Indiana Harbor Coke Company, L.P.

PREVENTIVE MAINTENANCE

AND OPERATION PLAN

(PMO Plan)

January 2019

List of Acronyms

САР	Compliance Assurance Plan
CCR	Central Control Room
C/S	Coke Side
CUI	Corrosion Under Insulation
DCS	Distributed Control System
dP	Differential Pressure
EAM	Enterprise Asset Management
ETS	Emission Tracking Software
H ₂ O	Water
HRSG	Heat Recovery Steam Generator
IDEM	Indiana Department of Environmental Management
IHCC	Indiana Harbor Coke Company, L.P.
IHCC Air Permit	Title V Permit 089-36826-00382 and its subsequent revisions, renewals, and any modifications
IR	Infrared Thermography
MOC	Management of Change
MWP	Maintenance Work Process
NESHAP	National Emission Standards for Hazardous Air Pollutants
O ₂	Oxygen
PCM	Pushing/Charging Machine
PM	Preventive Maintenance
PM Emissions	Particulate Matter emissions
P/S	Push Side
PMO Plan	Preventive Maintenance and Operation Plan
RCFA	Root Cause Failure Analysis
SO ₂	Sulfur Dioxide
USEPA	United States Environmental Protection Agency
40 CFR	Title 40 of the Code of Federal Regulations
VM	Volatile Matter

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I. INTRODUCTION

This document serves as the Preventive Maintenance and Operation Plan (PMO Plan) for Indiana Harbor Coke Company, L.P. (IHCC), which has been prepared to ensure compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) and with Title V Operating Permit No. 089-36826-00382 and its subsequent revisions, renewals, and any modifications (IHCC Air Permit).

The PMO Plan has been developed pursuant to a Consent Decree with the United States and the State of Indiana, which was entered in the United States District Court for the Northern District of Indiana with an Effective Date of 10/25/2018 (Consent Decree).

All employees of IHCC, as well as contractors and subcontractors, shall follow the guidelines detailed in this plan.

II. PURPOSE OF THE PMO PLAN

IHCC's PMO Plan shall have the goal of minimizing Coke Oven Leaks through the proper operation and integrity of the facility's oven maintenance program as well as compliance with limits and requirements established in the Consent Decree. The purposes of the PMO plan are to:

- 1. Set forth a plan to implement enhanced maintenance and operation of IHCC's Rebuilt Ovens.
- 2. Provide that IHCC operates and maintains its control systems, affected sources, and monitoring equipment in a manner consistent with safety and with good air pollution control practices and minimization of emissions as required by the Consent Decree and the IHCC Air Permit, and regulations promulgated under the CAA.
- 3. Provide procedures for maintenance and operation in order to minimize emissions at the facility from Coke Oven Leaks.

IHCC shall comply with the PMO Plan at all times.

III. DEFINITIONS

- a) Definitions used in this PMO Plan that are specific to individual steps of coke production:
 - 1. <u>Battery</u>: IHCC has four batteries denoted A, B, C, and D; Each Battery includes multiple banks of 16 or 17 Ovens.
 - 2. <u>Bypass Vent Stack</u>: each vent stack located between the Coke Oven battery common tunnel and each Heat Recovery Steam Generator (HRSG).
 - 3. <u>Bypass Venting</u>: the redirection of a flue gas stream through the Bypass Vent Stacks directly to the atmosphere for any reason. Bypass Venting through a Bypass Vent Stack commences when a Bypass Vent Stack lid opens and continues until the Bypass Vent Stack lid closes.
 - 4. <u>Bypass Venting Incident</u>: all Bypass Venting that results in an exceedance of the Consent Decree's or the IHCC Air Permit's 19% daily bypass venting limit.
 - 5. <u>Bypass Venting Percentage</u>: the venting as tracked through the Emissions Tracking System (ETS), which tracks the percentage of Bypass Venting in daily and 3-hour block averages.
 - 6. <u>Coal Sulfur Content or Sulfur Content</u>: the elemental composition of sulfur in coal by weight as determined by methods approved in the IHCC Air Permit.
 - 7. <u>Coke Oven or Oven</u>: any heat recovery oven at Batteries A, B, C, or D.
 - 8. <u>Coke Oven Door Leak</u>: emissions during a Coking Cycle from a Coke Oven door that do not comply with Title 40 of the Code of Federal Regulations (40 CFR) §63.303(b)(1) or (c)(2).
 - 9. <u>Coke Oven Leak or Leak</u>: any Coke Oven Door Leak or Crown Opacity. Visible emissions that occur during a Lightning Stand-Down shall not be considered a Coke Oven Leak for purposes of the PMO Plan provided the visible emissions do not continue for longer than 15, 30, or 45 minutes, as applicable, after the Lightning Stand-Down is over. The actions required in response to a Coke Oven Leak, per the Consent Decree, begin January 1, 2019 and continue until the Consent Decree is terminated.
 - 10. <u>Coke Oven Leak Root Cause Failure Analysis (RCFA) Trigger Level or RCFA Trigger Level</u>: is either (a) when an oven experiences Coke Oven Leaks in two consecutive Coking Cycles, or (b) when an oven experiences Coke Oven Leaks in four or more Coking Cycles in a calendar month. Leaks that result from operator error (e.g., failure to open dampers, close sole flues when a leak is detected, etc.) shall not count in determining whether the Root Cause Failure Analysis (RCFA) Trigger Level has been reached.
 - 11. <u>Coke Oven Root Cause Failure Analysis or Coke Oven RCFA</u>: an assessment conducted to determine the primary cause and any contributing cause of triggering a Coke Oven Leak RCFA Trigger Level.
 - 12. <u>Coking</u>: the process where coal that has been placed in a Coke Oven undergoes destructive distillation to produce coke.
 - 13. <u>Coking Cycle</u>: the time that begins after the Oven has been charged with coal and both doors have been placed on the Oven and ends when a door is removed.

- 14. <u>Coking Operations</u>: IHCC's operation of Coke Ovens and other coking equipment.
- 15. <u>Crown Opacity</u>: emissions during a Coking Cycle from a Coke Oven crown that causes at least 20% opacity for three (3) minutes using USEPA Method 9. IHCC has the option to use USEPA Alternative Method 082 in lieu of USEPA Method 9.
- 16. <u>Distributed Control System (DCS)</u>: a computerized system that provides visibility and control to various measurements and aspects of the IHCC facility.
- 17. <u>Lightning Stand-Down</u>: when lightning is within a ten (10) mile radius of the Facility as determined by a third-party weather tracking service, and exposed outdoor work must be stopped in accordance with IHCC's severe weather safety policy. A Lightning Stand-Down is over when an "all-clear" announcement is made after a thirty (30) minute period of no strikes within the ten (10) mile clearance radius in accordance with IHCC's severe weather safety policy.
- 18. <u>Oven Rebuilds</u>: repairing Ovens by removal and replacement of the Oven floor and sole flues and repair of Oven wall cracks.
- 19. <u>Heat Recovery Steam Generator (HRSG)</u>: an energy recovery heat exchanger that recovers heat from a hot gas stream for the purpose of steam generation.
- 20. <u>Rebuilt Ovens</u>: Ovens that have undergone Oven Rebuilds.
- 21. <u>Structural Issues</u>: issues involving the Oven structure (cracks or other damage to walls, floors, or flues; problems with Oven sealing; and/or other problems associated with the Oven structure) that cause Coke Oven Leaks.
- b) Definitions used in this PMO Plan to describe IHCC's systems and processes:
 - 1. <u>Emission Tracking Software (ETS)</u>: the emissions tracking software that is used to track bypass venting (i.e., record the percentage of bypass venting in daily and 3-hour block averages) and main stack emissions and bypass vent stack emissions (SO₂, PM, and lead).
 - 2. <u>Enterprise Asset Management System (EAM)</u>: a computerized asset maintenance system that provides asset management, work management, materials management, and purchasing capabilities to help IHCC maximize productivity and extend the life of its assets. IHCC currently uses IBM MAXIMO ("MAXIMO") as the EAM.
 - 3. <u>Maintenance Work Process (MWP)</u>: the process used at IHCC to efficiently execute maintenance activities on process equipment and facilities.

IV. PREVENTIVE MAINTENANCE

Preventive Maintenance (PM) is the performance of maintenance tasks that either 1) repair or service emission units in accordance with good engineering and air pollution control practices, 2) extend the life of an asset, or 3) detect a potential for unplanned failure. PM is managed within the Enterprise Asset Management (EAM) system. A PM record is a plan to perform periodic work on an asset or group of assets. The EAM system automatically generates certain PM Work Orders at a predetermined time interval to provide a method in which to execute the work in the field. PM tasks can be categorized as safety or environmental critical, which carry a higher scheduling priority than other PMs within the Maintenance Work Process (MWP).

All PMs are housed in the EAM system as described here. PM records contain the relevant information for conducting the PM and ensuring that the objectives described above are met. This may include, but is not limited to, the following: a job plan, the craft of group assigned to execute the task, the frequency for conducting the PM, a list of specific tasks that should be performed, a list of specific parameters that should be met, a list of equipment or tools necessary to conduct the PM, requirements for data collection or observations, and/or the location of the equipment to be serviced. PMs are updated as equipment or needs change or additional PMs are identified. Since the most current and up to date list of all PMs resides in the EAM system, a list is not included in this PMO Plan. An example list of environmental critical PMs is included as Attachment A – Example List of Environmental Critical PM. The current and up-to-date list of PMs is maintained in the EAM system; this PMO Plan will not be updated to reflect changes to the Environmental Critical PM list.

A completed PM record contains the statement of work (job plan), the name of the person or group who executed the PM task, and the date the PM was performed. Results of PM inspections may be reviewed for technical content and potential follow up actions by the Maintenance Planner. Paper copies of completed environmental critical PM work orders may be routed to the plant Environmental Manager or Environmental Representative for review. The work order closure process flow is included as Attachment B – PM Workflow Process.

V. QUARTERLY INTERNAL AND EXTERNAL OVEN HEALTH INSPECTIONS (CONSENT DECREE IV.D.23.a.i.)

Quarterly internal and external oven health inspections will be conducted by trained inspectors to assess the current state of each oven, following documented oven inspection procedures and recommended repairs. Employee training for the quarterly inspections is described in Section X.

The oven sole flue, oven mechanical, oven chamber, and oven refractory exterior, or crown area, inspections will be conducted, internally, on a quarterly basis following documented procedures, as described in Section V of this Plan and in accordance with checklists included as Attachments C, D, and E. Summary forms are maintained that documents any findings, which also include findings from additional inspections including the Infrared Thermography (IR) Scan, Oven Door Inspections, Damper Block Inspections, and Declinker Inspections. These findings will be reviewed by SunCoke personnel to determine whether action is required for each particular finding or whether a finding will simply continue to be monitored. Personnel designated to monitor and assess oven health will hold regular meetings to discuss changes to oven inspection procedures and scheduling. Any future revisions to the following summarized inspection procedures are documented within their respective revision logs.

General size definitions for various oven conditions identified in oven health inspections are summarized in Table 1. Repairs are also dependent on the location of the erosion and cracks within the coke oven. This table is for example purposes only.

Oven Condition Description	Size Definition	Repairs	
Minimum or Small	· $\frac{1}{4}$ " – $\frac{1}{2}$ " wide; no gas flow leaking	 Silica weld the crack 	
Erosion/Cracks	through crack		
• Moderate Erosion/Cracks	 ½" – 1" wide; small gas flow 	 Silica weld the crack 	
	leaking through crack	· Shica weld the crack	
		 Silica weld the crack to allow 	
· Severe Erosion/Cracks	 Large enough for material 	for planning of rebricking of	
	(coal/coke) to pass through crack	wall, then rebrick cracked	
		area.	
· Debris in Sole Flue	 Range from 0%, 25%, 75%, and 	 Cleanout blockage >50%, 	
	100% blockage	weather permitting	

Table 1. Summary of General Oven Condition Erosion/Crack/Blockage Size Definitions

A. Sole Flue Inspection

The sole flue inspection program is designed to evaluate the condition of the sole flue chambers at IHCC. The sole flue chambers are responsible for containing and promoting the combustion process as the volatile matter (VM) begins to burn off in the oven during the coking process. These chambers are comprised of a series of expansion joints and various silica brick shapes that come together to form four (4) gas passageways. These gas passageways carry the flue gas to the uptake portions of the oven and promote floor heating to assist in the coking process.

The sole flue inspection is completed on both the push and coke sides of the ovens where either a damper or an inspection brick is present. The inspection brick of the desired oven is removed to begin the inspection. The conditions observed during the inspection are recorded for further analysis to

determine whether any repairs may be necessary or whether there are items that require continued monitoring. Findings are summarized in a form, as Attachment C – Oven Health Inspection Summary Form – Sole Flue. The following is an example list of conditions that are checked during the inspection:

- Pinched/Slipped/Flattened Rings or Arches
- Drops or Debris in Sole Flue (i.e. Fallen Brick)
- Sole Flue Wall Damage (i.e. Cracks)
- Sole Flue Melt/Overheating
- Cracks and Signs of Air Leakage on the Sole Flue Floor (i.e. Black Lines)
- Previous Silica Weld Repair Condition
- Broken Sole Flue Damper Support and/or Damage

Repair designations and suggestions for repair timing for identified sole flue damage resulting from this inspection are summarized below. All sole flue repairs shall be completed as soon as practicable. If any sole flue repair is not completed within 120 days, then IHCC shall document the reasons for the delay.

