GRENADA COUNTY - TIE PLANT MS
KOPPERS INC
0960-00012
1997--------1999

AI (

Koppers Inc

General Information

ID	Branch	SIC	County	Basin	Start	End
876	Energy and Transportation	2491	Grenada	Yazoo River	11/09/1981	

Address

Physical Address (Primary)	Mailing Address
1 Koppers Drive Tie Plant, MS 38960	PO Box 160 Tie Plant, MS 38960

Telecommunications

Type	Address or Phone
Work phone number	(662) 226-4584, Ext. 11

Alternate / Historic AI Identifiers

Alt ID	Alt Name	Alt Type	Start Date	End Date
2804300012	Koppers Industries, Inc.	Air-AIRS AFS	10/12/2000	
096000012	Koppers Industries, Inc.	Air-Title V Fee Customer	03/11/1997	
096000012	Koppers Industries, Inc.	Air-Title V Operating	03/11/1997	03/01/2002
096000012	Koppers Industries, Inc.	Air-Title V Operating	01/13/2004	01/01/2009
MSR220005	Koppers Industries, Inc.	GP-Wood Treating	09/25/1992	
MSD007027543	Koppers Industries, Inc.	Hazardous Waste-EPA ID	08/27/1999	
HW8854301	Koppers Industries, Inc.	Hazardous Waste-TSD	06/28/1988	06/28/1998
HW8854301	Koppers Industries, Inc.	Hazardous Waste-TSD	11/10/1999	09/30/2009
876	Koppers Industries, Inc.	Historic Site Name	11/09/1981	12/11/2006
876	Koppers, Inc.	Official Site Name	12/11/2006	
MSP090300	Koppers Industries, Inc.	Water-Pretreatment	11/14/1995	11/13/2000
MSP090300	Koppers Industries, Inc.	Water-Pretreatment	09/18/2001	08/31/2006
MSU081080	Koppers Industries, Inc.	Water-SOP	11/09/1981	11/30/1985

Regulatory Programs

Program	SubProgram	Start Date	End Date
Air	Title V - major	06/01/1900	
Hazardous Waste	Large Quantity Generator	08/27/1999	
Hazardous Waste	TSD - Not Classified	06/28/1988	
Water	Baseline Stormwater	01/01/1900	
Water	PT CIU	11/14/1995	
	PT CIU - Timber Products		

Water	Processing (Subpart 429)	11/14/1995	
Water	PT SIU	11/14/1995	

Locational Data

Latitude	Longitude	Metadata	S / T / R	Map Links
33 ° 44 ' 3 .00 (033.734167)	89 ° 47 ' 8 .06 (089.785572)	**Point Desc:** PG- Plant Entrance (General). Data collected by Mike Hardy on 11/8/2005. Elevation 223 feet. Just inside entrance gate. **Method:** GPS Code (Psuedo Range) Standard Position (SA Off) **Datum:** NAD83 **Type:** MDEQ	Section: Township: Range:	SWIMS TerraServer Map It

12/20/2006 12:16:40 PM

Mississippi Department of Environmental Quality
Office of Pollution Control

I-sys 2000 Master Site Detail Report

Site Name: Koppers Industries Inc

PHYSICAL ADDRESS

LINE 1:	Tie Plant Road
LINE 2:	
LINE 3:	
MUNICIPALITY:	Tie Plant
STATE CODE:	MS
ZIP CODE:	38960-

MAILING ADDRESS

LINE 1:	PO Box 160
LINE 2:	
LINE 3:	
MUNICIPALITY:	Tie Plant
STATE CODE:	MS
ZIP CODE:	38960-

OTHER INFORMATION

MASTER ID:	000876
COUNTY:	Grenada
REGION	NRO
SIC 1:	2491
AIR TYPE:	TITLE V
HW TYPE:	TSD
SOLID TYPE:	
WATER TYPE:	INDUSTRIAL
BRANCH:	Energy

ECED CONTACT:

Collier, Melissa

BASIN:

AIR PROGRAMS ☑ SIP ☐ PSD ☐ NSPS ☐ NESHAPS ☐ MACT

Mississippi Department of Environmental Quality
Office of Pollution Control

Pemits

PROGRAM	PERMIT TYPE	PERMIT #	MDEQ PERMIT CONTACT	ACTIVE
AIR	TITLE V	096000012	Burchfield, David	YES
WATER	PRE-TREATMENT	MSP090300	Collins, Bryan	YES
HAZ. WASTE	TSD	HW8854301		NO
HAZ. WASTE	EPA ID	MSD007027543		NO
HAZ. WASTE	TSD	HW8854301	Stover, Wayne	YES
GENERAL	BASELINE	MSR22005		NO
WATER	SOP	MSU081080		NO

Compliance Actions

MEDIA	ACTIVITY TYPE	SCHEDULED	COMPLETED	INSPECTED B
HAZ WASTE	Financial Record Review	1/18/00	1/18/00	Twitty, Russ
WATER	CMI - PRETREATMENT			Whittington, Darryail
WATER	CEI - PRETREATMENT	9/30/00		Twitty, Russ
WATER	CEI - NA	9/30/00		Twitty, Russ
HAZ WASTE	Compliance Evaluation Inspection	9/30/00		Twitty, Russ
AIR	State Compliance Inspection	9/30/00		Twitty, Russ
WATER	CEI - NA	3/2/99	3/2/99	Twitty, Russ
HAZ WASTE	Compliance Evaluation Inspection	3/2/99	3/2/99	Twitty, Russ
AIR	State Compliance Inspection	3/2/99	3/2/99	Twitty, Russ

Inspection Report

Facility Name: Koppers Industries

Date: January 16, 1998

Address: 543 Tie Plant Road
Tie Plant, MS 38960

P. O. Box 160

Coded

Inspected By: Kayra N. Gutierrez

Person Contacted: Thomas L. Henderson, Plant Manager
Mike Sylvester, Field Supervisor

Facility No.: 0960-00012

Is facility major or minor? Major Title V

Purpose of Inspection:

- ☐ Compliance Verification
- ☐ O&M
- ☐ Performance Evaluation
- ☐ Complaint Investigation
- ☐ VEE
- ☒ Annual
- ☐ Surveillance
- ☐ Follow-up
- ☐ Other (Explain):

Current Permit Status: Title V operating permit issued March 11, 1997

Source Description: This is a creosote and pentachlorophenol wood treating facility.

Applicable Regulations:

- ☒ SIP
- ☐ PSD
- ☐ NSPS
- ☐ NESHAPS

Cite regulation by description or regulatory section number: APC-S-1, Sections 3.4(b), 3.4(a)(1), 3.4(a)(2), 3.6(a), 4.1(a).

State any permit conditions not being complied with and describe noncompliance:

Comments: Records for Emission Point AA-001 Woodwaste Boiler were checked. These records included temperature, opacity, CO emissions.

Inspection Report Form - Boilers

Facility Name: Koppers Industries **Date:** January 16, 1998

Emission Point No./Name: AA-001 Wellons/Nebraska Woodwaste Boiler with Multiclone collector.

Rated Boiler Size: 60.0 MMBTUH
or
_____ lbs steam/hr @ _____ psig

Operating Rate @ Insp: 18,030 lbs steam/hr @ 142 psig and 1884 ^{o}F

Fuel(s) Being Used: ☒ Woodwaste:
☒ Hogged Fuel @ 2 tons/hr

Soot Blowing: ☐ Periodic ☒ Manual ☐ Continuous ☐ Automatic
Schedule: As needed

Air Pollution Controls: ☐ None ☐ Baghouse ☐ Cyclone
☐ ESP ☒ Multiclone ☐ Scrubber (For Particulate)

Stack Emissions: Opacity 4.47 % by_CEM

Comments: A Method 9 VEE could not be performed due to rain.

Inspection Report

Facility Name: Koppers Industries **Date:** January 16, 1998

Emission Point No./Name: AA-001 Wllons- Nebraska Woodwaste boiler with Multiclone collector.

Type of particulate being handled: Soot

Cyclone Type(s) - If more than one, put number of units in the parentheses below.

_____Simple (Cylinder Length = 2 x Diameter)
_____ Potbellied (Cylinder length < 2 x Diameter)
_____ High Efficiency (Cylinder length > 2 x Diameter)
__xx__ Multiclone

Fan is Located: ☐ Upstream ☐ Downstream of Cyclone

If Downstream does fan have: ☐ Direct Emission
☐ Auxiliary Stack

If Upstream does cyclone have: ☐ No Cap (Vertical Emission)
☐ Fixed Cap (Diffuse Emission)
☐ Wind Respondent Cap (Horizontal Emission)

Is fallout occurring? ☐ Yes ☒ No

Does cyclone have dust buildup on exhaust? ☐ Yes ☒ No
How often is it cleaned up: Every time the boiler is inspected (once a year), the multiclone is also is also inspected. Last inspection was done on 11-11-96.

Does cyclone have any holes or split seams? ☐ Yes ☒ No

How is collected dust stored, moved, disposed of? Dust is collected and taken to the landfill.

Comments: A Method 9 VEE could not be performed due to rain.

Inspection Report

Facility Name: Koppers Industries **Date:** January 16, 1998

Emission Point No./Name: AA-002, fuel oil fired Murray Boiler

Rated Boiler Size: 28.5 MMBTUH
or
_____ lbs steam/hr @ _____ psig

Operating Rate @ Insp: ** MMBTUH

Fuel(s) Being Used: ☐ Fuel Oil, No. ____ @ _____ Gal/hr

For Solid Fuels, Describe Fuel Stoking Method: N/A

Soot Blowing: ☐ Periodic ☐ Manual ☐ Continuous ☐ Automatic
Schedule:

Air Pollution Controls: ☐ None ☐ Baghouse ☐ Cyclone
☐ ESP ☒ Multiclone ☐ Scrubber (For Particulate)

Stack Emissions: Opacity ** % by VEE, _____ % by CEM

Comments: This boiler is not in service. During last inspection for certification, it failed the inspection and could not be certified, therefore it can't be operated. Inspection was done by Travelers Insurance Co.

Koppers Industries
Emission Point AA-003 Wood Treatment Facility
List of Tanks

Ref No.	Description	Capacity	Contents	Changes in stored prod.?
6	#5 Work Tank	30,000 gallons	penta in oil	No
7	#2 Work Tank	30,000 gallons	creosote 60/40	No
8	#3 Work Tank	30,000 gallons	creosote	No
9	#4 Work Tank	22,420 gallons	creosote #1	No
10	2nd Decant Tank	30,000 gallons	creosote/water	No
11	Measuring Tank	4,200 gallons	creosote #1	No
12	Creo Storage Tank	100,000 gal.	creosote #1	No
13	Water Surge Tank	100,000 gal.	Process water	**
14	Oil Storage Tank	100,000 gal.	Fuel Oil	No
15	Creo Storage Tank	105,000 gal.	creosote 60/40	No
16	Process Water surge tank	300,000 gal	Process water	No
17	Storm Water Surge Tank	250,000 gal	Storm Water	No
18	Coagulant Tank	2,700 gal	Dearfloc 4301	No
19	Decant Tank	4,500 gal	creo/oil/water	No longer used
20	Creo Blowdown Tank	8,000 gal	water/creosote	No
21	Air Receiver		Compr. air	No
22	Air Receiver		Compr. air	No
23	Penta Blowdown Tank	8,000 gal	water/oil/penta	No
26	Aeration Tank	150,000 gal.	Waste water	No
27	Clarifier Tank	25,000 gal.	Waste water	No
28	Discharge Tank	15,000 gal	Waste Water	No
29	Creosote Dehydrator	4,000 gal		**
30	N.Penta Equalization T.	14,000 gal	penta/water/oil	No
31	S.Penta Equalization T.	14,000 gal	penta/water/oil	No
32	Penta Mix Tank	11,500 gal	oil/penta	No
33	Penta Mix Tank	5,000 gal	oil/penta	No
34	Penta concentrate Sto.T.	10,500 gal	penta concent.	No

29 NS

** This tanks were not being used at time of the inspection.

Koopers Industries
0960-00012
Inspection Report

The following is a list of emission points and their status during the inspection.

Emission Point	Description	Status
AA-004	Ref. No. 27,Tie Mill and Lumber Mill with cyclone	Not operating at time of inspection.
AA-005	Ref. No. 33, Boiler House Nat. gas space heater	Operating at time of inspection
AA-006	Ref. No. 35, Nat. gas steam cleaner	Operating at time of inspection
AA-007	Ref. No. 36, Wood Stove Shop Heater	Not longer at site
AA-008	Ref. No. 8, Treated Wood Storage	No visible emissions
AA-009	Ref. No. 31, Pole Kiln	Operating at time of inspection
AA-010	Ref No. 32 Pole Peeler	Not operating at time of inspection
AA-011	Ref. No. 34, Wood Preparation and Handling	Not operating at time of inspection
AA-012	Ref. No. 37, 2 parts cleaner/degreaser	Not operating at time of inspection
AA-013	Ref. No. 24, 1,000 gal. gasoline storage tank	In use
AA-014	Ref No. 25, 20,000 gal. diesel storage tank	In use
AA-015	Ref No. 33, Standby Boiler Room space heater	In use
AA-016	Ref. No. 33 Fire Pump building space heater	In use

3 x 13

Inspection Report Form

Facility Name: Koppers Industries **Date:** April 15, 1997

Address: Tie Plant Road
Tie Plant, Mississippi

Inspected By: Celina Matthes and Sherryl Johnson

FILE COPY

Person Contacted: Thomas L. Henderson, Plant Manager
Mike Sylvester, Field Supervisor

Facility No.: 0960-00012

Is facility major or minor? Major

Purpose of Inspection:

- ☒ Annual
- ☐ Follow-up
- ☐ Compliance Verification
- ☐ VEE
- ☐ O&M
- ☐ Performance Evaluation
- ☐ Complaint Investigation
- ☐ Surveillance
- ☐ Other (Explain):

Current Permit Status: Operating

Source Description: Koppers is a wood treatment facility. This facility produces railroad and utility products treated with creosote or pentachlorophenol for preservation.

Applicable Regulations:

☒ SIP ☐ PSD ☐ NSPS ☐ NESHAPS

Cite regulation by description or regulatory section number:
APC-S-1: 3.4(b), 3.4(a)(1), 3.4(a)(2), 3.6(a), 4.1(a),

Describe any problems noted or permit conditions not being complied:

None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-001, the Wellons/Nebraska Woodwaste Boiler with multiclone(Reference No. 1).

Rated Boiler Size: 60.0 MMBTU

Operating Rate @ Insp: 15,000 lbs steam/hr @ 160 psig @ 350° F

Fuel(s) Being Used: ☒ Woodwaste: treated and untreated wood

Soot Blowing: ☐ Periodic ☐ Manual ☐ Continuous ☒ Automatic

Air Pollution Controls: ☐ None ☐ Baghouse ☐ Cyclone
☐ ESP ☒ Multiclone ☐ Scrubber (For Particulate)

Complete Appropriate Control Device Sheets

Stack Emissions: Opacity 0 % by VEE, CEM reports for Opacity and CO are submitted semiannually.

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-002, the auxiliary fuel oil fired Murray Boiler (Reference No. 26)

Rated Boiler Size: 28.5 MMBTU

Operating Rate @ Insp: Not in Operation

Fuel(s) Being Used: ☒ Fuel Oil

Air Pollution Controls:

☐ None	☐ Baghouse	☐ Cyclone
☐ ESP	☒ Multiclone	☐ Scrubber (For Particulate)

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-003, the wood treatment facility with 5 treating cylinders, various pumps and valves, and 27 tanks (Reference Numbers 5-34).

Operations:

☐ Sawmill ☒ Hardwoods ☐ Softwoods

☐ Dry Kiln, Type:

☐ Planer ☐ Dimension Milling

☐ Chipper/Hogger ☐ Sanding

☐ Veneer Cutting ☐ Plywood Mfr.

☐ Particleboard Mfr. ☐ Hardboard Mfr.

☐ Waferboard Mfr. ☐ Assembly

☒ Finishing (wood preservation)

☐ Boiler, Type:

Products/ByProducts: Wood poles and lumber treated with creosote or pentachlorophenol

Emissions & Controls: None

Permit conditions not being complied with and descriptions of noncompliance: None

Additional Comments:
The wood treatment facility consists of 5 treatment cylinders where the wood materials are processed. All pumps, valves, and tanks feed to or from the treatment cylinders. All components of this system were inspected and appeared to be in good condition. The facility has a routine maintenance and housekeeping plan in operation.

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-004, the Tie Mill and Lumber Mill with cyclone(Reference No. 27)

Operations:

☒ Sawmill ☒ Hardwoods ☒ Softwoods

☐ Dry Kiln, Type:

☒ Planer ☐ Dimension Milling

☐ Chipper/Hogger ☐ Sanding

☐ Veneer Cutting ☐ Plywood Mfr.

☐ Particleboard Mfr. ☐ Hardboard Mfr.

☐ Waferboard Mfr. ☐ Assembly

☐ Finishing (Paint/Stain/Varnish)

☐ Boiler, Type:

Products/ByProducts: Untreated Railroad Ties and Lumber to be used later in wood treatment operations

Emissions & Controls: Particulate Matter controlled by a cyclone that blows waste into a trailer that is eventually hauled away.

(Complete Appropriate Control Device Sheets)

Permit conditions not being complied with and descriptions of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-005, the boiler house 0.2 MMBTUH natural gas fired space heater(Reference No. 33).

Description of Process: Boiler House space heater

Raw Materials: Natural Gas

Processing Operations: Heat

Products/By-Products: None

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-006, a 0.44 MMBTUH natural gas fired Steam Cleaner(Reference No. 35).

Description of Process: Steam Cleaner

Raw Materials: Natural Gas

Processing Operations: Steam Cleans various parts used in everyday operations

Products/By-Products: None

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-007, the Wood Stove Shop 0.10 MMBTUH Heater (Reference No. 36).

Description of Process: Wood Stove Shop Heater

Raw Materials: Natural Gas

Processing Operations: Heat

Products/By-Products: None

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date: April 15, 1997**

Emission Point No./Name: AA-008, treated wood storage (Reference No. 8)

Description of Process: Storage of treated wood prior to shipment

Raw Materials: Treated Wood

Processing Operations: Treated wood is piled in uniform stacks in a designated unsheltered area on the facility grounds.

Products/By-Products: Treated Wood

Emissions & Control Devices: None, emissions are fugitive fumes from the wood as a result of the treatment.

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date: April 15, 1997**

Emission Point No./Name: AA-009, The Pole Kiln (Reference No. 31)

Description of Process: Dries Wood Poles Prior to treatment

Raw Materials: Untreated Wood

Processing Operations: This emission point bakes untreated wood until the water content to reduced from approximately 80% to 35%. The drying of the wood is necessary for optimum wood treatment. It operates 3 days per week on average.

Products/By-Products: Dried untreated Wood

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-010, The Pole Peeler (Reference No. 32)

Description of Process: Peels Bark from Wood Poles Prior to treatment

Raw Materials: Untreated Wood Logs

Processing Operations: Wood Logs are feed to a peeler that removes the bark from the logs until the logs are smooth and uniform in shape.

Products/By-Products: Untreated Wood

Emissions & Control Devices: Particulate Matter(bark). The waste is conveyed to a trailer and later hauled away.

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-011, Wood fuel preparation and handling, including grinding, conveying, and silo loading (Reference No. 34)

Operations:

☐ Sawmill ☒ Hardwoods ☒ Softwoods

☐ Dry Kiln, Type:

☐ Planer ☐ Dimension Milling

☒ Chipper/Hogger ☐ Sanding

☐ Veneer Cutting ☐ Plywood Mfr.

☐ Particleboard Mfr. ☐ Hardboard Mfr.

☐ Waferboard Mfr. ☐ Assembly

☐ Finishing (Paint/Stain/Varnish)

☐ Boiler, Type:

Products/ByProducts: Chipped and Ground Woodwaste to be used as fuel for Emission Point AA-001.

Emissions & Controls: None

Permit conditions not being complied with and descriptions of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-012, 2 parts cleaners/degreasers (Reference No. 37)

Description of Process: These are Safety Kleen degreasing machines

Raw Materials: Tools and various small parts

Processing Operations: Degreasing

Products/By-Products: Cleaned Parts

Emissions & Control Devices: Safety Kleen performs all maintenance on these machines including handling and disposal of the solvents used in the machines.

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-013, A 1,000 gallon Gasoline Storage Tank (Reference No. 24)

Description of Process: Gasoline Storage

Raw Materials: Gasoline

Processing Operations: Storage

Products/By-Products: Gasoline

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-014, A 20,000 gallon Diesel Storage Tank (Reference No. 25)

Description of Process: Diesel Storage

Raw Materials: Diesel

Processing Operations: Storage

Products/By-Products: Diesel

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance: None

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-015, The Stand-By Boiler 0.1 MMBTUH natural gas fired space heater (Reference No. 33).

Description of Process: Space Heater

Raw Materials: Natural Gas

Processing Operations: Heat

Products/By-Products: None

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance:

None, emission point was not in operation at the time of inspection.

Facility Name: Koppers Industries **Date:** April 15, 1997

Emission Point No./Name: AA-016, The Fire Pump Building 0.02 MMBTUH Natural Gas Fired Space Heater (Reference No. 33).

Description of Process: Space Heater

Raw Materials: Natural Gas

Processing Operations: Heat

Products/By-Products: None

Emissions & Control Devices: None

Permit conditions not being complied with and description of noncompliance:
None, this emission point was not in operation at the time of inspection.

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

September 16, 1999

CERTIFIED MAIL: Z 265 668 151

Mr. Russ Twitty
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RE: KII Grenada Plant
Facility No. 0960-00012

Dear Mr. Burchfield:

In accordance with section 5.A.5 of our permit and to follow up on the phone call notifications we made September 9 and September 15, 1999, please be advised that the Data Acquisition System (DAS) associated with the boiler Continuous Emissions Monitor (CEM) is not operating properly. We believe that the DAS and the analyzer are not communicating. According to our vendor, who repaired the system last week, the data is being recorded but can not be retrieved.

As a consequence of this problem, KII intends to accelerate plans to replace the DAS hardware and software. KII intended to replace it anyway in order to avoid potential Y2K problems. The vendor of the existing equipment and software will complete the upgrade and resolve the current issue. Work is expected to start on or about September 21, 1999 and be completed by the end of the week.

The upgrade project will in no way impact or change the CEM system, including all probes and related equipment and lines. Therefore, KII does not believe a Permit to Construct, a permit change, or a notification in accordance with section 1.17(c) of the permit is required.

Please call if you have any questions. I can be reached at (412) 227-2248.

Sincerely,

Thomas E. DuPlessis
Environmental Manager

c: David Burchfield, MDEQ
Tom Henderson, Grenada Plant
Anthony Mayhan, Grenada Plant
Clark Mitchell, K-2000
Leslie Reis, K-1800

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

September 16, 1999

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Sincerely,

Thomas E. DuPlessis
Environmental Manager

c: David Burchfield, MDEQ
Tom Henderson, Grenada Plant
Anthony Mayhan, Grenada Plant
Clark Mitchell, K-2000
Leslie Reis, K-1800

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone (601) 226-4584
FAX (601) 226-4588

July 13, 1999

0960

Certified Mail: Z 490 517 001

RECEIVED
JUL 16 1999
Dept. of Environmental Quality
Office of Pollution Control

Russ Twitty
Air Facilities Branch
MS Dept. of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Twitty,

Semi-Annual Air Report

You will find enclosed our Semi-Annual Report for reporting point AA-001, the Wellons wood-fired boiler. The excess opacity emissions report is included for your review. The oil-fired boiler, AA-002, was not operated during the reporting period.

No treated wood was burned during the reporting period.

As you can see, we made improvements from January to July. Most occurrences happened during the boiler startup after the weekend. We have upgraded our fuel quality used during the startup of the boiler, which has greatly improved operations.

Sincerely,

Thomas L. Henderson

Thomas L. Henderson

cc: Tom DuPlessis

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

FILE COPY

May 26, 1999

Mr. Stephen Smith
Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219

Dear Mr. Smith:

Re: Title V Air Operating Permit Program
Facility No. 0960-00012

The Title V Operating Permit program fee for 1999 will soon be due. The attached reporting form shows your source's allowable (potential) emissions as currently recorded in our files. It also shows, for information only, any 1997 calendar year actual emissions that were reported for 1998 fee assessment purposes.

