10/8, 10/14, 10/15, 10/18, 10/20, 10/22, 10/25, 10/31, 11/7, 11/12, 12/7-12/11, 12/13-12/17	Duration of Deviation: Varies
Number of Deviations: 23	
<p>Probable Cause of Deviation: On 23 occasions, IHCC personnel observed positive pressure on B, C, and/or D Battery common tunnels.</p> <p>B battery positive pressure readings are mainly a result of oven rebuilds that were completed in November 2019.</p> <p>C and positive pressure readings are mainly a result of common tunnel repairs.</p> <p>D battery positive pressure readings are a result of common tunnel repairs to address low draft.</p>	
<p>Response Steps Taken: IHCC operations personnel monitor oven conditions to maintain negative draft within the common tunnel. B battery oven rebuild was completed in November 2019 and certain sections of C common tunnel were replaced in 2019. In addition, IHCC plans to replace certain sections of D common tunnel in 2020.</p>	

Permit Requirement (specify permit condition #) E.2.2 (c)	
Dates of Deviation: 10/5, 11/7	Duration of Deviation: Please see Table 3 (attached)
Number of Deviations: 2	
Probable Cause of Deviation: Door fires that occurred during the reporting period and lasted longer than 15 minutes on the push side or 45 minutes on coke side are the result of maintenance repairs. Corrective actions were taken, but operators were unable to stop the leaks within the allowed 15 minutes or 45 minutes on certain ovens for the dates shown in Table 3.	
Response Steps Taken: IHCC personnel monitor the ovens and perform all necessary mitigation steps to try to stop any door leaks. In addition to rebuilding coke ovens, IHCC maintains an on-going oven maintenance and repair program, which includes inspecting and cleaning the common tunnel to maintain sufficient draft.	

Signature:



Form Completed By: Nancy Estrada
Title/Position: Environmental Engineer
Phone: (219) 895-5976
Date: January 29, 2020

Attachments:

Table 1: D.1.12(b) - Uptake damper position indicated closed following the charge of the oven:

Incident Date / Time	Description / Asset
10/21/2019	D(62)

Table 2: D.1.13, D.1.18 – Common tunnel temperature out of the 1200 to 2400 degree Fahrenheit

Incident Date / Time	Description / Asset
10/1/2019	A, B common tunnel
10/2/2019	A, B, C common tunnel
10/3/2019	A, B, D common tunnel
10/4/2019	A, B, C common tunnel
10/5/2019	B, C common tunnel
10/6/2019	A, B, C common tunnel
10/7/2019	A, B, C common tunnel
10/8/2019	A, B common tunnel
10/9/2019	A, B, C common tunnel
10/10/2019	A, B, C common tunnel
10/11/2019	A, B, C common tunnel
10/12/2019	A, B, C common tunnel
10/13/2019	A, B, C common tunnel
10/14/2019	A, B, C common tunnel
10/15/2019	B, C, D common tunnel
10/16/2019	A, B, C common tunnel
10/17/2019	A, B, C common tunnel
10/18/2019	A, B common tunnel
10/19/2019	A, B common tunnel
10/20/2019	A, B common tunnel
10/21/2019	A, B common tunnel
10/22/2019	A, B common tunnel
10/23/2019	A, B, C common tunnel
10/24/2019	A, B, C common tunnel
10/25/2019	B common tunnel
10/26/2019	B common tunnel
10/27/2019	B, C common tunnel
10/28/2019	B, C common tunnel
10/29/2019	B, C common tunnel
10/30/2019	B, C common tunnel
10/31/2019	B, C common tunnel
11/1/2019	B common tunnel
11/2/2019	B common tunnel
11/3/2019	B, C common tunnel
11/4/2019	B, C common tunnel
11/5/2019	B common tunnel
11/6/2019	B common tunnel

11/7/2019	B, C common tunnel
11/8/2019	B common tunnel
11/9/2019	B common tunnel
11/10/2019	B, C, D common tunnel
11/11/2019	B,C, D common tunnel
11/12/2019	B, C common tunnel
11/13/2019	B common tunnel
11/14/2019	B, C common tunnel
11/15/2019	B, D common tunnel
11/16/2019	B common tunnel
11/17/2019	B common tunnel
11/18/2019	B, C common tunnel
11/19/2019	B, C common tunnel
11/20/2019	B, C common tunnel
11/21/2019	B, C common tunnel
11/22/2019	B, C, D common tunnel
11/23/2019	B, C common tunnel
11/24/2019	B, C common tunnel
11/25/2019	B, C, D, common tunnel
11/26/2019	B common tunnel
11/27/2019	B common tunnel
11/28/2019	B common tunnel
11/29/2019	B common tunnel
11/30/2019	B common tunnel
12/1/2019	B common tunnel
12/2/2019	B common tunnel
12/3/2019	B common tunnel
12/4/2019	B common tunnel
12/5/2019	B, C common tunnel
12/6/2019	B common tunnel
12/7/2019	B common tunnel
12/8/2019	B common tunnel
12/9/2019	B common tunnel
12/10/2019	B common tunnel
12/11/2019	B, C, D common tunnel
12/12/2019	B, C, D common tunnel
12/13/2019	B, D common tunnel
12/14/2019	B, D common tunnel
12/15/2019	B, D common tunnel
12/16/2019	B, D common tunnel
12/17/2019	B, D common tunnel
12/18/2019	B, D common tunnel
12/19/2019	B, D common tunnel
12/20/2019	B, D common tunnel