- Minimum a small crack, nearly superficial and will be monitored for future expansion. Little to no debris in sole flue.
- Moderate the crack has observed gas passing through the crack and now requires action. Welding is recommended. Debris blocks sole flue approximately 50%, clean out should be reviewed.
- Severe The crack is allowing material to pass through and repairs are needed as soon as practical. Debris in sole flue requires clean out.

B. Mechanical Inspection

The mechanical inspection program is a system designed to capture damage to key mechanical components of IHCC's coke ovens, summarized below. These components help maintain the refractory integrity of the oven during thermal cycling and ensure that proper tension and sealing is maintained for optimal oven performance.

I. Visible Components

The mechanical inspection is completed on both the push and coke sides of the ovens, as well as top and bottoms of the ovens. The entire coke oven, including but not limited to the following equipment, will be checked during the inspection:

- Buckstays
- Tie Rods (Both Top and Bottom) spring assemblies
- Sill Beams
- Lintels

- Doors
- Jamb Plates
- Battery Benches
- Oven Door
- Sole Flue End Wall Beam
- Sole Flue Damper Pipe

Conditions observed during the inspection, summarized in Table 2 below, are recorded for further analysis to determine whether any repairs may be necessary or whether there are items that require continued monitoring. This table is for example purposes only. Findings, such as Minimum, Moderate, and Severe repair requirements, are summarized in a form, as Attachment D – Oven Health Inspection Summary Form – Mechanical.

- II. Non-visible components
- Downcomers and upcomers
- Underneath walls

Non-visible portions of the oven, which include downcomers, upcomers, and underneath the walls, cannot be inspected directly. However, issues related to these areas may be inferred based on damage in visible areas of the oven, such as damage to adjacent airspace beams next to the wall or cracks in the wall of the oven. Conditions observed during the monitoring of visible components will be recorded and analyzed to determine whether maintenance or repairs on non-visible components will be necessary following inspection or at a later date.

Component List	What to Check	Condition(s)	
(Items and equipment to be	(Detailed list of what must be	(List of conditional states of	
checked under each task)	completed under each task)	deterioration)	
	• Тор	 Twisted, bowed, plumb, machinery contact 	
• Buckstay	· Middle	 Gaps between refractory wall and buckstay 	
	· Bottom	 Attached to foundation, corrosion 	
 Tie Rod Assembly (top and bottom) (left and right) 	· Spring	 Compressed/relaxed spring, missing spring 	
	· Nut/bridle	 Broken spring/tie rod, 2010 design or original 	
		 Bent or twisted spring assembly 	
	· Clean for proper air flow	· Air space open	

 Table 2. Summary of Conditions in Mechanical Oven Health Inspection

· 8" or 12" support beam	· Original position or spacing	 Structural integrity and corrosion 	
(between slab and pad)	· Deteriorated/structural integrity	 Warped, thinned, elastic collapse 	
	 Signs of overheating – discoloration, flame during charge 	 Verify brackets are installed to secure lintel 	
• Lintel	· Deterioration/gaps in refractory	 Burnt, leaking – air infiltration 	
	Correct position	 Lintel dropped or uneven 	
• Jambs	 Check for separation between refractory and jamb plate 	· Deterioration, spalling	
	 Separation between jamb and buckstay 	· Sill plate out of position	
	 Check for overheating 	 Material is warped 	
	Bottom sill plate	 Sill plate out of position 	
	Broken/cracked jamb	Deterioration	
	 Check structural for alignment 	 Broken, cracked refractory 	
· End wall	 Check for brick displacement or deformity 	• Bulging sections of brick	

C. Oven Chamber Inspection

The oven chamber inspection program is designed to evaluate the condition of the coking chamber at IHCC. The coking chamber is responsible for holding the coal charge, sustaining and containing the phase change, and releasing H_2O and VM from the coal bed. The inspection process is based on the use of photography and the comparison of photos between inspections. The oven chamber inspection is completed by taking photographs of the oven, after it has been pushed out, from the pusher side.

The following lists conditions that will be checked for during the inspection, reviewed in the photographs, and are triggers for repairs:

- Wall Cracks at Uptakes and Down Comers
- Failed Down Comer Arches
- Damaged Crown Arches
- Wall Holes/Erosion
- Damaged Refractory on Lintels/Side Jambs
- Loose or Fallen Crown Brick
- Cracks in Oven Walls (where flame is passing through cracks in oven walls)
- Floor Holes
- Carbon Thickness
- Pusher Side Sill

Repair designations and suggestions for repair timing for identified damage resulting from this inspection are summarized below:

- Minimum a small crack, nearly superficial and shall be monitored for future expansion.
- Moderate the crack has observed gas passing through the crack and now requires action. Welding is recommended.
- Severe The crack is allowing material to pass through and repairs are needed as soon as practical.

Findings are summarized in a form, included as Attachment E – Oven Health Inspection Summary Form – Oven Chamber. All photos are maintained electronically for future comparison and in accordance with recordkeeping requirements.

D. Oven Refractory Exterior Inspection

The oven refractory exterior inspection, which includes the oven crown area inspection, is completed on top of the ovens on both the push and coke sides of the ovens. Findings are summarized in a form, included as Attachment E – Oven Health Inspection Summary Form – Oven Chamber.

Repair designations and suggestions for repair timing for identified exterior refractory repair resulting from this inspection are summarized below:

- Minimum a small crack, nearly superficial and will be monitored for future expansion.
- Moderate the crack has observed gas passing through the crack and now require action. Patching is recommended.
- Severe The crack is allowing gaseous material to pass through and may cause bricks to fall out; repairs are needed as soon as practical.

1. Oven Crown

The oven crown is a combination of ceramic wool, and gunnite. Multiple layers are utilized to better insulate the oven silica brick and help maintain a steadier change in thermal cycling as the refractory proceeds through the coking process. During the inspection, the following is examined:

- Cracking and/or Hooved-Up Gunnite (with a focus at inspecting the lintel plate area of both the coke side (C/S) and push side (P/S))
- Evidence of Flames
- Smoke or Escaped Emissions
- Interface at the Lintel and Crown Brick

2. End Walls and Buttress Walls

The oven end walls contain the sole flue dampers and inspection bricks. The following are examined during the inspection:

- Spalling of Face Brick
- Erosion
- Glowing Cracks within Brick Mortar
- Damaged or Missing Face Brick
- Leakage Behind Sill Beam and Sole Flue Area

3. Center Jambs

Jambs provide sealing along the sides of the door and translate pressure from the buckstay to the silica brick oven walls. Any discoloration and signs of smoke in the areas of the center jambs are noted.

E. Infrared Thermography (IR) Scan

Infrared thermography (IR) is the condition-monitoring tool utilized to trend external metal temperatures of refractory lined equipment using an IR camera. IR can be used to identify areas where the refractory lining is exhibiting signs of deterioration. All data obtained during the examination will be evaluated to determine if repairs are necessary, and if not, based on their relevancy, be put on a monitoring schedule.

The IR inspection applies to refractory lined equipment at IHCC summarized below:

- Common Tunnels
- Vent Stacks
- Crossover Ducts

Upon completion of the IR inspection and data evaluation, areas showing indications of refractory deterioration, as indicated by "hot spots" that show higher temperature readings during the IR scan, shall be prioritized for repairs or subsequent inspections based on the observed temperature of the "hot spots."

F. Oven Door Inspections

Oven doors provide an access portal to the coking oven chamber. Its primary focus is to retain heat through a refractory insulating castable attached shape and latch securely to the oven buckstay. The door is constructed to provide a good sealing area between the lintel plate, jamb plate, and door sealing edge. The doors, lintels, and jambs are key components to maintain heat, reduce air infiltration, and allow access to the coke chamber for pushing and charging.

External door inspections will be conducted at least quarterly. The oven door inspections provide the necessary information for repair prioritization and work order scheduling.

When viewing the doors, personnel will look for holes, overheating, latches and their positions, sill beam position, damper functionality and integrity, and warping/bowing. In addition, personnel will note if gas lances are installed, if there are missing latches, and if the ceramic wool is missing or intact.

Findings are summarized in a form, included as Attachment D – Oven Health Inspection Summary Form – Mechanical.

G. Damper Block Inspections

Damper Block Inspections will be utilized to evaluate and understand the condition of the damper blocks. The uptake dampers are comprised of lightweight materials that are vacuum bonded to the desired shape or are pre-cast refractory shapes. These dampers are actuated using an air cylinder and controlled via computer system. The Damper Block Inspections determine whether any repairs are needed to the uptake areas, as identified by a stuck damper block or a broken damper block that negatively impacts uptake functionality. Areas inspected include the presence and integrity of the damper block currently installed as well as the functionality of their respective air cylinder.

Damper Block inspections are conducted at least quarterly with results of the inspection documented within the work order, for review, following the PM workflow process.

H. Declinker Inspections

Declinker Inspections are utilized to evaluate the level of built-up carbon material called "clinker" on the floors of Coke Ovens. This inspection determines whether a coke oven needs to undergo a declinker process and can include a measurement for the amount of carbon "clinker" present in the coke oven. Findings are summarized in a form, included as Attachment E – Oven Health Inspection Summary Form – Oven Chamber.

Declinker Inspections are conducted at least annually.

VI. PROCEDURES FOR REPAIRS RESULTING FROM COKE OVEN HEALTH INSPECTIONS

Depending on the results of the inspections previously summarized, various parts of the coke ovens may require routine maintenance and repairs. Any issues discovered during the inspection will be documented in their respective summary forms, following the PM Workflow Process, and are included as Attachment C – Oven Health Inspection Summary Form – Sole Flues. Table 3 provides an example summary of typical recommended coke oven repairs from oven health inspections. This table is for example purposes only; this PMO Plan will not be updated to reflect changes to this table.

Title	Trigger for Repair	Recommended Repairs		
Ceramic Wool Repair	Poor/Missing Ceramic	Repair/Replace Ceramic Wool		
	Wool			
Limit Switches Reset	Limit Switches Not	Reset Limits		
	Accurate			
Insufficient Common	Common Tunnel Pressure	Raise Draft		
Tunnel Pressure	Causing Low Draft			
Blocks Stuck-Build-up	Blocks Stuck-Build-up in	Clean Tracks		
in Tracks	Tracks			
Lintel Repair	Bad Lintel	Patch and Schedule Repair		
Cam Bolts Replacement	Missing Cam Bolts	Replace Cam Bolts		
Door/Refractory	Bad Door/Missing	Replace Door		
Blocks Replacement	Broken Blocks	Replace Blocks		
Restore Power to Unit	No Power to Unit	Restore Power		
Changing Damper Block	Cracking, Missing, or	Repair/Replace Damper Block		
	Drifting from Set Positions			
Hot Patch Door	Hot Spots	Patch the refractory		
Insulating the Crown	Damaged Crown Arches, Loose or Fallen Crown Brick	Replace the Ceramic Wool and/or Brick		
Declinkering Ovens	Carbon Build-Up	With the Oven Empty, Use the Pusher Ram, According to Procedures, and Scrape Away Built Up Clinker		
Ceramic Welding Repair	Cracked Refractory Brick	Fill Cracks/Holes via Ceramic Welding		

Table 3. Summary of Typical Oven Adjustments and Repairs

The list of recommended repairs is updated and revised based on operating experience with the most up-to-date version is maintained physically and/or electronically on IHCC's servers, as required. The current list of recommended repairs is available for inspection on-site upon request. Additional detail for more common coke oven repairs are summarized in the following subsections:

1. Repair Procedure for Changing a Coke Oven Uptake Damper Block

This repair procedure summarizes an example method for removal and replacement of the uptake damper block, performed after identifying necessary repairs from an inspection. The repair procedures for the uptake damper blocks on the P/S and the C/S of the oven are identical. If an oven has multiple damper blocks stacked, the bottom top is removed first, followed by the middle and bottom blocks. Otherwise, the single damper block is removed and replaced as a single piece. Removal is done using a block ladder, a device that the block can roll along saving the workers from the strain of the full weight

of the block. If all of the blocks need to be removed, it is recommended to inspect and clean the transition slide while access is readily available. The new uptake damper blocks are replaced into the slide using the block ladder and inspected by raising and lowering the slide to ensure the uptake functions properly.

2. Repair Procedure for the Hot Patch of a Coke Oven Door

This repair procedure summarizes an example method for hot patching a door, the purpose of which is to quickly and efficiently repair the coke oven door refractory. With the door rack on the loader bucket, the respective access procedures for the P/S and C/S are followed, as applicable. With the top latches slid in and the cams removed, the damaged door is removed and a new door is installed. For the P/S only, the oven belt must be running. The damaged door requiring a hot patch is then removed from the door rack and laid down with the material side up. Forms are placed on the areas that require patching. After the area is patched, the area is then covered with ceramic wool. After drying, the door is then set back in the rack or reinstalled onto the coke oven. Other methods may be used for hot patching a coke oven door, as appropriate, such as having coke oven doors repaired by a third party.

3. Repair Procedure for Insulating the Coke Oven Crown

This repair procedure summarizes an example method for insulating the crown on both the C/S and P/S of the coke oven, the purpose of which is to prevent or reduce air leakage at the oven crown area, ultimately minimizing Coke Oven Leaks. When an area is identified for repair, sealant is injected for repair or the existing insulation is removed and replaced with new insulation to reseal the area.

