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CCH supervisor addition proposal (and rebuttals)

Dated: 1998

# Memorandum of Investigation

## Coal & Coke Handling Supervisory Force Chicago Coke Plant

NOB,  
Send to

**To:** K. Leonard  
Vice President - Operations

**From:** P. F. Justice

**Date:** May 12, 1998

**Copies To:**

J. P. Dula

J. Garzella



### Purpose of this Investigation

To review and evaluate the requirements for "Shift Management" Supervisors in the Coal and Coke Handling subdivision of the Coke Plant. The present force is four (4) per turn, daylight only, seven days per week, or a total of 5.6 equivalent employees.

wharf  
river  
piled  
bynd.

### Overall Operation of the Coal and Coke Handling Operation

Coal is presently supplied by four different coal mine suppliers and is delivered to one of two local outside contractors, Beemsterboer and KCBX, who unload it, stock it temporarily, and transfer it to the Coke Plant in dump trucks. If the coal is received by rail, it is handled by KCBX. If it comes by water, in barges or ships, it is handled by Beemsterboer. Both of these companies are about ten minutes driving time away from the plant.

KCBX

At the plant the coal is kept separated by coal mine supplier and stocked in large, low piles in the storage yard. Generally, each of the contractors (KCBX and Beemsterboer) delivers coal from only one supplier at a time, so signs are placed at the coal piles to direct the trucks to the appropriate pile. Experienced drivers should need little direction. ← always new drivers

c/o safety of piles.

At the pile the successive trucks drive onto the relatively smooth, compacted pile and dump their loads in a row beginning at the front and going to the back of the pile. When a row is completed, a bulldozer, or the large "992" rubber tired front end loader will level and smooth out the row. Then the "992" truck will drive over the coal to further smooth and compact it. Additional layers can be added as long as the pile can be driven on. However, it is necessary to rotate the stock, so there will usually be two piles of each brand of coal so that coal can be added to one pile while it is being retrieved from the other.

← not only one pile.

In the coal handling and preparation process there are seven operations, or steps:

1. Coal is received and stocked in the yard.

& sampled. car #'s  
barge  
truck #'s  
paperwork



2. It is retrieved from storage and transported to Stock Hoppers by two Euclid diesel powered scrapers. The scrapers travel onto the piles and scrape up a load of coal into their hopper bodies.
3. At the Stock Hoppers, which are situated below ground level, the coal is discharged from the bottom of the euclids and falls into the hoppers. The hoppers discharge directly onto conveyor belts which transport the coal to the Pulverizers. *screening process removal of iron & wood.*
4. The pulverizing machines grind the coal to the correct size and discharge it onto conveyor belts which transport it to the Mixer Bins. *vibrating beds which must be set in the blend & thence to*
5. Up to this point (the Mixer Bins) the various coal brands are kept separated. There are six (6) mixer bins in which the various coals are stored. All of the bins must be stocked with coal at all times to permit continuous operations.
6. Beneath the bins are the Mixers, where adjustable gates are set to maintain a continuous proportioned blending of each type of coal as it is discharged from the Mixer Bins onto a conveyor belt.
7. From the Mixers the blended coal is then transported by conveyor to the Charging Bins (4) which mark the end of the coal handling operation. It has been estimated that the filling of the Charging Bins can be done in about 4-5 hours of continuous operation each day, but usually takes about six (6) hours allowing for occasional stoppages at various places in the process. *CH is batch operation - all of continuous operation rejects*
8. In addition to coal preparation and storage, this department also is in charge of the transfer of coke from the Wharf at the discharge end of the coke production operation to the conveyors which carry it to the Blast Furnace Department or place it in stock on the ground if the Blast Furnace doesn't need it. Coke placed on the ground is piled up and stocked, and is reclaimed and placed into a hopper for conveying to the Blast Furnace Department by the "950" Front End Loader. *Responsible through the screening station. Coke masters & wharf lines.*

*wet coal  
line coal  
winter opas  
summer opas  
spontaneous combustion*

The concerned jobs which come under the supervision of the concerned supervisory force on a daily basis are as follows:

**Daily Force**

**Hourly Job**

- 1 - Loader Operator #992 - Operates a large front end loader truck to distribute and compact the coal in the yard. He will also occasionally assist the Loader Operator "950" to stock and reclaim coke in ground storage. This job does not normally require any close supervision. *utilize around the plant. Does not have radio.*
- 1 - Bulldozer Operator (actually a Kipin contractor employee, but utilized and directed by Acme). - Levels coal piles in the storage yard. This job does not normally require any close supervision. *operator*

*ditches, berms, storm water runoff. dips sump*

*no radio -*

*cleanup  
kco. ordination  
w/face outdgy*



2 - Euclid Scraper Operators - Transport coal from storage or the Kipin outside contractors operation to the Stock Hopper. This job does not normally require any close supervision. *Audit Mtee*

*blends coal when to add H<sub>2</sub>O feed rates for E-4*

1 - Stock Hopper Attendant - Directs the Euclid Operators as to the number of loads, the sequence of types of coal required and when it can be dumped into the Stock Hopper. He is also in charge of the flow of material on the conveyors to the pulverizer building. This job does not normally require any close supervision.