12/21/2019	B, D common tunnel
12/22/2019	B, D common tunnel
12/23/2019	B, D common tunnel
12/24/2019	B, D common tunnel
12/25/2019	B, D common tunnel
12/26/2019	B,C, D common tunnel
12/27/2019	B, D common tunnel
12/28/2019	D common tunnel
12/31/2019	C common tunnel

3 3
Table 3: E.2.2(c) – Door Fire (required 15 min PS / 45 min CS)

Date	Battery	Oven #	Time Observed	P/S	C/S	Duration	Cause(s)	Corrective Action(s)
10/5/2019	D	37	12:30PM	X		>15 min	oven repairs; p/s roof refractory	Repaired hole and end wall
11/7/2019	C	67	7:30 AM	X		>15 min	Oven repairs; p/s sole flue	Repaired sole flue wall



SunCoke Energy™

Indiana Harbor Coke Company, L.P.
3210 Watling Street, MC 2-990
East Chicago, IN 46312
(219) 378-3949 FAX (219) 397-4590

April 27, 2020

Mr. Phil Perry
Compliance and Enforcement Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Mail Code 61 – 53 IGCN – 1003
Indianapolis, IN 46204 – 2551

RE: Quarterly Report for Q1 2020; Title V Permit No. 089-36982-000382

Dear Mr. Perry:

Please find attached Indiana Harbor Coke Company's (IHCC's) Part 70 Operating Permit Certification and Quarterly Report for Coal Charged, and the Quarterly Deviation and Compliance Monitoring Report for the 1st Quarter of 2020.

Sincerely,

Nancy Estrada
Environmental Engineer

cc:

Clifford Yukawa w/attachments
IDEM/Northwest Regional Office
330 US Highway 30, Suite F
Valparaiso, IN 46385

Attachments:

Part 70 Operating Permit Certification
Q4 Quarterly Report for Coal Charged
Q4 Quarterly Deviation & Compliance Monitoring Report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indiana Harbor Coke Company L.P., a contractor of ArcelorMittal
Source Address: 3210 Watling Street, East Chicago, Indiana 46312
Part 70 Permit Renewal No.: T089-36982-00382

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Quarterly Report for 1st Quarter 2020
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name: Patrick Nigl

Title/Position: General Manager

Phone: (219) 378-3902

Date: April 27, 2020

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT SECTION**

Part 70 Quarterly Report


Source Name: Indiana Harbor Coke Company L.P., a contractor of ArcelorMittal
 Source Address: 3210 Watling Street, East Chicago, Indiana 46312
 Part 70 Permit Renewal No.: T089-36982-00382
 Source/Facility: IHCC
 Limit: 2,040,000 tons of dry coal charged per twelve (12) consecutive month period with compliance determined at the end of each month

Quarter: 1st Year: 2020

Month	12 Month Rolling Sum Tons of Coal Charged	1st Quarter Tons	2nd Quarter Tons	3rd Quarter Tons	4th Quarter Tons
January	1,458,858	142,029			
February	1,478,260	128,629			
March	1,495,565	137,636			
April					
May					
June					
July					
August					
September					
October					
November					
December					

- No deviation occurred in this quarter.
 Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by: Patrick Nigl
 Title / Position: General Manager

Signature: 

Date: April 27, 2020
 Phone: (219)-378-3902
 Attached a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE and ENFORCEMENT BRANCH**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indiana Harbor Coke Company L.P., a contractor of ArcelorMittal
 Source Address: 3210 Watling Street, East Chicago, Indiana 46312
 Part 70 Permit Renewal No.: T089-36982-00382

Reporting Period: January 1, 2020 – March 31, 2020

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #): D.1.6 (a)(4)

Dates of Deviation: 1/5, 1/7, 1/12, 1/13, 1/27, 2/2, 2/10, 2/16, 3/1, 3/8, 3/30

Duration of Deviation: 14, 3-minute averages

Number of Deviations: 14

Probable Cause of Deviation: IHCC's certified Method 9 observer recorded 14 fugitive visible emissions from charging operations exceeding the twenty percent (20%) opacity standard as a three (3) minute average.

Response Steps Taken: IHCC is continuing to implement an on-going oven maintenance and repair program, optimize burning practices and monitor oven trends to reduce potential for charging opacity. Additionally, IHCC has replaced certain sections of C and D common tunnels and will continue to implement its on-going common tunnel repair program.