4. Repair Procedure for Declinkering Coke Ovens

This repair procedure summarizes an example method for declinkering ovens or carbon removal. Clinker is the eventual carbon buildup on the floors of coke ovens. An average coke oven should be declinkered approximately every 3-4 years. However, depending on the average charge weights and operating temperatures, the process may need to be completed earlier in the 2-3 year range.

An oven selected for declinkering is pre-inspected for possible wall welding requirements and sole flue arch conditions, and is then pushed empty. Oven temperature is closely monitored by the Product Technicians/Burners during this time. When the oven is ready for declinkering, the PCM pushing ram is eased into the oven for declinkering so that the ram head catches the buildup on the bottom of the floor. The process may be repeated several times as needed. Other methods may be used, as appropriate, in the process of declinkering.

Upon successful declinkering, the oven is then returned to production by "stepping" up the charge weights to minimize charges sticking to the floor of the oven.

5. Repair Procedure for Ceramic (Silica) Welding for Coke Ovens

This repair procedure summarizes an example method for performing ceramic (silica) welding for refractory cracks identified in a routine oven chamber inspection. Through normal use, a coke oven will develop cracks as the refractory ages.

Refractory cracks are referred to as:

- Minimum a small crack, nearly superficial and will be monitored for future expansion.
- Moderate the crack has observed gas passing through the crack and now required action. Welding is recommended.
- Severe The crack is allowing material to pass through.

The refractory is first prepared for welding by cleaning the refractory of loose rubble and carbon buildup. The ceramic welding is performed following the recommended welding practices, such as filling holes in a progressive and circular motion. Once welding has been completed, the welding area is visually inspected.

VII. QUARTERLY VISUAL INSPECTIONS OF COMMON TUNNEL (CONSENT DECREE IV.D.23.a.ii.)

The common tunnel is a cylindrical pipe, approximately six (6) feet in diameter, which joins oven uptakes on a battery. During the coking process in each oven, flue gas is drawn through the common tunnel using negative pressure generated by Cokenergy or the Bypass Vent Stacks.

An internal inspection of the common tunnel is used to determine if there are any potential blockages. This is done by visually inspecting the common tunnel from each end. In addition to an internal inspection, an external inspection of the common tunnel will be conducted quarterly to determine if there are any holes, or potential holes, and will be scheduled as a PM work order within the EAM system. During the external inspection, the top half of the common tunnel and stacks are scanned with an infrared tool and/or visual inspection.

Additionally, IHCC personnel will review pressure readings reported by the differential pressure (dP) cells in the common tunnel to determine whether any loss of negative pressure could be attributable to potential blockage. The common tunnel dP cell locations are summarized in Section IX of this PMO Plan.

After the inspections, the Oven Repair Supervisor, or equivalent, will make any necessary recommendations for common tunnel cleaning, repair, and/or replacement that affects negative pressure. Common tunnel cleaning, repair, and/or replacement is commenced as soon as practical and documented with generated work orders within the EAM system. Repair procedures for the common tunnel are found in Section VIII of this PMO Plan. An example copy of the common tunnel inspection is included as Attachment F – Common Tunnel Inspection Work Order. Updates to the PM shall be made within the EAM system.

VIII. PROCEDURES FOR REPAIRS RESULTING FROM COMMON TUNNEL INSPECTIONS

1. Repair Procedure for the Hot Patch of the Common Tunnel

The common tunnel is often repaired using a hot patch method. Hot patching can be achieved through windows, or access points, along the common tunnel. In an area where this is not possible, the common tunnel may be separated from the uptakes. After separating the common tunnel from the uptakes, the common tunnel section requiring a hot patch is drilled to pierce the interior refractory, following a predetermined anchor pattern. Once drilled, anchors are inserted and welded to the metal shell. Gunnite material is sprayed along the sides of the tunnel first, working up towards the top. After the gunnite material dries and, upon inspection appears stable, the uptake section is reattached.

This procedure is an example of one method used for repairing the common tunnel, though other methods may be used, as appropriate, such as cutting out and replacing an entire section.

2. Selective Replacement of the Common Tunnel

In the event that repairs of the common tunnel are unsuccessful, selective replacement of sections of the tunnel shall be made, as needed to ensure negative pressure within the common tunnel. The damaged section of the common tunnel is cut out and removed by crane and, a new piece is set into place.

IX. ADDITIONAL COMMON TUNNEL DIFFERENTIAL PRESSURE CELLS (CONSENT DECREE IV.D.23.a.iii.)

Differential pressure (dP) cells are used to ensure that the common tunnel maintains negative pressure during operations. Supplemental to the dP cells previously installed, as of Q1 2018, additional common tunnel differential pressure (DP) cells have been installed at approximately the midpoint between each Bypass Vent Stack on each respective battery. All currently installed common tunnel differential pressure cells are summarized in the following table:

A Battery	B Battery	C Battery	D Battery
North End of A Common	North End of B	North End of C	North End of D
Tunnel	Common Tunnel	Common Tunnel	Common Tunnel
North Side of Stack A1	North Side of Stack B1	North Side of Stack C1	North Side of Stack D1
South Side of Stack A1	South Side of Stack B1	South Side of Stack C1	South Side of Stack D1
Midpoint Between Stacks	Midpoint Between	Midpoint Between	Midpoint Between
A1 and A2	Stacks B1 and B2	Stacks C1 and C2	Stacks D1 and D2
North Side of Stack A2	North Side of Stack B2	North Side of Stack C2	North Side of Stack D2
South Side of Stack A2	South Side of Stack B2	South Side of Stack C2	South Side of Stack D2
End of Common Tunnel,			
South of Stack A2	th of Stack A2 Midpoint Between I		Midpoint Between
End of Common Tunnel,	Stacks B2 and B3	Stacks C2 and C3	Stacks D2 and D3
North of Stack A3			
North Side of Stack A3	North Side of Stack B3	North Side of Stack C3	North Side of Stack D3
South Side of Stack A3	South Side of Stack B3	South Side of Stack C3	South Side of Stack D3
Midpoint Between Stacks	Midpoint Between	Midpoint Between	Midpoint Between
A3 and A4	Stacks B3 and B4	Stacks C3 and C4	Stacks D3 and D4
North Side of Stack A4	North Side of Stack B4	North Side of Stack C4	North Side of Stack D4
South Side of Stack A4	South Side of Stack B4	South Side of Stack C4	South Side of Stack D4
South End of A Common	South End of B	South End of C	South End of D
Tunnel	Common Tunnel	Common Tunnel	Common Tunnel

Table 4. Summary of Common Tunnel dP Cell Locations

The differential pressure readings of the common tunnels, measured continuously, are visible within IHCC's Distributed Control System (DCS). In the event that pressure readings are positive, troubleshooting is performed to identify and correct the cause. These differential pressure cells are calibrated, on a quarterly basis through zero point checks, with additional checks performed as needed.

X. TRAINING OF OPERATORS (CONSENT DECREE IV.D.23.a.iv.)

All IHCC personnel, new employees, and employees transferred to a new job function will be trained for their specific job function and their respective environmental requirements. Training is refreshed on an annual basis for the required personnel. Refresher trainings are completed as needed. Field training may also be used in lieu of classroom training.

IHCC will train responsible personnel, including, but not limited to, Product Technicians/Burners, PCM Operators, and Oven Inspectors, to visually identify Coke Oven Leaks and Coke Oven health indicators. Training provides attendees with examples of Coke Oven Leaks and describes recordkeeping and corrective action requirements. For required IHCC personnel and/or contractors, Method 9 training is conducted by an external third party, in accordance with Method 9 requirements.

A. Product Technicians/Burners

Product Technicians/Burners are internally trained in the proper operation of the oven dampers, including door holes, sole flues, and uptakes, in order to maintain negative pressure in the ovens and common tunnel and optimal coke oven equilibrium, maximizing coke oven life, as well as their environmental requirements. Daily inspections of the oven condition are documented on Attachment I and submitted into the Shift Team Leader or Shift Manager at the end of their respective shift. Product Technicians/Burners are trained to identify a coke oven leak as any visible emissions, such as flames and/or smoke, from any part of the oven outside the door (i.e. buckstays, roof/crown, lintel, etc.). Training regarding coke oven leaks includes:

- P/S of Ovens All door leaks observed at any time during the coking cycle must be corrected within fifteen (15) minutes of identification.
- C/S of Ovens All door leaks under the shed observed at any time during the coking cycle must be corrected within forty-five (45) minutes of identification.
- All Other Coke Oven Leaks (i.e. Crown) All other coke oven leaks, outside the doors, observed from the ground at any time during the coking cycle must be corrected within thirty (30) minutes of identification. If crown leaks exceed thirty (30) minutes, the procedures for Method 9 readings, when applicable, must be followed.

Product Technicians/Burners are trained to properly complete the Coke Oven Checklist and Coke Oven Leak Record Sheet, included as Attachment I. The information record requires the oven number, the leak observed time, the leak end time, the cause (if known), corrective actions implemented to stop the leak, whether or not the leak was caused by adverse wind conditions, and the location of the leak. This form is submitted by the Product Technician/Burner into their respective Team Leader or Shift Manager for review.

Product Technicians/Burners are trained that all observed coke oven leaks must be responded to and properly documented. Training records for all trainees shall be maintained for five years.

B. PCM Operators

PCM Operators are internally trained in the identification and documentation of door leaks observed on their operational pushing report. This includes whether or not a leak was observed, the corrective actions implemented to mitigate and stop the leak, and the terminal time of the leak. Training records for all trainees will be maintained for five years.

C. Oven Inspectors

Oven inspectors utilize internal training to ensure the document inspection procedures are properly followed to ensure all necessary repairs can be identified and adequately made. Initial training shall include a presentation with example images for repair priority designations: minimal, moderate, and severe. This presentation reviews images of each oven component investigated. Meetings among the oven team personnel are held to review previous inspections to ensure sufficient knowledge.

XI. VISUAL INSPECTION OF EACH OVEN EXTERIOR (CONSENT DECREE IV.D.23.a.v.)

On a daily basis, a visual inspection of the exterior ends of the ovens, from the ground, must be made and documented to identify Coke Oven Leaks. Daily inspections, at a minimum, are documented by the Product Technician/Burner and maintained in accordance with record keeping requirements. Utilizing the Coke Oven Checklist and Coke Oven Leak Record Sheet, included as Attachment I, the daily shift inspection record includes the following:

- Inspection of the door and crown for leaks from the P/S of the oven
- Inspection of the door and crown for leaks from the C/S of the oven
- Inspection for leaks outside the shed on the C/S side
- Other comments the Product Technician/Burner may have identified during their visual inspection

In the event that an Oven Leak is observed during the operator's shift inspection, the record information requires the oven number, the leak observed time, the leak end time, the cause (if known), corrective actions implemented to stop the leak, whether or not the leak was caused by adverse wind conditions, and the location of the leak. In the event that adverse wind conditions are the cause of a Coke Oven Leak, the wind speed and direction are documented. This form, included as Attachment J, is submitted by the Product Technician/Burner into their respective Team Leader or Shift Manager for review. An additional oven leak form, used to document Coke Oven Leaks occurring outside of these daily inspections, is included as Attachment H – IHCC Coke Oven Leak Record. These forms are maintained physically and/or electronically, in accordance with recordkeeping requirements.

As part of the daily inspections described in Section XI, operators will also inspect the Oven Crown. In the event that opacity lasting more than 30 minutes is observed at the oven, a Method 9 reading will be performed to determine the opacity, provided conditions identified in Method 9 allow for an observation pursuant to Method 9. Method 9 will be conducted by certified observers, using a third party if practicable. The forms used to record the Method 9 opacity readings are included as Attachment G – Method 9 Inspection Form.

XII. PERIODICALLY CONFIRM METHOD 9 OPACITY READINGS DURING TRAINING (CONSENT DECREE IV.D.23.a.vi.)

In the course of training employees in performing Method 9 opacity readings, USEPA Alternative Method 082 shall be used annually to confirm the Method 9 opacity readings.

IHCC will use a third party "smoke school" to train employees in performing the Method 9 opacity readings. In addition, during training activities, the USEPA Alternative Method 082 may be conducted by the third party "smoke school" using their own equipment to confirm the Method 9 readings conducted by trainees. Any training records, certification forms, and/or inspection forms from the third party "smoke school" will be sent to the Environmental Manager for recordkeeping (either physically or electronically).

XIII. DAILY OPERATION CHECKLIST (CONSENT DECREE IV.D.23.a.vii.)

On a daily basis, an operation checklist, titled Coke Oven Checklist and Coke Oven Leak Record Sheet, and included as Attachment I, is completed by the Product Technician/Burner and maintained in accordance with record keeping requirements. The checklist includes the following:

- Inspection of the door and crown for leaks from the P/S of the oven
- Inspection of the door and crown for leaks from the C/S of the oven
- Inspection for leaks outside the shed on the C/S side
- Other comments the Product Technician/Burner may have identified during their visual inspection

In the event that a Coke Oven Leak is observed during the operator's shift, the record information requires the oven number, the leak observed time, the leak end time, the cause (if known), corrective actions implemented to stop the leak, whether or not the leak was caused by adverse wind conditions (in accordance with the Consent Decree), and the location of the leak. This form, included as Attachment I, is submitted by the Product Technician/Burner into their respective Team Leader or Shift Manager for review. An additional oven leak form, used to document coke oven leaks occurring outside of these daily inspections, is included as Attachment H – IHCC Coke Oven Leak Record. These forms are maintained physically and/or electronically, in accordance with recordkeeping requirements.