*Spout in case combustion clean up. RDD fill 20*

1 - Pulverizer Operator - He operates the "Cage Paktor" pulverizer, or if it is down, the Hammer Mill, to pulverize the coal. He must take samples daily and must adjust the spray of oil on the coal which is added to control its "bulk density". He is also in charge of the conveyor belts in the building. This job does not normally require any close supervision. *Changes made for pulverization. Spout adjusts cage & H<sub>2</sub>O. - w Belt & Pit*

*screens & feeders on plugs oversized by mag not @ hand at 1*

*responsible for tripper operation spout comb cleanup. He keeps coal moving from top of mixer bins*

1 - Mixer Bin Man - Operates the six (6) Mixer Bins. He must watch the level of coal in each bin and order coal from the yard to keep the bins even. He does this by contacting the Stock Hopper Attendant, who passes the orders on to the Euclid Operators. He also is responsible for the flow of coal on conveyors from the pulverizer to the bins and maintains a continuous flow of coal from each bin to the Mixers, which are directly beneath the bins. This job does not normally require any close supervision. *flowing*  
*Tripper operates properly - coal goes to right bin. checking E-man sending the right coal (audit)*

1 - Mixerman - Sets up and operates mixers beneath each bin to discharge a prescribed proportion of each type of coal in order to provide the required blend, as determined by Management. To assure this, he collects, weighs and reports daily samples at each Mixer. He is also responsible for the continuous flow of the conveyors in his area. This job does not normally require any close supervision. *This job requires close supervision*

*coal mixer changes*

*If this job is not done right, tragic results*

1 - Charging Bin Man - Observes the level of coal in each of his four (4) bins and distributes the blended coal as it is received, so as to assure that the operation is not disrupted and that all bins are filled each day. He is also responsible for maintaining conveyor flow from the Mixers to the bins. This job does not normally require any close supervision. *removes stickers. Spout comb clean up - person is responsible for moisture at the wharf*

*sump pump -*

1 - Wharf Attendant - This job attends the coke as it cools on the Coke Wharf and sprays hot spots with water. He controls the flow of coke by conveyor from the wharf to the #4 conveyor, which carries it to the Blast Furnace Dept. He also conveys coke to ground storage whenever the #4 conveyor cannot take it. He is also responsible for cleanup in the coke conveyor system in his area. While the concerned Supervisor works only on the daylight shift, the Wharf Attendant works around-the-clock. This job does not normally require any close supervision. *By-products Supervisor monitors on both shifts.*

*He pulls gates and modulates the openings to put coke on the conveyor. He monitors the coke for fine dirt leaves the wharf and goes on the conveyor belt. Proper load on the belt.*

*puts out coke if fires on the wharf. belts burn up - switches heaters - submersibles hot works -*

1 - Loader Operator #950 - Operates a front end loader to perform various material handling throughout the department. This includes such work as stocking and moving coke in ground storage and reclaiming it and placing it in a hopper for conveyor transportation to the Blast Furnace Department. Once each day he cleans coal spilled by the pusher. When required, loads processed coal into Euclids at the Kipin contractors site. He is also responsible to clean up the

*operates pettibone track cleaner*

*cleans pusher pad.*



person carries radio & is directed by the supervisor

oversize coal rejects at the pulverizer, etc. This work is all routine and repetitive, and therefore does not normally require any close supervision. However, due to the large area covered and the variety of duties performed, the supervisor may occasionally contact him and re-direct him to perform tasks which have a higher priority. Like the Wharf Attendant described above, this job works around-the-clock whereas the supervisor works only on the daylight shift.

BP controls on back shift

- 1 - Fork Truck Operator - He operates several pieces of equipment throughout the Coke Department and takes direction, by radio, from various supervisors in each of the areas he services. He uses the fork truck to unload deliveries and stock material at the shops, storeroom, By-Products area and Ovens as well as the Coal Preparation & Handling operation. He also performs such routine periodic work as handling and emptying sludge buckets, supplying fuel to the compressors, etc. On occasion he will operate a spare "950" front end loader to assist the Loader Operator #950, described above. Occasionally he will perform cleanup of spillage using a Bobcat. About once each day or so he will operate a Pettibone truck which is a front end loader equipped with a special bucket designed to clear spillage from railroad tracks. This job has a number of routine tasks which he performs daily, or as needed, without any direct supervision. In many cases he responds directly to the requests for assistance of his co-workers. Those duties require no supervision. However, as with the Loader Operator "950" there are occasions when he must be instructed as to work to be done, or must be re-directed to tasks of higher priority. Nevertheless, because of the fact that the job is familiar with all of the work normally done throughout the area and can foresee the work which needs to be done, close supervision should seldom be required.

always directed

for J.C.B. these people do not plan

Audit of maintenance

Again, a significant factor is that supervision and all of the jobs in this department can be in close communication with one another by radio and telephone.

6 radios in dept - Foreman, FL & 950 @ J.C.B.

- 1 - Service Man - This job services all of the mobile equipment in the department on a routine basis. This job does not normally require any close supervision.
- 4 - Laborers - Assist the operators where needed to maintain flow of coal through the various units described above and to perform cleanup. *should be 10 laborers @ the production level*
- 4 - Janitors - 2 work on daylight only, 7 days per week, plus one on second shift, weekdays only.

The above descriptions are brief and do not include the numerous small details that make up each job on a daily basis. This includes clearing jams in the equipment, especially in wet or freezing weather, cleaning up spills, and general daily cleanup, since coal and coke handling generate coal dust and coke breeze which cause a continuous cleanliness problem.

**The Need For Supervision**

In my observations of the various jobs, it was noted that the entire operation is more or less continuous and repetitive. Each job, beginning with the coal storage yard and running through the Coke Wharf area does the same thing, with little change, every day. Of course, there are variations, such as weather, when wet coal, due to rain or snow, can stick to the belts or hang up



in the bins, etc., but these are normally handled by the employees in the normal course of things, without need for special direction or supervision.

plus ops people stand around.

There are occasional times when close supervision might be required, such as to assure that changes in blend are properly carried out, or when the Cage Paktor pulverizer requires adjustment for wear, but the need for close direction would depend on the experience, judgment, skill and reliability of the regular operator. Similarly, some direction on the sequence or priority of tasks performed by the Loader Operator #950 or the Fork Lift Operator will no doubt be required.

I did not observe or learn of any conditions or problems on any of the concerned jobs that normally required unusual or imaginative solutions. The process is basically a simple, straight forward one, and the changes and adjustments that must be made to assure proper operations are, with few exceptions, ones they have encountered numerous times during day to day experience. In summary, the operating jobs are not complex or difficult and should not require close supervision.