As provided by Section 49-17-32 of the Mississippi Code Annotated, you may elect to use either the actual emissions for the preceding calendar year or the current allowable (potential) emissions in determining the annual quantity of emissions to be used in assessing fees. Acceptable methods for determining actual annual emissions are specified in Section 49-17-30 and are listed on an attachment. If you wish to have your fee assessment based on actual emissions, **you must return the attached reporting form by July 1, 1999**, showing your inventory of actual emissions for the 1998 calendar year along with the calculations, recorded data, and the methodology used to determine the inventory. If an inventory of actual emissions has not been received by July 1, 1999, the allowable (potential) emissions shown on the attached reporting form will be used as the basis for assessment of the fee for 1999.

The Title V Operating Permit program fee is due September 1st of each year. An invoice which reflects the billable emissions and fee amount due will be sent to you prior to September 1, 1999. If you wish the fee invoice to be sent to a person and/or address different from that used for this letter, **you must provide the correct billing information** in your response to the emissions reporting form. The invoice you receive will allow you to make quarterly payments if you so desire. Because the billable emissions and fee amount cannot be determined until your response to the annual emissions reporting form is processed and because the invoicing and processing of fee payments is done by the DEQ Office of Administration and not the Air Facilities Branch, **please do not include any payments with your response to this letter**; please make payments only in accordance with the amount and procedure specified in the fee invoice.

If you have any questions concerning this letter or the attachments, feel free to contact me at (601) 961-5171.

Sincerely,

David Burchfield

David Burchfield
Air Facilities Branch

Attachments

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

May 3, 1999

Mr. Thomas Henderson, Plant Manager
Koppers Industries, Inc.
P.O. Box 160
Grenada, MS 38960

Re: Title V Inspection
Koppers Industries
0960 - 00012
Grenada County-Tie Plant, MS

Dear Mr. Henderson:

Enclosed is an air inspection report completed as a result of this Office's Compliance Verification Inspection at the Koppers Facility on March 2, 1999. There were no apparent violations of the air pollution regulations or the facility's operating permit.

If you have any questions concerning this matter, please contact us at 961-5171.

Sincerely,

Russ Twitty, P.E.
Environmental Compliance and Enforcement Division

Enclosure

OFFICE OF POLLUTION CONTROL
P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

KOPPERS INDUSTRIES

0960

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

January 29, 1999

CERTIFIED MAIL Z 538 934 771

Mr. Russ Twitty
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Twitty:

Enclosed you will find the 1998 Compliance Certification required under our Title V Operating Permit No. 0960-00012. This submittal meets the requirement stated in Section 4.2 of our permit to provide this information to the Department.

If you have any questions I can be reached at 601-226-4584, ext. 11.

Sincerely,

Thomas L. Henderson

Thomas L. Henderson

Cc: Tom DuPlessis

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

January 19, 1999

CERTIFIED MAIL Z 538 934 768

Mr. Russ Twitty
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Twitty:

Enclosed you will find the stack test for our Wellons wood-fired boiler (AA-001). Environmental Monitoring Laboratories, Inc. performed the tests on December 15, 1998. During the tests we experienced equipment problems which prevented us from operating at maximum capacity.

We plan to re-test the boiler. I will contact you in the near future to schedule a re-test of our boiler.

If you have any questions I can be reached at 601-226-4584, ext. 11.

Sincerely,

Thomas L. Henderson

Thomas L. Henderson

Cc: Tom DuPlessis

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

January 19, 1999

CERTIFIED MAIL Z 538 934 767

Mr. Russ Twitty
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Twitty:

You will find enclosed our Semi-Annual Report for reporting point AA-001, the Wellons wood -fired boiler. The excess opacity emissions report is also included for your review. The oil-fired boiler, AA-002, was not operated during the reporting period.

KII discontinued burning treated wood on 7/31/98. All temperature deviations were reported in the letter you received on 8/21/98.

KVB-Enertec, Inc. repaired a leak in the CO monitor on 1/7/99 and the system is operating properly. This issue was reported to Mr. David Burchfield on 12/18/98.

If you have any questions I can be reached at 601-226-4584, ext. 11.

Sincerely,

Thomas L. Henderson

Cc: Tom DuPlessis

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

December 23, 1998

Mr. Ross Twitty
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289.0385

RE: Koppers Industries, Inc.
Grenada Plant
Facility No. 0960-00012

Dear Mr. Twitty:

As a follow-up to our September 2nd meeting, KII is pleased report that we have not found any additional compliance issues that have not already been reported. We continue to evaluate our technical and administrative options and will submit a plan to you once it has been completed. It is our intention to have a plan prepared by the end of June 1999. KII will then identify an implementation schedule for the preferred option.

KII will continue to burn untreated wood fuel in the wood-fired boiler until a plan is developed.

During our compliance evaluation we learned that there are several issues associated with our permit. Although none of these issues is compliance-related, we would like to discuss them with you. I will contact you shortly to arrange a meeting.

If you have any questions, please call me at (412) 227-2248.

Sincerely,

Thomas E. DuPlessis
Environmental Manager

c: Tom Henderson, Grenada Plant
Clark Mitchell, K-2000
Steve Smith, K-1800

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

December 18, 1998

CERTIFIED MAIL Z 538 934 765

Mr. David Burchfield
Air Facilities Branch
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

Re: Facility No. 960-00012

Dear Mr. Burchfield:

On 12/15/98 Environmental Monitoring Laboratories performed a stack test on our boiler. During the test, they discovered a problem with our oxygen analyzer. We believe there is an air leak in the system resulting in incorrect oxygen readings. We have contacted Enertec Inc. to assist us in correcting the problem.

I will keep you informed of our progress. I can be reached at 601-226-4584 ext. 11 if you have any questions.

Sincerely,

Thomas L Henderson
Plant Manager

Cc: Tom DuPlessis

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

SR_1259
0960_0001

CERTIFIED MAIL P 582 396 315

November 4, 1998

Mr. David Burchfield
Air Facilities Branch
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Burchfield:

We have contacted Mr. Daniel Russell, with Environmental Monitoring Laboratories, to assist us in performing a stack test on our wood fired boiler (AA-001) as required by Section 5B of our Title V Air Permit.

The test is scheduled for December 15, 1998. We will monitor PM emissions and opacity by stack testing in accordance with EPA Reference Methods 1-5 and 9. Testing will be performed simultaneously and while the boiler is operating at maximum capacity. In addition to temperature, CO concentration, and in-stack opacity continuous monitoring, we will also monitor the woodwaste feedrates during each hour of testing (lbs/hour).

You may contact me at 601-226-4584 ext. 22 or Mr. Russell at 601-856-3092 if more information is needed.

Sincerely,

James Hatch

James Hatch
Assistant Plant Manager

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

September 11, 1998

Mr. Russ Twitty
Mississippi Dept. of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Twitty:

On September 9, 1998 at 10 a.m. our opacity meter failed the automatic Span Calibration. We discovered the failure at 4 p.m. We promptly contacted Enertec Inc., the installers of the system, for assistance. Enertec accessed our system by the telephone line. Adjustments were completed at 2 p.m. on September 10 and the system passed the Span Calibration.

We will continue to monitor the system for possible problems.

You may contact me at 601-226-4584, ext. 22 if you have questions.

Sincerely,

James Hatch

James Hatch

Asst. Plant Manager

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

August 21, 1998

Mr. Russ Twitty
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289.0385

RE: Facility No. 0960-00012
Koppers Industries, Inc.
Grenada Plant

Dear Mr. Twitty:

Pursuant to Section 5.A.5 of our permit, this letter serves as notification that the temperature of our boiler deviated from the limit established in our permit while we were burning treated wood. Equipment malfunctions and the inability of the current fuel feed system to provide sufficient fuel to the boiler caused the temperature to drop below 1140° F.

A copy of the report from our continuous emission monitor is attached for your review. The report includes data from July 1-31 and August 18-20, 1998. The July data includes data since our written notification on July 29. Treated wood was burned during August in order to determine the cause of the problems associated with our fuel feed system. Each deviation is noted on the report.

We are preparing an action plan to resolve these issues and will be contacting you soon to arrange a meeting so that we may discuss them with you.

The opacity meter has been repaired and is working properly. Enertec Inc. provided training for plant personnel and we are negotiating a service contract and computer upgrade with them.

If you have any questions please call me at (601) 226-4584 (x22) or Tom DuPlessis at (412) 227-2248.

Sincerely,

James A. Hatch

James A. Hatch
Assistant Plant Manager

Enclosure

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

KOPPERS INDUSTRIES

323667 62-4 311

Date: AUGUST 20 1998

Pay To The Order Of:- MISSISSIPPI ST DEPT ENVIRONMEN

Amount $2,500.00

TWO THOUSAND FIVE HUNDRED AND 00/100 ONLY

MISSISSIPPI ST DEPT ENVIRONMEN
TITLE V AIR PERMIT
PO BOX 20325
JACKSON MS 39289-1325

Payable through Mellon Bank (DE) N.A., Wilmington, DE 19899
Mellon Bank (East) N.A., Philadelphia, PA 19102

DE

V.P. AND C.F.O.

KOPPERS INDUSTRIES, INC.
TREASURER

"323667" :031100047: 2"943 678"

KOPPERS INDUSTRIES, INC. PITTSBURGH PA 323667

SP CD	VENDOR	DIV	OUR AUDIT	YOUR INVOICE NBR	INV MO/DA	INV AMOUNT	DISC	NET AMT PAYABLE
7	940505031	477	02408081112	1349	0731	2500.00	0.00	***2500.00

customer # 0960-00012

AUG 1998

EPT OF ENVIRONMENTAL QUAL
TITLE V AIR PERMIT FEE
P. O. Box 20325
Jackson, MS 39289-1325

** INVOICE **

*** TITLE V AIR OPERATING PERMIT FEE ***

BILL TO:
KOPPERS INDUSTRIES INC

P O BOX 160
TIE PLANT, MS 38960

INVOICE # 1349
INVOICE DATE: 7/31/98

CONTACT: MONA VARNER
TELEPHONE: 601-961-5572

FACILITY I.D. # 0960-00012

TERMS: DUE 9/1/98

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	15.050	15.050	22.00	331.10
SO2	0.850	0.850	22.00	18.70
NOX	21.790	21.790	22.00	479.38
CO	54.710	0.000	22.00	0.00
VOC	19.390	19.390	22.00	426.58
TOTAL HAP's (VOC)	1.890	0.000	22.00	0.00
TOTAL HAPs (Non-Voc)	0.070	0.070	22.00	1.54

ADJUSTMENT FOR $2500 MINIMUM FEE	1,242.70
TOTAL ANNUAL FEE DUE	2,500.00

As per section 49-17-30 of the MS Code, a minimum fee of $2500 shall be assessed to and colleced from the owner or operator of each facility that is required to hold a Title V Permit.

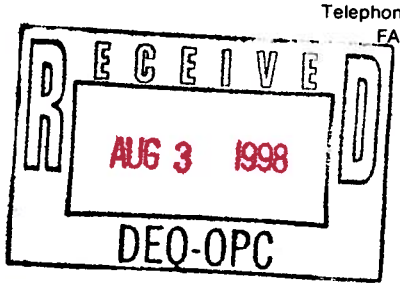
* * * FAILURE TO REMIT PAYMENT BY THE DUE DATE MAY * * *
* * * * * * * * * RESULT IN A LATE PENALTY * * * * * * * *

FILE COPY

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588



July 30, 1998

Mr. David Burchfield
Air Facilities Branch
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Burchfield:

Enclosed you will find the Semi-Annual Report for reporting point AA-001, the Wellons Woodwaste Boiler. The oil-fired boiler, reporting point AA-002, was not operated during the reporting period. Therefore, we did not monitor the sulfur content of the fuel oil.

Pursuant to my letter dated July 29, 1998, please note that the data is incomplete. The opacity meter malfunctioned on May 16, 1998, and temperature probes experienced numerous problems.

The report contains in stack information for the periods of operation during which the permit limitations were exceeded. All occurrences in which the opacity limits of the permit were exceeded (for data available through May 16) were during start up and under 15 minutes.

The boiler was fired with treated wood during the reporting period. The boiler temperature and fuel feed rates are also submitted.

Sincerely,

Thomas L. Henderson
Plant Manager

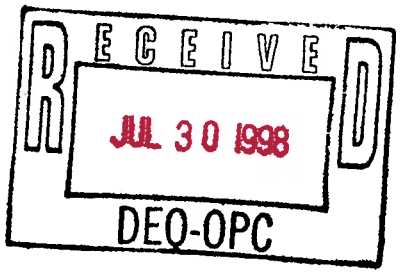
Cc: Tom Duplessis

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

July 29, 1998



Mr. David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

RE: Koppers Industries, Inc.
Grenada Plant
Facility No. 0960-00012

Dear Mr. Burchfield:

Pursuant to Section 5.A.5 of our permit, this letter serves as notification that we have problems with our opacity CEM and temperature probes and have experienced deviations from the permit requirement to burn treated wood only when the boiler temperature exceeds 1140 degrees F.

Opacity CEM

Based on the data available since January 1, 1998, our opacity readings were in compliance for the reporting period. However, on July 26, 1998, we discovered that our opacity monitor had malfunctioned on May 16, 1998. We had management change at the plant shortly before the equipment malfunction. Unfortunately, we did not identify the problem until after his replacement arrived. On July 27, we contacted Entertec, the company that supplied and installed the opacity monitor, and requested their assistance. Entertec arrived the next day and is currently making the necessary repairs. In order to prevent a reoccurrence, the opacity monitoring system will be inspected daily and any deficiencies will be noted and corrected.

Temperature Probes

During the time period from April 22, 1998 to May 23, 1998, we had numerous problems with the temperature probes on both of our cells. The probes would fail, we would replace them, and then order new ones. Unfortunately, before the new ones arrived the replacement probe failed on #2 cell and it took about 4 weeks for the new probe to arrive. There were similar problems with the #1 cell, but not as severe. We have now replaced the probes and have several replacement probes on hand to prevent this problem from arising again. The temperature monitoring system will also be inspected daily and any deficiencies will be noted and corrected..

Deviations From The Requirement To Have The Boiler Temperature In Excess Of 1140 Degrees F. When Firing Treated Wood.

During the time period of this report (1/1/98 to 6/30/98) there were instances in which we fired with treated wood, while the boiler temperature was below 1140 degrees F. Unfortunately, we have had difficulty maintaining the various systems that feed treated wood to the boiler. The resulting lack of fuel causes the temperature in the boiler to drop. It has taken us anywhere from a few minutes to a few hours to unclog or repair the conveyer and auger system that feeds directly into the boiler. However, the truck unloading and the silo feed systems have been down for days at a time when they malfunction. At times, the lack of fuel has also forced us to shut down the generator. This compounds the temperature problem because it reduces the temperature needed in the boiler to supply the reduced steam demand. This is important because the boiler is sized to provide steam for our treating operations and the co-generation facility. When the generator is down, the reduced steam demand means that the steam coils are larger than necessary and more efficient at removing heat.

Please refer to the attached monitoring system report for specific information about the opacity and temperature probe problems and the temperature deviations.

We have made several upgrades to our boiler feed system and believe the changes we have made will eliminate the clogging problem associated with the conveyor and auger system. We are presently evaluating more reliable alternatives to our current unloading and silo feed systems and will promptly implement the alternative(s) that we believe to be the most reliable.

I hope these explanations are sufficient, if there are any questions please call me at (601) 226-4584 (x11) or Tom DuPlessis at (412) 227-2248.

Sincerely,

Thomas L. Henderson
Plant Manager

Enclosure

C: Tom DuPlessis, K-1800

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

Burchfield

July 28, 1998

Mr. David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289.0385

RE: Koppers Industries, Inc.
Grenada Plant
Facility No. 0960-00012
"1997 Actual Emissions – Signature Authority"

Dear Mr. Burchfield:

In accordance with your July 15, 1998, phone call, please be advised that Mr. Thomas L. Loadman, Vice President, Railroad and Utility Products Division, signed the emissions report that was submitted on July 2, 1998.

Please call if you have any questions. I can be reached at (412) 227-2248.

Sincerely,

Thomas E. DuPlessis
Environmental Manager

Enclosure

c: Tom Henderson, Grenada Plant

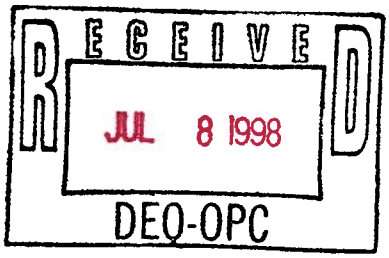
KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

Burchfield

July 7, 1998



Mr. David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289.0385

RE: Koppers Industries, Inc.
Grenada Plant
Facility No. 0960-00012
"1997 Actual Emissions"

Dear Mr. Burchfield:

In accordance with your July 7, 1998, phone call, I have enclosed the spreadsheets that were used to calculate 1997 actual emissions for our Grenada Plant.

Please call if you have any questions. I can be reached at (412) 227-2248.

Sincerely,

Thomas E. DuPlessis
Environmental Manager

Enclosure

c: Tom Henderson, Grenada Plant
Clark Mitchell, K-2000
Steve Smith, K-1800

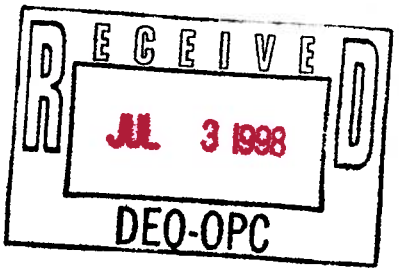
Grenada Co
0960-00012

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

July 2, 1998



Mr. David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289.0385

RE: Koppers Industries, Inc.
Grenada Plant
Facility No. 0960-00012
"1997 Actual Emissions"

Dear Mr. Burchfield:

In accordance with your May 29, 1998, letter, please accept the attached emissions reporting form for our Grenada Plant.

Please call if you have any questions. I can be reached at (412) 227-2248.

Sincerely,

Thomas E. DuPlessis
Environmental Manager

Enclosure

c: Tom Henderson, Grenada Plant
Clark Mitchell, K-2000
Steve Smith, K-1800

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-30, Mississippi Code of 1972 Annotated, all sources which choose to base their Annual Title V Fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

MDEQ Facility ID #: 0960-00012

Facility Name: Koppers Industries, Inc.

Site Address: 543 Tie Plant Road (Street Location) Tie Plant (City) (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1997. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	200.13	15.05
SO2	109.94	0.85
NOX	63.37	21.79
CO	13.29	54.71
VOC*	85.22	19.39
TRS	0.00	0.00
LEAD	0.01	0.002
CFCs/HCFCs	0.00	0.00
Other	0.00	0.00
Total HAPs (Voc)	0.00	1.89
Total HAPs (Non-Voc)	16.73	0.07

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Thomas D. Loudermilk 7-2-98

Signature Date

David Burchfield

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM
P.O. BOX 10385
JACKSON, MS 39289-0385

In accordance with Section 49-17-30, Mississippi Code of 1972 Annotated, all sources which choose to base their Annual Title V Fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

MDEQ Facility ID #: 0960-00012

Facility Name: Koppers Industries, Inc.

Site Address: 543 Tie Plant Road (Street Location) Tie Plant (City) (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1997. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	200.13	
SO2	109.94	
NOX	63.37	
CO	13.29	
VOC*	85.22	
TRS	0.00	
LEAD	0.01	
CFCs/HCFCs	0.00	
Other	0.00	
Total HAPs (Voc)	0.00	
Total HAPs (Non-Voc)	16.73	

*** Reflects Total VOC from the facility including VOCs that are HAPs.**

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Signature Date

David Burchfield

EXCESS EMISSIONS REPORT

PRINTED: 14-Jan-99

Koppers Industries

Tie Plant Road

Opacity in %

BEGINNING Jul. 1, 1998 AND ENDING Sep. 30, 1998

SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began Date	Excess Began Time	Excess Ended Date	Excess Ended Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
07/28	09:43	07/28	09:50	0:08	100.0	16. Primary Analyzer Malfunction	Enertec in for repairs.
07/28	09:59	07/28	10:12	0:14	100.0	16. Primary Analyzer Malfunction	Enertec in for repairs.
07/28	10:26	07/28	10:27	0:02	100.0	16. Primary Analyzer Malfunction	Enertec in for repairs.
07/28	10:38	07/28	11:10	0:33	100.0	16. Primary Analyzer Malfunction	Enertec in for repairs.
08/14	11:00	08/14	11:15	0:16	72.8	3. Startup	Changed gasket on superheater.
08/15	04:40	08/15	04:43	0:04	58.4	3. Startup	None at this time.
08/15	13:23	08/15	13:23	0:01	45.1	8. Normal Operation	None at this time.
08/15	23:35	08/15	23:37	0:03	80.9	Process Down	Replace defective breaker on feed drive.
08/15	23:43	08/15	23:45	0:03	53.2	Process Down	Replace defective breaker on feed drive.
08/19	22:46	08/19	22:52	0:07	84.4	Process Down	Repair broken teeth on silo auger.
08/20	00:35	08/20	00:41	0:07	77.0	3. Startup	Start boiler after silo repairs.
08/21	05:10	08/21	05:11	0:02	37.5	3. Startup	Adjust air/fuel
08/22	04:04	08/22	04:05	0:02	27.4	6. Clean Process Equipment	Clean ash collector.
08/26	02:42	08/26	03:03	0:22	83.0	Process Down	Power off
08/28	05:25	08/28	05:27	0:03	51.9	Process Down	Boiler down for w/e - pulling ash
08/31	03:32	08/31	03:38	0:07	62.3	6. Clean Process Equipment	Pulling ash
09/08	05:39	09/08	05:39	0:01	30.0	Process Down	Boiler off- feedwater pumps down
09/09	05:15	09/09	05:16	0:02	34.6	6. Clean Process Equipment	Pulling ash
09/14	05:28	09/14	05:28	0:01	38.2	3. Startup	Adjust air and fuel rates
09/16	05:42	09/16	05:43	0:02	22.7	6. Clean Process Equipment	Pulling fly ash
09/18	04:41	09/18	04:44	0:04	53.9	4. Shutdown	Pull ash, down for weekend
09/21	05:12	09/21	05:14	0:03	52.9	3. Startup	Adjust air/fuel
09/21	05:18	09/21	05:25	0:08	83.1	3. Startup	Adjust air/fuel
09/23	06:27	09/23	06:30	0:04	53.0	6. Clean Process Equipment	Pulling ash
09/25	11:05	09/25	11:08	0:04	63.3	3. Startup	Re-start boiler. Adjust air.
09/28	06:00	09/28	06:31	0:32	83.7	3. Startup	Adjust air / fuel.
09/29	13:56	09/29	14:00	0:05	62.2	3. Startup	Adjust air / fuel.