XIV. ONGOING MAINTENANCE AND REPAIRS (CONSENT DECREE IV.D.23.a.viii.)

Ongoing maintenance and repairs are tracked as part of the EAM software system, including but not limited to items identified by the daily operation checklist, titled Coke Oven Checklist and Coke Oven Leak Record Sheet, and included as Attachment I. Examples of recommended repairs are provided in Table 5. This table is for example purposes only; this PMO Plan will not be updated to reflect changes to this table.

Maintenance Repair	Trigger for Repair	Recommended Repairs
Lintel Repair	Bad Lintel	Patch and Schedule Repair
Cam Bolts Replacement	Damaged/Missing Cam Bolts	Replace Cam Bolts
Door/Refractory	Bad Door/Missing Refractory	Replace Door
Blocks Replacement	Broken Blocks	Replace Blocks
Restore Power to Unit	No Power to Unit	Restore Power
Changing Damper Block	Cracking, Missing, or Drifting from Set Positions	Repair/replace damper block
Hot Patch Door	Hot Spots	Patch the refractory
Insulating the Crown	Damaged Crown Arches, Loose or Fallen Crown Brick	Replace the ceramic wool and/or brick
Ceramic Welding Repair	Cracked Refractory Brick	Fill cracks/holes via ceramic welding

Table 5. Summary of Ongoing Maintenance and Repairs

XV. COORDINATION OF MAINTENANCE TO MINIMIZE BYPASS VENTING (CONSENT DECREE IV.D.23.a.ix.)

IHCC will coordinate with Cokenergy to minimize Bypass Venting. IHCC will make every effort to conduct maintenance that requires Bypass Venting during times when Cokenergy is conducting maintenance that requires Bypass Venting on one or more stacks. IHCC will review the Cokenergy HRSG outage schedule and, where practicable, schedule maintenance work to coincide with Cokenergy's work in a way that minimizes overall Bypass Venting.

XVI. RECORDKEEPING AND REPORTING (CONSENT DECREE IV.D.23.a.x.)

IHCC will maintain and make available for inspection the applicable records, logs, and/or reports maintained physically and/or electronically, as required by the Consent Decree. This documentation includes records detailing observed individual Coke Oven Leaks, Oven health indicators such as "Minimum", "Moderate", and "Severe", and any maintenance or repairs performed in response to Coke Oven Leaks. IHCC's recordkeeping and reporting obligations pertaining to regulatory requirements, except for the Consent Decree, are maintained in other IHCC plans and/or permits associated with the applicable regulation.

In addition, IHCC will submit semiannual progress reports to the USEPA and IDEM pursuant to the Consent Decree. These reports will include a copy of any updates to this PMO Plan, if applicable.

XVII. COMPLIANCE ASSURANCE PLAN

This section provides the Compliance Assurance Plan (CAP) to address potential periods of higher production levels, as follows. IHCC will evaluate the monthly production and monthly sulfur content of dry coal to identify whether they exceed both of the levels indicated by either Trigger 1 or Trigger 2 in the following chart in two consecutive months (High Production Level Months).

Level Description	Trigger 1	Trigger 2
Average Monthly Sulfur Content of Dry Coal	Between 0.7% and 0.9%	>0.9%
Average Monthly Tons of Dry Coal Charged	144,000	128,000

To identify High Production Level Months, the planned monthly production throughput will be evaluated with the previous month's average coal quality analyses. The monthly production and monthly quality averages for coal, including, but not limited to, sulfur and moisture content, will be tracked using a running log.

In conjunction with the Emission Tracking Software (ETS), the monthly production and monthly quality averages will be used to evaluate whether subsequent High Production Level Months may cause exceedances of particulate matter (PM) or sulfur dioxide (SO₂) limits. The calculated emissions will be compared to PM and SO₂ emissions limits set forth in the IHCC Air Permit and the Consent Decree in the Daily Compliance Status Report, an output of the ETS. The Daily Compliance Status Report and Monthly Sulfur Balance Report from the ETS will be maintained.

During subsequent High Production Level Months, IHCC will utilize ETS calculations to estimate if exceedances of PM Emissions or SO_2 emission limits may occur and respond accordingly. The following figures, used only for illustrative purposes, summarize the parameters used as the basis for SO_2 and PM Emissions:

These Variables: Determine:		Which Determine:	Which Determine:
HRSG Actual Steam Rate	Percent Gas Vented		
HRSG Potential Steam Rate	Percent Gas venteu		
Coal Sulfur	Potential SO ₂ Emission	Vented SO ₂ Rate	
Coke Sulfur	Factor		Total SO ₂ Rate
Production Rate			
Main Stack SO ₂ Concentration		Main Charle CO. Data	
Main Stack Gas Flow		Main Stack SO ₂ Rate	

Figure 1.	Illustrated I	Parameters	Used to	Determine	SO ₂ Rate

Figure 2.	. Illustrated Parameters Used to Determine PM Emissions Rate
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These Variables:	Determine:	Which Determine:	Which Determine:
HRSG Actual Steam Rate	Percent Gas Vented	Vented PM Emissions	
HRSG Potential Steam Rate			
Production Rate		Rate	Total PM Emission Rates
Uncontrolled PM Emissions Factor			
Main Stack PM Emissions Rate			

IHCC will coordinate with Cokenergy to comply with PM Emissions and SO_2 applicable limits. These responses include, but are not limited to, ensuring Bypass Venting Stacks are properly closed, and ensuring sufficient SO_2 scrubbing or optimized spray dryer operation with Cokenergy.

XVIII. ROOT CAUSE FAILURE ANALYSIS

IHCC utilizes RCFA techniques to investigate Coke Oven Leaks. The RCFA process helps address issues by identifying and implementing corrective actions for the root causes of events. By focusing on the root cause, the likelihood of recurrences can be reduced.

The primary aim of an RCFA is to identify the contributory (causal) factors that resulted in the nature, magnitude, and location of one or more past Coke Oven Leaks. By establishing causal factors, IHCC can identify potential actions, inactions, and/or conditions that may be modified to reduce the likelihood of recurrence of similar outcomes. In addition, the RCFA process is used to identify the lessons to be learned to promote continuous improvement. A team-based approach towards conducting an RCFA may be utilized, and the investigation will endeavor to understand the relationships between potential root cause(s) and resulting failure(s) to minimize the likelihood of recurrence.

One of two RCFAs will be conducted for every Coke Oven Leak and shall contain the information outlined below:

A. Summary RCFA

If IHCC determines that any of the Coke Oven Leaks triggering the RCFA were caused by high winds, equipment maintenance or malfunction that is unrelated to Structural Issues with the Oven, impacts from another Oven within the same bank of 16 or 17 Ovens, or acts or omissions not related to equipment owned or operated by IHCC or Cokenergy, then IHCC shall conduct a Summary RCFA that includes, at a minimum:

- a. The date and time that the Coke Oven Leaks were observed, and the duration of the Leaks, to the extent known;
- b. If the Coke Oven Leaks were caused by high winds, i.e., adverse wind conditions, identification of wind speed and direction data for the time of the Coke Oven Leaks;
- c. If the Coke Oven Leaks were caused by impacts from adjacent Ovens, identification of the causes of those impacts;
- d. Identification of any actions taken to stop the Coke Oven Leaks; and
- e. A description of corrective action(s) available to IHCC that are necessary to prevent or reduce the likelihood of a recurrence of Coke Oven Leaks at the Oven and the date of implementation of the corrective action(s).

B. Full RCFA

For Coke Oven Leaks triggering an RCFA that are not addressed by a Summary RCFA, IHCC will communicate with Cokenergy when conducting the Full RCFA that includes, at a minimum:

- a. The date and time that the Coke Oven Leaks were observed, and the duration of the Leaks, to the extent known. If the Coke Oven Leaks involved multiple time periods of emissions, the starting and ending dates and times of each time period shall be set forth, to the extent known;
- b. Identification of any actions taken to stop the Coke Oven Leaks;
- c. A detailed analysis that sets forth the root cause(s) and all contributing causes of the Coke Oven Leaks, to the extent determinable, and the steps, if any, that were taken to limit the duration and/or quantity of emissions associated with the Coke Oven Leaks;

- d. An analysis of the measures, if any, that are reasonably available to prevent or reduce the likelihood of a recurrence of Coke Oven Leaks resulting at the Coke Oven from the same root cause(s) and contributing causes in the future. The analysis shall evaluate design, operational, and maintenance changes, if any; the probable effectiveness of each such measure; the likely cost of each measure; whether or not an outside consultant should be retained to assist in the analysis; and whether the same issue would have an impact on other Ovens;
- e. A description of correction actions(s) implemented and the date of implementation of the corrective action(s), or, if not already implemented, a schedule for their implementation, including proposed commencement and completion dates, or an explanation that corrective action(s) is (are) not required;
- f. To the extent that investigations of the causes and/or possible corrective actions still are underway on the due date of the semi-annual report, a statement of the anticipated date by which a follow-up report fully conforming to the requirements of this Paragraph will be submitted; provided, however, that if a report or a series of reports containing the information required to be submitted under this Paragraph is not submitted within sixty (60) Days (or such additional time as USEPA may allow) after the semi-annual reporting period during which the RCFA is to be submitted, the stipulated penalty provisions of Section IX (Stipulated Penalties) of the Consent Decree shall apply for failure to timely submit the report. Nothing in this Paragraph shall be deemed to excuse investigation, reporting, and corrective action obligations under this Section for any Coke Oven Leak RCFA Trigger Level that occurs after another Coke Oven Leak RCFA Trigger Level for which an extension of time is requested under this Paragraph; and
- g. To the extent that completion of the implementation of corrective action(s), if any, is not finalized at the time of the submission of the report required under this Paragraph, the status of the correction actions will be reported in subsequent semi-annual reports until the status has been reported as complete.

Action items from RCFAs are assigned to individuals to complete items and are tracked. The status of action items is periodically reviewed by IHCC's leadership team.

XIX. ENVIRONMENTAL: MANAGEMENT OF CHANGE

At times, certain changes to IHCC assets or operational practices that involve significant changes to process, mechanical, civil, electrical or technological specifications are managed using the EAM system Management of Change (MOC) process.

The originator of a MOC must provide the basis for the change (provide the scope) which includes the description of why a change is being proposed and what improvements or benefits are expected (provide the justification). This information is included for all MOCs and is provided during the origination phase of a MOC record.

The MOC system coordinator assigns one or more subject matter experts to review the change. The review team will include the site Environmental Manager, or their designee, whenever a process change is being proposed that involves environmental media or a process with environmental implications. A predefined list of environmental consequences may be utilized during the review and is included as Attachment J – Environmental: Management of Change. The change will also be subjected to technical analysis for adherence to good engineering design standards and to ensure the proposed design is safe, reliable, cost-effective and environmentally sound. MOC reviewers can assign follow up actions that must be completed prior to implementation of the change. Subject matter experts or their designees review and approve any changes prior to implementation.

XX. ROLES AND RESPONSIBILITIES

General Manager – Overall responsibility for all facets of the IHCC facility. Related to the PMO Plan, the General Manager ensures that trained and qualified persons are assigned as the process owners of the MOC and RCFA work processes at the site. The General Manager shall ensure that RCFAs are conducted and reviewed.

Operations Manager – Overall responsibility for all operational activities at IHCC. Related to the PMO Plan, the Operations Manager ensures that Coke Oven Leak and other operational procedures are readily available, understood, and properly executed by operations personnel. Responsible for providing or directing personnel to provide timely communication of Coke Oven Leaks at Rebuilt Ovens.

Maintenance Manager – Overall responsibility for the plant maintenance process at IHCC. Related to the PMO Plan, the Maintenance Manager ensures that job plan tasks are sufficient to provide reliability and reduce the likelihood of Coke Oven Leaks. Responsible for verifying PM completion, reporting PM compliance and developing action plans. Reviews the outage schedule and coordinating maintenance with Cokenergy, as described in Section XV.

Environmental Manager – Overall responsibility for all environmental aspects at IHCC. Ensures that all events are reported in accordance with the IHCC Air Permit, Consent Decree, and the requirements of 40 CFR 63.10(d)(5)(ii) and 40 CFR 63.7341(d). Maintains applicable physical and/or electronic records, logs, reports, and/or notifications pertaining to permit and Consent Decree requirements. Prepares periodic reports for Coke Oven Leaks to the USEPA and IDEM as part of the semi-annual compliance certifications required under Paragraph 51 of the Consent Decree and paragraphs 63.311(d) and 63.7341(c) of 40 CFR 63, Subpart L and Subpart CCCCC, respectively. Reviews the field documentation for all environmental critical PM tasks to ensure proper follow up actions are taken.

Production Maintenance Coordinator or Designee – Overall responsibility for scheduling maintenance work and critical PM tasks at IHCC. Ensures that process equipment is available for scheduled work and that work order quality (content and codification) is in compliance with work process standards prior to release to maintenance.