Sade

During my visits, I was told of frequent occasions when the hourly supervisors would be called on to assist the operators to hammer on bins, or do other "hands-on" work to help the crews loosen the coal or otherwise help it to flow. I doubt that this should be necessary, and I don't feel that it should be an appropriate role for a supervisor, unless it was a very unusual or extreme emergency.

what experience

never operated this plant. working for me.

As part of my observations, I accompanied one of the supervisors in the Wharf area. This visit included a walking inspection of No. 4 conveyor which is the long conveyor which transports coke from the Coke Plant to the Blast Furnace Department. On that trip, he detected a set of trough-trainer rollers which sounded suspicious, and he noted its location for report to the Mechanical Repair Dept. When we got back from No. 4 Belt, he also inspected each of the other coke belts in the area. He found one belt missing two (2) clips in the lacing and another one missing four (4). This suggested to me that the belts had probably not been inspected recently, on a daily basis, and further raises the question whether the belts need to be inspected daily. If all workers in the area are cautioned to report visible belt damage when it is observed, perhaps a weekly, or twice weekly close inspection trip would suffice.

editorial comment: obviously Jack's experience inspecting belts with clips

Furthermore, I question whether this is a good use of an Operating Supervisors time. I would expect that, when the Supervisor reports his observation, a mechanical repairman will have to go back to the same location to assess the damage and determine the repairs required. He would then probably have to go back to his shop to get the necessary tools and parts for the repair. Perhaps a Mechanical Repairman, who is already trained to recognize proper and improper equipment or operation, and who is the one who will have to make the repair, should make the inspections as well. - *outs down time available for Mtee.*

Spurs cheaper than Mtee people.

peculiar

In the end, the entire inspection took about 2-1/2 hours, a lot of which was not fully utilized due to time spent on explanations and accommodations to myself along the way, and could probably have been done in 1-1/2 hours. On that day, at least, it was indicated that no further supervisory attention was required in the wharf area. This is not surprising since the Wharf Attendant and the Loader Operator "950" already work without supervision, or else receive it from another source, on the afternoon and night shifts.

cut short due to request of Mr. Justice, conceding to his physical condition

In the coal yard, the regular supervisor assigned to that area indicated that he spends a good deal of his time watching to ascertain that the outside contractor trucks place the coal in the proper

tail of E-5 went to the other side



places. Normally, the two contractors (KCBX and Beemsterboer) each deliver only one type coal for one destination on a given day, so there should be little need to watch them closely. When there is a change, it may be necessary to advise the drivers and reposition their signs to the correct coal pile. If it is necessary or desirable to check on the truck drivers occasionally, there are the "992" Operator, the Bulldozer Operator, the two (2) Scraper Operators and the Stock Hopper Attendant who are all constantly in the coal storage yard and could be instructed to note, correct and report any errors by the delivery trucks.

In addition to supervision of the employees who run the coal handling operation, the concerned supervisors have a number of administrative duties which they handle, on a regular basis, which include the following:

1. Bulk density oil is used as an additive to the coal at the pulverizer. The supervisor checks the contents of the tank when deliveries are received and at the start and end of each shift. While it is important to check deliveries it should not be necessary to check the tank twice each turn. It was noted that there had been an episode of dishonesty involving this oil at some time in the past. However, the present practice is probably overkill and probably could be reduced. *- internal need +*
2. Diesel fuel and gasoline deliveries - A supervisor monitors and measures these deliveries.
3. No. 3 Belt and No. C-21 Belt Scales - A supervisor reads and reports the metered production of coal and coke at each of these belts.
4. By Product Waste Tar Buckets - A supervisor checks the contents periodically and has them emptied by a fork lift operator when full. I think the fork lift operator has the experience to do this without direction, as long as he makes a report. *RCRA issue*
5. Parking Lot Maintenance - A supervisor sees to the clearing of snow. *- also grading, cleanup, sidewalks, neighborhood*
6. Safety Reports - Daily and monthly. Also periodic safety inspections and safety contacts with hourly employees. *opinion*
7. Trash Cans - A supervisor sends a Laborer or Fork Lift Trucker in response to occasional calls for removal of trash between the regular visits by Waste Management. *opinion*
8. Daily Production Report - Coal and coke.
9. Daily computer inputs, including the following:
  - a. Reported deliveries of coal from KCBX & Beemsterboer
  - b. Reported coke production from the ovens
  - c. Employee manhours worked
  - d. Maintenance job list

- e. Mobile equipment hours worked, which are used when scheduling routine periodic maintenance
- 10. A supervisor drives to KCBX or Beemsterboer and collects samples for the lab whenever a new shipment of coal arrives.
- 11. Sees that KIPIN, an outside contractor who works on the premises, is supplied with raw coal. *RCRA*
- 12. New employee orientation and training.

It is estimated that administrative duties such as the above items take from 1-2 man hours per day on the average, although it will vary.

*Geo - get M/H estimate*

**Recommendations**

In conclusion, I believe this operation differs very little from the many others I have encountered in the steel industry, with respect to the need for close supervision. As described above, the jobs are not especially complex, and vary little from day to day. Furthermore, the problems and variations which are encountered are seldom new and have been experienced many times by the experienced workforce. Therefore, the type of supervision and direction required should normally be of a general nature, common in the steel industry. There are about 21 employees in the department each day, and four (4) of those are janitors who should require almost no supervision. Therefore, a force of one (1) Area Manager and two (2) shift supervisors per turn, which amounts to 3 persons per day, on weekdays and 2 persons per day on weekends should be able to cover the area. This would constitute a force reduction of about three (3) persons, when compared to the present force of about six (6) Shift Managers or Asst. Shift Managers (hourly). No offsetting requirements for increases in hourly forces are expected.