Permit Requirement (specify permit condition #): D.1.19	
Dates of Deviation: 1/1-1/19, 1/21-2/8, 2/10- 3/31	Duration of Deviation: Please see Table 1 (attached)
Number of Deviations: 89	
<p>Probable Cause of Deviation: For a total of 89 days, IHCC was unable to maintain a temperature of 1200 to 2400 degrees Fahrenheit in the common tunnels on C and D Batteries at various times.</p> <p>For C Battery, the low common tunnel temperature readings are a result of scheduled inlet transition repairs by SunCoke and HRSG cleanings by Cokenergy.</p> <p>For D Battery, the low common tunnel temperature readings are a result of down time from equipment malfunctions, common tunnel repairs, and scheduled inlet transition repairs by SunCoke and HRSG cleanings by Cokenergy.</p>	
Response Steps Taken: IHCC is continuing to implement its on-going common tunnel repair program with repairs on C and D common tunnels in order to help maintain common tunnel temperatures.	

Permit Requirement (specify permit condition #) E.2.2 (c)	
Dates of Deviation: 1/11, 2/5, 2/7-2/12, 2/15-2/17, 2/19- 2/22, 2/24, 3/2, 3/3, 3/5, 3/8, 3/11, 3/17, 3/19-3/24, 3/30	Duration of Deviation: Varies
Number of Deviations: 30	
<p>Probable Cause of Deviation: On 30 occasions, IHCC pressure monitoring cells indicated positive pressure readings on A, C, and/or D Battery common tunnels.</p> <p>A Battery positive pressure readings are mainly a result of instrumentation issues.</p> <p>C Battery positive pressure readings are mainly a result of insufficient draft resulting from a need for HRSG cleaning.</p> <p>D battery positive pressure readings are a result of common tunnel repairs to address low draft.</p>	
Response Steps Taken: IHCC operations personnel monitor oven conditions to maintain negative draft within the common tunnel. A battery instrumentation underwent recalibration, and certain sections of C common tunnel were replaced in 2019. In addition, IHCC plans to replace additional sections of C and D common tunnels.	

Permit Requirement (specify permit condition #) E.2.2 (c)	
Dates of Deviation: 1/3, 1/17, 1/19, 1/29, 3/20, 3/21, 3/30	Duration of Deviation: Please see Table 2(attached)
Number of Deviations: 7	
<p>Probable Cause of Deviation: Door fires that occurred during the reporting period and lasted longer than 15 minutes on the push side or 45 minutes on coke side are the result of necessary maintenance, high winds, and door placement. Corrective actions were taken, but operators were unable to stop the leaks, within the allowed 15 minutes or 45 minutes on certain ovens for the dates shown in Table 2.</p>	
<p>Response Steps Taken: IHCC personnel monitor the ovens and perform all necessary mitigation steps to try to stop any door leaks. In addition, IHCC maintains an on-going oven maintenance and repair program, which includes inspecting and cleaning the common tunnel to maintain sufficient draft.</p>	

Signature:



Form Completed By: Nancy Estrada
Title/Position: Environmental Engineer
Phone: (219) 895-5976
Date: April 27, 2020

Attachments:

Table 1: D.1.13, D.1.18 – Common tunnel temperature out of the 1200 to 2400 degree Fahrenheit

Incident Date / Time	Description / Asset
1/1/2020	C common tunnel
1/2/2020	C common tunnel
1/3/2020	C common tunnel
1/4/2020	C common tunnel
1/5/2020	C, D common tunnel
1/6/2020	C common tunnel
1/7/2020	C common tunnel
1/8/2020	C common tunnel
1/9/2020	C, D common tunnel
1/10/2020	C common tunnel
1/11/2020	C common tunnel
1/12/2020	C common tunnel
1/13/2020	C common tunnel
1/14/2020	C common tunnel
1/15/2020	C common tunnel
1/16/2020	C common tunnel
1/17/2020	C common tunnel
1/18/2020	C common tunnel
1/19/2020	C common tunnel
1/21/2020	D common tunnel
1/22/2020	D common tunnel
1/23/2020	D common tunnel
1/24/2020	D common tunnel
1/25/2020	D common tunnel
1/26/2020	D common tunnel
1/27/2020	D common tunnel
1/28/2020	D common tunnel
1/29/2020	D common tunnel
1/30/2020	D common tunnel
1/31/2020	C, D common tunnel
2/1/2020	D common tunnel
2/2/2020	D common tunnel
2/3/2020	D common tunnel
2/4/2020	D common tunnel
2/5/2020	D common tunnel
2/6/2020	D common tunnel
2/7/2020	D common tunnel
2/8/2020	D common tunnel
2/10/2020	D common tunnel
2/11/2020	D common tunnel
2/12/2020	D common tunnel
2/13/2020	C, D common tunnel
2/14/2020	D common tunnel
2/15/2020	D common tunnel
2/16/2020	D common tunnel
2/17/2020	D common tunnel
2/18/2020	D common tunnel
2/19/2020	D common tunnel
2/20/2020	D common tunnel
2/21/2020	D common tunnel
2/22/2020	D common tunnel
2/23/2020	D common tunnel
2/24/2020	D common tunnel
2/25/2020	D common tunnel
2/26/2020	D common tunnel
2/27/2020	D common tunnel
2/28/2020	D common tunnel