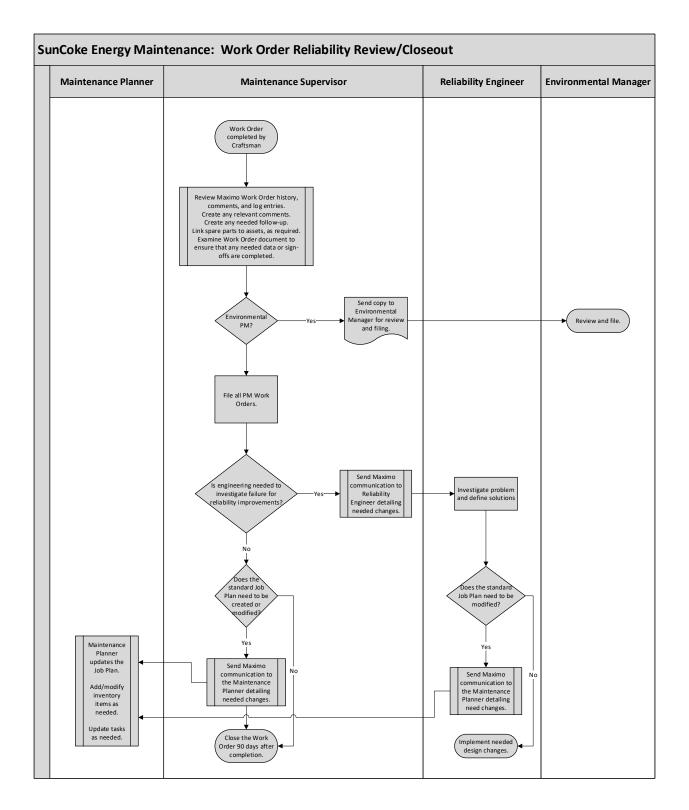
XXI. PMO PLAN MODIFICATIONS OR REVISIONS

Modifications may be made to this PMO Plan as necessary to satisfy applicable requirements or to reflect changes in equipment or procedures. In accordance with Paragraph 23 and Section VIII of the Consent Decree, changes to this PMO Plan related to minimizing Coke Oven Leaks shall be summarized and reported to USEPA and IDEM in the subsequent semi-annual periodic report. Such changes may be implemented immediately, but nonetheless shall be subject to the approval of USEPA in accordance with the Consent Decree. The PMO Plan revisions will be documented in Attachment K – PMO Plan Document Control Form.

ATTACHMENT A – EXAMPLE LIST OF ENVIRONMENTAL CRITICAL PM

PM	Description	Location
1499	PM IH A Battery Sole Flue Inspection	010A
1500	PM IH B Battery Sole Flue Inspection	010B
1501	PM IH C Battery Sole Flue Inspection	010C
1821	PM IH D Battery Sole Flue Inspection	010D
4645	PM IH A Battery Semi-Annual Tie Rod Inspection	STR-10A
4646	PM IH B Battery Semi-Annual Tie Rod Inspection	STR-10B
4647	PM IH C Battery Semi-Annual Tie Rod Inspection	STR-10C
4648	PM IH D Battery Semi-Annual Tie Rod Inspection	STR-10D
4896	PM IH A-Battery Maintenance Inspection of Common Tunnel 'Hot Spots'	TU-A
4573	PM IH B-Battery Maintenance Inspection of Common Tunnel 'Hot Spots'	TU-В
5087	PM IH C-Battery Maintenance Inspection of Common Tunnel 'Hot Spots'	TU-C
5088	PM IH D-Battery Maintenance Inspection of Common Tunnel 'Hot Spots'	TU-D
5202	Oven Door Inspection A-Battery	010A
5203	Oven Door Inspection B-Battery	010B
5204	Oven Door Inspection C-Battery	010C
5205	Oven Door Inspection D-Battery	010D
5380	Thermography Scan of A Battery Common Tunnel	010A
5381	Thermography Scan of B Battery Common Tunnel	010B
5382	Thermography Scan of C Battery Common Tunnel	010C
5383	Thermography Scan of D Battery Common Tunnel	010D
5461	PM IH A-Battery EV Stack Transition 'Hot Spot' Inspection	EVS-A
5462	PM IH B-Battery EV Stack Transition 'Hot Spot' Inspection	EVS-B
5463	PM IH C-Battery EV Stack Transition 'Hot Spot' Inspection	EVS-C
5464	PM IH D-Battery EV Stack Transition 'Hot Spot' Inspection	EVS-D
7154	PM IH A-Battery Mechanical Inspection	STR-10A
7155	PM IH B-Battery Mechanical Inspection	STR-10B
7156	PM IH C-Battery Mechanical Inspection	STR-10C
7159	PM IH D-Battery Mechanical Inspection	STR-10D
8144	A Battery Oven Chamber Bi-Annually Inspections	010A
8145	B Battery Oven Chamber Bi-Annually Inspections	010B
8146	C Battery Oven Chamber Bi-Annually Inspections	010C
8147	D Battery Oven Chamber Bi-Annually Inspections	010D
8149	A-Battery Oven Crown Area	010A
8153	B-Battery Oven Crown Area	010B
8154	C-Battery Oven Crown Area	010C
8155	D-Battery Oven Crown Area	010D

ATTACHMENT B - PM WORKFLOW PROCESS



ATTACHMENT C – OVEN HEALTH INSPECTION SUMMARY FORM – SOLE FLUE

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ATTACHMENT C (CONTINUED) – OVEN HEALTH INSPECTION SUMMARY FORM – SOLE FLUE

	1 SHORT OWNER			1 LONG OHWARD	
20	2 INSPECTION CHAMBER		20	2 DAMPER CHAMBER	
20	3 DAMPER CHAMBER		20	3 INSPECTION CHAMINER	
	4 LONG CHANGER			& SHORT CHAMBER	
OVEN	FLUE	Itsues	VEN		SSUES
C PER	1 SHORT CHAMBER		1.04	1 LONG CHAMBER	100
	2 INSPECTION CHAMBER			2 DAMPER CHAMBER	
21	2 NOTECTORIOWNER		21		
21			21	3 INSPECTICIN CHAMBER	
	4 LOND CHAVEER			4 SHORT CHAMBER	
OVEN	PLUE	ISSUES C	IVEN:		SSUES
	L SHORT CHAMBER			1 LONG CHAMBER	
22	2 INTECTION CHANNELTS		22	2 DAMPER CHAMDER	
22	I DAMPER CHAMBER		22	1 NOPECTICAL CHAMBER	
	4 LONG CHAVEER			E SHORT CHIMIER	
OVEN	PLUE	rssues	VEN		53UE5
0.000		19969	454		20052
	1 SHORT CHAMBER			1 LONG ON WHER	
23	2 INDECTION CHANNES		23	2 DAMPER CHAMBER	
20	I GAMPER CHAMBER		25	3 INSPECTION CHAMBER	
	4 LONG CHAMBER			4 SHORT CHAMBLE	
C/VEN ····	FLUE	ISSUES 0	IVEN:	FLUE	SSUES
	1 SHORT CHAMIN'R			1 LONG CHAMBER	
24	2 INSPECTION CHAMBER		24	2 DAMPER CHAMBER	
24	1 CAMPER CHAMBER		24	3 INSPECTION CHAMBER	
24			24		
	4 LONG CHAMBER			4 SHORT CHAMBER	
OVEN	PLUE	ISSUES	IVEN		SSUES
	1.5HORT CHAMBER			1 LONG CHANGER	
25	2 INSPECTION CHANGER		25	2 DAMPER CHAMBER	
125	A DAMPER DRAMBER		20	3 INSPECTICITICALMINER	
	4 LONG CHUNGER			4 SHORT CHILMIER	
COLUMN TO A					
OVEN	PLUE	essues o	IVEN.		ssues
	1 SHORT CHAMINER			1 LONG CHAMBER	
20	2 INSPECTION CHANRER		26	2 DAMPER CHAMBER	
26	A DAMPER CHAMBER		26	3 INSPECTORICHAMBER	
	4 LONG CHAMBER			4 SHORT CHAMBER	
OVEN	FLUE	ISSUES 0	VEN		SUS
or or	L SHORT CHAVER	0	100	1 LONG CHAMBER	a de la companya de la
177	2 INSPECTION CHAVILIN		27	2 DAMPER CHAMBER	
41	J CAMPER CHAMIER		41	2 INSPECTION CRAMINER	
	4 LONG CHAMBER			4 SHORT CHAMIER	
OVEN	FAUE	ISSUES 0	IVEN:	FLUE	SSUES
	L SHORT CHAVINE			110NB CHIMBER	
20	2 INFECTION CHANGER		20	2 DAMPER CHAMBER	
28			28		
20	J DAMPER CHAMBER		20	3 INSPECTION CHAMBER	
	4 LONG CHAMBER			4 SHORE CHAMBER	
OVEN	FLUE	ISSUES 0	IVEN	FLUE	55UES
	L SHORT CHAMBER			1 LONG CHIAVISTR	
20	2 REPECTION CHAMBER		20	2 DAMPER CHIMBER	
29	3 DAMPER CHAMBER		29	3 INSPECTION CHAMBER	
	A D CREAT ATTACABLES				
COLEN		REAL REAL REAL REAL REAL REAL REAL REAL	LINK.	A 31-27-887 293-84-49276	SALIES.
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30 cvvv 31 cvvv 32 cvvv 33 cvvv 34 cvvv 35 cvvv 36	HUE EVEL 2007 CHARDER 2007 CHAR	ESURES 0	30 31 32 32 33 33 33 34 34 35 50 50	FLUE C LUNG CANADER C LUNG CANADER C LUNG CANADER C LANDY CANADER C LOND CANADER C STORT CANADER C FLUE C LOND CANADER C <	55UE5 55UE5 55UE5 55UE5 55UE5
30 cvvv 31 cvvv 32 cvvv 33 cvvv 34 cvvv 35 cvvv 36	HUE EVEL 2003T COMMERS 2003T C	ESURES 0	30 31 32 32 33 33 33 34 34 35 50 50	FLUE E LUNG CAMADER E LUNG CAMADER E LARDAR CHAMER E LARDAR CHAMER E LUNG CHAMER LUNG CHAMER <t< td=""><td>55UE5 55UE5 55UE5 55UE5 55UE5</td></t<>	55UE5 55UE5 55UE5 55UE5 55UE5
30 cvvv 31 cvvv 32 cvvv 33 cvvv 34 cvvv 35 cvvv 36	HUE BOURD COMBUNITS INFORMATION CONTRACT INFORMATION CONTRACTOR	ESURES 0	30 31 32 32 33 33 34 34 35 VEN 35	FLUE E LUNG CANADER E LUNG CANADER E LANNTER CHANNER E LANNTER CHANNER E LUNG CANADER E FLUE E LUNG CANADER E	SSUES SSUES SSUES SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37	HUE EVENT EXPERITORIO COMBER EXPERITORI COMBER	ESURS 0	30 31 32 32 33 33 34 34 35 35 VEN 36 VEN 37	FLUE E LUNG CAMADER E LUNG CAMADER E LANDA CAMADER E LANDA CAMADER E LANDA CAMADER E LUND CAMADER E	SSUES
30 cvvv 31 cvvv 32 cvvv 33 cvvv 34 cvvv 35 cvvv 36	HUE BORT OWNER ENDITION CANNER ENDITION CANNER LINGTOWER HUE ENDITION CANNER ENDITION CANNER	ESURS 0	30 31 32 32 33 33 33 34 34 35 50 50	FLUE E LUNG CANADER E LUNG CANADER E LARMER CANADER E LARMER CANADER E LUNG CANADER E	SSUES SSUES SSUES SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37	HUE EVENT EXPERITORIO COMBER EXPERITORI COMBER	ESURS 0	30 31 32 32 33 33 34 34 35 35 VEN 36 VEN 37	FLUE E LUNG CAMADER E LUNG CAMADER E LANDA CAMADER E LANDA CAMADER E LANDA CAMADER E LUND CAMADER E	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 37 CVEV	HUE LIDERTON COMBER	ESURS 0	30 31 32 32 33 33 33 34 34 35 35 35	FLUE C LUNG CAMADER C LUNG CAMADER C LANDA CAMADER C SAMPER CAMADER C SAMPER CAMADER C FLUE C LUNNO CAMADER C SAMPER CAMADER C SAMPER CAMADER C LUNNO CAMADER C LUNNO CAMADER C LUNNO CAMADER C LONG CAMADER C <tr< td=""><td>SSUES</td></tr<>	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37	HUE BOOK COMBUNE SERVICEON COMBUNE ENTERED COMBUNE SERVICEON COMBUNE LINE COMMUNE LINE COMMUNE	ESURS 0	30 31 32 32 33 33 33 34 34 35 35 35	FLUE E LUNG CAMADER E LUNG CAMADER E LARAYER CAMADER E LARAYER CAMADER E SUCH CAMADER E LUNG CAMADER E <t< td=""><td>SSUES</td></t<>	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 37 CVEV	HUE EVEL 2007 OWNER 2007 CONNER 2007 CONNER	ESURS 0	30 31 32 32 33 33 34 34 35 35 VEN 36 VEN 37	FLUE E LUNG CANADER E LUNG CANADER E LANNTER CHANNER E LUNG CANADER E I	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37 CVEV 38	HUE EVEN EXPERITORIO COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUNE EXPERITORI COMBUNE EXPERITORI E	ISSURS 0 ISSURS 0	30 31 32 32 33 33 34 34 35 35 36 VEN 36 VEN 37 37	FLUE E LUNG CAMARIER E LUNG CAMARIER E LARREN CAMARIER E LARREN CAMARIER E LUNG CAMARIER E LUNG CAMARIER E LUNG CAMARIER E LUNG CAMARER E LUNG CAMARER <td< th=""><th>SSUES</th></td<>	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 37 CVEV	HUE BOURD COMBUNITS INCOMENT I	ISSURS 0 ISSURS 0	30 31 32 32 33 33 33 34 34 35 35 35	FLUE E LUNG CAMADER E LUNG CAMADER E LANNTER CHAMBER E LUNG CAMADER E E	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37 CVEV 38	HUE EVEN EXPERITORIO COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUN EXPERITORI COMBUNE EXPERITORI COMBUNE EXPERITORI E	ISSURS 0 ISSURS 0	30 31 32 32 33 33 34 34 35 35 36 VEN 36 VEN 37 37	FLUE E LUNG CAMARIER E LUNG CAMARIER E LARREN CAMARIER E LARREN CAMARIER E LUNG CAMARIER E LUNG CAMARIER E LUNG CAMARIER E LUNG CAMARER E LUNG CAMARER <td< th=""><th>SSUES</th></td<>	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37 CVEV 38 CVEV	HUE BOURD COMBUNITS INCOMENT I	ISSURS 0 ISSURS 0	30 VEN 31 32 VEN 33 VEN 34 VEN 35 VEN 36 VEN 37 VEN 38 VEN	FLUE E LUNG CANADER E LUNG CANADER E LANNTER CHANDER E LANNTER CHANDER E LUNG CANADER E HUTE CHANNER E LUNG CANADER E <t< th=""><th>SSUES</th></t<>	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37 CVEV 38	HUE LOOKITON COMBUN L SUCCESSION L SUCCESSIO	ISSURS 0 ISSURS 0	30 31 32 32 33 33 34 34 35 35 36 VEN 36 VEN 37 37	FLUE E LUNG CAMADER E LANNE CAMADER E LANNE CAMADER E LANNE CAMADER E LANNE CAMADER E LUNE CAMADER E	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37 CVEV 38 CVEV	HUE LOCATOR COMBUN LENGTON COMBUN LENGTON COMBUN LENGTON COMBUN LENGTON COMBUN LUSS COMMUN	ISSURS 0 ISSURS 0	30 VEN 31 32 VEN 33 VEN 34 VEN 35 VEN 36 VEN 37 VEN 38 VEN	FLUE E LUNG CAMADER E LUNG CAMADER E LANDA CAMADER E LANDA CAMADER E LANDA CAMADER E LUND CAMADER E LONG CAMADER E	SSUES
30 CVEV 31 CVEV 32 CVEV 33 CVEV 34 CVEV 35 CVEV 36 CVEV 36 CVEV 37 CVEV 38 CVEV	HUE EVEN ENDERTON CAMER ENDERTON CAMER	ISSURS 0 ISSURS 0	30 VEN 31 32 VEN 33 VEN 34 VEN 35 VEN 36 VEN 37 VEN 38 VEN	FLUE E LUNG CAMADER E LANNE CAMADER E LANNE CAMADER E LANNE CAMADER E LANNE CAMADER E LUNE CAMADER E	SSUES