*do not*

*get this of people*

*no time worked full day & his further pattern*

*c/o training*

**Additional Comments**

The concerned coke plant covers a fairly large area. With a reduction in force such as that suggested above, mobility will become more important. It is therefore suggested that the Company may want to provide an additional pickup truck, or a powered "scooter" so that the supervisors can get around more quickly.

It should be noted that this study reflects the practices and conditions now in force. However, I do not see that the presently contemplated changes in stocking and supplying of coal to the process from off-site would materially change the supervisory requirements.

*P. F. Justice*  
 \_\_\_\_\_  
 P. F. Justice



To: Dick O'Hara  
From: George Down

5-18-98

ACME COKE PLANT'S RESPONSE TO P.F. JUSTICE'S INVESTIGATION OF THE COAL & COKE HANDLING SUPERVISORY FORCE

PAGE1 PARA. 2, KCBX ALSO RECEIVES BARGES

PAGE1 PARA 3, "EXPERIENCED DRIVERS SHOULD NEED LITTLE DIRECTION." IN OUR CASE THESE DRIVERS HAVE VERY LITTLE EXPERIENCE BECAUSE THEY ARE ALWAYS CHANGING COMPANIES AND NEW DRIVERS ARE HAVING ALOT OF TROUBLE ON THE COAL PILES. SAFETY IS A MAJOR CONSIDERATION.

PAGE1 PARA 4, THE 992 IS A LARGE FRONT END LOADER, NOT A TRUCK. ALSO, IN THE LAST SENTENCE, WE DO TRY TO ROTATE OUR COAL BUT NOT NORMALLY IN TWO PILES, WE USUALLY SPLIT THE EXISTING PILE AND RECLAIM ON ONE HALF AND STOCK ON THE OTHER HALF.

PAGE1 PARA #1, THERE IS NO MENTION IN THE COAL RECEIVING AREA OF THE IMPORTANCE OF SAMPLING NEW COAL SHIPMENTS, THE RECORD KEEPING RESPONSIBILITIES IN KEEPING TRACK OF R.R. CAR NUMBERS, BARGE NUMBERS AND TRUCK NUMBERS. IT IS ALSO EXTREMELY IMPORTANT THAT COAL TRUCKS DUMP THEIR LOAD OF COAL ON THE CORRECT COAL PILE. WHEN TRYING TO EXPLAIN THIS TO COAL TRUCK DRIVERS THEY FEEL THAT COAL IS COAL AND THEY DON'T UNDERSTAND THAT THERE ARE IMPORTANT DIFFERENCES IN COAL.

PAGE2 PARA #3, THE LAST SENTENCE SHOULD READ: THE HOPPERS DISCHARGE ONTO VIBRATING BEDS, (SYNTRONS), WHICH MUST BE SET CORRECTLY FOR THE BLENDING OF COAL AND THE FEED RATE TO THE PULVERIZERS. THE COAL THEN TRAVELS THROUGH SEVERAL LOCATIONS WHERE SCREENING OF WOOD, METAL AND OTHER FOREIGN OBJECTS ARE REMOVED ENROUTE TO THE PULVERIZERS.

PAGE2 PARA #7, THE ONLY WAY THAT THE CHARGING BINS CAN BE FILLED IN 4 TO 5 HOURS IS IF THE OVENS WERE DOWN THE PREVIOUS DAY. COAL HANDLING IS A BATCH OPERATION NOT A CONTINUOUS OPERATION, BATCH OPERATION WILL SHUT DOWN AND MUST BE STARTED. THE TARGET EACH DAY IS TO FILL THE CHARGING BINS IN 6 HOURS, THIS ALLOWS 2 HOURS OF CLEAN UP. THE TIME IT TAKES TO FILL UP THE CHARGING BINS IS DEPENDENT ON WET COAL, FROZEN COAL, FINE COAL WINTER OPERATION AND SUMMER OPERATION. CONTINUOUS CLEANING IN THE COAL HANDLING AREA IS VERY IMPORTANT BECAUSE OF THE POSSIBILITY OF SPONTANEOUS COMBUSTION.

PAGE2 PARA #8, THE COKE HANDLING AREA IS RESPONSIBLE FOR THE COKE ALL THE WAY TO THE SCREENING STATION. COORDINATION WITH THE FURNACE AND THE SCREENING STATION IS IMPORTANT, WHETHER TO STOCK OR RECLAIM, FURNACE OUTAGES, LOADING OF COKE TRAINS ALL MUST BE COORDINATED. CLEAN UP OF THE WHARF AREA, ALL THE CONVEYOR BELTS, DRIVE PULLEYS, TAIL PULLEYS, SNUB PULLEYS, TAKE UP PULLEYS AND ALL WALKWAYS ARE IMPORTANT YEAR AROUND, BUT ESPECIALLY CRUCIAL IN THE WINTER MONTHS.

PAGE2 PARA ON LOADER OPERATOR #992, THIS OPERATOR NEEDS CLOSE SUPERVISION WHEN OPERATING THE 992 ON THE COAL PILES. THE EFFICIENT OPERATION ON THE COAL PILES NEEDS SOMEONE SUPERVISING THE TRAFFIC PROBLEMS ON TOP OF THE PILES WHEN THERE ARE ONE 992 TRACTOR, ONE BULLDOZER, TWO EUCLIDS AND SEVERAL COAL TRUCKS ALL TRYING TO PERFORM THEIR ASSIGNED TASKS. THE SUPERVISOR MUST ALSO AUDIT THE DAILY MECHANICAL INSPECTION OF THE 992 TRACTOR BY THE OPERATOR.