2/29/2020	D common tunnel
3/1/2020	D common tunnel
3/2/2020	D common tunnel
3/3/2020	D common tunnel
3/4/2020	C, D common tunnel
3/5/2020	C, D common tunnel
3/6/2020	C, D common tunnel
3/7/2020	C, D common tunnel
3/8/2020	C, D common tunnel
3/9/2020	C, D common tunnel
3/10/2020	C, D common tunnel
3/11/2020	C, D common tunnel
3/12/2020	C common tunnel
3/13/2020	C common tunnel
3/14/2020	C common tunnel
3/15/2020	C common tunnel
3/16/2020	C common tunnel
3/17/2020	C, D common tunnel
3/18/2020	C, D common tunnel
3/19/2020	C common tunnel
3/20/2020	C, D common tunnel
3/21/2020	C, D common tunnel
3/22/2020	C, D common tunnel
3/23/2020	C, D common tunnel
3/24/2020	C, D common tunnel
3/25/2020	C, D common tunnel
3/26/2020	C, D common tunnel
3/27/2020	C, D common tunnel
3/28/2020	C common tunnel
3/29/2020	C common tunnel
3/30/2020	C common tunnel
3/31/2020	C common tunnel

Table 2: E.2.2(c) – Door Fire (required 15 min PS / 45 min CS)

Date	Battery	Oven #	Time Observed	P/S	C/S	Duration	Cause(s)	Corrective Action(s)
1/3/2020	D	65	7:32 AM	X		>15 min	Buckstay damage	Adjusted sole flues and buckstay repairs
1/17/2020	D	66	8:25 AM	X		>15 min	Buckstay damage	Adjusted sole flues and buckstay repairs
1/29/2020	D	31	7:25 AM	X		>15 min	Crack in common tunnel	Repaired crack in common tunnel
3/20/2020	A	2	7:25 AM	X		>15 min	High Winds (25 mph)	Adjusted sole flues
3/21/2020	D	6	7:01 AM	X		>15 min	Door placement	Adjusted sole flues, opened uptake, raised draft and closed crown
3/30/2020	C	26	6:30 AM	X		>15 min	High Winds (17 mph)	Adjusted sole flues
3/30/2020	C	33	6:30 AM	X		>15 min	High Winds (17 mph)	Adjusted sole flues



SunCoke Energy™

Indiana Harbor Coke Company, L.P.
3210 Watling Street, MC 2-990
East Chicago, IN 46312
(219) 378-3949 FAX (219) 397-4590

January 29, 2020

Mr. Phil Perry
Compliance and Enforcement Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Mail Code 61 – 53 IGCN – 1003
Indianapolis, IN 46204 – 2551

40 CFR 63, Subparts L and CCCCC
2019 Second Semi-Annual Compliance Certification

Dear Mr. Perry:

Indiana Harbor Coke Company, L.P. (IHCC) operates a coke production facility located in East Chicago, Indiana. The facility is subject to the National Emissions Standards for Coke Oven Batteries (MACT L) and the National Emissions Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks (MACT CCCCC).

Per applicable reporting and recordkeeping provisions of 40 CFR 63.311 and 40 CFR 63.7341, IHCC is providing the following information for the semiannual compliance period of July 1, 2019 through December 31, 2019.

- IHCC did not experience any malfunction events with respect to the standards of MACT L during the current reporting period.
- IHCC experienced deviations from the work practice standards listed in MACT L and incorporated in the facility's Work Practice Plan pursuant to 40 CFR 63.303(b)(3). IHCC is reporting these deviations in Table 1 below.

TABLE 1. DEVIATIONS FROM MACT L WORK PRACTICE STANDARDS

Dates	Event Description	Corrective Action
7/2, 7/13, 7/25-7/29, 9/26, 10/21	IHCC personnel recorded that the oven damper was not positioned to maximize draft during charging activities on the listed dates.	IHCC is installing a new damper positioning system to ensure dampers are positioned to maximize draft during charging. Additionally, IHCC performs maintenance and repairs on the existing uptake damper assemblies daily. Please see Attachment A for more details.
07/01-07/05, 07/07, 07/08, 07/11, 07/12, 07/14, 07/15, 07/20, 07/25, 07/26, 07/28, 08/03, 08/05, 08/07, 08/30, 09/13, 09/15, 09/23, 09/25, 09/29, 10/4-10/6, 10/8, 10/14, 10/15, 10/18, 10/20, 10/22, 10/25, 10/31, 11/7, 11/12, 12/7-12/11, 12/13-12/17	IHCC personnel observed positive pressure on B, C and/or D Battery common tunnel attributable to the oven rebuild project that was completed in November 2019, common tunnel repairs, HRSG fouling, and common tunnel blockage that resulted in low draft.	IHCC operations personnel monitor oven conditions to maintain negative draft within the common tunnel. Additionally, B battery oven rebuild was completed in November 2019, certain sections of C common tunnel were replaced in 2019, and additional plans to replace certain sections of D common tunnel in Q1 and Q2 of 2020.

