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Coke Oven NESHAP Dated: 3/30/94

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Coke Oven NESHAP March 30, 1994 Page 2

o Delivery and installation of new equipment which will eliminate inverter and UPS failures on pusher and door machines was completed on 3/25/94.

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COKE OVEN NESHAP STATUS

SCHEDULE SUMMARY

1. DOOR JAMBS

o Installation complete.

2. COKE OVEN DOORS

- o Delivery on schedule.
- o Installation on schedule.

GOOSENECKS

o Installation complete.

4. UPTAKE ELBOW COVERS

o Installation complete.

5. MACHINE SPOTTING

- o Procurement of the pusher machines axle brake is in progress.
- o All replacement power supplies were delivered and installed.

6. COAL CHARGING

- o An installation and operating cost analysis was prepared for an on car jumper system vs. off car jumper system based on current operating experience and estimated costs to install an off car jumper system utilizing plant labor. The conclusion is that an off car jumper system is the cost effective solution.
- o Testing of the off car jumper system to evaluate emissions performance vs. equipment gas sealing requirement was completed.
- o Engineering for the off car jumper system is planned to start in early April.

7. FLARE STACKS

o Installation for NESHAP compliance was completed on 3/28/94 and successfully tested on 3/29/94 to meet the mandated 3/31/94 completion.

COKE OVEN NESHAP STATUS SCHEDULE SUMMARY PAGE 2

- 8. COLLECTOR MAIN PRESSURE CONTROL
 - o Installation complete.
- 9. RECONDITION EQUIPMENT
 - o Reconditioning of all coke oven door extractor equipment is 95% complete.
 - o Procurement of rehabilitated and upgraded coke side jamb cleaners is 50% complete.
- 10. PRIMARY COOLER TEMPERATURE CONTROL
 - o Preliminary engineering is in progress.
- 11. PUSHER SIDE JAMB CLEANERS
 - o On schedule for mid-November 1994 completion.

COKE OVEN NESHAP PROJECT STATUS

A. ENGINEERING

- 1. Coke Oven Doors
 - o Complete.
- 2. Machinery Spotting
 - o Vendor (Saturn) engineering for the pusher machine brakes is 90% complete.
 - o A combination inverter and UPS package has been furnished by Saturn to replace the existing equipment on all machines.
- 3. Uptake Elbow Covers (Riser Caps)
 - o Complete.
- 4. Coal Charging

Charge Car Modifications:

- o An installation and operating cost analysis of on car jumper system vs. off car jumper system (aka 4th hole U-tube) was performed and the conclusion is that the off car jumper system is the cost effective solution.
- o Testing of the off car jumper system option to evaluate emissions performance vs. equipment gas sealing requirements was completed.
- o The results of the above testing indicate that the use of "donuts" is not required under all drop sleeves as originally anticipated. Therefore, the operating cost for the off car jumper system will be reduced.
- o Engineering for the off car jumper system is planned to start in early April.
- 5. Collector Main Pressure Control
 - o Complete.

6. Flare Stacks

- o Engineering is complete except for as-builts and OEM service and repair manual.
- o The operating instruction manual was issued to the plant on 3/23/94.
- o The test plan was developed and the flare stacks were successfully tested on 3/29/94 for NESHAP compliance.

7. Project Schedule

- o Acme Engineering has developed and is maintaining the project bar chart schedules.
- 8. Primary Cooler Temperature Control
 - o A bid specification for engineering services is being prepared.
- 9. Pusher Side Jamb Cleaners
 - o The equipment bid was received and reviewed.

B. PURCHASE ORDER STATUS

- 1. Coke Oven Doors
 - o No change.
- 2. Coal Charging
 - o A P.R. for installation engineering of the off car jumper system was written on 3/20/94.
- 3. Door Jambs
 - o Complete.
- 4. Goosenecks
 - o Complete.
- 5. Recondition Equipment
 - o No change.
- 6. Equipment Inspections
 - o No change.

- 7. Uptake Elbow Covers
 - o Complete.
- 8. Machinery Spotting
 - o No change.
- 9. Flare Stacks
 - o No change.
- 10. Collector Main Pressure Control
 - o Complete.

C. INSTALLATION SCHEDULE

1. Doors

Coke Side:

o Complete.

Pusher Side:

- o On schedule.
- o (50) retrofitted doors have been delivered.
- o (50) retrofitted doors have been installed.
- o (50) old doors have been shipped.
- 2. Jamb and Sills Coke Side
 - o The installation was completed 8/6/93.
- 3. Goosenecks
 - o The installation was completed on 11/13/93.
- 4. Uptake Elbow Covers
 - o Installation was completed on 11/13/93.
- 5. Machinery Spotting
 - o Delivery of the pusher machines brake is scheduled for 4/18/94.
 - o Delivery and installation of all the replacement power supply units was completed on 3/26/94.

6. Coal Charging

o The present schedule shows the off car jumper system installation being completed 9/12/94. However, the schedule will be accelerated within the project budget limits.

7. Collector Main Pressure Control

o The installation was completed 10/4/93.

8. Flare Stacks

- o The installation for NESHAP compliance was completed on 3/28/94 and successfully tested on 3/29/94.
- o Punch list items are planned to be completed on 4/8/94.

9. Recondition Equipment

- o Installation of the replacement coke side jamb cleaners is delayed until the coke side spotting systems are fully operational.
- o Installation of the second reconditioned pusher side door extractor is planned for mid-April.

D. SHOP INSPECTIONS

- 1. Coke Oven Doors
 - o No change.
- 2. Door Jambs
 - o Complete.
- 3. Goosenecks
 - o Complete.
- 4. Coal Charging
 - o No change.

E. TRAINING

- 1. Coke Oven Doors
 - o No change.
- 2. Work Practice
 - o Work practice training is in progress.

3. Uptake Elbow Covers

o Complete.

4. Spotting Systems

- o Training of operating personnel will be reviewed after the replacement power supplies and pusher machines brake installations are completed.
- o Training of maintenance personnel was completed w/o 3/7/94.

5. Flare Stacks

o Training of operating and maintenance personnel is planned for the w/o 4/4/94.

F. WORK PRACTICE PLAN

- o The draft Coke Oven NESHAP Work Practice Plan was submitted to the USEPA on 11/15/93.
- o Several teams have been formed to formulate detailed operating plans for various coke oven operations. The teams continue to work on the plans.

COKE SIDE JAMBS AND RETROFIT DOORS 3/30/94

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FLARE STACKS 3/30/94

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