EXCESS EMISSIONS REPORT

PRINTED: 14-Jan-99

Koppers Industries

Tie Plant Road

Opacity in %

BEGINNING Oct. 1, 1998 AND ENDING Dec. 31, 1998

SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began Date	Excess Began Time	Excess Ended Date	Excess Ended Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
10/02	22:37	10/02	22:42	0:06	52.1	20. Corrective Maintenance	Clean wood from photo eyes
10/02	22:46	10/02	22:51	0:06	58.2	20. Corrective Maintenance	Clean wood from photo eye.
10/05	09:27	10/05	09:28	0:02	42.6	3. Startup	Start boiler - adjust air/fuel.
10/06	22:55	10/06	22:57	0:03	33.9	6. Clean Process Equipment	Clean photo eyes in fuel hopper.
10/07	09:15	10/07	09:16	0:02	29.5	20. Corrective Maintenance	Clean wood dust from photo eye(silo)
10/09	04:00	10/09	04:03	0:04	75.1	4. Shutdown	Shutdown boiler to clean ash collectors.
10/09	08:21	10/09	08:27	0:07	75.8	4. Shutdown	Cleaning boiler-ash collectors
10/09	08:31	10/09	08:33	0:03	40.2	4. Shutdown	Cleaning boiler - ash collectors
10/09	09:34	10/09	09:35	0:02	35.8	4. Shutdown	Cleaning boiler - ash collectors
10/09	09:40	10/09	09:44	0:05	54.5	4. Shutdown	Cleaning boiler - ash collectors
10/09	10:11	10/09	10:16	0:06	71.1	4. Shutdown	Cleaning boiler - ash collectors
10/09	10:30	10/09	10:31	0:02	33.4	4. Shutdown	Cleaning boiler - ash collectors
10/13	07:07	10/13	07:26	0:20	88.5	3. Startup	Adjust air / fuel
10/13	07:28	10/13	07:29	0:02	34.4	3. Startup	Adjust air / fuel.
10/14	08:57	10/14	08:59	0:03	52.3	3. Startup	Adjust air / fuel.
10/14	13:50	10/14	13:53	0:04	81.7	3. Startup	Adjust air / fuel.
10/15	07:15	10/15	07:18	0:03	49.5	3. Startup	Adjust air / fuel.
10/17	05:58	10/17	06:02	0:05	49.8	4. Shutdown	Down for the weekend
10/19	07:36	10/19	07:38	0:03	46.2	3. Startup	Adjust air / fuel.
10/19	07:43	10/19	07:45	0:03	39.7	3. Startup	Adjust air / fuel.
10/20	08:17	10/20	08:19	0:03	45.6	3. Startup	Adjust air / fuel.
10/26	07:16	10/26	07:52	0:37	85.2	3. Startup	Adjust air / fuel.
10/26	07:55	10/26	07:59	0:05	74.5	3. Startup	Adjust air / fuel.
10/26	08:10	10/26	08:15	0:06	70.8	3. Startup	Adjust air / fuel.
10/26	08:19	10/26	08:30	0:12	66.5	3. Startup	Adjust air / fuel.
10/26	08:37	10/26	08:46	0:10	58.4	3. Startup	Adjust air / fuel.
10/27	09:03	10/27	09:11	0:09	80.6	3. Startup	Adjust air / fuel.
10/28	09:32	10/28	09:41	0:10	79.8	3. Startup	Adjust air / fuel.
10/30	07:05	10/30	07:12	0:08	62.4	3. Startup	Adjust air / fuel.
11/02	07:15	11/02	07:18	0:04	61.9	3. Startup	Adjust air / fuel.
11/03	07:35	11/03	07:40	0:06	67.1	3. Startup	Adjust air / fuel.
11/06	14:52	11/06	14:53	0:02	36.2	3. Startup	Adjust air / fuel.
11/09	08:20	11/09	08:24	0:05	57.6	3. Startup	Adjust air / fuel.
11/09	08:30	11/09	08:35	0:06	67.0	3. Startup	Adjust air / fuel.
11/14	06:38	11/14	06:38	0:01	40.6	4. Shutdown	Down for the weekend
11/22	15:52	11/22	15:53	0:02	46.8	3. Startup	Adjust air / fuel.
11/22	16:01	11/22	16:13	0:13	82.3	3. Startup	Adjust air / fuel.
11/24	03:31	11/24	03:38	0:08	81.2	3. Startup	Adjust air / fuel.
11/24	08:54	11/24	08:57	0:04	54.8	3. Startup	Adjust air / fuel.
11/25	06:09	11/25	06:12	0:04	61.2	4. Shutdown	Down for the weekend
12/03	09:16	12/03	09:19	0:04	47.9	3. Startup	Adjust air / fuel.
12/07	06:29	12/07	06:53	0:25	84.8	3. Startup	Adjust air / fuel.
12/08	02:46	12/08	02:48	0:03	38.4	8. Normal Operation	None at this time.

EXCESS EMISSIONS REPORT

PRINTED: 14-Jan-99

Koppers Industries

Tie Plant Road

Opacity in %

BEGINNING Oct. 1, 1998 AND ENDING Dec. 31, 1998

SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began Date	Excess Began Time	Excess Ended Date	Excess Ended Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
12/06	12:19	12/08	12:23	0:05	57.0	3. Startup	Repaired silo.
12/10	09:29	12/10	09:35	0:07	61.1	3. Startup	Clean photoeye
12/10	22:43	12/10	22:44	0:02	43.3	3. Startup	Clean photoeye
12/11	03:04	12/11	03:11	0:08	81.4	3. Startup	Clean photoeye
12/11	05:02	12/11	05:10	0:09	86.8	3. Startup	Adjust air / fuel.
12/12	06:44	12/12	06:46	0:03	37.4	3. Startup	Adjust air / fuel.
12/14	06:14	12/14	06:18	0:05	43.5	3. Startup	Adjust air / fuel.
12/15	05:56	12/15	06:02	0:07	86.5	Process Down	Silo stopped working. Track broke.
12/15	06:45	12/15	06:59	0:15	87.1	Process Down	Pull ash and clean cell #1
12/15	07:18	12/15	07:21	0:04	45.5	Process Down	Pull ash and clean cell #2
12/15	07:25	12/15	07:33	0:09	68.4	3. Startup	Adjust air / fuel.
12/15	07:39	12/15	07:49	0:11	85.5	3. Startup	Adjust air / fuel.
12/15	08:10	12/15	08:14	0:05	69.6	8. Normal Operation	Adjust wood fuel feed auger.
12/15	08:17	12/15	08:21	0:05	83.6	8. Normal Operation	Adjust wood fuel auger.
12/15	19:45	12/15	19:51	0:07	81.3	8. Normal Operation	Adjust wood fuel auger.
12/15	23:54	12/15	23:55	0:02	30.5	8. Normal Operation	None at this time.
12/16	09:57	12/16	09:58	0:02	29.5	Process Down	Superheater gasket blew
12/16	10:04	12/16	10:19	0:16	65.3	Process Down	Superheater gasket blew
12/16	10:22	12/16	10:43	0:22	86.2	Process Down	Superheater gasket blew
12/16	13:18	12/16	15:22	2:05	86.1	Process Down	Superheater gasket blew
12/16	15:27	12/16	15:35	0:09	72.6	3. Startup	Adjust air / fuel.
12/16	16:08	12/16	16:10	0:03	71.5	3. Startup	Adjust air / fuel.
12/17	07:21	12/17	07:25	0:05	58.8	6. Clean Process Equipment	Pull ash
12/17	07:35	12/17	07:41	0:07	69.8	6. Clean Process Equipment	Pull ash
12/17	08:36	12/17	08:36	0:01	26.5	8. Normal Operation	None at this time.
12/17	08:46	12/17	08:51	0:06	72.4	3. Startup	Adjust air / fuel.
12/17	20:41	12/17	20:48	0:08	80.8	3. Startup	Adjust air / fuel.
12/19	11:56	12/19	12:02	0:07	71.9	20. Corrective Maintenance	Replace screw in damper arm.
12/20	07:17	12/20	07:21	0:05	55.2	Process Down	Pull ash
12/28	08:17	12/28	08:41	0:25	85.2	3. Startup	Wet fuel, freezing temps.
12/28	15:40	12/28	15:44	0:05	46.3	3. Startup	Clean photoeye
12/29	02:16	12/29	02:24	0:09	64.3	2. Control Equipment Malfunction	G.E.drive quit (#2)
12/29	02:43	12/29	02:45	0:03	48.8	2. Control Equipment Malfunction	G.E. drive quit (#2)
12/29	02:51	12/29	02:52	0:02	18.1	2. Control Equipment Malfunction	G.E. drive quit (#2)
12/29	02:58	12/29	02:59	0:02	36.9	2. Control Equipment Malfunction	G.E. drive quit (#2)
12/29	03:12	12/29	03:13	0:02	45.1	3. Startup	Restart boiler
12/29	03:27	12/29	03:27	0:01	32.1	3. Startup	Restart boiler Adjust fuel flow
12/29	05:27	12/29	05:28	0:02	39.7	20. Corrective Maintenance	Belt broke in #1 cell
12/29	07:20	12/29	07:23	0:04	64.5	3. Startup	Adjust air and fuel, replaced GE drive.
12/29	07:39	12/29	07:42	0:04	68.6	3. Startup	G.E. drive #2 was replaced
12/29	07:48	12/29	07:50	0:03	52.5	3. Startup	G.E. drive #2 was replaced
12/29	07:57	12/29	07:59	0:03	39.0	3. Startup	G.E drive #2 was replaced

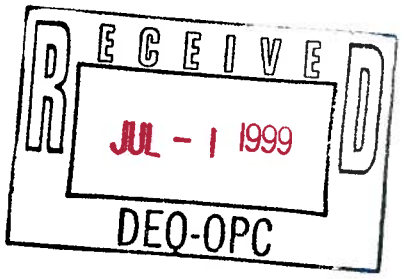
KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

Burchfield

June 30, 1998



SENT OVERNIGHT VIA UPS

Mr. David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289.0385

RE: KII Grenada Plant
Facility No. 0960-00012
"1998 Actual Emissions"

Dear Mr. Burchfield:

In accordance with your May 26, 1999, letter, please accept the attached emissions reporting form for our Grenada Plant. Mr. Thomas L. Henderson, Plant Manager, signed the form. The spreadsheets used to calculate the actual emissions are also enclosed.

Please call if you have any questions. I can be reached at (412) 227-2248.

Sincerely,

Thomas E. DuPlessis
Environmental Manager

Enclosures

c: Tom Henderson, Grenada Plant
Clark Mitchell, K-2000
Leslie Reis, K-1800

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

May 29, 1998

Mr. Stephen Smith
Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219

Dear Mr. Smith:

Re: Title V Air Operating
Permit Program
Facility No. 0960-00012

The Title V Operating Permit program fee for 1998 will soon be due. The attached reporting form shows your source's allowable emissions as currently recorded in our files.

As provided by Section 49-17-32 of the Mississippi Code Annotated, you may elect to use either actual or allowable (potential) emissions in determining the annual quantity of emissions to be used in assessing fees. Acceptable methods for calculating actual annual emissions were specified in Section 49-17-30 and are listed on the attachments. If you choose the basis of actual emissions, you must submit the attached reporting form showing your inventory of emissions for the 1997 calendar year by July 1, 1998, along with the calculations and the methodology used in determining the inventory. If an inventory of emissions has not been received by July 1, 1998, the allowable emissions shown on the attached reporting form will be used as the basis for this year's assessment of fees.

This fee is due September 1st of each year. An invoice which reflects the billable emissions and amount due will be sent to you prior to September 1, 1998. If you have a billing address different from the address at which you received this letter, please indicate the correct billing address in your response. The invoice you receive will allow you to make quarterly payments if you so desire.

If you have any questions concerning this letter or the attachments, feel free to contact me at (601) 961-5171.

Sincerely,

David Burchfield

David Burchfield
Air Facilities Branch

Attachments

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

February 19, 1998

Mr. Stephen T. Smith, Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

Dear Mr. Smith:

File Copy

Re: Compliance Assurance Monitoring
Facility No. 0960-00012
Grenada, Mississippi

Please accept this as written notification that the Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64) was promulgated on October 22, 1997. A copy of the rule is enclosed. CAM applies to each pollutant-specific emission unit (PSEU) that:

- is located at a major Title V facility,
- is subject to an emission limitation or standard for the applicable regulated air pollutant, except those standards exempted by §64.2(b)(1),
- uses a control device to achieve compliance with the applicable standard, and
- has potential pre-control emissions that exceed or are equivalent to the major source threshold.

As detailed in § 64.5, for most pollutant-specific emission units, submittal of a CAM plan is only required as part of an application for renewal of a Title V Operating Permit. **However, for large pollutant-specific emission units** (units for which potential post-control emissions exceed or are equivalent to the major source threshold) the initial Title V application or the application for a significant Title V modification must address CAM if the application has not been filed, or has not been determined to be complete before April 20, 1998.

If the Title V permit is reopened for cause by EPA or MDEQ after April 20, 1998, the submittal of a CAM plan for PSEU's affected by the reopening **may** be required.

OFFICE OF POLLUTION CONTROL
P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

Our records indicate you have been issued a Title V permit, therefore the CAM rule, as written, will have no impact on your source until renewal unless there is a reopening either for cause or to incorporate a significant modification. Any application for a significant revision to the Title V permit which is received on or after April 20, 1998, must address CAM. If the company plans a significant modification to the facility in the near future, you may delay the impact of the CAM rule on the large PSEU's affected by the modification by submitting a complete application for modification of the Title V permit prior to April 20, 1998.

If there are any questions, please contact me at (601) 961-5250.

Sincerely yours,

David Burchfield
Air Facilities Branch

DB

Enclosure

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

FILE COPY

February 9, 1998

Mr. Thomas L. Henderson, Plant Manager
Koppers Industries
P. O. Box 160
Tie Plant, MS 38960

Dear Mr. Henderson:

Re: Facility No. 0960-00012
Tie Plant, Mississippi

On January 16, 1998, the Office of Pollution Control performed an inspection of the referenced facility. There were no apparent air pollution problems.

If you have any questions, please contact me at (601) 961-5593.

Very truly yours,

Kayra N. Gutierrez
Environmental Compliance and Enforcement
Division

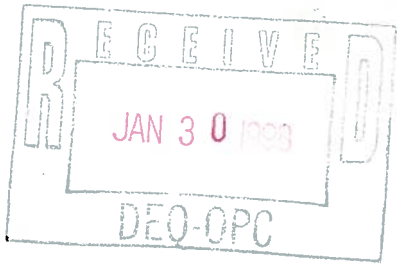
KG

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

January 29, 1998



Mr. David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Burchfield,

Enclosed you will find the 1997 Compliance Certification required under our Title V Operating Permit No. 0960-00012. This submittal was requested in your letter of 12 January 1998 to Mr. Stephen T. Smith of Koppers. This submittal meets the requirement stated in Section 4.2 of our permit to provide this information to the Department and to the Permit Board.

If you have any questions, please call Mr. Mike Sylvester at our plant or Mr. Tom Duplessis in our Pittsburgh office at (412) 227-2248.

Sincerely,

Thomas L. Henderson
Plant Manager

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

Burchfield

DATE: January 22, 1998

TO: David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality

FROM: Thomas L. Henderson

SUBJECT: Facility No. 960-00012
Tie Plant, Mississippi
Grenada County
Semi-annual Report for Points AA-001, AA-002

Dear Mr. Burchfield:

Attached is the Semi-Annual report for reporting point AA-001. Reporting point AA-002 was not operated in the 3rd or 4th quarters of 1997.

The report contains in stack opacity information for the periods of operation in which the permit limitations were exceeded. All occurrences in which the permit was exceed were during startup and under 15 minutes. The boiler was not fired with treated wood during the reporting period thus no temperature data is being submitted.

During the week of October 20, 1997 we performed preventive maintenance on the Continuous Emissions Monitoring System. The opacity meter was also cleaned and serviced. During the preventive maintenance it was discovered that we had a problem with the PLC that indicates a "dirty lens" on the opacity meter lens. The unit was calibrated and a new analog input card was installed so we could remotely monitor the opacity from the boiler control room the work was completed on October 26, 1997.

If you have any questions about this report or would like to discus it in further detail please contact me at 601-226-4584.

Sincerely,

Thomas L. Henderson

Thomas L. Henderson
Plant Manager

cc: Steve Smith

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

0960.0012

January 12, 1998

Mr. Stephen T. Smith, Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

File Copy

Dear Mr. Smith:

This letter is a reminder that January 31, 1998 is the deadline for submitting your annual compliance certification. Requirements for your submittal is addressed in Section 4.4.1 of your Title V Operating Permit. You will be expected to show certification of compliance for the preceding year (1997).

Enclosed is a copy of a memorandum distributed by the Environmental Protection Agency (EPA) which includes a sample certification along with comments. We hope this will assist you in completing and submitting your certification in a timely manner.

If you have questions, please contact me at (601) 961-5250.

Sincerely,

David Burchfield
Air Facilities Branch

DB
Enclosure

OFFICE OF POLLUTION CONTROL
P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.1	1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)	YES	CONTINUOUS	PLANT RECORDS.
1.2	1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)	YES	CONTINUOUS	ENFORCEMENT ACTIONS BY MSDEQ HAVE NOT OCCURRED.
1.3	1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)	YES	CONTINUOUS	PERMIT HAS NOT BEEN MODIFIED, REVOKED REOPENED SINCE ISSUANCE. NO REQUESTS FOR MODIFICATION BY PERMITTEE HAVE OCCURRED.
1.4	1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)	YES	CONTINUOUS	NO ACTIONS INVOLVING PROPERTY RIGHTS HAVE OCCURRED.
1.5	1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)	YES	CONTINUOUS	NO REQUESTS FOR INFORMATION RELATING TO MODIFYING, REVOKING, REISSUING OR TERMINATING THIS PERMIT HAVE BEEN MADE BY MSDEQ.
1.6	1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid,	YES	CONTINUOUS	NO ACTION BY KOPPERS IS NECESSARY.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.6 (CON'T)	the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)			
1.7	1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6. (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)	YES	INTERMITTENT	MSDEQ REQUESTED EMISSION INFORMATION ON 5 JUNE 1997. KOPPERS PROVIDED EMISSIONS INFORMATION TO MSDEQ ON 18 JULY 1997. EMISSION FEE REQUEST WAS PAID TO MSDEQ ON 16 SEPTEMBER 1997. ACTUAL EMISSIONS WERE USED AS THE BASIS

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.) (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.) (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.8	1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)	YES	CONTINUOUS	NO PERMIT REVISIONS HAVE BEEN REQUESTED BY PERMITTEE.
1.9	1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)	YES	INTERMITTENT	ALL REQUIRED DOCUMENTS SUBMITTED HAVE BEEN CERTIFIED.
1.10	1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following: (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit; (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit; (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)	YES	INTERMITTENT	MSDEQ AIR QUALITY INSPECTORS WERE ON-SITE ON 15 APRIL 1997. ALL REQUESTS FOR INFORMATION AND ASSISTANCE WERE MET. THERE WERE NO REQUESTS FOR SAMPLING OR MONITORING.
1.11	1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.12	1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9 (b))	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.
1.13	1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)	YES	CONTINUOUS	PLANT RECORDS.
1.14	1.14 Nothing in this permit shall alter or affect the following: (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section; (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act. (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)	YES	CONTINUOUS	NO ACTION REQUIRED OF KOPPERS DURING 1997.
1.15	1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)	NOT DETERMINED		DEADLINE FOR APPLICABILITY HAS NOT PASSED. DETERMINATION OF APPLICABILITY HAS NOT YET BEEN MADE.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.16	1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)	YES	CONTINUOUS	THIS PERMIT EXPIRES IN 2002. RENEWAL APPLICATION NOT DUE UNTIL 1 SEPTEMBER 2001.
1.17	1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if: (a) the changes are not modifications under any provision of Title I of the Act; (b) the changes do not exceed the emissions allowable under this permit; (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes: (1) a brief description of the change(s), (2) the date on which the change will occur, (3) any change in emissions, and (4) any permit term or condition that is no longer applicable as a result of the change; (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)	YES	CONTINUOUS	NO CHANGES IN OPERATION HAVE BEEN MADE UNDER THIS CONDITION.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.18	1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)	YES	CONTINUOUS	KOPPERS WAS NOT INFORMED OF ANY AIR POLLUTION EMERGENCY AFFECTING THE OPERATION OF THIS PLANT DURING 1997.
1.19	1.19 Except as otherwise provided by Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", or otherwise provided herein, a modification of the facility requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include: (a) routine maintenance, repair, and replacement; (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;	YES	CONTINUOUS	NO CHANGES AFFECTED BY THIS REQUIREMENT WERE MADE IN 1997.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act; (d) use of an alternative fuel or raw material by a stationary source which: (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or 2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or (f) any change in ownership of the stationary source."			
1.20	1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)	YES	CONTINUOUS	NO CHANGE OF OWNERSHIP HAS OCCURRED.
1.21	1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.I)	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.22	1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones. (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling. (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling. (C) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-I, Section 3.7)	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 1997.
1.23	1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT OCCURRED IN 1997.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met. (C) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (2) the permitted facility was at the time being properly operated; (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. (c) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (d) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Re.: APC-S-6, Section III.G.)			
1.24	1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns. (a) Upsets (as defined by APC-S-1, Section 2.34) (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (a) an upset occurred and that the permittee can identify the cause(s) of the upset; (b) the source was at the time being properly operated; (c) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and	YES	INTERMITTENT	ONE UPSET EVENT OCCURRED IN 1997 RESULTING IN EXCEEDING THE 40% OPACITY LIMIT ON THE WOOD FIRED BOILER (SOURCE AA-001). THE EVENT OCCURRED ON 16 JUNE 1997. MSDEQ WAS NOTIFIED ON 20 JUNE 1997 AND A WRITTEN REPORT SUBMITTED TO MSDEQ ON 24 JUNE 1997. MAINTENANCE ACTIVITIES DID NOT RESULT IN EXCESS EMISSIONS. REGULAR, CONTROLLED STARTUPS AND SHUTDOWNS WERE ACCOMPLISHED IN CONFORMANCE WITH THESE REQUIREMENTS.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	Regulations or any applicable permit; (d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and (e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken. 2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof. (3) This provision is in addition to any upset provision contained in any applicable requirement. (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26) (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (b) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	Rules and Regulations or any applicable permit. (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof. (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. (C) Maintenance. (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (a) the permittee can identify the need for the maintenance; (b) the source was at the time being properly operated; (c) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (d) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken. (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof. (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-I, Section 10)			
1.25	1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.	YES	CONTINUOUS	PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 1997.

ITEM	PERMIT CONDITION SECTION 3. EMISSION LIMITATIONS & STANDARDS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
3.A.1	3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a)& (b). (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period. (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-I, Section 3.1)	YES	INTERMITTENT	PLANT RECORDS. DURING STARTUP AND SOOT BLOWING, PROCEDURES USED LIMIT OPACITY. ONE UPSET EVENT OCCURRED IN 1997 RESULTING IN EXCEEDING THE 40% OPACITY LIMIT ON THE WOOD FIRED BOILER (SOURCE AA-001). THE EVENT OCCURRED ON 16 JUNE 1997. MSDEQ WAS NOTIFIED ON 20 JUNE 1997 AND A WRITTEN REPORT SUBMITTED TO MSDEQ ON 24 JUNE 1997.
3.A.2	3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)	YES	CONTINUOUS	PLANT RECORDS. OPERATIONS DO NOT PRODUCE OPACITY AT THIS LEVEL.

ITEM	PERMIT CONDITION SECTION 3. EMISSION LIMITATIONS & STANDARDS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
3.B.1	3.B.1 For Emission Points AA-001 and AA-O7, particulate matter emission rates shall not exceed 0.30 grains per standard dry cubic foot.	YES	CONTINUOUS	PLANT RECORDS , TEST DATA AND VENDOR INFORMATION. AA-001 WAS TESTED IN 1997 AND DEMONSTRATED COMPLIANCE. AA-007 IS A SMALL, OCCASIONALLY USED SOURCE. THE FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMITATION.
3.B.2	3.B.2 For Emission Points AA-001, AA-002, AA-005, AA-006, AA-007, AA-015, and AA-016, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMITATION.
3.B.3	3.B.3 For Emission Point AA-002, the maxinmm permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{-0.1667}$ where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMITATION.
3.B.4	3.B.4 For Emission Points AA-005, AA-006, AA-015, and AA-016, the maximum permissible emission of ash andlor particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMIT.

ITEM	PERMIT CONDITION SECTION 3. EMISSION LIMITATIONS & STANDARDS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
3.B.5	3.B.5 For Emission Points AA-003, AA-004, and AA-008 through AA-012, the particulate matter emission rate shall not exceed the amount determined by the relationship $E = 4.1\ p^{0.67}$ where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.	YES	CONTINUOUS	PLANT RECORDS AND DATA SUBMITTED WITH APPLICATION. THESE SOURCES DO NOT PRODUCE PARTICULATE EMISSIONS IN EXCESS OF THIS LIMIT.