- IHCC experienced deviations from the work practice standards established for the observation of coke oven doors for leaks as required by 40 CFR 63.303(c)(2). Please see Attachment B for more details.
- IHCC did not experience any malfunction events with respect to the standards of MACT CCCCC during the current reporting period.
- During the current reporting period, IHCC did not experience any deviations from the emission limitations, work practice standards, or operation and maintenance requirements listed in MACT CCCCC. The coke oven batteries operated for 4,416 hours during this semi-annual compliance period.

As the responsible official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the above are true, accurate, and complete.

Sincerely,


Patrick Nigl
General Manager

cc:

Clifford Yukawa
IDEM/Northwest Regional Office
330 W US Highway 30, Suite F
Valparaiso, IN 46385

Edward Nam
Air and Radiation Division US EPA Region 5
77 West Jackson Boulevard (A-18J)
Chicago, IL 60604

ATTACHMENT A:

UPTAKE DAMPER POSITION DEVIATIONS

Uptake damper position indicated closed following the charge of the oven

Incident Date / Time	Description / Asset
7/2/2019	C (24)
7/13/2019	B (67, 59)
7/25/2019	D (41)
7/26/2019	B (1)
7/27/2019	B (66)
7/28/2019	B (1)
7/29/2019	D (41)
9/26/2019	B (52)
10/21/2019	D (62)

ATTACHMENT B:

DOOR LEAK DEVIATIONS

Door Fire (required 15 min PS / 45 min CS)

Date	Battery	Oven #	Time Observed	P/S	C/S	Duration	Cause(s)	Corrective Action(s)
7/3/2019	C	32	12:30PM	X		>15 min	insufficient draft	adjusted uptakes
7/7/2019	B	6	7:30 AM	X		>15 min	sole flues plugged	adjusted uptakes
8/9/2019	C	31	12:48 PM	X		0:32	insufficient draft	adjusted uptakes
8/9/2019	D	31	12:40 PM	X		0:20	insufficient draft	adjusted uptakes
8/16/2019	C	32	7:55 AM	X		>15 min	insufficient draft	adjusted uptakes
8/16/2019	C	36	7:55 AM	X		>15 min	insufficient draft	adjusted uptakes
9/5/2019	C	16	8:39 AM	X		0:21	insufficient draft	adjusted uptakes
9/5/2019	C	36	8:39 AM	X		0:21	insufficient draft	adjusted uptakes
9/5/2019	C	37	8:39 AM	X		0:21	insufficient draft	adjusted uptakes
9/19/2019	D	35	1:03 PM	X		0:20	maintenance repairs	adjusted uptakes
								repairs completed
10/5/2019	D	37	6:45 AM	X		>15 min	maintenance repairs	
11/7/2019	C	67	6:00AM	X		>15 min	Oven repairs	repairs completed



SunCoke Energy™

Indiana Harbor Coke Company, L.P.
3210 Watling Street, MC 2-990
East Chicago, IN 46312
(219) 378-3949 FAX (219) 397-4590

January 29, 2020

Mr. Phil Perry
Compliance and Enforcement Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Mail Code 61 – 53 IGCN – 1003
Indianapolis, IN 46204 – 2551

RE: Resubmission of Quarterly Reports for Q1, Q2, and Q3 2019; Title V Permit No. 089-36982-000382

Dear Mr. Perry:

Attached please find Indiana Harbor Coke Company's (IHCC's) Part 70 Operating Permit Certification and revised Quarterly Reports for Coal Charged, and the Quarterly Deviation and Compliance Monitoring Report for the 1st, 2nd, and 3rd Quarters of 2019. We are resubmitting amended reports to include additional deviations and to correctly identify the ovens listed in Table 1. No changes were made to the Quarterly Reports for Coal Charged.

Sincerely,

Nancy Estrada
Environmental Engineer

cc:

Clifford Yukawa w/attachments
IDEM/Northwest Regional Office
330 US Highway 30, Suite F
Valparaiso, IN 46385

Attachments:

Part 70 Operating Permit Certification
Q1, Q2, Q3 Quarterly Reports for Coal Charged
Revised Q1, Q2, Q3 Quarterly Deviation & Compliance Monitoring Report



SunCoke Energy™

SunCoke Energy, Inc.
3210 Walling St
MC 2980
East Chicago, IN 46312
219-378-3900 Phone
219-397-4590 Fax

April 14, 2020

United States Environmental Protection Agency, Region V
Air and Radiation Division
Air Enforcement Branch – Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: Annual Compliance Certification – Permit No. T089-36982-00382

To whom it may concern:

Attached you will find Indiana Harbor Coke Company's (IHCC) Part 70 Operating Permit Annual Compliance Certification for the reporting period from January 1, 2019 to December 31, 2019. If you have any questions regarding this report, please contact me at (219) 378-3903 or at nestrada@suncoke.com.

Sincerely,

Nancy Estrada
Environmental Engineer

cc:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204 -- 2251

Attachments:

Part 70 Operating Permit - Annual Compliance Certification Report for 2019

PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION

This form can be used to satisfy the annual compliance certification requirements for Part 70 sources under 326 IAC 2-7-6, 326 IAC 2-7-6(5)(C) and FESOP sources under 326 IAC 2-8-5(a)(1)(C).