PAGE 2 PARA ON THE BULLDOZER OPERATOR, THIS CONTRACTOR EMPLOYEE MUST BE SUPERVISED. ACME SUPERVISORS DIRECT HIM ON GROOMING THE COAL PILES, WHEN TO PUSH UP THE PILES, WHEN TO DO COAL FIELD CLEANING, WHEN TO MAINTAIN THE PLANT'S DITCHES, PONDS, AND BERMS, REQUIRED BY THE STORM WATER RUN OFF LAWS. ALSO THIS OPERATOR MUST CLEAN THE QUENCHER SUMP THREE TIMES A WEEK. THIS CONTRACTOR EMPLOYEE PRESENTLY HAS ONLY 7 MONTHS EXPERIENCE.

PAGE 3 PARA ON EUCLID OPERATORS, THESE OPERATORS NEED CONTINUOUS SUPERVISION ON PILE GROOMING, DIRECTION OF RECLAIM, WHEN TO MOVE WET, FROZEN AND SNOW COVERED COAL AND IN AUDITING THE OPERATORS MECHANICAL INSPECTION OF THE MACHINE.

PAGE 3 PARA ON STOCK HOPPER ATTENDANT, THIS OPERATOR MUST BLEND COALS, ADJUST THE COAL FLOW RATE ON E-4 BELT, AND ADD WATER TO THE COAL WHEN NEEDED. YOUNG OPERATORS AND TURN OVER OF OPERATORS WITH A LACK OF JUDGMENT AND EXPERIENCE WITH WET, SNOW COVERED AND FROZEN COAL CAUSES MAJOR DISRUPTIONS AT THE PULVERIZERS. THIS OPERATOR MUST ADJUST FOR THE PULVERIZER IN OPERATION AND ALSO FOR THE PULVERIZATION NUMBERS.

PAGE 3 PARA ON THE PULVERIZER OPERATOR, A RESPONSIBLE FOREMAN IS NEEDED HERE WITH ENOUGH EXPERIENCE TO DETERMINE THE AMOUNT OF BULK DENSITY OIL AND WATER TO ADD TO THE COAL. HE MUST ALSO MONITOR THE OPERATOR ON THE CLEANING OF SCREENS AND FEEDERS, T BELT MAGNET. THE ADJUSTMENT OF THE COAL FLOW RATE THROUGH THE SYSTEM AND THE ADJUSTMENT OF THE HAMMER MILL AND THE CAGE PAKTOR BASED ON THE PULVERIZATION NUMBERS. THE OPERATOR IS ALSO RESPONSIBLE FOR THE INSPECTION OF POINT Q, S BELT, T BELT, W BELT AND W PIT AND W DRIVE. BECAUSE OF THE POSSIBILITY OF SPONTANEOUS COMBUSTION, DAILY CLEANING OF THE HAMMER MILL, THE CAGE PAKTOR AND ALL DUCTS AND CHUTES IS ESSENTIAL.

PAGE 3 PARA ON MIXER BIN MAN, THE MIXER BIN MAN MUST WATCH THE LEVEL OF COAL IN EACH BIN AND ORDER COAL FROM THE YARD TO KEEP THE COAL FLOWING, HE CAN NOT KEEP THE BINS EVEN BECAUSE THE COALS IN EACH OF THE BINS ARE OF DIFFERENT PERCENTAGES IN THE COAL MIX. THE OPERATOR IS RESPONSIBLE FOR KEEPING THE COAL FLOWING FROM THE TOP OF THE BINS. HE MUST BLOW DOWN THE BINS AS NEEDED WHEN HE OBSERVES ONE STICKING OR RAT HOLING. HE IS RESPONSIBLE FOR THE OPERATION OF THE TRIPPER CAR AND A DAILY MECHANICAL INSPECTION OF THE TRIPPER CAR. HIS MOST IMPORTANT RESPONSIBILITIES ARE TO MAKE SURE THAT THE COAL GOES INTO THE CORRECT BIN, AND TO CHECK ON THE E-MAN TO MAKE SURE OF THE CORRECT COAL. HE MUST KEEP THE MIXER BIN AREA CLEAN TO PREVENT SPONTANEOUS COMBUSTION.

PAGE 3 PARA ON CHARGING BIN MAN, THE CHARGING BIN MAN IS RESPONSIBLE FOR THE LEVEL OF COAL IN EIGHT BINS, NOT FOUR. THE OPERATOR MUST STAY IN COMMUNICATION WITH THE OVEN TOP FOREMAN SO AS TO ENSURE THE FLOW OF COAL THROUGH THE CHARGING BINS INTO THE LARRY CAR. HE OBSERVES FOR COAL STICKING OR RAT HOLING IN THE BINS AND BLOW DOWN AS NEEDED. AT THE BEGINNING OF THE SHIFT AND AT THE END OF THE SHIFT HE MUST BE COUNTED ON TO GIVE HONEST AND ACCURATE BIN READINGS.

PAGE 3 PARA ON WHARF ATTENDANT, THIS OPERATOR IS RESPONSIBLE FOR THE MOISTURE CONTROL OF THE COKE. HE MUST FOLLOW HIS JOB PROCEDURES. HE PULLS THE WHARF GATES OPEN THEN MODULATES THE OPENING IN ORDER TO PROPERLY LOAD



THE CONVEYOR BELT WITH COKE. HE MUST MONITOR THE COKE FOR FIRE AND PUT THEM OUT AS NEEDED. COMMUNICATION MUST BE MAINTAINED BETWEEN THE WHARF AND THE SCREENING STATION ON WHEN TO STOCK AND RECLAIM COKE, AS WELL AS WHEN LOADING R.R. COKE CARS. DURING WINTER OPERATIONS SALAMANDERS AND HOT WORKS HEATERS MUST BE MONITORED AS WELL AS THE USE OF WATER AND THE FLOW OF COKE. IF PROPER WORK PRACTICES ARE NOT FOLLOWED ENTIRE SECTIONS OF THE WHARF CAN BECOME UNUSABLE BECAUSE OF FROZEN COKE OR SEVERE BRICK SPALLING CAUSED BY UNCONTROLLED FIRES. HOUSEKEEPING ON THE WHARF IS IMPORTANT AND THE TWO SUMP PUMPS IN THE BASEMENT MUST BE MAINTAINED.