BEGINNING: JULY 1, 1997 -
ENDING: DEC 31,1997

SOURCE: CEMS

EXCESS EMISSIONS REPORT
KOPPERS INDUSTRIES
TIE PLANT MS
OPACITY IN %
COMPLIANCE LIMIT: 40%

1/22/98

EXCESS BEGAN DATE	EXCESS BEGAN TIME	EXCESS ENDED DATE	EXCESS ENDED TIME	DURATION HOURS	MAGNITUDE	REASON FOR EXCESS EMISSIONS	CORRECTIVE ACTION TAKEN
8/07	03:47	8/07	03:54	0:08	95.5	3. STARTUP	INCREASE ID
8/09	06:48	8/09	06:50	0:03	33.5	3. STARTUP	ADD DRY FUEL
8/10	17:34	8/10	17:39	0:06	64.3	3. STARTUP	ADD DRY FUEL
8/18	11:31	8/18	11:34	0:04	62.2	3. STARTUP	LOW INDUCED DRAFT
8/20	07:14	8/20	07:18	0:05	56.4	3. STARTUP	INCREASE UNDER AIR
8/20	07:39	8/20	07:41	0:03	53.8	3. STARTUP	INCREASE UNDER AIR
8/28	21:13	8/28	21:16	0:04	51.2	3. STARTUP	INCREASE ID
8/30	03:48	8/30	03:51	0:04	49.9	3. STARTUP	INCREASE ID
9/12	19:00	9/12	19:02	0:03	44.6	3. STARTUP	ADD DRY FUEL
9/12	19:02	9/12	19:03	0:02	43.4	3. STARTUP	ADD DRY FUEL
9/15	04:04	9/15	04:11	0:08	50.6	3. STARTUP	ADD DRY FUEL
9/16	04:25	9/16	04:28	0:04	42.7	3. STARTUP	ADD DRY FUEL
9/29	04:51	9/29	04:55	0:05	52.4	3. STARTUP	ADD DRY FUEL
10/04	04:38	10/04	04:39	0:02	73.5	3. STARTUP	DECREASE LOAD
10/18	04:08	10/18	04:08	0:01	31.4	3. STARTUP	DECREASE LOAD
10/23	03:45	10/23	03:46	0:02	70.4	3. STARTUP	DECREASE LOAD
10/28	20:14	10/28	20:16	0:03	86.8	3. STARTUP	ADD DRY FUEL
10/31	08:57	10/31	09:02	0:06	61.1	3. STARTUP	ADD DRY FUEL
11:05	18:59	11:05	18:59	0:01	34.2	3. STARTUP	CLEAN UNDERGRATE
12:15	22:22	12:15	22:25	0:04	74	3. STARTUP	DECREASE LOAD
12/29	06:08	12/29	06:20	0:13	86.6	3. STARTUP	ADD DRY FUEL

Koppers Industries, Inc.

Grenada Plant

1998 KII Emissions Summary

01-BOILER, WOOD FIRED	tn/yr	Sulfur	Chlorine	(lb/hr):
Total Wood Burned:	16,918	0.11%	0.07%	9375
Creo Wood Burned:	4,586	0.25%	0.04%	
Penta Wood Burned:	2,364	0.25%	0.25%	
Untreated Wood Burned:	9,968	0.01%	0.04%	
Removal Efficiency[1]:		70.00%	45.00%	

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2.07	lb/tn	2/96 Test	17.51	9.70
SO_2	1.30	lb/tn	Mass Calc	11.02	6.11
NO_X[3]	3.3	lb/tn	2/96 test	27.91	15.47
CO[2]	8.3	lb/tn	CEM	70.21	38.91
VOC	0.91	lb/tn	FR Test	7.70	4.27
HCl[4]	1.538	lb/tn	2/96 Test	1.82	7.21
Arsenic	8.8E-05	lb/tn	AP-42	0.0007	0.000
Cadmium	1.7E-05	lb/tn	AP-42	0.0001	0.000
Chromium	1.3E-04	lb/tn	AP-42	0.0011	0.001
Lead	3.1E-04	lb/tn	AP-42	0.0026	0.001
Manganese	8.9E-03	lb/tn	AP-42	0.0753	0.042
Nickel	5.6E-04	lb/tn	AP-42	0.0047	0.003
Selenium	1.8E-05	lb/tn	AP-42	0.0002	0.000
Mercury	6.5E-06	lb/tn	AP-42	0.0001	0.000
Total HAP Metals				0.08	0.047

[1] Removal efficiencies based on 2/96 stack test.

[2] CO factor is 8.3 for 600 ppm fired on untreated fuel, 2.1 for 150 ppm fired on treated fuel.

[3] NOX factor is 3.3 for high fire, treated wood. Use 1.6 for untreated wood.

[4] Emission factor developed for Florence based on Grenada stack test data. Calculated using only Penta wood burned.

Koppers Industries, Inc.

Grenada Plant

1998 KII Emissions Summary

26-BOILER, FUEL OIL

Oil Burned(MGal/yr): 0 | Fuel Use Rate(MGal/hr): 0

Sulfur Content: 0.500 %

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/MGal	AP-42	0.00	0.00
SO_2	71	lb/MGal	AP-42	0.00	0.00
NO_X	20	lb/MGal	AP-42	0.00	0.00
CO	5	lb/MGal	AP-42	0.00	0.00
VOC	0.2	lb/MGal	AP-42	0.00	0.00

Number of days boiler assumed to operate is #DIV/0!

05-WOOD PRESERVING PROCESSES

Creosote Ties (CF)	1,944,876
Creosote Poles (CF)	85,781
Total Creosote Wood (CF)	2,030,657
Oil/Penta Poles (CF)	1,055,177

1998 Form R Report Data			
Form R	Emis. (lb)	Tr. Vol.(cf)	Em. Factor
Creosote	5,988	2,030,657	2.949E-03
Penta	1	1,055,177	1.327E-06
#6 Oil VOC	5,700	1,055,177	5.401E-03

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Creosote-VOC	2.949E-03	lb/cf	Form R	2.99	0.68
Creosote-HAPs:					
Benzene	22	% in vapor	Calculation	0.66	0.15
Biphenyl	0.16	% in vapor	Calculation	0.00	0.00
Cresols	0.46	% in vapor	Calculation	0.01	0.00
Dibenzofurans	0.61	% in vapor	Calculation	0.02	0.00
Naphthalene	17	% in vapor	Calculation	0.51	0.12
P-Xylenes	4.5	% in vapor	Calculation	0.13	0.03
Phenol	1.4	% in vapor	Calculation	0.04	0.01
Quinoline	1.5	% in vapor	Calculation	0.04	0.01
Toluene	26	% in vapor	Calculation	0.78	0.18
Total Creosote-HAP	73.63	% in vapor		2.20	0.50
Pentachlorophenol (VOC)	1.33E-06	lb/cf	Form R	0.00	0.00
#6 Oil (VOC)	5.4E-03	lb/cf	Engr. Est.	2.85	0.65
Total VOC				5.84	1.33

Koppers Industries, Inc.

Grenada Plant

1998 KII Emissions Summary

08-PRESERVATIVE TREATED WOOD, STORAGE FUGITIVES [FUGITIVES]

Pollutant	Emission Factor	Units	Basis	Estimated Emissions (tn/yr)	(lb/hr)
Creosote Ties					
Creosote (VOC)	4.25E-03	lb/cf	FR Test	4.13	0.94
Naphthalene	1.37E-03	lb/cf	FR Test	1.33	0.30
Benzene	1.74E-06	lb/cf	FR Test	0.00	0.00
Toluene	3.54E-05	lb/cf	FR Test	0.03	0.01
Creosote Poles					
Creosote (VOC)	1.15E-02	lb/cf	FR Test	0.49	0.11
Naphthalene	3.34E-03	lb/cf	FR Test	0.143	0.033
Benzene	4.23E-06	lb/cf	FR Test	0.000	0.000
Toluene	1.52E-04	lb/cf	FR Test	0.007	0.001
Penta Poles					
Oil (VOC, est. as creo)	1.15E-02	lb/cf	FR Test	6.07	1.38
Pentachlorophenol	1.9E-06	lb/cf	Engr. Est.	0.001	0.000
Totals					
VOC				10.69	2.44
Naphthalene				1.48	0.34
Benzene				0.002	0.000
Toluene				0.041	0.009
Pentachlorophenol				0.001	0.000
HAP Organics (Total)				1.52	0.35

Kiln not A.R. permit
27 = AA-001
28 not permitted
32 = AA-010

Koppers Industries, Inc.

Grenada Plant

1998 KII Emissions Summary

31-DRY KILNS

Poles Dried	939,635	C. F.	Batch size (cf):	13000
			Batch time (hrs):	72

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
VOC	0.05	lb/cf	Alabama	23.49	9.03

27-CYCLONES FOR WOOD MILLING

Number of Cyclones:	1
Ave. Hours/Day:	8
Ave Days/Yr Each:	100
Total Hours:	800

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	0.80	2

28-YARD ROADS, FUGITIVE PARTICULATES [FUGITIVES]

E=k(5.9)(s/12)(S/30)(W/3)^0.7(w/4)^0.5(365-p)/365 lb/VMT

k=particle size factor=	1.00		6	=No. vehicles driving
s=silt content (%) of road=	10	%	15	=Typ. miles/hr driving
S=mean vehicle speed=	15	mph	2.5	=Typ. hrs driving/day
W=mean vehicle weight=	15	tons	6	=Typ. d/wk driving
w=mean no. of wheels=	4	wheels	1	=Trtng volume factor
p=no. wet days/year=	110	days	70,200	=Ann veh mi. traveled
VMT=Veh. Mi. Traveled=	70,200	VMT		

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	5.30	lb/VMT	AP-42	186.00	127

(1) Hourly based on 365 days, 8 hours per day

32-POLE PEELER

Poles Peeled=	268,702	CF/yr	440	CF/hr
Pole Density=	45	lb/CF		
Pole Amount Peeled=	6,046	tn/yr	9.9	tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.350	lb/ton	AP-42	1.06	3.465

33 = AA-015, AA-005, AA-016
34 = AA-011
35 = AA-006

Koppers Industries, In
Grenada Plant

1998 KII Emissions Summary

33-SPACE HEATERS, NATURAL GAS

Location	BTU/Hr	BTU/CF	CF/Hr	Hr/Yr	MMCF/Yr
Boiler House	200000	1000	200	2016.00	0.4032
Standby Boiler Room	100000	1000	100	2016.00	0.2016
Fire Pump Building	20000	1000	20	2016.00	0.04032
TOTAL	320000		320		0.64512

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.18	lb/MMCF	AP-42	0.00	0.00
SO_2	0.6	lb/MMCF	AP-42	0.00	0.00
NO_X	94	lb/MMCF	AP-42	0.00	0.00
CO	40	lb/MMCF	AP-42	0.00	0.00
VOC	11	lb/MMCF	AP-42	0.00	0.00

34-WOOD FUEL PREPARATION & HANDLING [FUGITIVES]

Wood Fuel Processed: 16,918 Tn/Yr | 12 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.25	lb/tn	Engr. Est.	2.11	3.00

35-STEAM CLEANER, NATURAL GAS FIRED

Annual Usage: 1500 hours/yr | Fuel Use Rate: 440 CF/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	12	lb/MMCF	AP-42	0.00	0.01
SO_2	0.6	lb/MMCF	AP-42	0.00	0.00
NO_X	100	lb/MMCF	AP-42	0.03	0.04
CO	21	lb/MMCF	AP-42	0.01	0.01
VOC	5.8	lb/MMCF	AP-42	0.00	0.00

Koppers c.

Gre 37 = AA-012

1998 KII Er

36-WOOD STOVE HEATER, SHOP

Annual Usage: 0 tn/yr | Fuel Use Rate: 0.01 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	30.6	lb/tn	AP-42	0.00	0.31
SO_2	0.4	lb/tn	AP-42	0.00	0.00
NO_X	2.8	lb/tn	AP-42	0.00	0.03
CO	230.8	lb/tn	AP-42	0.00	2.31
VOC	43.8	lb/tn	AP-42	0.00	0.44

37-PARTS CLEANERS, DEGREASERS

Number of units operating: 2

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
VOC	0.33	tn/unit/yr	AP-42	0.66	0.00

TOTAL PLANT EMISSIONS (less fugitives)[1]

Pollutant		Estimated (tn/yr)	Emissions (lb/hr)	Source #'s
Particulate	.....	19.37	15.48	01,26,27,32,33,35,36
SO_2 [2]	.....	11.02	6.11	01,26,33,35,36
NO_X	.....	27.95	15.54	01,26,33,35,36
CO	.....	70.21	41.22	01,26,33,35,36
VOC	.....	37.69	15.07	01,26,05,31,33,35,36,37
Lead	.....	0.0026	0.0015	01
Total HAPs (VOC)	.....	2.21	0.85	05
Total HAPs (non-VOC)	.....	0.08	0.047	01

[1]Fugitive sources not included above: #08, Treated Wood Storage; #28, Yard; and #34, Wood Fuel Prep

[2]Assumes backup boiler operating at same time as primary for number of days shown.

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

Burchfield

July 18, 1997

Mr. David Burchfield
Air Facilities Branch
State of Mississippi
Department of Environmental Quality
Office of Pollution Control
PO Box 10385
Jackson MS 39289-0385

Dear Mr. Burchfield,

Attached is the Annual Emissions Reporting Form for our plant at Grenada MS. This plant holds a Title V Operating Permit No. 0960-00012 which was issued by the Department on 12 March 1997.

The Actual Annual Emission Rate is based on 1996 production data for our operations. The emission factors are based upon source tests, AP-42 and engineering calculations, as appropriate. The emissions estimates for individual sources are summarized in the attached spreadsheets.

We notice that your tabulation of Annual Allowable Emission Rates differ from those included in our Title V permit application. We would welcome the opportunity to meet and to discuss your tabulated values. I will call you within the month to arrange a meeting.

If you have any questions, please call me at (412)-227-2677.

Sincerely,

Stephen T. Smith
Environmental Program Manager

cc: Tom Henderson, Grenada, MS
T. Zordan

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

July 16, 1997

Thomas L. Henderson
Plant Manager
Koppers Industries, Inc.
P.O. Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson:

Re: Facility No. 0960-00012
Tie Plant, Mississippi

On April 15, 1997, Sherryl Johnson and I performed an inspection of the referenced facility. There were no apparent air pollution problems.

If you have any questions, please call me at (601) 961-5746.

Very truly yours,

Celina Matthes
Air Support Branch

CM/cm

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

Burchfield

RECEIVED
JUL 23 1997
Dept. of Environmental Quality
Office of Pollution Control

DATE: July 16, 1997

TO: David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality

FROM: Thomas L. Henderson

SUBJECT: Facility No. 960-00012
Tie Plant, Mississippi
Grenada County
Semi-Annual Report For Points AA-001, AA-002.

Dear Mr. Burchfield:

Attached is the Semi-Annual report for reporting point AA-001. Reporting point AA-002 was not operated in the 1st or 2nd quarter 1997.

The report for point AA-001 contains the In-Stack opacity information for the periods of operation in which the permit limitations were exceeded. On June 16 we exceeded our permit limitation for opacity. Attached to the is report is a copy of the letter submitted on June 24 explaining this violation. All other occurrences in which the permit was exceeded were during startups and were under 15 minutes. The boiler was fired with treated wood during the reporting period. The boiler temperature and Fuel Feed Rate for these periods are also being submitted. The Fuel Feed Rate was determined using the Fuel Feed Rate data collected during the February 20-21, 1996 Stack Test. The opacity reading is calculated using a rolling average of six minutes. If the opacity exceeds 40% in any six minute interval, then the rolling average is computed continually until the Opacity is below the 40% permit limit.

If you have any questions about this report or would like to discus it in further detail please contact me at 601-226-4584.

Sincerely,

Thomas L. Henderson
Plant Manager

cc: Steve Smith

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

July 10, 1997

Mr. Stephen T. Smith, Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

File Copy

Dear Mr. Smith:

Re: Facility No. 0960-00012
Tie Plant, Mississippi

This letter is to remind you that the facility's Title V operating permit contains semiannual reporting requirements in Paragraph 5.A.4 unless otherwise specified elsewhere in the permit. The reports are due by January 31 and July 31 of each year. If the permit doesn't specify a date, it is our intent that the semiannual reporting requirements be on a calendar basis.

Please be aware that for reporting requirements with nothing to report (e.g., as is frequently the case for requirement 5.A.7), we expect the report to so state.

If you have any questions, please let us know.

Sincerely,

David Burchfield
Air Facilities Branch

DB

ZORDAN ASSOCIATES, INCORPORATED
MURRYSVILLE, PA

FAX FROM: T. ZORDAN	ATTENTION: DAVID BURCHFIELD
PHONE NUMBER: 412)733-2156	PHONE NUMBER: 601 961 5171
FAX NUMBER: (41)733-2156	FAX NUMBER: 601 - 961 5742
FILE: 97 024	PAGES, INCLUDING COVER: 3

DATE: 29 July 97

MESSAGE:

Mr Burchfield -

Per the request of Steve Smith of Kopers.

Call if you have questions.

Regards -

Tom Zordan

ZORDAN ASSOCIATES, INCORPORATED
3807 EDINBURG DRIVE
MURRYSVILLE, PA 15668

29 June 1997

Mr. David Burchfield
Air Facilities Branch
State of Mississippi
Department of Environmental Quality
Office of Pollution Control
PO Box 10385
Jackson, MS 39289-0385

Dear Mr. Burchfield,

At the request of Mr. Stephen T. Smith of Koppers Industries, Inc., I am writing to you to provide the technical background on the emission factor for SO_2 used in the Annual Emissions Reporting Form for the Koppers plant at Grenada MS.

The spreadsheet attached to the Annual Emissions Reporting Form notes that a mass balance calculation was used to compute the emissions factor. This approach is very similar to the one used in the Title V permit application for the Grenada plant. The approach was to estimate the entire sulfur quantity present in the wood fuel; to assume that all of that sulfur was converted to SO_2; and to account for the control efficiency of the APCS. The details of this approach are discussed below.

Three types of wood fuel are used in the wood fired boiler at Grenada; untreated wood; used, creosote treated wood; and used pentachlorophenol treated wood. The wood is chipped fired in the combustor. The quantities of each type of wood fuel are logged so that the annual quantity of each type is known.

Sulfur is a minor constituent of wood. Most green wood samples contain so little sulfur that it rarely exceeds the detection limit of the analytical method. Typically, this is 0.01% S on an as received basis. The value selected by Koppers represents data from samples they have analyzed and from the literature. Used creosote and pentachlorophenol treated wood contain slightly greater levels of sulfur. There are data from Koppers and from the literature to indicate that the value of 0.25% sulfur is representative of the range.

If the sulfur content of the three types of wood fuel is used to compute the sulfur balance of the total fuel stream for 1996, the following results are obtained.

- Untreated Wood: 0.01% S x 10125 tons wood = 1.0125 tons S
- Creo Treated Wood: 0.25% S x 200 tons wood = 0.5 tons S
- Penta Treated Wood: 0.25% S x 85.8 tons wood = 0.21 tons S

This yields a total of 1.7225 tons of S present in the fuel stream. This, in turn, would correspond to 3.445 tons of SO_2 assuming that all of the sulfur is converted to SO_2. The 2/96 stack test at the Grenada plant indicated that the control efficiency for SO_2 is 75%. Consequently, 25% of the SO_2 entering the multiclone would be emitted from the stack. Using 30% emitted (or 70% control) is a conservative assumption. Hence the emissions would be 3.445 tons SO_2 x 30% = 1.034 tons SO_2.

The corresponding emission factor is obtained from

EF = [1.034 tons SO_2 x 2000 lb/ton]/10411 total tons wood fuel
= 0.1986 lb SO_2 / ton fuel

If you have any questions please contact Steve Smith at (412)-227-2677 or me at (412)-[redacted]33-2156.

Sincerely,

Thomas A. Zordan

cc: S. T. Smith - Koppers
T. Henderson - Koppers

Project: 97-[redacted]2A
Reference: [redacted]02[redacted]18.DOC

Burchfield

ZORDAN ASSOCIATES, INCORPORATED
3807 EDINBURG DRIVE
MURRYSVILLE, PA 15668

29 June 1997

Mr. David Burchfield
Air Facilities Branch
State of Mississippi
Department of Environmental Quality
Office of Pollution Control
PO Box 10385
Jackson, MS 39289-0385

Dear Mr. Burchfield,

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Sulfur is a minor constituent of wood. Most green wood samples contain so little sulfur that it rarely exceeds the detection limit of the analytical method. Typically, this is 0.01% S on an as received basis. The value selected by Koppers represents data from samples they have analyzed and from the literature. Used creosote and pentachlorophenol treated wood contain slightly greater levels of sulfur. There are data from Koppers and from the literature to indicate that the value of 0.25% sulfur is representative of the range.

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The corresponding emission factor is obtained from

EF =[1.034 tons SO_2 x 2000 lb/ton]/10411 total tons wood fuel
= 0.1986 lb SO_2 / ton fuel

If you have any questions please contact Steve Smith at (412)-227-2677 or me at (412)-733-2156.

Sincerely,

Thomas A. Zordan

cc: S. T. Smith - Koppers
T. Henderson - Koppers

Project: 97-02A
Reference: 702A18.DOC

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

DATE: June 24, 1997

TO: David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality

FROM: Thomas L. Henderson

SUBJECT: Facility No. 960-00012
Tie Plant, Mississippi
Grenada County
Opacity Violation for Point AA-001

Dear Mr. Burchfield:

On June 16, 1997 we exceeded our permit limitation for opacity. The violation duration was 1.24 hrs and the opacity average was 97.2%. The opacity violation was caused by a combination of wet fuel and our induced draft controller was malfunctioning. The boiler was being fired with untreated sawdust purchased for local producers. Due to the recent heavy rainfall we have experienced most of the sawdust we have purchased has been wet.

The Malfunctioning controller was repaired and the sawdust we have purchased in the last week has been drier.

If you have any questions about this report or would like to discus it in further detail please contact me at 601-226-4584.

Sincerely,

Thomas L. Henderson
Plant Manager

cc: Steve Smith

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

DATE: June 24, 1997

TO: David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality

FROM: Thomas L. Henderson

SUBJECT: Facility No. 960-00012
Tie Plant, Mississippi
Grenada County
Opacity Violation for Point AA-001

Dear Mr. Burchfield:

On June 16, 1997 we exceeded our permit limitation for opacity. The violation duration was 1.24 hrs and the opacity average was 97.2%. The opacity violation was caused by a combination of wet fuel and our induced draft controller was malfunctioning. The boiler was being fired with untreated sawdust purchased for local producers. Due to the recent heavy rainfall we have experienced most of the sawdust we have purchased has been wet.

The Malfunctioning controller was repaired and the sawdust we have purchased in the last week has been drier.

If you have any questions about this report or would like to discus it in further detail please contact me at 601-226-4584.

Sincerely,

Thomas L. Henderson
Plant Manager

cc: Steve Smith

FILE COPY

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

June 5, 1997

Mr. Stephen Smith
Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219

Dear Mr. Smith:

Re: Title V Air Operating
Permit Program
Facility No. 0960-00012

The Title V Operating Permit program fee for 1997 will soon be due. The attached reporting form shows your source's allowable emissions as currently recorded in our files.

As provided by Section 49-17-32 of the Mississippi Code Annotated, you may elect to use either actual or allowable (potential) emissions in determining the annual quantity of emissions to be used in assessing fees. Acceptable methods for calculating actual annual emissions were specified in Section 49-17-30 and are listed on the attachments. If you choose the basis of actual emissions, you must submit the attached reporting form showing your inventory of emissions for the 1996 calendar year by July 1, 1997, along with the calculations and the methodology used in determining the inventory. If an inventory of emissions has not been received by July 1, 1997, the allowable emissions shown on the attached reporting form will be used as the basis for this year's assessment of fees.

This fee is due September 1st of each year. An invoice which reflects the billable emissions and amount due will be sent to you prior to September 1, 1997. If you have a billing address different from the address at which you received this letter, please indicate the correct billing address in your response. The invoice you receive will allow you to make quarterly payments if you so desire.

If you have any questions concerning this letter or the attachments, feel free to contact me at (601) 961-5171.

Sincerely,

David Burchfield
Air Facilities Branch

Attachments

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

DATE: April 10, 1997

TO: David Burchfield
Air Facilities Branch
Mississippi Department of Environmental Quality

FROM: Thomas L. Henderson

SUBJECT: Facility No. 960-00012
Tie Plant, Mississippi
Grenada County
Air Permit Reporting For Points AA-001, AA-002

Dear Mr. Burchfield:

Attached is the quarterly data for 1st quarter 1997 for reporting point AA-001. Reporting point AA-002 was not operated in the 1st Quarter.

The report for point AA-001 contains the In-Stack opacity information for the periods of operation in which the permit limitations were exceeded. All occurrences in which the permit was exceeded were during startups and were under 15 minutes. The Boiler was fired with treated wood during the reporting period. The boiler temperature and feed rate for these periods are also being submitted. The Fuel Feed Rate was determined using the Fuel Feed Rate data collected during the February 20-21, 1996 Stack Test. The Opacity reading is calculated using a rolling average of six minutes. If the opacity exceeds 40% in any six minute interval, then the rolling average is computed continually until the Opacity is below the 40% permit limit.