SOURCE INFORMATION

(1) Source name:	Indiana Harbor Coke Company L.P. -- contractor of Arcelor Mittal Steel -- Indiana Harbor East				
(2) Source address:	3210 Watling Street, MC 2 -- 990				
(3) City:	East Chicago	(4) State:	Indiana	(5) Zip code:	46312
(6) Mailing address: (if different from above)	3210 Watling Street, MC 2 -- 990				
(7) Mailing City:	East Chicago	(8) Mailing State:	Indiana	(9) Mailing Zip code:	46312
(10) Permit numbers:	T089-36982-00382	(11) Reporting Period:	January 1, 2019 to December 31, 2019		
(12) Contact person:	Nancy Estrada	(13) Email Address:	nestrada@suncoke.com		
(14) Phone number:	219-378-3903	(15) Fax number:	219-397-4590		
(16) Comments:					

SOURCE COMPLIANCE INFORMATION

(17) CHECK THE BOX NEXT TO EITHER (A) OR (B) BELOW. (The terms "continuous compliance" and "intermittent compliance" are defined on the Definitions page).	
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(A) This source was in CONTINUOUS COMPLIANCE with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit.	
(B) This source was in CONTINUOUS COMPLIANCE with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit, except for the terms and conditions listed in the following table for which the source reported intermittent compliance.	X

IMPORTANT: If you select option (B), you must complete the following table in which you list any permit terms for which compliance was intermittent during the permit for the reporting period covered by this Compliance Certification.

Source Name: Indiana Harbor Coke Company L.P. -- contractor of Arcelor Mittal Steel
 - Indiana Harbor East Source Permit Number: T089-36982-00382

Permit Term/ Condition	Description of Permit Condition	*Method Codes	Report Date/Comments
D.1.6(a)(4)	Fugitive PM Emissions	VE INSP RR	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020
D.1.13(b)	Particulate Matter Control	RR RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020
D.1.4 (a)	Lead Limitation	Calc RR	EOR submitted May 30, 2019
D.1.15	Duct Temperature	RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020
E.2.2(c)	NESHAP - Door Leaks	WP RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020 1 st Half Semiannual Compliance Certification submitted on July 30, 2019 Revised report submitted on January 29, 2020 2 nd Half Semiannual Compliance Certification submitted on January 29, 2020

E.2.2(c)	NESHAP – Common Tunnel Pressure	WP RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020 1 st Half Semiannual Compliance Certification submitted on July 30, 2019 Revised report submitted on January 29, 2020 2 nd Half Semiannual Compliance Certification submitted on January 29, 2020
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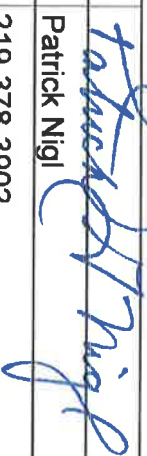
Method Codes:

Monitoring methods: CEMS = continuous emissions monitoring system; COMS = continuous opacity monitoring system; ST = stack test; VE = visible emissions; RK = record keeping; RR = review of records; MB = mass balance; EF = emissions factor; Insp = inspections; FA = fuel analysis; WP = work practice; PM = parametric monitoring; Calc = calculations; O = other (specify in Comments)

For Part 70 sources: The submittal by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

For FESOP sources: The notification which shall be submitted by the Permittee requires the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:		Title/Position:	General Manager
Printed Name:	Patrick Nigl	Date:	April 14, 2020
Phone number:	219-378-3902	Email Address:	pignigl@suncoke.com

PLEASE NOTE: YOU MUST EITHER SIGN THIS FORM OR ATTACH THE CERTIFICATION FORM INCLUDED IN YOUR PERMIT.



SunCoke Energy™

SunCoke Energy, Inc.
3213 Walling St
MC 2-900
East Chicago, IN 46312
219-378-3900 Phone
219-397-4590 Fax

April 14, 2020

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204 – 2251

RE: Annual Compliance Certification – Permit No. T089-36982-00382

To whom it may concern:

In accordance with the general reporting requirements established in Condition B.9(a) of T089-36982-00382, (Part 70 Operating Permit Renewal No. T089-36982-00382), attached you will find Indiana Harbor Coke Company's (IHCC) Part 70 Operating Permit Annual Compliance Certification for the reporting period from January 1, 2019 to December 31, 2019. If you have any questions regarding this report, please contact me at (219) 378-3903 or at nestrada@suncoke.com.

Sincerely,

Nancy Estrada
Environmental Engineer

cc:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch-Indiana (AE-17J)
77 Jackson Boulevard
Chicago, IL 60604-3590

Attachments:

Part 70 Operating Permit - Annual Compliance Certification Report for 2019

PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION

This form can be used to satisfy the annual compliance certification requirements for Part 70 sources under 326 IAC 2-7-5, 326 IAC 2-7-6(5)(C) and FESOP sources under 326 IAC 2-8-5(a)(1)(C).