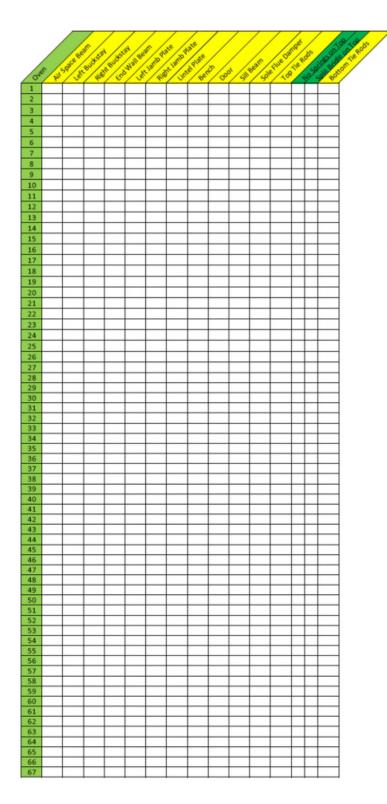
ATTACHMENT C (CONTINUED) – OVEN HEALTH INSPECTION SUMMARY FORM – SOLE FLUE

	FLUE				
		ISSUES	OVEN	PLUE	ISSUES
	1 SHORT CHAMBER			1 LONG CHAMBER	
	2 INSPECTION CHAMBER		40	2 DAMPER DIAMBER	
	3 DAMPER CHAMBER		40	3 NEPECTON CHAMER	
	4 LONG CHAMBER			4 SHORT CHAMBER	
WEN I	FLUE	ISSUES	OVEN	PLUE	ISUES
	1 SHORT CHAMEER			1 LONG CHAMBER	
11	2 INSPECTION CHAMBER		11	2 DAMPER CHAMBER	
41	3 DAMPER CHAMEER		41	3 INSPECTION CHAMBER	
	4 LONG CHAMPER		1	4 SHORT CHAMBER	
	FLUE	153UE5	OVEN	FLUE	ISSUES
	1 SHORT CHAMSER	19701	US DR	1 LONG CHAMBER	13963
42	2 INSPECTION CHAMBER		42	2 DAMPER CHAMBER	
	3 DAMPER CHAMED		42	3 INSPECTION CHAMBER	
	4 LONG CHAMBER			4 SHORT CHAMBER	
NTN I	FLUE	1651185	OVEN	FLUE	et sue s
	1 SHORT CHAMEER			1 LONG CHAMBER	
12	2 INSPECTION CHAMBER		12	2 DAMPER CHAMBER	
	DAMPER CHAMPER		43	3 INCRECTION CHAMETR	
	4 LONG CHAMBER			4 SHORT CHAMBER	
	FUUE	ISSUES	OVEN		ISSUES
	1 SHORT CHAMBER	(32022	UV DN	FLUE 1 LONG CHAMBER	ESVES
1					
44	2 INSPECTION CHAMBER		44	2 DAMPER CHAMILER	
	3 DAMPER CHAMEOR		-+-+	3 INSPECTION CHAMBER	
	A LONG CHAMPER			4 SHORT CHAMBER	
/EN	FLUE	65185	OVEN.	FLUE	ISSUES .
	1 SHORT CHAMER.			L LONG CHAMBER	
	2 INSPECTION CHAMBER		45	2 DAMPER CHAMBER	
	2 DAMPER CHAMBER		45	3 INSPECTION CHAMBER	
•••	4 LONG CHANTLER			4 SHORT CHAMBON	
		(3)(B)	OVEN		1041103
	FLUE		UPICN .	FLUE	ISSUES .
1	1 SHORT CHAMBER			1 LONG CHAMBLE	
	2 INSPECTION CHAMBER		46	2 DAMPER CHAMBER	
	3 DAMPER CHAMBER		40	3 INSPECTION CHAMBER	
	4 LONG CHANNER			4 SHORT CHAMBER	
	FLUE	1551125-	OVEN	FLUE	ISSUES .
	1 SHORT CHAMBER			1 LONG CHAMBLE	
	2 INSPECTION DIAMBER		17	2 DAMPER OHMHER	
	2 DAMPER CHAMEDI		4/	3 INFECTOR CHAMED	
	4 LONG CHAMPER			4 SHORT CHAMBER	
			A		
	FLUE	15015	OVEN	nut	ISUES
	1 SHORT CHANNER			LICING CHANIBER	
	2 INSPECTION CHARMER		48	2 DAMPER CHAMBER	
+0	3 DAMPER CHAMEDI		40	3 INSPECTION CHAMBER	
	4 LONG CHAMPER			4 SHORT CHAMBER	
	FLUE	55025	OVEN	FLUE	ISUES .
	1 SHORT CHAMBER			L LONG CHAMBER	
[2 INSPECTION CHAMBER		1.0	2 DAMPER CHAMILER	
	DIMMPERCHAMEDI		49	J INFECTION CHIMED	
	4 LONG CHAMBER			4 SHORT CHAMBER	
	FUUE	ISSUES	OVEN	FLUE	ISEU25
	1 SHORT CHAMBER			1 LONG CHAMBER	
50	2 INSPECTION CHAMBER		50	2 DAMPER CHAMEER	
50	3 DAMPER CHAMBER		1 30	3 INSPECTION CHAMINER	
	4 LONG CHAMPER			4 SHORT CHASMER	
EN I	FLUE	ISSUES			ISSUES
	1 SHORT CHAMLER		OVEN	FLUE	
			OVEN		
				1 LONG CHAMBER	
וור	2 INSPECTION CHAMBER			1 LONG CHAMBER 2 DAMPER CHAMBER	
	2 INSPECTION CHAMBER 3 DAMPER CHAMBER		51	2 DAMPER CHAMBER 2 DAMPER CHAMBER 3 INSPECTION CHAMBER	
_	2 INSPECTION CHAMBER 2 DAMPER CHAMBER 4 LONG CHAMBER		51	110NG CHAMBER 2 DAMPER CHAMBER 3 INSPECTION CHAMBER 4 SHORT CHAMBER	
/EN	2 INSPECTION CHAMBER 2 DAMPER CHAMBER 4 LONG CHAMBER FLUE	essues		110NG CHANGER 2 DAWINER CHANGER 3 INSPECTION CHANGER 4 SHORT CHANGER FLUE	aturs
/EN	2 INSPECTION CHAMBER 2 DAMPER CHAMBER 4 LONG CHAMBER		51	110NG CHAMBER 2 DAMPER CHAMBER 3 INSPECTION CHAMBER 4 SHORT CHAMBER	
/EN	2 INSPECTION CHAMBER 2 DAMPER CHAMBER 4 LONG CHAMBER FLUE		51	110NG CHANGER 2 DAWINER CHANGER 3 INSPECTION CHANGER 4 SHORT CHANGER FLUE	
/EN	2 INSPECTION DRAMBER 3 DRAFER CHANGER 4 LONG CHANTER FLUE 1 SHORT CHANGER		51	110ND CHANNER 2 DAMPER CHANNER 3 INSPECTION CHANNER 4 SHORT CHANNER FLUE 210ND CHANNER	
52	2 INSPECTION CHAMBER 2 DAMPER CHAMBER 4 LONG CHAMBER FLUE 1 SHORT CHAMBER 2 INSPECTION CHAMBER 2 INSPECTION CHAMBER		51	1 LONG CHAMBER 2 DAMPER CHAMBER 3 INSPECTION CHAMBER 4 SHOTT CHAMBER FLUE 1 LONG CHAMBER 2 DAMPER CHAMBER	
52	2 INSPECTION CHAMBER 2 CHAMPER CHAMBER 4 LONG CHAMBER FLUE 1 SHORT CHAMBER 2 INSPECTION CHAMBER 3 CHAMPER CHAMBER		51	LLONG CHANGER 2 DAMPER CHANGER 3 PRIPECTICH CHANGER 4 SHOTT CHANGER FLUE LLONG CHANGER 2 DAMPER CHANGER 3 HUPECTICH CHANGER	
52	2 INSPECTION CHANNES 3 DAMPER CHANNES 4 LONG CHANNES FILLE 1 SHORT CHANNES 2 INSPECTION CHANNES 3 DAMPER CHANNES 1 DAMPER CHANNES FILLE FILLE	259.83	51 52	LUMIS CHANGER 2 DAMPER CHANGER 3 DIARPERCIO CHANGER 4 SHORT CHANGER 2 LONG CHANGER 2 LONG CHANGER 3 INVERCION CHANGER 3 INVERCION CHANGER 6 SHORT CHANGER FLUE	disues
52	2 INSPECTION DIAMINER 2 DAMPER CHAMPER FLUE 1 SHOP CHAMPER 2 INSPECTION DIAMINER 3 DIAMPER CHAMPER 1 LONG CHAMPER FLUE 1 SHOP CHAMPER	259.83	51 CVEN 52 CVEN	LUNIS CHANEER 2 DANPER CHANEER 3 INSPECTION CHANEER 5 SIGHT CHANEER ELUE 2 DANPE CHANEER 2 INSPECTION CHANEER 6 SHOPT CHANEER FLUE 1 LONIS CHALER	disues
52	2 INSPECTION DAMAGER 2 DAMAGER COMMER 2 DAMAGER 2 DISPECTION DAMAGER 2 DISPECTION COMMER 4 DONG COMMER 2 DISPECTION COMMER 2 DISPECTION COMMER 2 DISPECTION COMMER 2 DISPECTION COMMER	259.83	51 CVEN 52 CVEN	LUME CHANGER EDMARTIC CHANGER EDMERCTIC CHANGER FUE LUME CHANGER ELLE EDMARTIC CHANGER ENCECTON CHANGER ELLENS CHANGER ELLENS CHANGER ELLENS CHANGER	disues
52 53	2 INSPECTION DAMAGES 2 DAMARES CHAMBES FLUE 1 SHORT CHAMBES 2 DAMARE CHAMBES 3 DAMARE CHAMBES 1 SHORT CHAMBES 1 SHORT CHAMBES 2 DISPECTION DAMABES 2 DISPECTION DAMABES 2 DISPECTION DAMABES	259.83	51 52	LIZING CHANNER LIZING CHANNER DIVERSITIO CHANNER A SIGNIT CHANNER LIZING CHANNER LIZING CHANNER LIZING CHANNER DIVERCIO CHANNER LIZING CHANNER DIVERCIO CHANNER DIVERCIO CHANNER	disues
52 53	2 INSPECTION DAMABLE 2 DAMPER CHAMBLE A LIVIN CHAMBER FLUE 2 SHORT CHAMBER 3 DAMPER CHAMBER 3 DAMPER CHAMBER 2 INSPECTION CHAMBER 2 INSPECTION CHAMBER 2 INSPECTION CHAMBER 3 DAMPER CHAMBER	851.83 851.83	51 52 53	LUME CHANGER 20MINTRI CHANGER 20MINTRI CHANGER A SHOTT CHANGER 20MINTRI CHANGER 20MINTRI CHANGER 20MINTRI CHANGER 4SHOTT CHANGER 20MINTRI CHANGER 20MINTRI CHANGER 20MINTRI CHANGER 3 INDECTOR CHANGER 3 INDECTOR CHANGER	45UES
EN 52 53	2 INSPECTION DAMABLE 2 DAMPER COMMENT 2 DAMPER COMMENT FLUE 2 DISTICTION COMMENT 3 DAMPER COMMENT 3 DAMPER COMMENT 4 DONG COMMENT 2 DISTICTION DAMABLE 3 DAMPER COMMENT 2 DISTICTION DAMABLE 4 DONG COMMENT 4 DONG COMMENT	259.83	51 CVEN 52 CVEN	LIZING CHANNER DUMITIK CHANELP DUMITIK CHANELP DUMITIK CHANELP SUPECTON CHANELP LIZING CHANELP DUMITIK CHANELP DUMITIK CHANELP LIZING CHANELP DUMITIK CHANELP DUMITIK CHANELP DUMITIK CHANELP DUMITIK CHANELP DUMITIK CHANELP	disues
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52 53 53	2 INSTEIN O AMAGER 2 INSTEIN CAMPER 2 INSTEIN CAMPER	851.83 851.83	51 52 53	LIZING CHAMBER LIZING CHAMBER DIVERSTON CHAMBER A SHOT CHAMBER LIZING CHAMBER DIVERSTON CHAMBER DIVERSTON CHAMBER DIVERSTON CHAMBER DIVERSTON CHAMBER LIZING CHAMBER LIZING CHAMBER	45UES
52 53 53	2 INDEXTON DAMABLE 2 DAMPER DAMBER 4 LOND CHAMPER FLUE 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER 2 INDEXTONARER	851.83 851.83	51 52 53	LUMIC CHANNER 20M/INTR CHANNER 20M/INTR CHANNER A SHOTT CHANNER 20M/INTR CHANNER	45UES
52 53 53	2 INSTEIN O AMAGER 2 INSTEIN CAMPER 2 INSTEIN CAMPER	851.83 851.83	51 52 53	LIZING CHAMBER LIZING CHAMBER DIVERSTON CHAMBER A SHOT CHAMBER LIZING CHAMBER DIVERSTON CHAMBER DIVERSTON CHAMBER DIVERSTON CHAMBER DIVERSTON CHAMBER LIZING CHAMBER LIZING CHAMBER	45UES
52 53 53	2 INSTEADOR CAMBLE 2 DAMER COMMER 2 DAMER COMMER 2 DAMER COMMER 2 INSTEADOR ON CAMBLE 2 DAMER COMMER 2 DAMER COMMER 2 DAMER COMMER 2 DAMER COMMER 2 DAMER COMMER 2 DAMER COMMER 2 DISTEADOR COMMER	255083	51 52 53 53	LIDIE CHANKER LOWERCHANNER ASIDE CHANKER ASIDE CHANKER ELLE LIDIE CHANKER SHORT CHANKER SHORT CHANKER LIDIE CHANKER	185UES
52 53 53 54	EINSTEININ CAMARIE EINSTEININ CAMARIE ELONG CHAMIER FLUE ELONG CHAMIER ELONG CHAMIER ELONG CHAMIER EINSTEININ CHAMIER EINSTEININ CHAMIER ELONG CHAMIER	851.83 851.83	51 52 53	LIZINE CHANNER LIZINE CHANNER DIMITIKE CHANNER A SIGNT CHANNER LIZINE COMMERCIANNER DIMITIKE CHANNER DIMITIKE CHANNER	45UES
52 53 53 54	EINSTEININ OMMERI JOMMER OMMERI JOMMER OMMERI JOMMER OMMERI JUST J	255083	51 52 53 0VEN 53 0VEN 54	LIDRO CHANNER LOMANER CHANNER A SHOT CHANNER A SHOT CHANNER LIDRO CHANNER B CHANNER DIMINER CHANNER B CHANNER LIDRO CHANNER B CHANNER LIDRO CHANNER DIMINER CHANNER DIMINER CHANNER DIMINER CHANNER DIMINER CHANNER B SHOTT CHANNER DIMINER CHANNER B SHOTT CHANNER DIMINER CHANNER LIDRO CHANNER	185UES
52 53 53 54	EINSTEIND CAMMER	255083	51 52 53 0VEN 53 0VEN 54	LIZING CHANNER LIZING CHANNER ZIMING CHANNER A SIGNT CHANNER A SIGNT CHANNER ZIMING CHANNER	185UES
52 53 53 54 54	EINSTEININ CAMAREN EINSTEININ	255083	51 52 53 53	LIDIE CHANNER LIDIE CHANNER DIMITIE CHANELO INFECTION CHANNER LIDIE CHANNER	185UES
52 53 53 54 54	2 INSTEADO CAMBER 2 INSTEADO CAMBER 2 INMER CAMPER 2 INSTEADO CAMBER 2 INSTEADO CAMBER	85085 85083 85083	51 52 53 53 54 55	LIDIE CHANNER LOWE CHANNER DIMITIE CHANER A SIGIT CHANER ELIEE LIDIE CHANER BILIEE LIDIE CHANER	asues asues asues asues
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531 522 533 533 533 533 533 554 555 555 557 557 558	Electronic Convergin Convergin	53453 53463 53463	51 52 53 54 55 55 55 55 57 58	LIDING CHAMBER LIDING CHAMBER DIMITIKO CHAMBER A SHORT CHAMBER A SHORT CHAMBER DIMITIKO CHAMBER	ASUES ASUES