PAGE 3 PARA ON 950 LOADER OPERATOR, THE LAST TWO SENTENCES SHOULD READ, THE SUPERVISOR MUST CONTINUOUSLY CONTACT THIS OPERATOR TO RE-DIRECT HIM. ON THE 3/11 AND 11/7 SHIFTS THE BY PRODUCTS FOREMAN SUPERVISES BOTH THE 950 OPERATOR AND THE WHARF OPERATOR, THEY NEED CONSTANT SUPERVISION. BESIDES CLEANING UP COAL AT THE OVENS DAILY, THIS OPERATOR MUST ALSO CLEAN UP COKE DAILY ON THE PUSHER PADS.

PAGE 4 PARA ON THE FORK TRUCK OPERATOR, THE BOTTOM THIRD OF THIS PARAGRAPH IS NOT CORRECT. ALTHOUGH THERE ARE SEVERAL TASKS WHICH ARE DONE ROUTINELY THE FORK LIFT OPERATOR IS ALWAYS DIRECTED BY COKE PLANT SUPERVISORS EITHER FROM THE OVENS, BY PRODUCTS, MAINTENANCE OR THE COAL HANDLING DEPARTMENTS. THIS OPERATOR IS A JOB CLASS 8 AND DOES NOT PLAN HIS DAY, NOR CAN HE FORESEE WHAT WORK AND IN WHAT ORDER THEY SHOULD BE DONE.

PAGE 4 PARA 3, ALTHOUGH RADIOS AND TELEPHONES ARE HELPFUL IN COMMUNICATION WITHIN THE COAL & COKE HANDLING DEPARTMENT THEY ARE NOT ALWAYS AVAILABLE. THERE ARE NOT ENOUGH RADIOS OR TELEPHONES AND THEY ARE UNRELIABLE.

PAGE 4 PARA 4 ON THE SERVICE MAN, THIS JOB REQUIRES SUPERVISION. COAL HANDLING SUPERVISORS MONITOR ALL OF THE EQUIPMENT IN THE DEPARTMENT AND THE NUMBER OF HOURS THEY ARE USED AND ENSURE THAT IT IS SET OUT FOR SERVICE AT THE RECOMMENDED TIME. THEY MUST ALSO MONITOR AND CONTROL THE FILTERS AND LUBRICANTS THAT ALL OF THE PIECES OF EQUIPMENT NEED IN ORDER TO BE PROPERLY SERVICED.

PAGE 4 PARA 5 ON THE LABORERS, AT THE PRESENT PRODUCTION RATE THE COAL & COKE HANDLING DEPARTMENT ALWAYS HAS HAD TEN LABORERS, NOW WE HAVE ONLY FIVE, SO THE SUPERVISORS IN THE DEPARTMENT MUST BE VERY EFFICIENT IN THE USE OF THE LABORERS, NOT TOO MANY OPPORTUNITIES CAN BE MISSED.

PAGE 4 PARA 7, THIS PARAGRAPH SEEMS TO BE A DISCLAIMER. IT IS ADMITTED THAT NUMEROUS SMALL DETAILS ARE NOT INCLUDED IN THESE JOB DESCRIPTIONS.

PAGE 5 PARA 2, 3RD LINE, "THE NEED FOR CLOSE DIRECTION WOULD DEPEND ON THE EXPERIENCE, JUDGMENT, SKILL AND RELIABILITY OF THE REGULAR OPERATOR". WITH THE CONTINUOUS TURN OVER OF PEOPLE IN THE COKE PLANT THERE ARE NO OPERATORS WITH ALOT OF EXPERIENCE, JUDGMENT OR SKILL. THE MAJORITY OF JOBS IN THE COAL & COKE HANDLING DEPARTMENT ARE EITHER ONE OR TWO LEVELS ABOVE A LABORER, SO THERE IS A CONTINUOUS TURN OVER OF PEOPLE. WE HAVE GONE THROUGH YEARS OF TRANSITIONAL EMPLOYEES, RIVERDALE REPLACEMENT EMPLOYEES, AND NOW MANY OF THE JOBS IN THE COAL & COKE HANDLING DEPARTMENT ARE ON THE BOARD FOR RE-BIDDING, SO SOON WE'LL HAVE A NEW WAVE OF OPERATORS IN THE DEPARTMENT.



PAGE 5 PARA 4, THE LAST SENTENCE STATES THAT IT IS NOT APPROPRIATE FOR HOURLY SUPERVISORS TO DO HANDS ON WORK WITH THE CREWS. THE HOURLY FOREMAN MUST HELP CLEAR BLOCKAGES IN BINS AND CHUTES BECAUSE THERE ARE NO MASS FLOW HOPPERS OR CHUTES IN THE DEPARTMENT, ALSO THESE HOURLY FOREMAN ARE WORKING FOREMAN, THEY MUST ASSIST WHEN NEEDED.

PAGE 5 PARA 5, MR. JUSTICE SEEMS TO LACK EXPERIENCE WITH CONVEYOR BELTS AND CLIPS. THERE ARE ONLY TWO BELTS IN THE DEPARTMENT WITH VULCANIZED SPLICES, ALL OTHER BELTS HAVE MECHANICAL SPLICES WITH CLIPS WHICH ROUTINELY WEAR OUT AND BREAK. THESE BELT SPLICES MUST BE INSPECTED DAILY AND CLIPS REPLACED AS NEEDED. THE MISSING CLIPS HE MENTIONED WERE ON THE MTCE. LIST AND WERE REPAIRED LATER THAT DAY. THIS DEPARTMENT HAS 23 BELTS AND NONE OF THEM HAVE PULLED APART IN YEARS BECAUSE THEY ARE INSPECTED DAILY. HE SEEMS TO BE EDITORIALIZING IN THE LAST SENTENCE OF THIS PARAGRAPH. WHAT HE SUGGESTS IS NOT POSSIBLE, AN EMPLOYEE WITH IN SOME CASES ONLY A COUPLE OF MONTHS OF EXPERIENCE IS NOT QUALIFIED TO INSPECT BELTS.