If you have any questions about this report or would like to discus it in further detail please contact me at 601-226-4584.

Sincerely,

Thomas L. Henderson

Thomas L. Henderson
Plant Manager

cc: Steve Smith

FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

March 12, 1997

Certified Mail No. P 354 269 547

Mr. Steve Smith, Environmental Program Manager
Koppers Industries Incorporated
436 Seventh Avenue, Incorporated
Pittsburgh, Pennsylvania 15219-1800

DATA CODED

Dear Mr. Smith:

Re: Operating Permit No. 0960-00012
Tie Plant, Mississippi

Enclosed please find Title V Operating Permit No. 0960-00012 issued for the operation of air emissions equipment. Operation of the air emissions equipment at the facility shall be in accordance with the terms, conditions, and limitations of the permit. This Title V Operating Permit supersedes and replaces any previously held Operating Permit. Please note that, unless specified otherwise, each condition in this Title V Operating Permit is federally-enforceable. Also, the Permit Board modified the construction permit issued, November 8, 1994 and modified January 14,1997, such that it is now consistent with this operating permit.

Modification to this process or facility is not allowed under this permit. Should you wish to make such a modification, it will be necessary to submit a new application for a construction permit and an application for revision of this Title V Operating Permit. This permit expires on March 1, 2002. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

Any appeal of this permit action must be made within the 30 day period provided for in Section 49-17-20(4)(b) Mississippi Code of 1972.

If you have any questions or if we can be of service, please let me know.

Very truly yours,

David Burchfield
Air Facilities Branch

WDB:st
Enclosure

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 23, 1997

Ms. Carla Pierce, Chief
Operating Permits Section
U.S. Environmental Protection Agency
APTMD - 12th Floor
Atlanta Federal Center
100 Alabama St., S.W.
Atlanta, GA 30365

Dear Ms. Pierce:

In accordance with Section VI. of our Implementation Agreement (IA), 40 CFR Part 70 and Mississippi's Title V regulations, we are submitting a disk copy of the draft/proposed Title V operating permit, public notice, permit application summary form, and information relative to the draft Title V operating permit for the following sources which are not targeted by Region IV's permit review strategy:

- ANR Pipeline Company - Sardis Compressor Station (Fac. No. 2100-00028)
- Koppers Industries, Incorporated (Fac. No. 0960-00012)
- Koch Gateway Pipeline Co. - Jackson Compressor Station (Fac. No. 2380-00096)
- Koch Gateway Pipeline Co. - McComb Compressor Station (Fac. No. 2760-00031)

For these sources the permit application summary form (App. A of the IA) is enclosed in lieu of a hard copy of the permit application. A hard copy of the application is available upon request.

Per our agreement, we request that the submittal of this information begin EPA's 45-day review period for proposed permits.

If you have any questions, please let me know.

Very truly yours,

Wayne B. Anderson

Wayne B. Anderson, P.E.
Chief, Air Facilities Branch

Enclosures
jhb/WBA

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 22, 1997

Mr. Stephen T. Smith, Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

Dear Mr. Smith:

Re: Koppers Industries, Inc.
Facility No. 0960-00012
Tie Plant, Mississippi

Enclosed is a copy of a public notice for comment on the above referenced facility.

If you have any questions, please contact us.

Very truly yours,

David Burchfield
Air Facilities Branch

DB
Enclosure

cc: Ms. Sherry Traweek, OPC

K:\DOCS\TV-NOTIC\97ATV012.4

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 22, 1997

File copy

Mr. Stephen T. Smith, Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

Dear Mr. Smith:

Re: Koppers Industries, Inc.
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Very truly yours,

David Burchfield
Air Facilities Branch

DB
Enclosure

cc: Ms. Sherry Traweek, OPC

K:\DOCS\TV-NOTIC\97ATV012.4

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

File Copy

January 22, 1997

Postmaster
Grenada, MS 38960

Dear Sir:

Re: Koppers Industries, Inc.
Facility No. 0960-00012
Tie Plant, Mississippi

Please post the attached public notice in your post office on or before January 24, 1997.

If you are unable to do so or if you have any questions, please advise.

Very truly yours,

David Burchfield
Air Facilities Branch

DB
Attachment
cc: Ms. Sherry Traweek, OPC

K:\DOCS\TV-NOTIC\97ATV012.3

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 22, 1997

Postmaster
Grenada, MS 38960

Dear Sir:

Re: Koppers Industries, Inc.
Facility No. 0960-00012
Tie Plant, Mississippi

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If you are unable to do so or if you have any questions, please advise.

Very truly yours,

David Burchfield
Air Facilities Branch

DB
Attachment
cc: Ms. Sherry Traweek, OPC

K:\DOCS\TV-NOTIC\97ATV012.3

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 16, 1997

Ms. Marie Mills, Legal Notice Dept.
The Clarion Ledger
P.O. Box 40
Jackson, MS 39205

Dear Ms. Mills:

Enclosed herewith is a legal notice to be published in your newspaper on or before Friday, January 24, 1997. Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact David Burchfield of my staff at (601) 961-5250.

Very truly yours,

Dwight K. Wylie

Dwight K. Wylie, P.E.
Chief, Air Division

DKW:DB
Enclosure

cc: Ms. Pamela Mitchell, OPC (4044)
Ms. Sherry Traweek, OPC

K:\DOCS\TV-NOTIC\97ATV012.2

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 16, 1997

Ms. Marie Mills, Legal Notice Dept.
The Clarion Ledger
P.O. Box 40
Jackson, MS 39205

Dear Ms. Mills:

Enclosed herewith is a legal notice to be published in your newspaper on or before Friday, January 24, 1997. Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact David Burchfield of my staff at (601) 961-5250.

Very truly yours,

Dwight K. Wylie, P.E.
Chief, Air Division

DKW:DB
Enclosure

cc: Ms. Pamela Mitchell, OPC (4044)
Ms. Sherry Traweek, OPC

K:\DOCS\TV-NOTIC\97ATV012.2

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

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Chief, Air Division

DKW:DB
Enclosure

cc: Ms. Pamela Mitchell, OPC (4044)
Ms. Sherry Traweek, OPC

K:\DOCS\TV-NOTIC\97ATV012.2

FILE COPY

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 15, 1997

Certified Mail No. P 046 604 501

Mr. Stephen Smith
Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

DATA CODED

Dear Mr. Smith:

Re: Construction Permit Modification
Facility No. 0960-00012
Tie Plant, Mississippi

This letter is to inform you that the above referenced Permit to Construct issued November 8, 1994, has been modified. This modification consists of removal of emission limitations on the woodwaste boiler for which there are no applicable requirements. Also, based on recent compliance testing results, the minimum required combustion chamber temperature while firing treated wood was lowered from 1600° to 1140°.

Enclosed please find the modified permit.

Any appeal of this permit action must be made within the 30 day period provided for in Section 49-17-29(4)(b) Mississippi Code of 1972.

Very truly yours,

David Burchfield
Air Facilities Branch

DB:sr
Enclosure

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

via FAX and U. S. Mail

January 8, 1997

Mr. David Burchfield (FAX No. 601-961-5742)
Air Facilities Branch
Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

RE: Title V Draft Permit Modification
Facility No. 0960-00012
Tie Plant, Grenada County, MS

Dear Mr. Burchfield:

I have reviewed the proposed changes to the draft Title V permit to incorporate the Title VI requirement. KII has no objection to inclusion of these provisions. Please proceed with the changes as appropriate.

Please call me at (412)227-2677 if you have any additional questions.

Sincerely,

Stephen T. Smith
Environmental Program Manager

KOPPERS INDUSTRIES

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
Fax: (412) 227-2423

David B.

via FAX and U. S. Mail

January 8, 1997

Mr. David Burchfield (FAX No. 601-961-5742)
Air Facilities Branch
Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

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Facility No. 0960-00012
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Please call me at (412)227-2677 if you have any additional questions.

Sincerely,

Stephen T. Smith
Environmental Program Manager

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 6, 1997

Mr. Stephen T. Smith
Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

Dear Mr. Smith:

Re: Facility No. 0960-00012
Tie Plant, Mississippi

We would like to use this opportunity to inform you that the EPA has recently formally objected to one of our Proposed Title V permits, in part, because it did not include Title VI applicable requirements. They also informed us that they would object to any Proposed Title V permits in the future which did not contain Title VI applicable requirements. In a memo we received recently, they (EPA) pointed out that most part 70 sources will have at least some air conditioners, chillers, and refrigerators, and that these units will almost certainly be subject to Title VI applicable requirements. In response to EPA's comments, we are adding a new section (Section 7 - Title VI Applicable Requirements) to all Title V permits. Attached is a copy of this section. Please note that this permit language has been reviewed and approved by EPA, Region IV. We would appreciate your written comments on this new section, if you have any, by January 16, 1997.

Thank you for your cooperation in this matter. If you have any questions about this letter, or would like to discuss it in further detail, please call us at 601-961-5250.

Sincerely,

David Burchfield
Air Facilities Branch

WDB
Enclosure

cc: Ms. Sherry Traweek, OPC

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 6, 1997

Mr. Stephen T. Smith
Environmental Program Manager
Koppers Industries, Inc.
436 Seventh Avenue, K-1800
Pittsburgh, PA 15219-1800

Dear Mr. Smith:

Re: Facility No. 0960-00012
Tie Plant, Mississippi

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Thank you for your cooperation in this matter. If you have any questions about this letter, or would like to discuss it in further detail, please call us at 601-961-5250.

Sincerely,

David Burchfield

David Burchfield
Air Facilities Branch

WDB
Enclosure

cc: Ms. Sherry Traweek, OPC

0920-12

PLEASE NOTE THE FOLLOWING THE FOLLOWING ADDRESS CHANGE:

CHANGE FROM:

Koppers Industries, Inc.
Attn: Ronald Murphy
P. O. Box 160
Tie Plant, MS 38960

TO:

Koppers Industries, Inc.
Attn: Thomas Henderson
P. O. Box 160
Tie Plant, MS 38960

Still Contact Steven T. Smith
Env. Program Mgr.
436 Seventh Ave, K-1900 Pittsburgh PA 15219-1800
(412) 227-2677

KOPPERS INDUSTRIES

Date: SEPTEMBER [illegible] 1999

366292

62-1
311

Amount
$1,914.80

Pay To The Order Of: MISSISSIPPI ST DEPT ENVIRONMEN

ONE THOUSAND NINE HUNDRED FOURTEEN AND 80/100 ONLY

MISSISSIPPI ST DEPT ENVIRONMEN
TITLE V AIR PERMIT
PO BOX 20325
JACKSON MS 39289-1325

Payable through Mellon Bank (DE) N.A., Wilmington, DE 19899
Mellon Bank (East) N.A., Philadelphia, PA 19102

DE

KOPPERS INDUSTRIES, INC.
V.P. AND C.F.O.

mc Schenning
TREASURER

⑈366292⑈ ⑆031100047⑆ 2⑈943 678⑈

KOPPERS INDUSTRIES, INC. PITTSBURGH PA 366292

SP CD	VENDOR	DIV	OUR AUDIT	YOUR INVOICE NBR	INV MO/DA	INV AMOUNT	DISC	NET AMT PAYABLE
	940505031	477	02409080983	2047	0731	1914.80	0.00	***1914.80

0960-00012

SEP 1999
RECEIVED
AS/BS
FEES

366292

[redacted] OF ENVIRONMENTAL QUALI[redacted]
TITLE V AIR PERMIT FEE
P. O. Box 20325
Jackson, MS 39289-1325

** INVOICE **

*** TITLE V AIR OPERATING PERMIT FEE ***

BILL TO:
KOPPERS INDUSTRIES INC

P O BOX 160
TIE PLANT, MS 38960

INVOICE # 2047
INVOICE DATE: 7/31/99

MDEQ CONTACTS:
FINANCIAL: MONA VARNER 601-961-5572
ENGINEERING:JAY BARKLEY 601-961-5154

FACILITY I.D. # 0960-00012

TERMS: DUE 9/1/99

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	19.37	19.37	20.00	387.40
SO2	11.20	11.20	20.00	224.00
NOX	27.45	27.45	20.00	549.00
CO	70.21	70.21	0.00	0.00
VOC	37.64	37.64	20.00	752.80
LEAD	0.00	0.00	0.00	0.00
TRS	0.00	0.00	20.00	0.00
TOTAL HAP's (VOC)	2.21	2.21	0.00	0.00
TOTAL HAPs (Non-Voc)	0.08	0.08	20.00	1.60
CFC's / HCFC's	0.00	0.00	0.00	0.00
Other	0.00	0.00	20.00	0.00

TOTAL ANNUAL FEE DUE 1,914.80

As per Section 49-17-30 of the MS Code, the maximum emission rate used for calculation of fees for any pollutant is 4,000 tons, with total fees not to exceed $250,000 per facility. You were billed for actual or allowable emissions based upon the option which you previously indicated.

* * * FAILURE TO REMIT PAYMENT BY THE DUE DATE MAY * * *
* * * * * * * * RESULT IN A LATE PENALTY * * * * * * * *

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM
P.O. BOX 10385
JACKSON, MS 39289-0385

In accordance with Section 49-17-30, Mississippi Code of 1972 Annotated, all sources which choose to base their annual Title V Fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

MDEQ Facility ID #: 0960-00012

Facility Name: Koppers Industries, Inc.

Site Address: 543 Tie Plant Road (Street Location) Tie Plant (City) (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1998. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	FOR INFO ONLY Actual Emission Rate (TPY) Reported for Calendar Year 1997	Actual Annual (1998) Emission Rate (TPY)
Particulate Matter (PM)	200.13	15.05	19.37
SO2	109.94	0.85	11.20
NOX	63.37	21.79	27.95
CO	13.29	54.71	70.21
VOC*	85.22	19.39	37.64
TRS	0.00	0	Ø
LEAD	0.01	0.002	0.0026
CFCs/HCFCs	0.00	0	Ø
Other	0.00	0	Ø
Total HAPs (Voc)	0.00	1.89	2.21
Total HAPs (Non-Voc)	16.73	0.07	0.08

* Reflects Total VOC from the facility including VOCs that are HAPs.

David Burchfield

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Thomas L. Henderson
Signature

6-30-99
Date

EXCESS EMISSIONS REPORT
PRINTED: 12-Jul-99
Koppers Industries
Tie Plant Road
Opacity in %
BEGINNING Jan. 1, 1999 AND ENDING Mar. 31, 1999
SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began Date	Time	Excess Ended Date	Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
1/01	06:28	01/01	06:32	0:05	70.7	Process Down	Boiler not in operation.
1/05	03:57	01/05	04:00	0:04	48.1	Process Down	Sawdust would not go up belt
1/05	04:03	01/05	04:07	0:05	77.6	Process Down	Sawdust would not go up belt
1/06	07:51	01/06	07:54	0:04	40.5	6. Clean Process Equipment	Pull ash #1 cell
1/06	09:43	01/06	09:43	0:01	47.2	6. Clean Process Equipment	Pull ash #2 cell
1/06	10:22	01/06	10:25	0:04	74.2	6. Clean Process Equipment	Clean photoeye
1/08	04:46	01/08	04:51	0:06	47.6	6. Clean Process Equipment	Clean photoeye
1/11	06:52	01/11	06:53	0:02	42.5	6. Clean Process Equipment	Clean photoeye
1/11	11:47	01/11	11:58	0:12	72.0	Process Down	Out of fuel
1/11	12:04	01/11	12:19	0:16	81.4	Process Down	Out of fuel
1/11	12:22	01/11	12:30	0:09	67.0	3. Startup	None at this time.
1/11	12:33	01/11	12:47	0:15	85.4	6. Clean Process Equipment	Clean photoeye
1/12	11:20	01/12	11:22	0:03	57.1	6. Clean Process Equipment	Clean cell and pull ash
1/13	19:22	01/13	19:27	0:06	58.9	20. Corrective Maintenance	Wet fuel adjusted level
1/14	20:43	01/14	20:47	0:05	74.8	3. Startup	Adjust air and fuel feed
1/14	21:59	01/14	22:03	0:05	57.2	3. Startup	Adjust air and fuel
1/14	22:06	01/14	22:13	0:08	73.3	3. Startup	Adjust air and fuel feeds
1/15	01:08	01/15	01:12	0:05	72.9	3. Startup	Readjust air and fuel
1/15	05:36	01/15	05:38	0:03	67.9	20. Corrective Maintenance	Silo stopped feeding
1/15	05:44	01/15	05:44	0:01	61.9	3. Startup	Adjust air and fuel feed
1/15	13:57	01/15	14:01	0:05	68.6	20. Corrective Maintenance	Silo stopped feeding
1/15	14:05	01/15	14:08	0:04	50.8	3. Startup	Adjust air and fuel feeding
1/16	02:25	01/16	02:29	0:05	75.2	20. Corrective Maintenance	Silo stopped feeding
1/16	06:32	01/16	06:36	0:05	79.9	3. Startup	Due to silo malfunctioning
1/17	06:18	01/17	06:22	0:05	83.0	4. Shutdown	Reduced fuel and pulled ash(down Sunday)
1/19	01:59	01/19	02:04	0:06	73.9	Process Down	Silo down and low steam
1/19	03:13	01/19	03:16	0:04	71.4	Process Down	Silo down and low steam
1/19	14:54	01/19	14:59	0:06	83.8	3. Startup	Restart due to boiler down
1/20	08:53	01/20	08:55	0:03	68.2	6. Clean Process Equipment	Pull ash, cleaning cells
1/21	07:57	01/21	07:59	0:03	48.0	6. Clean Process Equipment	Pulling ash and cleaning cells
1/22	10:57	01/22	11:00	0:04	32.0	4. Shutdown	Blowed gasket
1/22	11:12	01/22	11:20	0:09	78.5	4. Shutdown	Blowed gasket
1/22	11:26	01/22	11:42	0:17	82.2	4. Shutdown	Blowed gasket
1/22	11:42	01/22	11:43	0:02	59.7	4. Shutdown	Blowed gasket
1/22	11:54	01/22	12:14	0:21	78.0	3. Startup	Restart boiler
1/22	12:35	01/22	12:36	0:02	49.5	3. Startup	Restart boiler
1/24	07:45	01/24	07:47	0:03	38.0	4. Shutdown	Shutdown of boiler
1/24	08:17	01/24	08:22	0:06	68.2	4. Shutdown	Shutdown of boiler
1/25	08:10	01/25	08:19	0:10	73.6	3. Startup	Adjust air and fuel
1/26	09:34	01/26	09:34	0:01	36.9	6. Clean Process Equipment	Pull ash and clean cell
1/26	09:43	01/26	09:43	0:01	26.6	6. Clean Process Equipment	Pull ash and clean cell
1/26	10:24	01/26	10:30	0:07	64.0	6. Clean Process Equipment	Pull ash and clean cell
1/29	09:00	01/29	09:05	0:06	66.9	3. Startup	Adjust air and fuel

EXCESS EMISSIONS REPORT
PRINTED: 12-Jul-99
Koppers Industries
Tie Plant Road
Opacity in %
BEGINNING Jan. 1, 1999 AND ENDING Mar. 31, 1999
SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began ate	Time	Excess Ended Date	Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
1/29	09:17	01/29	09:20	0:04	61.4	3. Startup	Adjust air and fuel
1/30	20:29	01/30	20:35	0:07	80.6	Process Down	Fuel conveyor stopped pulling
1/30	20:44	01/30	20:47	0:04	48.0	Process Down	Fuel conveyor malfunction
1/30	20:52	01/30	20:55	0:04	82.4	Process Down	Fuel conveyor malfunction
1/30	21:16	01/30	21:16	0:01	35.7	Process Down	Fuel conveyor still down
1/31	06:54	01/31	07:01	0:08	67.7	4. Shutdown	Shutdown for weekend
2/01	07:53	02/01	07:57	0:05	50.5	3. Startup	Adjust air and fuel(wet wood)
2/01	08:10	02/01	08:18	0:09	84.9	3. Startup	Adjust air and fuel (wet wood)
2/01	08:21	02/01	08:25	0:05	78.7	3. Startup	Adjust air and fuel (wet wood)
2/01	08:29	02/01	08:42	0:14	76.8	3. Startup	Adjust air and fuel (wet wood)
2/01	08:50	02/01	09:07	0:18	76.5	3. Startup	Adjust air and fuel (wet wood)
2/01	09:29	02/01	09:40	0:12	65.0	3. Startup	Adjust air and fuel (wet wood)
2/02	08:46	02/02	08:47	0:02	38.3	3. Startup	Adjust air and fuel
2/03	10:12	02/03	10:16	0:05	65.4	6. Clean Process Equipment	Pull ash and clean cell
2/04	11:56	02/04	11:57	0:02	46.5	6. Clean Process Equipment	Clean cell and pull ash
2/05	09:38	02/05	09:40	0:03	70.9	3. Startup	Adjust air and fuel
2/05	11:09	02/05	11:13	0:05	57.9	6. Clean Process Equipment	Pull ash and clean cell
2/06	06:29	02/06	06:31	0:03	37.7	3. Startup	Adjust air and fuel
2/08	06:04	02/08	06:16	0:13	59.7	3. Startup	Adjust air and fuel
2/08	06:21	02/08	06:25	0:05	74.5	3. Startup	Adjust air and fuel
2/08	06:29	02/08	06:43	0:15	63.3	3. Startup	Adjust air and fuel
2/09	09:44	02/09	09:48	0:05	58.9	3. Startup	Adjust air and fuel
2/09	09:54	02/09	09:59	0:06	64.5	3. Startup	Adjust air and fuel
2/11	07:54	02/11	07:56	0:03	44.7	6. Clean Process Equipment	Pull ash and clean cell
2/12	15:21	02/12	15:22	0:02	67.1	6. Clean Process Equipment	Pull ash and clean cell
2/15	11:50	02/15	12:02	0:13	84.0	3. Startup	Restart boiler due to silo
2/16	11:33	02/16	11:41	0:09	52.2	6. Clean Process Equipment	Pull ash and clean cell
2/17	06:34	02/17	06:37	0:04	60.1	6. Clean Process Equipment	Pull ash and clean cell
2/17	09:30	02/17	09:32	0:03	37.0	6. Clean Process Equipment	Pull ash and clean cell
2/18	13:48	02/18	13:51	0:04	49.9	6. Clean Process Equipment	Pull ash and clean cell
2/19	15:42	02/19	15:45	0:04	57.2	6. Clean Process Equipment	Pull ash and clean cell
2/20	06:46	02/20	06:47	0:02	37.3	4. Shutdown	Shutdown for weekend
2/22	10:02	02/22	10:38	0:37	85.3	3. Startup	Adjust fuel and air, wet fuel
2/22	13:53	02/22	14:10	0:18	85.2	3. Startup	Restart boiler, wet fuel takes longer
2/23	07:09	02/23	07:13	0:05	66.4	6. Clean Process Equipment	Pull ash and clean cell
2/23	07:23	02/23	07:26	0:04	75.7	6. Clean Process Equipment	Pull ash and clean cell
2/23	07:30	02/23	07:33	0:04	67.6	6. Clean Process Equipment	Pull ash and clean cell
2/24	14:20	02/24	14:22	0:03	42.4	6. Clean Process Equipment	Pull ash and clean cell
2/25	16:31	02/25	16:34	0:04	51.6	6. Clean Process Equipment	Pull ash and clean cell
2/27	06:07	02/27	06:10	0:04	51.1	6. Clean Process Equipment	Pull ash and clean cell
3/01	06:14	03/01	06:28	0:15	82.6	6. Clean Process Equipment	Pull ash and clean cell
3/02	17:20	03/02	17:21	0:02	36.4	20. Corrective Maintenance	Silo got jammed
3/03	07:08	03/03	07:11	0:04	42.6	6. Clean Process Equipment	Pull ash and clean cell