ATTACHMENT C (CONTINUED) – OVEN HEALTH INSPECTION SUMMARY FORM – SOLE FLUE

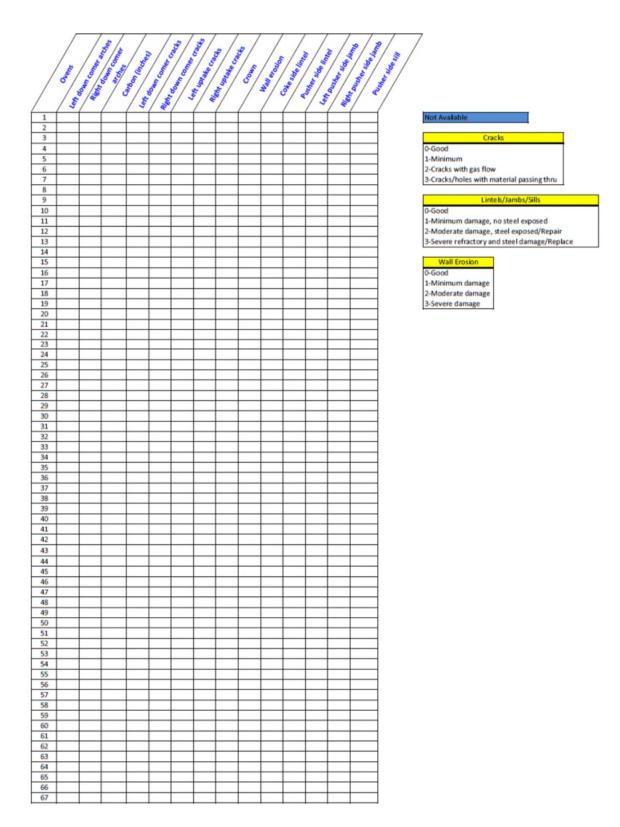
OVEN	FLUE	ISSUES	OVEN	FLUE	ISSUES
	1 SHORT CHAMBER			110NG CHAMBER	
CO	2 INSPECTION DIAMBER		60	2 DAMPER CHAMBER	
60	3 DAMPER CHAMBER		60	3 INSPECTION CHAMBER	
	4 LOND CHAMPER			4 SHORT CHAMMER	
OVEN	FLUE	ISSUES	OVEN	FLUE	ISSUES
	1 SHORT CHAMEER			1 LONG CHAMBER	
61	2 INSPECTION CHAMBER		C1	2 DAMPER CHAMBER	
DT	3 DAMPER CHAMBER		61	3 INSPECTION CHAMBER	
	4 LONG CHAMPER			4 SHORT CHAMPER	
OVEN	FLUE	ISSUES	OVEN	FLUE	15015
	1 SHORT CHAMBER			1 LONG CHAMBER	
62	2 INSPECTION CHAMBER		62	2 DAMPER CHAMBER	
DZ	2 DAMPER CHAMBER		02	3 INSPECTION CHAMBER	
	4 LONG CHAMBER			4 SHORT CHAMDER	
OVEN	FLUE	ISSUES	OVEN	RUE	INFORME
	1 SHORT CHAMBER			110ND CHAMBER	
63	2 INSPECTION CHAMIEER		63	2 DAMPER CHAMBER	
00	3 DAMPER CHAMBER		00	3 INSPECTION CHAMBER	
	4 LONG CHAMPER			4 SHORT CHAMPER	
OVEN	FLUE	ISSUES	OVEN	FLUE	SEVES
	1.9KOAT CHAMSER			110NG CHAMBER	
64	2 INSPECTION CHAMBER		64	2 DAMPER CHAMBER	
04	B DAMPER CHAMEER		04	J INSPECTION CHAMBER	
	4 LONG CHAMBER			4 SHORT CHAMUER	
OVEN	FLUE	ISSUES	OVEN	RUE	ISSUES
	1 SHORT CHAMBER			1 LONG CHAMBER	
65	2 INSPECTION CHANIER		65	2 DAMPER CHAMBER	
00	B DAMPER CHAMBER		65	1-INSPECTION CHAMBER	
	4 LONG CHAMER			4 SHORT CHAMER	
OVEN	FLUE	ISSUES .	OVEN	FLUE	ISSUES
	1 SHORT CHAMBER			1 LOND CHAMSER	
66	2 INSPECTION CHAMIBER		CC	2 DAMPER CHAMBER	
00	B DAMPER CHAMBLE		66	1 INSPECTION CHAMINER	
	4 LONG CHAMBER			4 SHORT CHAMBER	
OVEN	FLUE	ISUES	OVEN	FLUE	ISSUES
	1 SHORT CHAMEER			1 LONG CHAMBER	
07	2 INSPECTION OHAMINER		67	2 DAMPER CHAMBER	
61			6/		
67	3 DAMPER CHAMBER 4 LONG CHAMBER		67	A SHORT CHAMBER	

ATTACHMENT D – OVEN HEALTH INSPECTION SUMMARY FORM – MECHANICAL



The Items With The	e Most Dama	3e	
	Worst	to Least	
Air Space Beams	0	0	0
Left Buckstay	0	0	0
Right Buckstay	0	0	0
End Wall Beam	0	0	0
Left Jamb Plate	0	0	0
Right Jamb Plate	0	0	0
Lintel Plate	0	0	0
Bench	0	0	
Door	0	0	0
Sill Beam	0	0	0
Sole Flue Damper	0	0	0
Top Tie Rods	0	0	0
Bottom Tie Rods			0

ATTACHMENT E – OVEN HEALTH INSPECTION SUMMARY FORM – OVEN CHAMBER



ATTACHMENT F – COMMON TUNNEL INSPECTION WORK ORDER

tion of ove				Ed					
	en crown area lookin	Inspection of oven crown area looking for cracks, openings in crowns, uptake piers, holes in elbows, dampers and transitions.	n crowns, uptake pi	ers, holes in elbo	ows, dampers and tran	sitions.			
Asset		BATTERY D							
Location: 010D		BATTERY D							
Sched Start:	23		Site: IH	H		Job	Job Plan: 9342		
Sched Finish:			Priority:			Superv	Supervisor: DWLEROUX		
Target Start: 4/29/18	1 4/29/18		Work Type: PM	Md			Lead:		
Target Finish: 4/30/18	# 4/30/18		Status: COMP	COMP			Crew:		
			Parent:						
			Failure Class: OVEN	OVEN					
Report Date: 4/24/18	11 4/24/18		Problem Code:						
eported By	Reported By: KDGRAPER								
			GL Account:	GL Account: 311.50642.101.111.000.000.0000	11.000.000.0000		_		
						Frequency:	ncy: 30	Units:	DAYS
Task IDs									
		Task ID Description							Status
		10 Obtain Permi	10 Obtain Permission to access battery	к					COMP
		Coordinate ac inspected.	ccess to the oven crow	<i>u</i> n area and make	Coordinate access to the oven crown area and make sure that pushing and charging is not occuring within the vicinity of the oven area being inspected.	arging is not occurin.	g within the vicinit	y of the oven area	being
		Complete SW	Complete SWP / STP for the site						
		20 Perform Over	20 Perform Oven Exterior Inspection						COMP
		Perform oven Conditional C	r exterior inspection ir classification folllow th	n accordance with (e Severe, Moderat	Perform oven exterior inspection in accordance with OV-PRO-0606Oven Exterior Inspection Conditional Classification follow the Severe, Moderate, Minimal, and No Damage ranking system.	rtior Inspection age ranking system.			
		30 Analysis and	30 Analysis and Reporting of the Results	Its					COMP
		Analyze the c	crown data collected d	luring the inspectio	Analyze the crown data collected during the inspection and tabulate results into Oven Refractory Exterior Report	to Oven Refractory E	sterior Report		
		40 Enter WO's fo	40 Enter WO's for Severe Classification Conditions Recorded	n Conditions Recor	ded				COMP
		Enter WO's fo	or Severe Classificatio	n Conditions Recor	Enter WO's for Severe Classification Conditions Recorded during exterior inspection	ction			
Planned Labor									
Task ID	0 Craft	Skill Level	Labor	Vendor	Contract	Qty	Hours	Rate	Line Cost
	and the second sec								