PAGE 5 PARA 6, THIS PARAGRAPH SEEMS TO BE SPECULATION. OPERATING FOREMAN ARE QUALIFIED TO INSPECT EQUIPMENT AND SUGGEST REPAIRS. IF THE MECHANICAL REPAIRMEN WERE REQUIRED TO INSPECT ALL DEPARTMENT EQUIPMENT THIS WOULD REDUCE THE TIME AVAILABLE FOR REPAIR WORK.

PAGE 5 PARA 7, THE LAST SENTENCE IN THIS PARAGRAPH IS WRONG. THE WHARF OPERATOR AND THE 950 LOADER OPERATOR ARE SUPERVISED 24 HOURS A DAY, THE COAL & COKE HANDLING DEPARTMENT SUPERVISES THEM DURING THE 7/3 SHIFT, AND THE BY PRODUCTS FOREMAN SUPERVISES THEM ON THE 3/11 AND 11/7 SHIFTS. THIS INSPECTION WAS CUT SHORT DUE TO THE PHYSICAL CONDITION AND AGE OF MR. JUSTICE. HE NEVER MADE A COMPLETE INSPECTION ON #4 BELT.

PAGE 6 PARA 1, IT IS NECESSARY TO CHECK ON THE COAL DELIVERY TRUCK DRIVERS CONTINUOUSLY BECAUSE THERE ARE ALWAYS NEW DRIVERS AND MANY DRIVERS WHO FEEL THAT ALL COAL IS THE SAME AND IT ISN'T IMPORTANT WHERE THEY DUMP THEIR LOAD. MR. JUSTICE SUGGESTS THAT THE OPERATORS WHO WORK IN THE COAL STORAGE YARD CAN KEEP AN EYE ON THE COAL TRUCKS, THIS ISN'T POSSIBLE, THESE PEOPLE ARE ALREADY FULLY UTILIZED.

PAGE 6 PARA 3, THE POLICY OF CHECKING THE LEVEL OF THE BULK DENSITY OIL TANK AT THE START AND END OF EACH SHIFT IS NECESSARY BECAUSE IT SERVES AS AN INTERNAL AUDIT.

PAGE 6 PARA 6, THE HANDLING OF THIS MATERIAL IS COVERED BY FEDERAL LAW, IT IS NECESSARY THAT A SUPERVISOR MANAGES THIS.

PAGE 6 PARA 7, BESIDES CLEARING OF SNOW IN THE PARKING LOT THE COAL HANDLING SUPERVISES IT'S GRADING, CLEAN UP, AND THE SIDE WALKS AND FENCE LINE ON THE EAST SIDE OF THE FENCE.

PAGE 7 PARA ON ADMINISTRATIVE DUTIES, THE ESTIMATE OF ONLY 1-2 MAN HOURS PER DAY SPENT ON THIS IS NOT ACCURATE. THERE IS NO MENTION OF TRAINING THAT IS REQUIRED BY OSHA AND THE EPA, PLUS NEEDED TRAINING SUCH AS FIRE TRAINING, AND WITH THE HIGH TURN OVER OF EMPLOYEES THE COAL & COKE HANDLING FOREMAN ARE REQUIRED TO SPEND MUCH MORE THAN 1-2 HOURS PER DAY.



PAGE 7 PARA ON RECOMMENDATIONS, MR. JUSTICE BELIEVES THAT THIS OPERATION DIFFERS VERY LITTLE FROM OTHERS HE HAS ENCOUNTERED, WHAT OTHER COKE PLANTS HAS HE WORKED IN? HE STATES THAT THE SUPERVISION AND DIRECTION REQUIRED SHOULD BE OF A GENERAL MATURE, COMMON IN THE STEEL INDUSTRY. HE DOES NOT SEEM TO UNDERSTAND THAT THE COAL & COKE HANDLING DEPARTMENT IS MADE UP OF EMPLOYEES WITH VERY LITTLE EXPERIENCE WHO ARE EITHER ONE OR TWO STEPS UP FROM BEING A LABORER, AND WHO ARE JUST BIDDING THEIR TIME UNTIL THEY CAN BID ON A HIGHER PAYING JOB ELSEWHERE. THEY GENERALLY HAVE NEITHER THE EXPERIENCE NOR THE ABILITY TO BE PART OF A SELF DIRECTED WORK FORCE.

THERE ARE APPROXIMATELY 27 EMPLOYEES WORKING IN THE DEPARTMENT EACH DAY AND 3 OF THEM ARE JANITORS, NOT 4 AS HE WROTE. THE AREA COVERED BY THE COAL & COKE HANDLING DEPARTMENT IS A VERY LARGE AREA AND 2 SHIFT SUPERVISORS PER DAY IS NOT ENOUGH EVEN ON THE BEST OF DAYS. MR. JUSTICE WAS NOT HERE DURING THE RAINY SEASON OR DURING THE WINTER MONTHS WHEN THIS DEPARTMENT RUNS ONLY BECAUSE IT HAS AN ADEQUATE NUMBER OF SUPERVISORS WITH MANY YEARS OF EXPERIENCE, WHO ARE DETERMINED TO GET THE JOB DONE

MR. JUSTICE FEELS THAT THE COAL & COKE HANDLING OPERATION IS SIMPLE, STRAIGHT FORWARD AND ROUTINE. CONSIDERING THE AGE OF THE EQUIPMENT IN THIS DEPARTMENT AND THE HIGH TURN OVER OF EMPLOYEES, THIS DEPARTMENT RUNS WELL ONLY BECAUSE IT HAS AN ADEQUATE NUMBER OF SUPERVISORS WHO CONTINUOUSLY MONITOR EVERY AREA OF THE DEPARTMENT.