EXCESS EMISSIONS REPORT
PRINTED: 12-Jul-99
Koppers Industries
Tie Plant Road
Opacity in %
BEGINNING Jan. 1, 1999 AND ENDING Mar. 31, 1999
SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began ate	Time	Excess Ended Date	Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
3/03	19:40	03/03	19:47	0:08	82.9	Process Down	Power failure
3/05	15:31	03/05	15:32	0:02	18.6	6. Clean Process Equipment	Pull ash and clean cell
3/06	07:30	03/06	07:31	0:02	37.4	6. Clean Process Equipment	Pull ash and clean cell
3/06	07:37	03/06	07:45	0:09	72.3	6. Clean Process Equipment	Pull ash and clean cell
3/09	13:57	03/09	14:00	0:04	39.2	3. Startup	Adjust air and fuel
3/09	14:07	03/09	14:29	0:23	56.9	3. Startup	Adjust air and fuel
3/09	14:31	03/09	14:34	0:04	40.1	3. Startup	Restart boiler bue to maintenance work
3/09	14:36	03/09	14:38	0:03	42.9	3. Startup	Restart boiler due to maintenance work
3/09	15:09	03/09	15:15	0:07	55.8	3. Startup	Restart boiler due to maintenance work
3/09	16:43	03/09	16:48	0:06	66.6	20. Corrective Maintenance	Blown gasket maintenance
3/10	09:22	03/10	09:23	0:02	37.0	6. Clean Process Equipment	Pull ash and clean cell
3/15	06:10	03/15	06:28	0:19	83.2	3. Startup	Adjust air and fuel
3/16	08:18	03/16	08:22	0:05	50.8	6. Clean Process Equipment	Pull ash and clean cell
3/18	10:00	03/18	10:09	0:10	83.5	3. Startup	Restart boiler, Adjust fuel and air
3/19	08:45	03/19	08:45	0:01	25.3	3. Startup	Adjust air and fuel
3/20	06:35	03/20	06:36	0:02	43.6	4. Shutdown	Shutdown for weekend
3/22	06:13	03/22	06:29	0:17	83.9	3. Startup	Start up after weekend, wet fuel
3/29	06:29	03/29	06:32	0:04	44.5	3. Startup	Adjust air and fuel, after weekend
3/29	06:35	03/29	06:37	0:03	39.8	3. Startup	Adjust air and fuel, after weekend

EXCESS EMISSIONS REPORT
PRINTED: 06-Jul-99
Koppers Industries
Tie Plant Road
Opacity in %
BEGINNING Apr. 1, 1999 AND ENDING Jun. 30, 1999
SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began		Excess Ended		Duration		Reason for Excess	Corrective Action
ate	Time	Date	Time	Hours	Magnitude	Emissions	Taken
4/06	20:41	04/06	20:44	0:04	70.2	20. Corrective Maintenance	#2 feed drive quit working; corrected
4/12	05:08	04/12	05:10	0:03	34.3	3. Startup	Startup from weekend, adjust air&fuel
4/13	03:53	04/13	03:53	0:01	52.7	20. Corrective Maintenance	#2 breaker tripped
4/13	23:58	04/14	00:01	0:04	59.1	20. Corrective Maintenance	#2 breaker tripped off
4/14	05:18	04/14	05:21	0:04	68.3	6. Clean Process Equipment	Pull ash and clean cell
4/14	22:48	04/14	22:52	0:05	65.1	20. Corrective Maintenance	#2 breaker tripped, relays are bad
4/19	06:08	04/19	06:12	0:05	47.1	3. Startup	Adjust fuel and air, begin after weekend
4/20	14:04	04/20	14:08	0:05	48.5	6. Clean Process Equipment	Clean cell and pull ash
4/23	23:25	04/23	23:29	0:05	74.8	4. Shutdown	Shutdown for weekend
4/30	05:49	04/30	05:55	0:07	74.4	6. Clean Process Equipment	Clean cells and pull ash
5/01	05:57	05/01	05:57	0:01	30.5	4. Shutdown	Shutdown boiler for weekend
5/10	05:11	05/10	05:18	0:08	83.1	3. Startup	Startup boiler/adjust air and fuel
5/20	06:15	05/20	06:25	0:11	79.5	6. Clean Process Equipment	Clean cell and pull ash
5/20	18:46	05/20	19:20	0:35	84.5	16. Primary Analyzer Malfunction	Shutter malf. reset breaker/clean filter
5/20	19:31	05/20	19:41	0:11	84.5	16. Primary Analyzer Malfunction	Shutter malf. Replace filter/reset
5/26	06:27	05/26	06:30	0:04	62.6	6. Clean Process Equipment	Pull ash and clean cell
6/01	06:30	06/01	06:31	0:02	34.2	3. Startup	Adjust fuel and air
6/05	05:56	06/05	06:00	0:05	65.9	4. Shutdown	Shutdown of boiler
6/07	06:27	06/07	06:28	0:02	38.0	3. Startup	adjust air and fuel
6/12	05:00	06/12	05:07	0:08	63.3	4. Shutdown	Shutdown for the weekend
6/14	07:41	06/14	07:46	0:06	47.6	3. Startup	Startup from the weekend
6/17	06:49	06/17	06:53	0:05	70.5	6. Clean Process Equipment	Pulling ash and cleaning cell
6/21	05:58	06/21	06:01	0:04	43.6	3. Startup	Startup after weekend, adjust fuel & air
6/23	15:03	06/23	15:13	0:11	82.8	1. Changing Fuels	Wet fuel from rain; Slowed operations
6/26	06:09	06/26	06:18	0:10	58.0	4. Shutdown	Shutdown for weekend
6/26	06:22	06/26	06:27	0:06	56.3	4. Shutdown	Shutdown for weekend
6/26	06:40	06/26	06:49	0:10	81.3	6. Clean Process Equipment	Cleaning cells

Koppers Industries, Inc.

Grenada Plant

1997 KII Emissions Summary

01-BOILER, WOOD FIRED	tn/yr	Sulfur	Chlorine	(lb/hr):
Total Wood Burned:	13,181	0.01%	0.04%	9375
Creo Wood Burned:	42	0.25%	0.04%	
Penta Wood Burned:	2	0.25%	0.25%	
Untreated Wood Burned:	13,137	0.01%	0.04%	
Removal Efficiency (1):		70.00%	45.00%	

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2.07	lb/tn	2/96 Test	13.64	9.70
SO_2	0.13	lb/tn	Mass Calc	0.85	0.61
NO_X[3]	3.3	lb/tn	2/96 test	21.75	15.47
CO[2]	8.3	lb/tn	CEM	54.70	38.91
VOC	0.91	lb/tn	FR Test	6.00	4.27
HCl[4]	1.538	lb/tn	2/96 Test	0.00	7.21
Arsenic	8.8E-05	lb/tn	AP-42	0.0006	0.000
Cadmium	1.7E-05	lb/tn	AP-42	0.0001	0.000
Chromium	1.3E-04	lb/tn	AP-42	0.0009	0.001
Lead	3.1E-04	lb/tn	AP-42	0.0020	0.001
Manganese	8.9E-03	lb/tn	AP-42	0.0587	0.042
Nickel	5.6E-04	lb/tn	AP-42	0.0037	0.003
Selenium	1.8E-05	lb/tn	AP-42	0.0001	0.000
Mercury	6.5E-06	lb/tn	AP-42	0.0000	0.000
Total HAP Metals				0.07	0.047

[1] Removal efficiencies based on 2/96 stack test.

[2] CO factor is 8.3 for 600 ppm fired on untreated fuel, 2.1 for 150 ppm fired on treated fuel.

[3] NOX factor is 3.3 for high fire, treated wood. Use 1.6 for untreated wood.

[4] Emission factor developed for Florence based on Grenada stack test data. Calculated using only Penta wood burned.

Koppers Industries, Inc.
Grenada Plant

1997 KII Emissions Summary

26-BOILER, FUEL OIL

Fuel Use Rate(MGal/hr): 0

Oil Burned(MGal/yr): 0 Sulfur Content: 0.500 %

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/MGal	AP-42	0.00	0.00
SO_2	71	lb/MGal	AP-42	0.00	0.00
NO_X	20	lb/MGal	AP-42	0.00	0.00
CO	5	lb/MGal	AP-42	0.00	0.00
VOC	0.2	lb/MGal	AP-42	0.00	0.00

Number of days boiler assumed to operate is #DIV/0!

05-WOOD PRESERVING PROCESSES

		1996 Form R Report Data (would prefer 1997 data)			
		Form R	Emis. (lb)	Tr. Vol.(cf)	Em. Factor
Creosote Ties (CF)	1,948,066	Creosote	5,223	2,103,886	2.483E-03
Creosote Poles (CF)	125,325	Penta	4	722,368	5.260E-06
Total Creosote Wood (CF)	2,073,391	#6 Oil VOC	2,821	722,368	3.905E-03
Oil/Penta Poles (CF)	600,646				

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Creosote-VOC	2.483E-03	lb/cf	Form R	2.57	0.59
Creosote-HAPs:					
Benzene	22	% in vapor	Calculation	0.57	0.13
Biphenyl	0.16	% in vapor	Calculation	0.00	0.00
Cresols	0.46	% in vapor	Calculation	0.01	0.00
Dibenzofurans	0.61	% in vapor	Calculation	0.02	0.00
Naphthalene	17	% in vapor	Calculation	0.44	0.10
P-Xylenes	4.5	% in vapor	Calculation	0.12	0.03
Phenol	1.4	% in vapor	Calculation	0.04	0.01
Quinoline	1.5	% in vapor	Calculation	0.04	0.01
Toluene	26	% in vapor	Calculation	0.67	0.15
Total Creosote-HAP	73.63	% in vapor		1.89	0.43
Pentachlorophenol (VOC)	5.26E-06	lb/cf	Form R	0.00	0.00
#6 Oil (VOC)	3.9E-03	lb/cf	Engr. Est.	1.17	0.27
Total VOC				3.75	0.85

Koppers Industries, Inc.

Grenada Plant

1997 KII Emissions Summary

08-PRESERVATIVE TREATED WOOD, STORAGE FUGITIVES [FUGITIVES]

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Creosote Ties					
Creosote (VOC)	4.25E-03	lb/cf	FR Test	4.14	0.94
Naphthalene	1.37E-03	lb/cf	FR Test	1.33	0.30
Benzene	1.74E-06	lb/cf	FR Test	0.00	0.00
Toluene	3.54E-05	lb/cf	FR Test	0.03	0.01
Creosote Poles					
Creosote (VOC)	1.15E-02	lb/cf	FR Test	0.72	0.16
Naphthalene	3.34E-03	lb/cf	FR Test	0.209	0.048
Benzene	4.23E-06	lb/cf	FR Test	0.000	0.000
Toluene	1.52E-04	lb/cf	FR Test	0.010	0.002
Penta Poles					
Oil (VOC, est. as creo)	1.15E-02	lb/cf	FR Test	3.45	0.79
Pentachlorophenol	1.9E-06	lb/cf	Engr. Est.	0.001	0.000
Totals					
VOC				8.31	1.90
Naphthalene				1.54	0.35
Benzene				0.002	0.000
Toluene				0.044	0.010
Pentachlorophenol				0.001	0.000
HAP Organics (Total)				1.59	0.36

Koppers Industries, Inc.

Grenada Plant

1997 KII Emissions Summary

31-DRY KILNS

Poles Dried	359,195	C. F.	Batch size (cf):	13000
			Batch time (hrs):	72

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
VOC	0.05	lb/cf	Alabama	8.98	9.03

27-CYCLONES FOR WOOD MILLING

Number of Cyclones:	1
Ave. Hours/Day:	8
Ave Days/Yr Each:	50
Total Hours:	400

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	0.40	2

28-YARD ROADS, FUGITIVE PARTICULATES [FUGITIVES]

E=k(5.9)(s/12)(S/30)(W/3)^0.7(w/4)^0.5(365-p)/365 lb/VMT

k=particle size factor=	1.00		6	=No. vehicles driving
s=silt content (%) of road=	10	%	15	=Typ. miles/hr driving
S=mean vehicle speed=	15	mph	2.5	=Typ. hrs driving/day
W=mean vehicle weight=	15	tons	6	=Typ. d/wk driving
w=mean no. of wheels=	4	wheels	1	=Trtng volume factor
p=no. wet days/year=	110	days	70,200	=Ann veh mi. traveled
VMT=Veh. Mi. Traveled=	70,200	VMT		

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	5.30	lb/VMT	AP-42	186.00	127

(1) Hourly based on 365 days, 8 hours per day

32-POLE PEELER

Poles Peeled=	254,764	CF/yr	440	CF/hr
Pole Density=	45	lb/CF		
Pole Amount Peeled=	5,732	tn/yr	9.9	tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.350	lb/ton	AP-42	1.00	3.465

Koppers Industries, Inc.
Grenada Plant

1997 KII Emissions Summary

33-SPACE HEATERS, NATURAL GAS

Location	BTU/Hr	BTU/CF	CF/Hr	Hr/Yr	MMCF/Yr
Boiler House	200000	1000	200	2016.00	0.4032
Standby Boiler Room	100000	1000	100	2016.00	0.2016
Fire Pump Building	20000	1000	20	2016.00	0.04032
TOTAL	320000		320		0.64512

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.18	lb/MMCF	AP-42	0.00	0.00
SO_2	0.6	lb/MMCF	AP-42	0.00	0.00
NO_X	94	lb/MMCF	AP-42	0.00	0.00
CO	40	lb/MMCF	AP-42	0.00	0.00
VOC	11	lb/MMCF	AP-42	0.00	0.00

34-WOOD FUEL PREPARATION & HANDLING [FUGITIVES]

Wood Fuel Processed: 13,181 Tn/Yr | 12 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.25	lb/tn	Engr. Est.	1.65	3.00

35-STEAM CLEANER, NATURAL GAS FIRED

Annual Usage: 2000 hours/yr | Fuel Use Rate: 440 CF/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	12	lb/MMCF	AP-42	0.01	0.01
SO_2	0.6	lb/MMCF	AP-42	0.00	0.00
NO_X	100	lb/MMCF	AP-42	0.04	0.04
CO	21	lb/MMCF	AP-42	0.01	0.01
VOC	5.8	lb/MMCF	AP-42	0.00	0.00

Koppers Industries, Inc.

Grenada Plant

1997 KII Emissions Summary

36-WOOD STOVE HEATER, SHOP

Annual Usage: 0 tn/yr

Fuel Use Rate: 0.01 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	30.6	lb/tn	AP-42	0.00	0.31
SO_2	0.4	lb/tn	AP-42	0.00	0.00
NO_X	2.8	lb/tn	AP-42	0.00	0.03
CO	230.8	lb/tn	AP-42	0.00	2.31
VOC	43.8	lb/tn	AP-42	0.00	0.44

37-PARTS CLEANERS, DEGREASERS

Number of units operating: 2

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
VOC	0.33	tn/unit/yr	AP-42	0.66	0.00

TOTAL PLANT EMISSIONS (less fugitives)[1]

Pollutant		Estimated (tn/yr)	Emissions (lb/hr)	Source #'s
Particulate	.....	15.05	15.48	01,26,27,32,33,35,36
SO_2[2]	.....	0.85	0.61	01,26,33,35,36
NO_X	.....	21.79	15.54	01,26,33,35,36
CO	.....	54.71	41.22	01,26,33,35,36
VOC	.....	19.39	14.59	01,26,05,31,33,35,36,37
Lead	.....	0.0020	0.0015	01
Total HAPs (VOC)	.....	1.90	0.79	05
Total HAPs (non-VOC)	.....	0.07	0.047	01

[1]Fugitive sources not included above: #08, Treated Wood Storage; #28, Yard; and #34, Wood Fuel Prep

[2]Assumes backup boiler operating at same time as primary for number of days shown.

federal register

Wednesday
October 22, 1997

Part II

Environmental Protection Agency

40 CFR Part 64, et al.
Compliance Assurance Monitoring; Final Rule

An emission limitation or standard may also be expressed either as a work practice, process or control device parameter, or other form of specific design, equipment, operational, or operation and maintenance requirement. For purposes of this part, an emission limitation or standard shall not include general operation requirements that an owner or operator may be required to meet, such as requirements to obtain a permit, to operate and maintain sources in accordance with good air pollution control practices, to develop and maintain a malfunction abatement plan, to keep records, submit reports, or conduct monitoring.

Emissions unit shall have the same meaning as provided under part 70 of this chapter.

Exceedance shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Excursion shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

Inherent process equipment means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered a control device.

Major source shall have the same meaning as provided under part 70 or 71 of this chapter.

Monitoring means any form of collecting data on a routine basis to determine or otherwise assess compliance with emission limitations or standards. Recordkeeping may be considered monitoring where such records are used to determine or assess compliance with an emission limitation or standard (such as records of raw material content and usage, or records documenting compliance with work practice requirements). The conduct of compliance method tests, such as the procedures in appendix A to part 60 of this chapter, on a routine periodic basis may be considered monitoring (or as a supplement to other monitoring), provided that requirements to conduct such tests on a one-time basis or at such times as a regulatory authority may require on a non-regular basis are not considered monitoring requirements for purposes of this paragraph. Monitoring may include one or more than one of the following data collection techniques, where appropriate for a particular circumstance:

(1) Continuous emission or opacity monitoring systems.

(2) Continuous process, capture system, control device or other relevant parameter monitoring systems or procedures, including a predictive emission monitoring system.

(3) Emission estimation and calculation procedures (e.g., mass balance or stoichiometric calculations).

(4) Maintenance and analysis of records of fuel or raw materials usage.

(5) Recording results of a program or protocol to conduct specific operation and maintenance procedures.

(6) Verification of emissions, process parameters, capture system parameters, or control device parameters using portable or in situ measurement devices.

(7) Visible emission observations.

(8) Any other form of measuring, recording, or verifying on a routine basis emissions, process parameters, capture system parameters, control device parameters or other factors relevant to assessing compliance with emission limitations or standards.

Owner or operator means any person who owns, leases, operates, controls or supervises a stationary source subject to this part.

Part 70 or 71 permit shall have the same meaning as provided under part 70 or 71 of this chapter, provided that it shall also refer to a permit issued, renewed, amended, revised, or modified under any federal permit program promulgated under title V of the Act.

Part 70 or 71 permit application shall mean an application (including any supplement to a previously submitted application) that is submitted by the owner or operator in order to obtain a part 70 or 71 permit.

Permitting authority shall have the same meaning as provided under part 70 or 71 of this chapter.

Pollutant-specific emissions unit means an emissions unit considered separately with respect to each regulated air pollutant.

Potential to emit shall have the same meaning as provided under part 70 or 71 of this chapter, provided that it shall be applied with respect to an "emissions unit" as defined under this part in addition to a "stationary source" as provided under part 70 or 71 of this chapter.

Predictive emission monitoring system (PEMS) means a system that uses process and other parameters as inputs to a computer program or other data reduction system to produce values in terms of the applicable emission limitation or standard.

Regulated air pollutant shall have the same meaning as provided under part 70 or 71 of this chapter.

§ 64.2 Applicability.

(a) *General applicability.* Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in § 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

(b) *Exemptions—.* (1) *Exempt emission limitations or standards.* The requirements of this part shall not apply to any of the following emission limitations or standards:

(i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.

(ii) Stratospheric ozone protection requirements under title VI of the Act.

(iii) Acid Rain Program requirements pursuant to sections 404, 405, 406, 407(a), 407(b), or 410 of the Act.

(iv) Emission limitations or standards or other applicable requirements that apply solely under an emissions trading program approved or promulgated by the Administrator under the Act that allows for trading emissions within a source or between sources.

control devices, the applicable regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source, for each parameter monitored, the owner or operator shall collect four or more data values equally spaced over each hour and average the values, as applicable, over the applicable averaging period as determined in accordance with paragraph (b)(4)(i) of this section. The permitting authority may approve a reduced data collection frequency, if appropriate, based on information presented by the owner or operator concerning the data collection mechanisms available for a particular parameter for the particular pollutant-specific emissions unit (e.g., integrated raw material or fuel analysis data, noninstrumental measurement of waste feed rate or visible emissions, use of a portable analyzer or an alarm sensor).

(iii) For other pollutant-specific emissions units, the frequency of data collection may be less than the frequency specified in paragraph (b)(4)(ii) of this section but the monitoring shall include some data collection at least once per 24-hour period (e.g., a daily inspection of a carbon adsorber operation in conjunction with a weekly or monthly check of emissions with a portable analyzer).

(c) *Evaluation factors.* In designing monitoring to meet the requirements in paragraphs (a) and (b) of this section, the owner or operator shall take into account site-specific factors including the applicability of existing monitoring equipment and procedures, the ability of the monitoring to account for process and control device operational variability, the reliability and latitude built into the control technology, and the level of actual emissions relative to the compliance limitation.

(d) *Special criteria for the use of continuous emission, opacity or predictive monitoring systems.* (1) If a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS) is required pursuant to other authority under the Act or state or local law, the owner or operator shall use such system to satisfy the requirements of this part.

(2) The use of a CEMS, COMS, or PEMS that satisfies any of the following monitoring requirements shall be deemed to satisfy the general design criteria in paragraphs (a) and (b) of this section, provided that a COMS may be subject to the criteria for establishing indicator ranges under paragraph (a) of this section:

(i) Section 51.214 and appendix P of part 51 of this chapter;

(ii) Section 60.13 and appendix B of part 60 of this chapter;

(iii) Section 63.8 and any applicable performance specifications required pursuant to the applicable subpart of part 63 of this chapter;

(iv) Part 75 of this chapter;

(v) Subpart H and appendix IX of part 266 of this chapter; or

(vi) If an applicable requirement does not otherwise require compliance with the requirements listed in the preceding paragraphs (d)(2)(i) through (v) of this section, comparable requirements and specifications established by the permitting authority.

(3) The owner or operator shall design the monitoring system subject to this paragraph (d) to:

(i) Allow for reporting of exceedances (or excursions if applicable to a COMS used to assure compliance with a particulate matter standard), consistent with any period for reporting of exceedances in an underlying requirement. If an underlying requirement does not contain a provision for establishing an averaging period for the reporting of exceedances or excursions, the criteria used to develop an averaging period in (b)(4) of this section shall apply; and

(ii) Provide an indicator range consistent with paragraph (a) of this section for a COMS used to assure compliance with a particulate matter standard. If an opacity standard applies to the pollutant-specific emissions unit, such limit may be used as the appropriate indicator range unless the opacity limit fails to meet the criteria in paragraph (a) of this section after considering the type of control device and other site-specific factors applicable to the pollutant-specific emissions unit.

§ 64.4 Submittal requirements.

(a) The owner or operator shall submit to the permitting authority monitoring that satisfies the design requirements in § 64.3. The submission shall include the following information:

(1) The indicators to be monitored to satisfy §§ 64.3(a)(1)–(2);

(2) The ranges or designated conditions for such indicators, or the process by which such indicator ranges or designated conditions shall be established;

(3) The performance criteria for the monitoring to satisfy § 64.3(b); and

(4) If applicable, the indicator ranges and performance criteria for a CEMS, COMS or PEMS pursuant to § 64.3(d).

(b) As part of the information submitted, the owner or operator shall submit a justification for the proposed elements of the monitoring. If the performance specifications proposed to satisfy § 64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences between the requirements proposed by the owner or operator and the manufacturer's recommendations or requirements. The owner or operator also shall submit any data supporting the justification, and may refer to generally available sources of information used to support the justification (such as generally available air pollution engineering manuals, or EPA or permitting authority publications on appropriate monitoring for various types of control devices or capture systems). To justify the appropriateness of the monitoring elements proposed, the owner or operator may rely in part on existing applicable requirements that establish the monitoring for the applicable pollutant-specific emissions unit or a similar unit. If an owner or operator relies on presumptively acceptable monitoring, no further justification for the appropriateness of that monitoring should be necessary other than an explanation of the applicability of such monitoring to the unit in question, unless data or information is brought forward to rebut the assumption. Presumptively acceptable monitoring includes:

(1) Presumptively acceptable or required monitoring approaches, established by the permitting authority in a rule that constitutes part of the applicable implementation plan required pursuant to title I of the Act, that are designed to achieve compliance with this part for particular pollutant-specific emissions units;

(2) Continuous emission, opacity or predictive emission monitoring systems that satisfy applicable monitoring requirements and performance specifications as specified in § 64.3(d);

(3) Excepted or alternative monitoring methods allowed or approved pursuant to part 75 of this chapter;

(4) Monitoring included for standards exempt from this part pursuant to § 64.2(b)(1)(i) or (vi) to the extent such monitoring is applicable to the performance of the control device (and associated capture system) for the pollutant-specific emissions unit; and

(5) Presumptively acceptable monitoring identified in guidance by EPA. Such guidance will address the requirements under §§ 64.4(a), (b), and (c) to the extent practicable.