SOURCE INFORMATION				
(1) Source name:	Indiana Harbor Coke Company L.P. – contractor of Arcelor Mittal Steel – Indiana Harbor East			
(2) Source address:	3210 Watling Street, MC 2 – 990			
(3) City:	East Chicago	(4) State:	Indiana	(5) Zip code: 46312
(6) Mailing address: (if different from above)	3210 Watling Street, MC 2 – 990			
(7) Mailing City:	East Chicago	(8) Mailing State:	Indiana	(9) Mailing Zip code: 46312
(10) Permit numbers:	T089-36982-00382	(11) Reporting Period:	January 1, 2019 to December 31, 2019	
(12) Contact person:	Nancy Estrada	(13) Email Address:	nestrada@suncoke.com	
(14) Phone number:	219-378-3903	(15) Fax number:	219-397-4590	
(16) Comments:				

SOURCE COMPLIANCE INFORMATION

(17) CHECK THE BOX NEXT TO EITHER (A) OR (B) BELOW. (The terms "continuous compliance" and "intermittent compliance" are defined on the Definitions page).

(A) This source was in CONTINUOUS COMPLIANCE with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit.	
(B) This source was in CONTINUOUS COMPLIANCE with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit, except for the terms and conditions listed in the following table for which the source reported intermittent compliance.	X

IMPORTANT: If you select option (B), you must complete the following table in which you list any permit terms for which compliance was intermittent during the permit for the reporting period covered by this Compliance Certification.

Source Name: Indiana Harbor Coke Company L.P. – contractor of Arcelor Mittal Steel Source Permit Number: T089-36982-00382
 – Indiana Harbor East

Permit Term/ Condition	Description of Permit Condition	*Method Codes	Report Date/Comments
D.1.6(a)(4)	Fugitive PM Emissions	VE INSP RR	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020
D.1.13(b)	Particulate Matter Control	RR RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020
D.1.4 (a)	Lead Limitation	Calc RR	EOR submitted May 30, 2019
D.1.15	Duct Temperature	RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020
E.2.2(c)	NESHAP – Door Leaks	WP RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020 1 st Half Semiannual Compliance Certification submitted on July 30, 2019 Revised report submitted on January 29, 2020 2 nd Half Semiannual Compliance Certification submitted on January 29, 2020

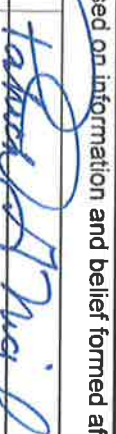
E.2.2(c)	NESHAP – Common Tunnel Pressure	WP RK	1 st Quarterly Deviation Report, submitted April 29, 2019 Revised report submitted on January 29, 2020 2 nd Quarterly Deviation Report, submitted July 30, 2019 Revised report submitted on January 29, 2020 3 rd Quarterly Deviation Report, submitted on October 30, 2019 Revised report submitted on January 29, 2020 4 th Quarterly Deviation Report, submitted on January 29, 2020 1 st Half Semiannual Compliance Certification submitted on July 30, 2019 Revised report submitted on January 29, 2020 2 nd Half Semiannual Compliance Certification submitted on January 29, 2020
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Method Codes:
 Monitoring methods: CEMS = continuous emissions monitoring system; COMS = continuous opacity monitoring system; ST = stack test; VE = visible emissions; RK = record keeping; RR = review of records; MB = mass balance; EF = emissions factor; Insp = inspections; FA = fuel analysis; WP = work practice; PM = parametric monitoring; Calc = calculations; O = other (specify in Comments)

For Part 70 sources: The submittal by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

For FESOP sources: The notification which shall be submitted by the Permittee requires the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:		Title/Position:	General Manager
Printed Name:	Patrick Nigl	Date:	April 14, 2020
Phone number:	219-378-3902	Email Address:	pignigl@suncoke.com

PLEASE NOTE: YOU MUST EITHER SIGN THIS FORM OR ATTACH THE CERTIFICATION FORM INCLUDED IN YOUR PERMIT.

Attachment C
List of Lightning Stand-downs

Date	Lightning Stand Down Start Time	Lightning Stand Down End Time
10/2/2019	23:50	1:07
10/11/2019	0:18	1:33
1/10/2020	22:40	23:10
3/9/2020	05:43	06:21
03/28/2020	01:24	01:54
3/28/2020	06:07	08:10

Attachment D

List of Coke Oven Leaks Caused by High Winds

Battery	Oven	Leak Location	Date	Time Noticed	Time Ended	Duration (hours:min)	Wind Dir	Wind Speed (mph)	High Winds?
A	2	Push Side Door	3/20/2020	7:25 AM	8:00 AM	0:35	N	25	Y
C	26	Push Side Door	3/30/2020	6:30 AM	8:35 AM	2:05	W	17	Y
C	36	Push Side Door	3/30/2020	6:30 AM	8:35 AM	2:05	W	17	Y