ATTACHMENT G – METHOD 9 INSPECTION FORM

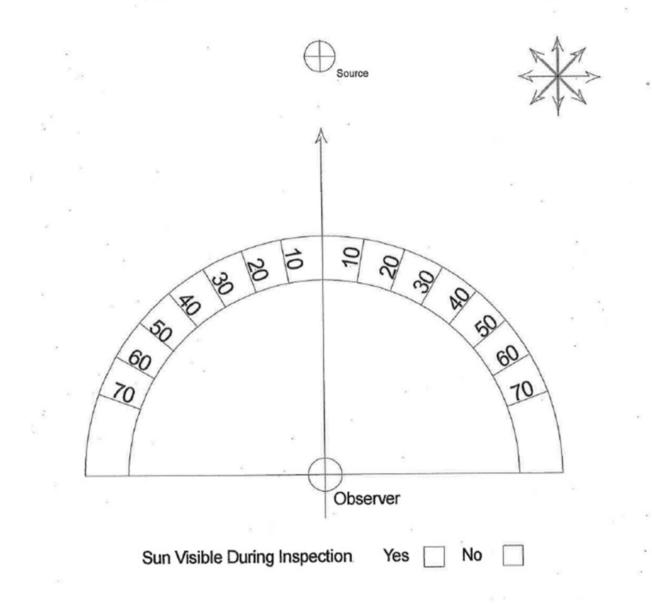
SEC Method 9 VE Inspection Form

Date: Source: Observ. began: Observ. ended: Observed from:	_			feet	B: SI W	nission ackgrou cy cond 'ind spe 'ind dire	ition: ed:	lor:		leginning e comments	End See comments	E
Distance to source: Direction to source:	_			Teet		mbient			_			-
	_	****	*****	****	W	et bulb	temp.	:	••	******	*** *********	8
Height of source:		***	*****	******	R	el. hum	idity %	6:	-			-
Vert. angle to source: Plum type:	_			ttached					Sheet		of	
r min type.	_											
Comments	0	15	30	45			0	15	30	45	Comment	ts
		· ·			0	30						
					1	31						-
					2	32						
					3	33						
					4	34						
					5	35						
					6	36						
					7	37						
					8	38						
					9	39						
					10	40						
					11	41						
					12	42						
					13	43						
					14	44						
					15	45						
					16	46						
					17	47						
					18	48						
	-				19	49	_		-			
					20	50						
	-				21	51						
					22	52						
					23	53						
					24	54	-					
					25	55						
					26	56						
		-			27	57	-					
	-	-	-		28	58	_	-	-			
	-		-		29	59		-	-			
Observers signature						57						
					Additio	nal info.(include	steam di	ssipation	n point if apj	licable):	

SEC Method 9 VE Inspection Form

Attachment G (CONTINUED) – Method 9 INSPECTION FORM

Date:	USEPA METHOD 9 Criteria Determination	Source Data:
Observer:		
Time Begin:		
Time End:	·	



ECORD #	Coke Oven Leaks must be extinguished in: 15 min P/S; 45 min C/S; 30 min Crown	CORRECTIVE ACTIONS & CAUSE OF LEAK	WHAT WAS DONE TO CORRECT THE DOOR LEAK? WHAT WAS THE POTENTIAL CAUSE OF THE DOOR LEAK?	Sole flues plugged & uptake blocked stuck / adjusted door dampers																					
IHCC COKE OVEN LEAK RECORD	nguished in:	COKE SIDE (C/S)	Leak Out Time																						
KE OVE	st be exti	COKE	DOOR	V V	Y // N	N // X	N // X	N // X	N // Å	N // X	N // Å	N // X	N // A	N // X	N // X	N // X	Y // N	N // X	N // A	N // X	N // X	N // X	N // X	N // A	
IHCC CO	Leaks mu	IDE (P/S)	Leak Out Time	6:35 PM																					
	Coke Over	PUSHER SIDE (P/S)	DOOR	N S	Y // N	Y // N	N // X	X // N	N // X	N // X	N // X	X // N	N // X	N // A											
Use Only Blue or Black Ink		Record all times in 24 hour format	TIME LEAK NOTICED	12:45 PM																					
Use On	DATE:	Record all tit	OVEN	B44																					

ATTACHMENT H – IHCC COKE OVEN LEAK RECORD

For every coke oven leak, record the oven #, the time the door leak was noticed; and the time it was corrected. List the corrective actions that were taken and indicate

if adverse wind conditions existed in the "Comments" section.

If you are the person who notices the door leak and calls the CCR operator, YOU are responsible for ensuring that the door leak is recorded. Coke oven door leaks can be recorded on push reports or product tech coke oven leak record reports.

NOTE - Coke oven leaks are visible emissions that occur from the crown or a door's top, sides, dampers, or holes.

Product Technician IHCC COKE OVEN LEAK RECORDS must be submitted to the Shift Supervisor at the end of the DAY Revised 06/22/2018

ATTACHMENT I - IHCC COKE OVEN CHECKLIST AND COKE OVEN LEAK **RECORD SHEET**

Battery Ovens - IHCC COKE OVEN CHECKLIST INSPECTION RECORD

SHIFT:

_

Your signature indicates that all doors and crowns were inspected on SunCoke Energy

Supervisor Signature

DATE:

Daily inspection: 1. Inspect door and crown for leaks on the push side from the Pad 2. Inspect door leaks on the coke side from inside the shed 3. Inspect for leaks on the shed from the road 4. Inspect the uptakes of ovens to be charged prior to push to verify they can open to a minimum of 8" and able to close

_

			PUSHER SIDE	Use Or COKE SIDE	COKE SIDE		nctionality?	COMMENTS
	Time of		POSHER SIDE	CONE BUE				
OVEN #	(AM or FM)	INITIALS	Inspect from Pad	Inside Shed	Outside Shed (from	30-50 mini prode	utes prior to uction	Are there any uptakes not moving property? Are all the thermocouples working?
			1.00		road)	Push	Coke	Are the door seating property?
E1	11:23 PM	JEB	x	x	x	OT N	YIN	Coke side damper stuck at 6. Thermocouple on Plot
1						Y // N	Y // N	
2						Y // N	YIN	
3						YIN	YUN	
4						YIN	YIN	
\$						YIIN	YIN	
6			-			YIIN	YIIN	
7 8						YIIN	YIIN	
9			-			Y#N	YHN	
10						YIN	YIN	
11						YIN	YIIN	
12		-	-		-	Y // N	YIN	
13						YIN	YIN	
14						YIIN	YIIN	
15						YIN	YUN	
16						YIIN	Y // N	
1/						YIIN	YIIN	
19						Y#N	YUN	
20						YIIN	YIN	
21						YUN	Y // N	
22						YIIN	YUN	
23						YIIN	YUN	
24						YIN	YUN	
25						YIIN	YUN	
26						YIN	YIN	
37						YIN	YIN	
28						YIIN	YUN	
29						YIN	YUN	
30		-				YIIN	YUN	
31						YIIN	YIN	
32						YIN	YIIN	
33						YIIN	YIN	
34						YIIN	YIN	
35						YIIN	YIIN	
36			-			YIIN	YIN	
38				-		YIN	YIIN	
38						YIIN	YIIN	
40						Y#N	YUN	
41						YIIN	YIN	
42						YIN	YUN	
43						YIN	YUN	
44						YUN	YIIN	
45						YIN	YUN	
46						YIN	YUN	
47						YIN	YUN	
48						YIN	¥ // N	
49			-			YUN	YIN	
50						YIN	YIN	
\$1						YIN	YUN	
52						YIN	YIN	
\$3						YIN	YUN	
54			-			YIIN	YIN	
66					-	YIIN	YIN	
56						Y // N	YIN	
57						YIN	YIN	
58						YIN	YUN	
\$9						YIIN	YIN	
60						YIN	YIIN	
61						YIIN	YIN	
62			-			Y // N	YIN	
63			-			YIIN	YIIN	
64			-			YIIN	YUN	
60			-			YIIN	YUN	
0.0								

Product Technician to initial in the box provided if there were no Door/Crown Leaks observed during your shift
There were no Door/Crown Leaks observed during my shift

SUBMIT TO THE ENVIRONMENTAL DEPARTMENT AT THE END OF SHIFT

ALL OVENS THAT ARE OUT OF SERVICE SHOULD BE MARK AS "OOS" OR "EMPTY" OR "MAINTENANCE HOLD" ENSURE THAT UPTAKES ARE CLOSED FOR ALL OUT OF SERVICE OVENS

Revised 06/22/2018

ATTACHMENT I (CONTINUED) – IHCC COKE OVEN CHECKLIST AND COKE OVEN LEAK RECORD SHEET

Battery Ovens - IHCC COKE OVEN LEAK RECORD

DATE:	SHIFT:	Your signature indicates that all door and	*
	Supervisor Signature	crown leaks observed on on the battery were recorded during your shift and all Method 9 readings were collected as required	SunCoke Energy

1. For every Door / Crown Leak, you must record the oven #, the times the leak was noticed and corrected, the potential cause & 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 JEB	PUSHER SIDE		CROWN Leak End Time Target: <30 minutes Push Side Coke Side		Wind Related?	Uptake Open?	Method 9 Reading Required? (Crown Leak >30 min)	Method 9 Reading Conducted?	Reasons for not conducting Method 9 (i.e. Sun Compliance)	Potential Cause & Corrective Actions
			Leak End Time Target: <15 minutes 12:05 PM									What is the cause of the leak? What was done to correct the leak?
					12:45 PM		Y /(1)	() // N	()// N	()/ N		Sole flue dampers adjusted, Increase draft Crown not properly sealed
							Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	YIN		
							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	YIIN		
							Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	YIN		
							Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	YIN		
							Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	Y // N		
		-					Y // N	Y // N	YIIN	Y // N		
							YIIN	YIN	YIN	YIN		
							Y // N	Y // N	Y // N	Y // N		
							YIIN	Y // N	Y // N	YIIN		
						-	Y // N	Y // N	Y // N	Y // N		
							YIIN	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	Y // N		
							YIIN	YIIN	Y // N	YIN		
							Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	Y // N		
	C		N				Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	YIIN		
			<u>1</u>				Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	YIN		
							Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	Y // N		
							Y // N	Y // N	Y // N	Y // N		
							YIIN	YIIN	Y // N	YIN		
							Y // N	Y // N	Y // N	Y // N		
							YUN	Y // N	Y // N	YUN		
							Y // N	Y // N	Y // N	Y // N		
							YUN	YIN	Y // N	Y // N		
-							Y // N	YIN	Y // N	Y // N		
							YIIN	Y // N	Y // N	YUN		

Wind Speed:

Wind Direction:

SUBMIT TO THE ENVIRONMENTAL DEPARTMENT AT THE END OF SHIFT

Revised 06/22/2018

ATTACHMENT J - ENVIRONMENTAL: MANAGEMENT OF CHANGE

8	Actions (CNI)				luktivis (2) 🖗 Qoʻ					Pro 1
	💌 Find. 👘 🔻 Select Action	× 🕽 🖬 🖉								
Let Stand	fard Action Log									
Advanced Sea	rch 👻 🖬 Save Query 👻 🖉 Bookmarks									
Dandard Activity	Fitter - 🏔 📋 👷 🖉 13 of 13								C) Dow	citad 17
Randard Action	Rescription	Tist	Trebs	Satur	P Category	₽	Organization	1	Site J	ρ
015	Determine if the change affects quench water or the quench pond operation.	EW/RON	PRE START	ACTIVE						
013	Determine if the change affects the water balance at the site.	ENVIRON	PRE START	ACTIVE						
008	Provide requirement for new emissions monitoring device (T/C, dP, analyzers, etc.)	ENVIRON	PRE START	ACTIVE						4
010	Determine if the change introduces a new process vent or modification of an existing one.	ENVIRON	PRE START	ACTIVE						4
<u>062</u>	Determine if the change impacts the capacity of wastewater treatment system components.	ENVIRON	PRE START	ACTIVE						4
017	Determine if the change complets with existing permit requirements.	ENVRON	PRE START	ACTIVE						4
014	Determine if the change affects water quality that is subject to a regulatory standard.	ENVIRON	PRE START	ACTIVE						4
106	Update environmental records for emissions from existing or new sources of known pollutants (VOC, SO	ENVIRON	PRE START	ACTIVE						4
011	Determine if the change creates a new process wastewater stream or the re-routing of an existing one	ENVIRON	PRE START	ACTIVE						4
018	Determine if the change affects environmental compliance requirements.	ENVRON	PRE START	ACTIVE						4
007	Document additional regulated pollutants	ENVIRON	PRE START	ACTIVE						-
009	Determine impact to the method of operation or design of an air emission unit.	ENVIRON	PRE START	ACTIVE						4
016	Determine if the change will produce a solid or liquid waste.	ENVRON	PRE START	ACTIVE						4

Select Records

ATTACHMENT K – PMO PLAN DOCUMENT CONTROL FORM

- To be completed every time the PMO Plan is revised
- Provide reference to section(s) that have been revised under "Details of Revision"

Issue	Date	Authorized	Details of Revision