(c)(1) Except as provided in paragraph (d) of this section, the owner or operator shall submit control device (and process

temperature measurement device, visual observation, or CEMS); and

(iii) The performance requirements established to satisfy § 64.3(b) or (d), as applicable.

(2) The means by which the owner or operator will define an exceedance or excursion for purposes of responding to and reporting exceedances or excursions under §§ 64.7 and 64.8 of this part. The permit shall specify the level at which an excursion or exceedance will be deemed to occur, including the appropriate averaging period associated with such exceedance or excursion. For defining an excursion from an indicator range or designated condition, the permit may either include the specific value(s) or condition(s) at which an excursion shall occur, or the specific procedures that will be used to establish that value or condition. If the latter, the permit shall specify appropriate notice procedures for the owner or operator to notify the permitting authority upon any establishment or reestablishment of the value.

(3) The obligation to conduct the monitoring and fulfill the other obligations specified in §§ 64.7 through 64.9 of this part.

(4) If appropriate, a minimum data availability requirement for valid data collection for each averaging period, and, if appropriate, a minimum data availability requirement for the averaging periods in a reporting period.

(d) If the monitoring proposed by the owner or operator requires installation, testing or final verification of operational status, the part 70 or 71 permit shall include an enforceable schedule with appropriate milestones for completing such installation, testing, or final verification consistent with the requirements in § 64.4(e).

(e) If the permitting authority disapproves the proposed monitoring, the following applies:

(1) The draft or final permit shall include, at a minimum, monitoring that satisfies the requirements of § 70.6(a)(3)(i)(B);

(2) The permitting authority shall include in the draft or final permit a compliance schedule for the source owner to submit monitoring that satisfies §§ 64.3 and 64.4, but in no case shall the owner or operator submit revised monitoring more than 180 days from the date of issuance of the draft or final permit; and

(3) If the source owner or operator does not submit the monitoring in accordance with the compliance schedule as required in paragraph (e)(2) of this section or if the permitting authority disapproves the monitoring submitted, the source owner or operator shall be deemed not in compliance with part 64, unless the source owner or operator successfully challenges the disapproval.

§ 64.7 Operation of approved monitoring.

(a) *Commencement of operation.* The owner or operator shall conduct the monitoring required under this part upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to § 64.6(d).

(b) *Proper maintenance.* At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) *Response to excursions or exceedances.* (1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) *Documentation of need for improved monitoring.* After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

§ 64.8 Quality improvement plan (QIP) requirements.

(a) Based on the results of a determination made under § 64.7(d)(2), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with § 64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

(b) Elements of a QIP:

the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(A) The identification of each term or condition of the permit that is the basis of the certification;

(B) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required under paragraph (a)(3) of this section. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

(C) The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph (c)(5)(iii)(B) of this section. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under part 64 of this chapter occurred; and

(D) Such other facts as the permitting authority may require to determine the compliance status of the source.

(iv) A requirement that all compliance certifications be submitted to the Administrator as well as to the permitting authority.

* * * * *

PART 71—FEDERAL OPERATING PERMITS PROGRAMS

1. The authority citation for part 71 continues to read as follows:

Authority: 42 U.S.C. 7401, *et seq.*

2. Section 71.6 is amended by revising paragraphs (a)(3)(i)(A), (a)(3)(iii)(C), (c)(5)(iii) and (c)(5)(iv), and by removing (c)(5)(v) to read as follows:

§ 71.6 Permit content.

* * * * *

(a) * * *

(3) * * *

(i) * * *

(A) All monitoring and analysis procedures or test methods required under applicable monitoring and testing requirements, including part 64 of this chapter and any other procedures and methods that may be promulgated pursuant to sections 114(a)(3) or 504(b) of the Act. If more than one monitoring or testing requirement applies, the permit may specify a streamlined set of monitoring or testing provisions provided the specified monitoring or testing is adequate to assure compliance at least to the same extent as the monitoring or testing applicable requirements that are not included in the permit as a result of such streamlining;

* * * * *

(iii) * * *

(C) For purposes of paragraph (a)(3)(iii)(B) of this section, deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with paragraphs (a)(3)(i) and (a)(3)(ii) of this section. For a situation lasting more than 24 hours which constitutes a deviation, each 24 hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

(*1*) A situation where emissions exceed an emission limitation or standard;

(*2*) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met;

(*3*) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit;

(*4*) A situation in which an exceedance or an excursion, as defined in part 64 of this chapter, occurs.

* * * * *

(c) * * *

(5) * * *

(iii) A requirement that the compliance certification include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(A) The identification of each term or condition of the permit that is the basis of the certification;

(B) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required under paragraph (a)(3) of this section. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

(C) The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph (c)(5)(iii)(B) of this section. The certification shall identify each deviation and take it into account in the compliance certification; and

(D) Such other facts as the permitting authority may require to determine the compliance status of the source.

(iv) A requirement that all compliance certifications be submitted to the Administrator as well as to the permitting authority.

* * * * *

[FR Doc. 97-27264 Filed 10-21-97; 8:45 am]

BILLING CODE 6560-50-P

Proposed Permit Application Summary Form

File Copy

General Facility Information

Facility Name: Koppers Industries, Inc.
Facility Address: 436 Seventh Avenue, Pittsburgh, PA 15219
Facility City, State, Zip: Tie Plant, MS 38960
Source Description: The facility is an existing creosote and pentachlorophenol wood treating plant.
SIC Code of Major Product: 2491
AFS ID: 280430012
Date Application Received: June 24, 1996 (final version, originally submitted Title V application with Synthetic Minor addendum on April 3, 1995)
Application Number:
Permit Number(s):

Application Type/Permit Activity

☒ Initial Issuance ☐ General Permit ☐ Conditional Major
☐ Permit Modification ☐ Permit Renewal

Facility Emissions Summary

Pollutant	Actual (tpy)	Potential (tpy)
PM		176.36
SO_2		109.94
NO_x		63.37
CO		13.29
VOC		Between 100 and 250
LEAD		0.01
HAP ≥ 10 TPY (by CAS)		16.73
TOTAL EMISSIONS		

Compliance Summary

☐ Source is out of compliance ☐ Compliance schedule included ☒ Compliance certification signed

Applicable Requirements List

☐ NSR ☐ NSPS ☒ SIP ☐ PSD ☐ NESHAPS ☐ Other

Miscellaneous

☐ Acid rain source
☐ Source applied for federally enforceable emissions cap
☐ Source provided terms for alternative operating scenarios
☐ Source requested case-by-case 112(g) or (j) determination
☐ Application proposes new control technology
☐ Source Subject to 112(r)
☐ Source subject to a MACT standard
☒ Certified by responsible official
☐ Diagrams or drawings included
☐ Confidential business (CBI) included

Wood treating facilities were removed as a source category for MACT development because the EPA found that there were no major sources in this category. This facility is a Title III major source because they will burn treated wood in the woodwaste boiler. If a MACT regulation doesn't apply under a combustion source

category, one will have to be developed specifically for this facility.

KOPPERS INDUSTRIES

279050 62-4 311

Date: SEPTEMBE[redacted]1997

Amount
$1,252.32

Pay To The Order Of: MISSISSIPPI ST DEPT ENVIRONMEN

ONE THOUSAND TWO HUNDRED FIFTY TWO AND 32/100 ONLY

MISSISSIPPI ST DEPT ENVIRONMEN
TITLE V AIR PERMIT
PO BOX 20325
JACKSON MS 39289-1325

Payable through Mellon Bank (DE) N.A., Wilmington, DE 19899
Mellon Bank (East) N.A., Philadelphia, PA 19102

DE

KOPPERS INDUSTRIES, INC.
V.P. AND C.F.O.

mc Schering
TREASURER

"279050" :031100047: 2"943 678"

279050

KOPPERS INDUSTRIES, INC. PITTSBURGH PA

SP CD	VENDOR	DIV	OUR AUDIT	YOUR INVOICE NBR	INV MO/DA	INV AMOUNT	DISC	NET AMT PAYABLE
	940505031	477	02407081482	1158	0805	1252.32	0.00	***1252.32

0960-00012

RECEIVED
SEP 1997
AIR/SWB
FEES

DEPT OF ENVIRONMENTAL QUALITY
TITLE V AIR PERMIT FEE
P. O. Box 20325
Jackson, MS 39289-1325

** CREDIT MEMO **

* * TITLE V AIR OPERATING PERMIT FEE * *

BILL TO:
KOPPERS INDUSTRIES INC

P O BOX 160
TIE PLANT, MS 38960

CREDIT MEMO 1157
INVOICE DATE: 8/05/97

CONTACT PERSON: Alice Brown
TELEPHONE: 601-961-5572

FACILITY I.D. # 0960-00012

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	200.130	200.130	16.00	(3,202.08)
SO2	109.940	109.940	16.00	(1,759.04)
NOX	63.370	63.370	16.00	(1,013.92)
CO	0.000	0.000	16.00	0.00
VOC	85.220	85.220	16.00	(1,363.52)
LEAD	0.000	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	0.000	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	16.730	16.730	16.00	(267.68)
CFC's / HCFC's	0.000	0.000	16.00	0.00
				(7,606.24)

** CREDIT MEMO **

Invoice #851 revised 8/5/97. Replaced by invoice #1157.

* * * *FILE COPY* * * *

DEPT OF ENVIRONMENTAL QUALITY
TITLE V AIR PERMIT FEE
P. O. Box 20325
Jackson, MS 39289-1325

** INVOICE **

*** TITLE V AIR OPERATING PERMIT FEE ***

BILL TO:
KOPPERS INDUSTRIES INC

P O BOX 160
TIE PLANT, MS 38960

INVOICE # 1158
INVOICE DATE: 8/05/97

CONTACT PERSON: Alice Brown
TELEPHONE: 601-961-5572

FACILITY I.D. # 0960-00012

TERMS: DUE 9/1/97

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	12.200	12.200	16.00	195.20
SO2	1.040	1.040	16.00	16.64
NOX	17.680	17.680	16.00	282.88
CO	44.570	0.000	16.00	0.00
VOC	47.230	47.230	16.00	755.68
LEAD	0.000	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	11.630	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	0.120	0.120	16.00	1.92
CFC's / HCFC's	0.000	0.000	16.00	0.00

TOTAL ANNUAL FEE DUE 1,252.32

As per Section 49-17-30 of the MS Code, the maximum emission rate used for calculation of fees for any pollutant is 4,000 tons, with total fees not to exceed $250,000 per facility. You were billed for actual or allowable emissions based upon the option which you previously indicated.

* * * FAILURE TO REMIT PAYMENT BY THE DUE DATE MAY * * *
* * * * * * * * * RESULT IN A LATE PENALTY * * * * * * * *

* * *FILE COPY* * *

DEPT OF ENVIRONMENTAL QUALITY
TITLE V AIR PERMIT FEE
P. O. Box 20325
Jackson, MS 39289-1325

** INVOICE **

*** TITLE V AIR OPERATING PERMIT FEE ***

BILL TO:
KOPPERS INDUSTRIES INC

P O BOX 160
TIE PLANT, MS 38960

INVOICE # 851
INVOICE DATE: 8/01/97

CONTACT PERSON: Alice Brown
TELEPHONE: 601-961-5572

FACILITY I.D. # 0960-00012

TERMS: DUE 9/1/97

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	200.130	200.130	16.00	3,202.08
SO2	109.940	109.940	16.00	1,759.04
NOX	63.370	63.370	16.00	1,013.92
CO	13.290	0.000	16.00	0.00
VOC	85.220	85.220	16.00	1,363.52
LEAD	0.010	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	0.000	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	16.730	16.730	16.00	267.68
CFC's / HCFC's	0.000	0.000	16.00	0.00

TOTAL ANNUAL FEE DUE 7,606.24

As per Section 49-17-30 of the MS Code, the maximum emission rate used for calculation of fees for any pollutant is 4,000 tons, with total fees not to exceed $250,000 per facility. You were billed for actual or allowable emissions based upon the option which you previously indicated.

* * * FAILURE TO REMIT PAYMENT BY THE DUE DATE MAY * * *
* * * * * * * * RESULT IN A LATE PENALTY * * * * * * * *

* * * FILE COPY * * *

Burch

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM
P.O. BOX 10385
JACKSON, MS 39289-0385

In accordance with Section 49-17-30, Mississippi Code of 1972 Annotated, all sources which choose to base their Annual Title V Fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

MDEQ Facility ID #: 0960-00012

Facility Name: Koppers Industries, Inc.

Site Address: 543 Tie Plant Road (Street Location) Tie Plant (City) _____ (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1996. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	200.13	12.20
SO2	109.94	1.04
NOX	63.37	17.68
CO	13.29	44.57
VOC*	86.22	47.23
TRS	0.00	NA
LEAD	0.01	NA
CFCs/HCFCs	0.00	NA
Other	0.00	NA
Total HAPs (Voc)	0.00	11.63
Total HAPs (Non-Voc)	16.73	0.12

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Thomas L. Henderson 7/28/97

Signature Date

JUL 21 1997

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM
P.O. BOX 10385
JACKSON, MS 39289-0385

In accordance with Section 49-17-30, Mississippi Code of 1972 Annotated, all sources which choose to base their Annual Title V Fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

MDEQ Facility ID #: 0960-00012

Facility Name: Koppers Industries, Inc.

Site Address: 543 Tie Plant Road (Street Location) Tie Plant (City) (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1996. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	200.13	12.20
SO2	109.94	1.04
NOX	63.37	17.68
CO	13.29	44.57
VOC*	86.22	47.23
TRS	0.00	NA
LEAD	0.01	NA
CFCs/HCFCs	0.00	NA
Other	0.00	NA
Total HAPs (Voc)	0.00	11.63
Total HAPs (Non-Voc)	16.73	0.12

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Signature Date

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM
P.O. BOX 10385
JACKSON, MS 39289-0385

In accordance with Section 49-17-30, Mississippi Code of 1972 Annotated, all sources which choose to base their Annual Title V Fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

MDEQ Facility ID #: 0960 - 00012

Facility Name: Koppers Industries, Inc.

Site Address: 543 Tie Plant Road (Street Location) Tie Plant (City) (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1996. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	200.13	
SO2	109.94	
NOX	63.37	
CO	13.29	
VOC*	85.22	
TRS	0.00	
LEAD	0.01	
CFCs/HCFCs	0.00	
Other	0.00	
Total HAPs (Voc)	0.00	
Total HAPs (Non-Voc)	16.73	

*** Reflects Total VOC from the facility including VOCs that are HAPs.**

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Signature Date

EXCESS EMISSIONS REPORT

PRINTED: 07-Apr-97
Koppers Industries
Tie Plant Road
Opacity in %
BEGINNING Jan. 1, 1997 AND ENDING Mar. 31, 1997
SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began Date	Excess Began Time	Excess Ended Date	Excess Ended Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
01/09	15:58	01/09	16:09	0:12	98.8	3. Startup	Add Dry Fuel During Startup
01/10	15:18	01/10	15:23	0:06	79.0	3. Startup	Add Dry Fuel During Startup
01/17	04:28	01/17	04:35	0:08	92.4	3. Startup	Add Dry Fuel During Startup
01/21	16:43	01/21	16:44	0:02	52.6	3. Startup	Add Dry Fuel During Startup
02/17	05:16	02/17	05:17	0:02	14.4	3. Startup	Add Dry Fuel during Startup
02/17	13:16	02/17	13:17	0:02	57.0	3. Startup	Add Dry Fuel During Startup
03/05	14:13	03/05	14:16	0:04	67.1	3. Startup	Add Dry Fuel During Startup
03/07	13:34	03/07	13:37	0:04	73.5	3. Startup	Add Dry Fuel During Startup
03/07	16:57	03/07	16:59	0:03	89.2	3. Startup	Add Dry Fuel During Startup
03/27	17:02	03/27	17:02	0:01	51.2	3. Startup	Reduce Induced Draft

EXCESS EMISSIONS REPORT
PRINTED: 1-Jul-97
Koppers Industries
Tie Plant Road
Opacity in %
BEGINNING Apr. 1, 1997 AND ENDING Jun. 30, 1997
SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began Date	Excess Began Time	Excess Ended Date	Excess Ended Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
04/16	20:20	04/16	20:23	0:04	86.2	3. Startup	Add Dry Fuel
04/23	05:13	04/23	05:14	0:02	38.0	3. Startup	Add Dry Fuel
04/28	21:46	04/28	21:51	0:06	91.3	3. Startup	Add Dry Fuel
05/16	19:41	05/16	19:43	0:03	37.7	3. Startup	Increase Undergrate Air
05/19	22:36	05/19	22:40	0:03	66.0	3. Startup	Reduce Feed Rate
05/24	09:15	05/24	09:20	0:05	62.3	3. Startup	Reduce Feed Rate
05/27	04:05	05/27	04:06	0:01	45.7	3. Startup	Increase undergrate Air 5%
06/05	03:58	06/05	04:01	0:03	41.1	3. Startup	Add Dry Fuel
06/05	07:57	06/05	07:57	0:01	44.6	3. Startup	Add Dry Fuel
06/05	08:14	06/05	08:14	0:01	53.0	3. Startup	Add Dry Fuel
06/06	04:15	06/06	04:18	0:03	40.9	3. Startup	Add Dry Fuel
06/06	00:06	06/06	01:29	1:24	97.2	2. Control Equipment Malfunction	Clean ID Control
06/16	23:10	06/16	23:33	0:05	62.4	3. Startup	Adjust ID
06/16	18:19	06/16	08:21	0:04	54.9	3. Startup	Increase ID
06/16	08:31	06/16	08:34	0:04	55.1	3. Startup	Increase ID
06/16	09:19	06/16	09:21	0:02	38.5	3. Startup	Increase Undergrate Air
06/19	03:09	06/19	03:10	0:02	37.7	3. Startup	Increase undergrate Air

FROM 02/27/97 00:00 TO 02/27/97 23:59

Date/ Time	Opacity %	Cell 1 F	Cell 2 F
02-27-97 00:00	0.6	1267	1428
02-27-97 01:00	1.0	1306	1365
02-27-97 02:00	1.0	1361	1535
02-27-97 03:00	0.6	1256	1409
02-27-97 04:00	1.1	1159	1426
02-27-97 05:00	9.7	1185	1068
02-27-97 06:00	1.2	1117	1207
02-27-97 07:00	2.6	1200	1147
02-27-97 08:00	1.4	1094	1180
02-27-97 09:00	0.1	1082	1219
02-27-97 10:00	0.0	1177	1346
02-27-97 11:00	0.2	1056	1195
02-27-97 12:00	0.7	1027	1177
02-27-97 13:00	0.2	1190	1337
02-27-97 14:00	1.6	1009	1151
02-27-97 15:00	1.2	934	1060
02-27-97 16:00	0.2	1096	1253
02-27-97 17:00	0.3	1155	1333
02-27-97 18:00	0.3	1353	1578
02-27-97 19:00	0.3	1386	1519
02-27-97 20:00	0.5	1414	1558
02-27-97 21:00	1.2	1241	1346
02-27-97 22:00	1.5	1290	1448
02-27-97 23:00	0.9	1347	1512

Burn Treated wood

Feed Rate 6624.1 lbs hr

Koppers Industries
Tie Plant Road
Daily Summary

FROM 03/18/97 00:00 TO 03/18/97 23:59

Date/ Time	Opacity %	Cell 1 F	Cell 2 F
03-18-97 00:00	2.8	1375	1355
03-18-97 01:00	4.8	574	541
03-18-97 02:00	12.1	1194	1059
03-18-97 03:00	8.7	1177	1158
03-18-97 04:00	0.1	1269	1349
03-18-97 05:00	2.2	1020	1330
03-18-97 06:00	1.5	1288	1165
03-18-97 07:00	1.6	1160	1129
03-18-97 08:00	2.1	1326	856
03-18-97 09:00	1.7	1221	1186
03-18-97 10:00	1.8	1424	1036
03-18-97 11:00	1.8	1443	1066
03-18-97 12:00	0.6	1560	1434
03-18-97 13:00	3.3	1398	1315
03-18-97 14:00	3.4	1386	1439
03-18-97 15:00	2.5	1201	1223
03-18-97 16:00	0.1	1356	1421
03-18-97 17:00	1.1	1258	1270
03-18-97 18:00	1.2	1218	1335
03-18-97 19:00	3.0	1301	1439
03-18-97 20:00	0.5	1176	1284
03-18-97 21:00	1.8	1153	1216
03-18-97 22:00	2.3	1105	1164
03-18-97 23:00	4.2	1053	1108

Burn Treated wood
3514.8 lbs/hr

Koppers Industries
Tie Plant Road
Daily Summary

FROM 03/25/97 00:00 TO 03/25/97 23:59

Date/ Time	Opacity %	Cell 1 F	Cell 2 F
03-25-97 00:00	5.0	1218	1325
03-25-97 01:00	2.4	1403	1449
03-25-97 02:00	5.2	957	742
03-25-97 03:00	14.1	1187	1088
03-25-97 04:00	14.9	945	1162
03-25-97 05:00	5.6	1213	1134
03-25-97 06:00	3.6	1233	1283
03-25-97 07:00	6.8	1135	1188
03-25-97 08:00	8.6	1113	1138
03-25-97 09:00	3.5	1222	1229
03-25-97 10:00	3.0	1265	1287
03-25-97 11:00	1.6	1368	1396
03-25-97 12:00	3.3	1329	1066
03-25-97 13:00	1.1	1433	1369
03-25-97 14:00	0.4	1465	1473
03-25-97 15:00	0.8	1310	1353
03-25-97 16:00	0.7	1392	1403
03-25-97 17:00	0.9	1358	1353
03-25-97 18:00	0.0	1386	1423
03-25-97 19:00	1.2	1321	1367
03-25-97 20:00	0.7	1423	1547
03-25-97 21:00	2.2	1340	1288
03-25-97 22:00	4.1	1265	1282
03-25-97 23:00	1.2	1232	1250

Burn Treated wood

4325.9 lbs/hR

Koppers, Inc. Grenada MS
1996 Estimated Actual Emissions

18-Jul-97 emis-inv

EMISSION INVENTORY CALCULATION
KOPPERS INDUSTRIES, INC. - GRENADA, MS
ESTIMATED ACTUAL EMISSIONS 1996

01-BOILER, WOOD FIRED	tn/yr	Sulfur	Chlorine	(lb/hr):
Total Wood Burned:	10,411	0.02%	0.00%	3855.85
Creo Wood Burned:	200	0.25%	0.04%	
Penta Wood Burned:	85.80	0.25%	0.25%	(hr/yr):
Untreated Wood Burned:	10,125	0.01%	0.00%	5400
Removal Efficiency (1):		70.00%	45.00%	

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2.07	lb/tn	2/96 Test	10.78	3.99
SO2	0.20	lb/tn	Mass Calc	1.04	0.38
NOX (3)	3.3	lb/tn	2/96 test	17.18	6.36
CO (2)	8.3	lb/tn	CEM	43.20	16.00
VOC	0.91	lb/tn	FR Test	4.74	1.75
HCl (4)	1.538	lb/tn penta wood fuel	2/96 Test	0.07	0.02
Arsenic	8.8E-05	lb/tn	AP-42	0.0005	0.000
Cadmium	1.7E-05	lb/tn	AP-42	0.0001	0.000
Chromium	1.3E-04	lb/tn	AP-42	0.0007	0.000
Lead	3.1E-04	lb/tn	AP-42	0.0016	0.001
Manganese	8.9E-03	lb/tn	AP-42	0.0463	0.017
Nickel	5.6E-04	lb/tn	AP-42	0.0029	0.001
Selenium	1.8E-05	lb/tn	AP-42	0.0001	0.000
Mercury	6.5E-06	lb/tn	AP-42	0.0000	0.000
Total HAP Metals				0.05	0.019

(1) Removal efficiencies based on 2/96 stack test.
(2) CO factor is 8.3 for 600 ppm fired on untreated fuel, 2.1 for 150 ppm fired on treated fuel.
(3) NOX factor is 3.3 for high fire, treated wood. Use 1.6 for untreated wood.
(4) Based on 2/96 stack test and penta treated wood fuel.