Attachment E
Daily Bypass Venting Percentages

Date	Daily
10/1/2019	7.35
10/2/2019	7.35
10/3/2019	7.38
10/4/2019	7.18
10/5/2019	5.87
10/6/2019	7.35
10/7/2019	8.32
10/8/2019	10.07
10/9/2019	9.70
10/10/2019	9.76
10/11/2019	9.93
10/12/2019	12.50
10/13/2019	10.00
10/14/2019	9.51
10/15/2019	13.08
10/16/2019	9.86
10/17/2019	9.79
10/18/2019	11.05
10/19/2019	9.70
10/20/2019	9.70
10/21/2019	13.71
10/22/2019	12.70
10/23/2019	9.70
10/24/2019	7.66
10/25/2019	3.45
10/26/2019	3.46
10/27/2019	3.45
10/28/2019	4.53
10/29/2019	3.45
10/30/2019	4.62
10/31/2019	6.18
11/1/2019	6.18
11/2/2019	6.18
11/3/2019	6.18
11/4/2019	5.59
11/5/2019	3.55
11/6/2019	1.28
11/7/2019	2.05
11/8/2019	1.13
11/9/2019	1.10
11/10/2019	1.45
11/11/2019	1.12
11/12/2019	2.61
11/13/2019	3.30
11/14/2019	4.42
11/15/2019	2.04
11/16/2019	1.17
11/17/2019	1.10
11/18/2019	1.10
11/19/2019	1.10
11/20/2019	1.30
11/21/2019	1.10
11/22/2019	1.10
11/23/2019	1.10
11/24/2019	1.18
11/25/2019	1.12
11/26/2019	2.93
11/27/2019	1.61
11/28/2019	1.10
11/29/2019	2.23
11/30/2019	2.94
12/1/2019	2.94
12/2/2019	2.94

12/3/2019	2.94
12/4/2019	2.94
12/5/2019	2.94
12/6/2019	8.82
12/7/2019	2.94
12/8/2019	2.94
12/9/2019	2.94
12/10/2019	7.06
12/11/2019	8.82
12/12/2019	10.95
12/13/2019	9.60
12/14/2019	9.19
12/15/2019	9.27
12/16/2019	9.19
12/17/2019	9.19
12/18/2019	8.91
12/19/2019	7.46
12/20/2019	6.35
12/21/2019	6.25
12/22/2019	6.25
12/23/2019	6.25
12/24/2019	6.25
12/25/2019	6.25
12/26/2019	6.25
12/27/2019	6.25
12/28/2019	5.04
12/29/2019	0.00
12/30/2019	1.96
12/31/2019	9.51
1/1/2020	11.35
1/2/2020	11.31
1/3/2020	7.62
1/4/2020	6.25
1/5/2020	6.25
1/6/2020	6.25
1/7/2020	6.25
1/8/2020	6.25
1/9/2020	6.32
1/10/2020	6.27
1/11/2020	6.25
1/12/2020	6.25
1/13/2020	6.25
1/14/2020	6.26
1/15/2020	6.25
1/16/2020	6.25
1/17/2020	6.25
1/18/2020	6.25
1/19/2020	5.33
1/20/2020	0.00
1/21/2020	4.56
1/22/2020	6.64
1/23/2020	6.26
1/24/2020	6.31
1/25/2020	6.29
1/26/2020	6.25
1/27/2020	6.25
1/28/2020	6.25
1/29/2020	6.26
1/30/2020	6.25
1/31/2020	6.25
2/1/2020	6.32
2/2/2020	6.25
2/3/2020	6.34
2/4/2020	6.25

2/5/2020	6.43
2/6/2020	6.29
2/7/2020	4.57
2/8/2020	0.00
2/9/2020	0.00
2/10/2020	4.66
2/11/2020	6.25
2/12/2020	6.25
2/13/2020	6.25
2/14/2020	6.25
2/15/2020	6.25
2/16/2020	6.25
2/17/2020	6.25
2/18/2020	6.25
2/19/2020	6.25
2/20/2020	6.25
2/21/2020	6.36
2/22/2020	6.25
2/23/2020	6.25
2/24/2020	6.25
2/25/2020	6.25
2/26/2020	6.25
2/27/2020	6.36
2/28/2020	6.25
2/29/2020	6.25
3/1/2020	6.25
3/2/2020	6.58
3/3/2020	9.54
3/4/2020	12.50
3/5/2020	12.53
3/6/2020	12.50
3/7/2020	11.81
3/8/2020	6.29
3/9/2020	6.25
3/10/2020	6.27
3/11/2020	6.36
3/12/2020	6.25
3/13/2020	6.25
3/14/2020	6.27
3/15/2020	6.25
3/16/2020	6.25
3/17/2020	6.37
3/18/2020	6.25
3/19/2020	6.31
3/20/2020	12.32
3/21/2020	12.50
3/22/2020	12.50
3/23/2020	12.50
3/24/2020	12.50
3/25/2020	11.72
3/26/2020	15.89
3/27/2020	12.68
3/28/2020	6.28
3/29/2020	6.25
3/30/2020	6.25
3/31/2020	6.25