

**What they found (65 items including):**

- TCC was operating three unenclosed and unsealed pumps, and did not duct gases from each sump
- More than 25% of the coke produce at the Facility was furnace coke.
- TCC was operating two unenclosed and unsealed weak ammonia-liquor storage tanks at the facility
- TCC does not use the proper equipment for monitoring leaks
- TCC did not make a first attempt at repair on the exhauster
- TCC stated that records of monitoring and visual inspections of the control equipment for the Facility's process vessels, tar storage tanks, and tar-intercepting sumps for control equipment do not exist.
- TCC did not respond to the EPA with the requested information about leaks in 1992, 2005-2009.
- A TCC representative stated that only initial training has been provided to coke plant-operating personnel and that refresher training has not been provided.
- When EPA requested to review TCC records that indicate that the leaks identified were timely repaired. TCC indicated that it has not kept any records of such leak repairs.
- TCC protested the additional testing. The EPA responded that TCC must conduct the emissions testing at appropriate locations at the respective stacks. To date, TCC has not submitted a DIAL test protocol to EPA.

**Findings of Violations:**

- EPA finds that TCC has operated as a furnace coke by-product recovery plant since 2007.
- TCC failed to enclose and seal all opening on three tar-intercepting sumps operating at the Facility.
- TCC failed to duct gases from each process vessel, tar storage tank, and tar-intercepting sump to the gas collection system, or other enclosed point in the by-product recovery process where benzene in the gas will be recovered or destroyed.
- TCC failed to enclose and seal all openings on a light-oil storage tank at the Facility
- TCC failed to attach, to four pieces of leaking equipment, a weatherproof and readily visible identification marked with the equipment identification number.
- TCC failed to conduct monthly equipment leak monitoring for pumps in benzene service for nine months between November 2005 and April 2008.

- TCC failed to record and keep, in a readable accessible location, detailed schematics, design specifications, and piping and instrumentation diagrams pertaining to the design of control equipment.
- TCC failed to keep records of monitoring and visual inspections of the control equipment or systems installed for the Facility's process vessels, tar storage tanks, and tar-incepting sumps.
- TCC failed to submit all of the information required by the EPA
- TCC's Title V operating permit did not include all applicable requirements
- ECC failed to provide refresher training for all coke plant operating personnel

## **Orders**

### **Within 15 days:**

- Seal all the tar-incepting sumps, opening at the ammonia liquor storage tanks and submit certification the changes have been made.
- Create new procedures for monitoring and calibrating the equipment
- Comply with monthly monitoring equipments for all pumps and valves in benzene service and mark all pieces of equipment in benzene service.

### **Within 30 days:**

- They must duct gases from each tar-incepting sump and excess ammonia-liquor storage tank to the gas collection system, or other enclosed point in the by-products recovery process where the benzene in the gas would be recovered or destroyed.
- Must comply with the rest of the regulations they were breaking
- They must implement the refresher training program in its work practice plan for all coke operating personnel
- Must submit a protocol for DIAL testing.

## **Enforcement**

- If TCC does not comply, the EPA has the right to apply up to 37,500 per day and pursue civil penalties.