28 May 1998

TO: K. Leonard

From: J. Garzella

Mr. Justice refers to his experience in the steel industry, there is no reference to his experience with the coking industry.

Re: P. Justice's conclusions regarding the Need for Supervision

All steel mill jobs are repetitive in nature, and hence are not complex or difficult. The order in which they are performed and the timely movement of work effort make the difference between a unit that prospers and one which cannot compete. It is the direction of these resources that determines survival. This direction is provided by trained, experienced, and concerned supervisors.

Mr. Justice makes numerous references to the experience of coal handling employees. The coal handling jobs are entry level jobs, experience is generally limited. Money is made by overtime. More overtime is generated by remaining in one's area, rather than finding where the problem exists and going to that area to help clean it up.

Batteries have been damaged and destroyed by improper coal blends. Our mixer machines date back to the early 1900's, four of them are made of wood. The mix is set by clamping a gate to set the level of coal on a flat belt. All belts must be kept flowing at all times during a run with the proper amount of coal on the belt. A supervisor is stationed in the mixers to insure the coal is blended properly. The settings are measured and weighed for accuracy twice daily because they have changed during a day's operation. Lumps, and coal hanging up in the bins are major problems. Mr. Justice does not believe that it is necessary to hammer on coal bins in order to keep coal flowing. An inspection of the bins and the tools would reveal that coal bins are beaten routinely. A redesign of the mixer machines and bins utilizing mass flow bins and weigh cells could reduce the requirements of a supervisor in the mixers.

The supervisor in the Pulverizer area is conceded by the report, to be necessary due to its effect on quality. Close supervision is necessary due to the lack of experience in the area. Other duties which the report does not recognize include sampling, bulk density oil addition and adjustment, inspection for iron which will destroy oven walls, inspections and cleanup to avoid spontaneous combustion fires in a wooden structure, charging bins, and tar sludge processing (this is a RCRA activity).

The coal yard supervisor analysis has several rash assumptions. The first is that truck drivers will follow instructions without being supervised. Many will, others will not. Most of the drivers that come into the plant come from brokers, and as such have no concern for anything other than hauling as much product as possible in the time available. There is a high turnover rate among these drivers, they are continually cautioned to obey stop signs, speed limits, and other rules of the road within the plant. Constant observation and instruction is necessary. The second rash assumption is any of the five positions mentioned would report anything done by a truck driver outside of something affecting their personal safety. The contract states that management will direct the work force--these people are not management (one does not even work for Acme) and generally do not have the personalities to correct the actions of another worker.

With respect to the requirements for supervision at the Wharf, it is evident that Mr. Justice has little experience inspecting conveyor belts with mechanical splices. A clip can break and catch on iron work or a frozen idler, and tear or break the belt. This causes operating delays, and maintenance expenses that are avoidable. When a conveyor belt malfunctions and spills, it can create a lot of unnecessary work in a very short time. Daily inspections coupled with timely maintenance ensure equipment availability. A recommendation that a Mechanical Technician is the proper individual to make the inspection ignores three issues: 1.) The Mechanical Technician does not inspect for cleanup and does not direct the laborers for cleanup, 2.) The Mech Techs routinely carry the tools and equipment to perform the routine jobs that they are assigned, such as repairing idlers etc, 3.) the Mech Techs are already fully utilized and these inspections would have to be done on overtime, which costs more than a temporary foreman.



Wharf feeders are also inexperienced individuals; this position has a high turnover rate. Supervision is necessary to ensure that cleanup is done properly, fires on the wharf are controlled so the belts do not burn up, salamanders and hot works are lit during winter, that sump pumps, belts, scrapers, skirting, flop plates, etc. are working properly.

Mr. Justice makes the statement on Page 5, 6th paragraph that "on that day, at least, it was indicated that no further supervisory attention was required in the wharf area." In Mr. Justice's draft, the statement was crossed out and was hand written to state "On that day, at least, I inferred that no further supervisory attention was required in the wharf area". This raises a credibility issue with Mr. Justice's conclusions. I talked with the two supervisors Mr. Justice had at the wharf area, they stated that at no time did they indicate to Mr. Justice that no further supervision was necessary in the wharf area.

This statement is followed by "This is not surprising since the Wharf Attendant and the Loader Operator "950" already work without supervision, or else receive it from another source on the afternoon and night shifts. Mr. Justice seems unaware that supervision is provided on the back shifts by the By-Products foreman, and either unwilling or incapable of making this determination.

When the inspection of #4 Belt is made, the supervisor also inspects the outfall, the intake, the expansion joints on the gas main, inspects for gas leaks, and for fire extinguishers along the belt.

The supervisors also handle Hot Work Permit area preparation, inspection, supervision, and close-out of the Hot Work Permit in order to prevent and control fires in the coal and coke handling areas during maintenance.

Page 5, especially the 6th paragraph, reveals Mr. Justice's investigation to be incomplete, biased towards a predetermined position without proper investigation, rampant with innuendo and unsupported opinion. A reading of the page gives many more examples. This is an unprofessional report.

The Coal Handling Department covers a large area. Mr. Justice recommends a scooter or another truck to implement his recommendations. Scooters are unsafe, especially over the coke plant terrain. The use of a truck to traverse the area between the Pulverizer, the Mixers, and the Yard positions is impractical. We want our supervisors to walk the belts and the area they are for which they are responsible in order to find problems before they become major outages. In addition, the terrain precludes the practical use of a truck as a time saving piece of equipment.

The last paragraph states that the changes in the stocking and supplying of coal would not change the supervisory requirements. This is unproved