Koppers, Inc. Grenada MS
1996 Estimated Actual Emissions

26-BOILER, FUEL OIL

Oil Burned(MGal/yr): 0 Sulfur Content: 0.500 %

Fuel Use Rate(MGal/hr): 0

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/MGal	AP-42	0.00	0.00
SO2	71	lb/MGal	AP-42	0.00	0.00
NOX	20	lb/MGal	AP-42	0.00	0.00
CO	5	lb/MGal	AP-42	0.00	0.00
VOC	0.2	lb/MGal	AP-42	0.00	0.00

Number of days boiler assumed to operate is 0

05-WOOD PRESERVING PROCESSES

Creosote Ties	1,963,569	C. F.
Creosote Poles	140,317	C. F.
Total Creosote Wood	2,103,886	C. F.
Oil/Penta Poles	722,390	C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Creosote (VOC)	0.015	lb/cf	Form R	15.78	3.60
HAPs contained in creosote:					
Benzene	22	% in vapor	Calculation	3.47	0.79
Biphenol	0.16	% in vapor	Calculation	0.03	0.01
Cresols	0.46	% in vapor	Calculation	0.07	0.02
Dibenzofurans	0.61	% in vapor	Calculation	0.10	0.02
Naphthalene	17	% in vapor	Calculation	2.68	0.61
P-Xylenes	4.5	% in vapor	Calculation	0.71	0.16
Phenol	1.4	% in vapor	Calculation	0.22	0.05
Quinoline	1.5	% in vapor	Calculation	0.24	0.05
Toluene	26	% in vapor	Calculation	4.10	0.94
TOTAL CREO. HAP	73.63	% in vapor		11.62	2.65
Pentachlorophenol (VOC)	2.54E-05	lb/cf	Form R	0.01	0.00
#6 Oil (VOC)	1.0E-02	lb/cf	Engr. Est.	3.61	0.82
TOTAL VOC				19.40	4.42

Koppers, Inc. Grenada MS
1996 Estimated Actual Emissions

08-PRESERVATIVE TREATED WOOD STORAGE FUGITIVES

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Creosote Ties					
Creosote (VOC)	4.25E-03	lb/cf	FR Test	4.17	0.95
Naphthalene	1.37E-03	lb/cf	FR Test	1.35	0.31
Benzene	1.74E-06	lb/cf	FR Test	0.00	0.00
Toluene	3.54E-05	lb/cf	FR Test	0.03	0.01
Creosote Poles					
Creosote (VOC)	1.15E-02	lb/cf	FR Test	0.81	0.18
Naphthalene	3.34E-03	lb/cf	FR Test	0.234	0.053
Benzene	4.23E-06	lb/cf	FR Test	0.000	0.000
Toluene	1.52E-04	lb/cf	FR Test	0.011	0.002
Penta Poles					
Oil (VOC, est. as creo)	1.15E-02	lb/cf	FR Test	4.15	0.95
Pentachlorophenol	1.9E-06	lb/cf	Engr. Est.	0.001	0.000
Totals					
VOC				9.13	2.08
Naphthalene				1.58	0.36
Benzene				0.002	0.000
Toluene				0.045	0.010
Pentachlorophenol				0.001	0.000
HAP Organics (Total)				1.63	0.37

31-DRY KILNS

Poles Dried	421,255	C. F.	Batch size (cf):	13000
			Batch time (hrs):	72

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
VOC	0.05	lb/cf	Alabama	10.53	9.03

27-CYCLONES FOR WOOD MILLING

Number of Cyclones:	1
Ave. Hours/Day:	8
Ave Days/Yr Each:	41.5
Total Hours:	332

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	0.33	2

28-YARD ROADS FUGITIVE PARTICULATES

E=k(5.9)(s/12)(S/30)(W/3)^0.7(w/4)^0.5(365-p)/365 lb/VMT

k=particle size factor=	1.00		6	=No. vehicles driving
s=silt content (%) of road=	10	%	15	=Typ. miles/hr driving
S=mean vehicle speed=	15	mph	2.5	=Typ. hrs driving/day
W=mean vehicle weight=	15	tons	6	=Typ. d/wk driving
w=mean no. of wheels=	4	wheels	1.5	=Trtng volume factor
p=no. wet days/year=	110	days	105,300	=Ann veh mi. traveled
VMT=Veh. Mi. Traveled=	105,300	VMT		

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	5.30	lb/VMT	AP-42	278.99	191

(1) Hourly based on 365 days, 8 hours per day

32-POLE PEELER

Poles Peeled=	239,140	CF/yr	440	CF/hr
Pole Density=	45	lb/CF		
Pole Amount Peeled=	5,381	tn/yr	9.9	tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.350	lb/ton	AP-42	0.94	3.465

33-SPACE HEATERS, NATURAL GAS

Location	BTU/Hr	BTU/CF	CF/Hr	Hr/Yr	MMCF/Yr
Boiler House	0	1000	0	2016.00	0
Standby Boiler Room	0	1000	0	2016.00	0
Fire Pump Building	0	1000	0	2016.00	0
TOTAL	0		0		0.005144

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.18	lb/MMCF	AP-42	9.33E-04	9.26E-04
SO2	0.6	lb/MMCF	AP-42	3.11E-03	3.09E-03
NOX	94	lb/MMCF	AP-42	4.87E-01	4.84E-01
CO	40	lb/MMCF	AP-42	2.07E-01	2.06E-01
VOC	11	lb/MMCF	AP-42	5.70E-02	5.66E-02

34-WOOD FUEL PREPARATION & HANDLING (Fugitive)

Wood Fuel Processed	10,411	Tn/Yr	12	tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.25	lb/tn	Engr. Est.	1.30	3.00

35-STEAM CLEANER, NATURAL GAS FIRED

Annual Usage	0	hours/yr	Fuel Use Rate	0	CF/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	12	lb/MMCF	AP-42	0.00	0.00
SO2	0.6	lb/MMCF	AP-42	0.00	0.00
NOX	100	lb/MMCF	AP-42	0.00	0.00
CO	21	lb/MMCF	AP-42	0.00	0.00
VOC	5.8	lb/MMCF	AP-42	0.00	0.00

Koppers, Inc. Grenada MS
1996 Estimated Actual Emissions

36-WOOD STOVE HEATER, SHOP

Annual Usage	10	tn/yr	Fuel Use Rate	0.001141553	tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	30.6	lb/tn	AP-42	0.15	0.03
SO2	0.4	lb/tn	AP-42	0.00	0.00
NOX	2.8	lb/tn	AP-42	0.01	0.00
CO	230.8	lb/tn	AP-42	1.15	0.26
VOC	43.8	lb/tn	AP-42	0.22	0.05

37-PARTS CLEANERS, DEGREASERS

Number of units operating: 2

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
VOC	0.33	tn/unit/yr	AP-42	0.66	0.00

TOTAL PLANT EMISSIONS

Pollutant		Estimated (tn/yr)	Emissions (lb/hr)
Particulate (less fugitive)	.....	12.20	9.49
SO2 (2)	.....	1.04	0.39
NOX	.....	17.68	6.85
CO	.....	44.57	16.47
VOC(less fugitive) (3)	.....	35.60	15.31
HAPs(Organics/VOC)	.....	11.63	2.65
Naphthalene	.....	2.68	0.61
HAP Metals	.....	0.05	0.02
HCl	.....	0.07	0.02
Total HAPs	.....	11.75	2.69

(2) Assumes backup boiler operating at same time as primary for number of days shown.
(3) Does not include VOC HAPs

EXCESS EMISSIONS REPORT

PRINTED: 07-Apr-97

Koppers Industries

Tie Plant Road

Opacity in %

BEGINNING Jan. 1, 1997 AND ENDING Mar. 31, 1997

SOURCE: CEMS COMPLIANCE LIMIT: 40.00

Excess Began Date	Excess Began Time	Excess Ended Date	Excess Ended Time	Duration Hours	Magnitude	Reason for Excess Emissions	Corrective Action Taken
01/09	15:58	01/09	16:09	0:12	98.8	3. Startup	Add Dry Fuel During Startup
01/10	15:18	01/10	15:23	0:06	79.0	3. Startup	Add Dry Fuel During Startup
01/17	04:28	01/17	04:35	0:08	92.4	3. Startup	Add Dry Fuel During Startup
01/21	16:43	01/21	16:44	0:02	52.6	3. Startup	Add Dry Fuel During Startup
02/17	05:16	02/17	05:17	0:02	14.4	3. Startup	Add Dry Fuel during Startup
02/17	13:16	02/17	13:17	0:02	57.0	3. Startup	Add Dry Fuel During Startup
03/05	14:13	03/05	14:16	0:04	67.1	3. Startup	Add Dry Fuel During Startup
03/07	13:34	03/07	13:37	0:04	73.5	3. Startup	Add Dry Fuel During Startup
03/07	16:57	03/07	16:59	0:03	89.2	3. Startup	Add Dry Fuel During Startup
03/27	17:02	03/27	17:02	0:01	51.2	3. Startup	Reduce Induced Draft

Koppers Industries
Tie Plant Road
Daily Summary

FROM 02/27/97 00:00 TO 02/27/97 23:59

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02-27-97 05:00	9.7	1185	1068
02-27-97 06:00	1.2	1117	1207
02-27-97 07:00	2.6	1200	1147
02-27-97 08:00	1.4	1094	1180
02-27-97 09:00	0.1	1082	1219
02-27-97 10:00	0.0	1177	1346
02-27-97 11:00	0.2	1056	1195
02-27-97 12:00	0.7	1027	1177
02-27-97 13:00	0.2	1190	1337
02-27-97 14:00	1.6	1009	1151
02-27-97 15:00	1.2	934	1060
02-27-97 16:00	0.2	1096	1253
02-27-97 17:00	0.2	1155	1333
02-27-97 18:00	0.3	1353	1578
02-27-97 19:00	0.3	1386	1519
02-27-97 20:00	0.5	1414	1558
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Burn Treated wood

Feed Rate 6624.1 lbs hr

Koppers Industries
Tie Plant Road
Daily Summary

FROM 03/18/97 00:00 TO 03/18/97 23:59

Date/ Time	Opacity %	Cell 1 F	Cell 2 F
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03-18-97 04:00	0.1	1269	1349
03-18-97 05:00	2.2	1020	1330
03-18-97 06:00	1.5	1288	1165
03-18-97 07:00	1.6	1160	1129
03-18-97 08:00	2.1	1326	856
03-18-97 09:00	1.7	1221	1186
03-18-97 10:00	1.8	1424	1036
03-18-97 11:00	1.8	1443	1066
03-18-97 12:00	0.6	1560	1434
03-18-97 13:00	3.3	1398	1315
03-18-97 14:00	3.4	1386	1439
03-18-97 15:00	2.5	1201	1223
03-18-97 16:00	0.1	1356	1421
03-18-97 17:00	1.1	1258	1270
03-18-97 18:00	1.2	1218	1335
03-18-97 19:00	3.0	1301	1439
03-18-97 20:00	0.5	1176	1284
03-18-97 21:00	1.8	1153	1216
03-18-97 22:00	2.3	1105	1164
03-18-97 23:00	4.2	1053	1108

Burn Treated wood
3514.8 lbs/hR

Koppers Industries
Tie Plant Road
Daily Summary

FROM 03/25/97 00:00 TO 03/25/97 23:59

Date/ Time	Opacity %	Cell 1 F	Cell 2 F
03-25-97 00:00	5.0	1218	1325
03-25-97 01:00	2.4	1403	1449
03-25-97 02:00	5.2	957	742
03-25-97 03:00	14.1	1187	1088
03-25-97 04:00	14.9	945	1162
03-25-97 05:00	5.6	1213	1134
03-25-97 06:00	3.6	1233	1283
03-25-97 07:00	6.8	1135	1188
03-25-97 08:00	8.6	1113	1138
03-25-97 09:00	3.5	1222	1229
03-25-97 10:00	3.0	1265	1287
03-25-97 11:00	1.6	1368	1396
03-25-97 12:00	3.3	1329	1066
03-25-97 13:00	1.1	1433	1369
03-25-97 14:00	0.4	1465	1473
03-25-97 15:00	0.8	1310	1353
03-25-97 16:00	0.7	1392	1403
03-25-97 17:00	0.9	1368	1353
03-25-97 18:00	0.0	1396	1423
03-25-97 19:00	1.2	1321	1367
03-25-97 20:00	0.7	1423	1547
03-25-97 21:00	2.2	1340	1288
03-25-97 22:00	4.1	1265	1282
03-25-97 23:00	1.2	1232	1250

Burn Treated wood

4325.9 lbs/hR

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

KOPPERS INDUSTRIES
GRENADA MISSISSIPPI
TREATED WOOD BURNING LOG

START DATE / TIME	END DATE / TIME	FUEL CHAIN START	FUEL CHAIN END	DIFF. (HRS)	LBS/HR BURNED
2-27-97 6^00 pm	2-27-97 12^00 mid	16956.1	16960.3	4.2	~~5677.8~~ 6624.1
3-18-97 12^00 noon	3-18-97 7^00 pm	17091.7	17094.3	2.6	3514.8
3-25-97 1^00 pm	3-25-97 8^00 pm	17136.0	17139.2	3.2	4325.9

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V
PERMIT TO OPERATE
AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT

Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Issued this 11th day of March, 1997

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____
HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires 1st day of March, 2002

Permit No. 0960-00012

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)

1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)

1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)

1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.
(Ref.: APC-S-6, Section III.A.5.)

1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.

(a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity

marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)

1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)

1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: APC-S-6, Section III.C.2.)

1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.
(Ref.: APC-S-1, Section 3.9 (a))

1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9 (b))

1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.
(Ref.: APC-S-6, Section III.F.1.)

(3) any change in emissions, and

(4) any permit term or condition that is no longer applicable as a result of the change;

(d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)

1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)

1.19 Except as otherwise provided by Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", or otherwise provided herein, a modification of the facility requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) use of an alternative fuel or raw material by a stationary source which:

(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or

1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(c) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Re.: APC-S-6, Section III.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

(a) Upsets (as defined by APC-S-1, Section 2.34)

(1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards

(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

(1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

(a) the permittee can identify the need for the maintenance;

(b) the source was at the time being properly operated;

(c) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

(d) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and

(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.

(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.

(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

Emission Point	Description
AA-011	Ref. No. 34, Wood Fuel Preparation and Handling including grinding, conveying, and silo loading
AA-012	Ref. No. 37, the two (2) Parts Cleaners/Degreasers
AA-013	Ref. No. 24, the 1,000 gallon Gasoline Storage Tank
AA-014	Ref. No. 25, the 20,000 gallon Diesel Storage Tank
AA-015	Ref. No. 33, the Standby Boiler Room natural gas fired space heater rated at 0.1 MMBTUH
AA-016	Ref. No. 33, the Fire Pump Building natural gas fired space heater rated at 0.02 MMBTUH

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: APC-S-1, Section 3.1)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-001 and AA-007	State Regulation APC-S-1, §3.4(b)	3.B.1	Particulate Matter	0.30 grains per standard dry cubic foot
AA-001, AA-002, AA-005, AA-006, AA-007, AA-015, and AA-016	State Regulation APC-S-1, §4.1(a)	3.B.2 and 1.19	Sulfur Dioxide	4.8 pounds per million BTU heat input or as otherwise limited by facility modification restrictions

3.B.3 For Emission Point AA-002, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

3.B.4 For Emission Points AA-005, AA-006, AA-015, and AA-016, the maximum permissible emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.

3.B.5 For Emission Points AA-003, AA-004, and AA-008 through AA-012, the particulate matter emission rate shall not exceed the amount determined by the relationship

$$E = 4.1\ p^{0.67}$$

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

(a) the identification of each term or condition of the permit that is the basis of the certification;

(b) the compliance status;

(c) whether compliance was continuous or intermittent;

(d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

(a) the date, place as defined in the permit, and time of sampling or measurements;
(b) the date(s) analyses were performed;
(c) the company or entity that performed the analyses;
(d) the analytical techniques or methods used;
(e) the results of such analyses; and
(f) the operating conditions existing at the time of sampling or measurement.
(Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))

5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(Ref.: APC-S-6, Section III.A.3.b.(2))

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E.
(Ref.: APC-S-6, Section III.A.3.c.(1))

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken within five (5) days of the time the deviation began.
(Ref.: APC-S-6, Section III.A.3.c.(2))

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit.

7.1 **If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:**

(a) **All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.**

(b) **The placement of the required warning statement must comply with the requirements pursuant to § 82.108.**

(c) **The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.**

(d) **No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.**

7.2 **If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:**

(a) **Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.**

(b) **Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.**

(c) **Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.**

(d) **Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply recordkeeping requirements pursuant to § 82.166. ("MVAC -**

APPENDIX A

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 μm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

REQUIREMENTS RELATIVE TO THE PROTECTION OF STRATOSPHERIC OZONE

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39289-0385
Telephone No. (601) 961-5171
January 24, 1997

DATA CODED

Public Notice No. 97A-TV-012

Koppers Industries, Inc., Facility No. 0960-00012, located at Tie Plant Road, Tie Plant, MS 38960, (601) 226-4584, has applied to the Mississippi Department of Environmental Quality for a Title V Permit to Operate an existing creosote and pentachlorophenol wood treating plant. The applicant's operations fall within SIC Code 2491. A Title V Permit to Operate is a permit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law.

The application has been evaluated and the staff of the Department believes that, with proper constraints and limitations on Koppers Industries, Inc., this operation meets all State and Federal air pollution control laws and standards. Therefore, the staff of the Board has developed a draft Title V permit containing numerous regulatory constraints specifically stated in the draft permit.

Persons wishing to comment upon or object to the proposed determinations and draft permit are invited to submit comments in writing to David Burchfield at the above Permit Board address no later than thirty (30) days from the date of publication of this notice. All comments received by that date will be considered in the formulation of the staff recommendation regarding the application as well as the Board decision. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

After receipt of public comments and thorough consideration of all comments, the staff will formulate its recommendations for permit issuance and a proposed Title V permit if that is the recommendation. The Title V permit is a Federally-enforceable permit as well as a State permit. Therefore, the U.S. Environmental Protection Agency (EPA) will also be allowed an opportunity to review the application, proposed permit, and all comments received during the public comment period prior to Permit Board action on the application. Also, EPA has agreed to treat this draft permit as a proposed permit and to perform its 45-day review provided by the law and regulations concurrently with the public notice period. The EPA review period will expire on or about February 24, 1997. Additional details, the application, and a copy of the draft permit, are available by writing or calling David Burchfield at the above Permit Board address and telephone number. This information is also available for review at the following location(s) during normal business hours.

Mississippi Department of Environmental Quality
Air Division
101 West Capitol
Jackson, MS 39201

Please bring the foregoing to the attention of persons whom you know will be interested.

K:\DOCS\TV-NOTIC\97ATV012.1

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39289-0385
Telephone No. (601) 961-5171
January 24, 1997

File Copy

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Koppers Industries, Inc., Facility No. 0960-00012, located at Tie Plant Road, Tie Plant, MS 38960, (601) 226-4584, has applied to the Mississippi Department of Environmental Quality for a Title V Permit to Operate an existing creosote and pentachlorophenol wood treating plant. The applicant's operations fall within SIC Code 2491. A Title V Permit to Operate is a permit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law.

The application has been evaluated and the staff of the Department believes that, with proper constraints and limitations on Koppers Industries, Inc., this operation meets all State and Federal air pollution control laws and standards. Therefore, the staff of the Board has developed a draft Title V permit containing numerous regulatory constraints specifically stated in the draft permit.

Persons wishing to comment upon or object to the proposed determinations and draft permit are invited to submit comments in writing to David Burchfield at the above Permit Board address no later than thirty (30) days from the date of publication of this notice. All comments received by that date will be considered in the formulation of the staff recommendation regarding the application as well as the Board decision. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

After receipt of public comments and thorough consideration of all comments, the staff will formulate its recommendations for permit issuance and a proposed Title V permit if that is the recommendation. The Title V permit is a Federally-enforceable permit as well as a State permit. Therefore, the U.S. Environmental Protection Agency (EPA) will also be allowed an opportunity to review the application, proposed permit, and all comments received during the public comment period prior to Permit Board action on the application. Also, EPA has agreed to treat this draft permit as a proposed permit and to perform its 45-day review provided by the law and regulations concurrently with the public notice period. The EPA review period will expire on or about February 24, 1997. Additional details, the application, and a copy of the draft permit, are available by writing or calling David Burchfield at the above Permit Board address and telephone number. This information is also available for review at the following location(s) during normal business hours.

Mississippi Department of Environmental Quality
Air Division
101 West Capitol
Jackson, MS 39201

Please bring the foregoing to the attention of persons whom you know will be interested.

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STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V
PERMIT TO OPERATE
AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT

File Copy

Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Issued this _____ day of _____, 19___

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____
HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires _____ day of _____, 19___

Permit No. 0960-00012

Draft/Proposed

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)

1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)

1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)

1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.
(Ref.: APC-S-6, Section III.A.5.)

1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.

INFORMATION RELATIVE TO THE DRAFT TITLE V OPERATING PERMIT

FOR:

Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi
Facility No. 0960-00012

File Copy

FACILITY DESCRIPTION

The facility is an existing creosote and pentachlorophenol wood treating plant. Fuel for the woodwaste boiler includes purchased treated and untreated woodwaste and office paper generated at the facility.

TITLE V PROGRAM APPLICABILITY BASIS

This facility has the potential to emit particulate matter, PM_{10}, and SO_2 at rates in excess of 100 tons per year and the Hazardous Air Pollutant Hydrogen Chloride in excess of 10 tons per year. Therefore, the facility is subject to Title V requirements.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (APC-S-6), and applicable requirements. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

1. any standard or other requirement set forth in the State Implementation Plan (SIP) approved or promulgated by EPA through rulemaking under Title I of the Federal Clean Air Act (Federal Act) including :

    a. most of the State of Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (APC-S-1) amended December 9, 1993, (most recent version submitted for EPA SIP approval),
    b. the State of Mississippi Regulations for the Prevention of Air Pollution Emergency Episodes (APC-S-3) amended April 25, 1988,
    c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (APC-S-5) amended December 9, 1993, and 40 CFR Part 52.21 by reference, and
    d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (APC-S-2) amended December 9, 1993, relating to construction permits and synthetic minor operating permits;

2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;

3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of APC-S-1;

4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of APC-S-1 and 40 CFR Parts 61, 63, and 68;

5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (APC-S-7) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;

6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act;

7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act;

8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;

9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;

10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;

11. any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Act;

12. any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Federal Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of APC-S-6 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

SPECIFIC APPLICABLE REQUIREMENTS

The fuel burning and manufacturing processes must comply with the specific applicable requirements per the following table.

EMISSION LIMITS					
Emission Point No.	Pollutant	Draft Permit Emission Limits	Equivalent Mass Emission Rate		
			lb/hr	TPY	Other
AA-001	Particulate Matter	0.30 gr/dscf	9.7	42.49	
AA-007	Particulate Matter	0.30 gr/dscf	0.428	0.18	
AA-001	Sulfur Dioxide	4.8 lbs/mmbtu	9.7	42.49	
AA-002	Sulfur Dioxide	4.8 lbs/mmbtu	136.8	599.18	
AA-005	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	

EMISSION LIMITS					
Emission Point No.	Pollutant	Draft Permit Emission Limits	Equivalent Mass Emission Rate		
			lb/hr	TPY	Other
AA-006	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-007	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-015	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-016	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-002	Ash and/or Particulate Matter	$E = 0.8808 * I^{-0.1667}$	0.429	1.88	
	Sulfur Dioxide	0.5% sulfur by weight.	15.4	67.45	
AA-003, AA-004, AA-008, AA-009, AA-010, and AA-012	Particulate Matter	$E = 4.1\ p^{0.67}$	31.727	138.96	
AA-011	Particulate Matter	$E = 4.1\ p^{0.67}$	12.0	20.53	
AA-005	Ash and/or Particulate Matter	0.6 lbs/mmbtu	<0.001	<0.01	
AA-006	Ash and/or Particulate Matter	0.6 lbs/mmbtu	0.006	0.02	
AA-015	Ash and/or Particulate Matter	0.6 lbs/mmbtu	<0.001	<0.01	
AA-016	Ash and/or Particulate Matter	0.6 lbs/mmbtu	<0.001	<0.01	

OTHER LIMITS:

The temperature in the Woodwaste Boiler must be maintained at 1140°F or greater when firing treated wood.

Materials other than untreated wood, creosote treated wood, pentachlorophenol treated wood, or office waste paper are prohibited in the woodwaste boiler . The office waste paper shall be limited to waste paper generated on site by Kopper's office operations and shall not contain plastic or non-combustible wastes.

The total amount of office waste paper burned in the woodwaste boiler shall be less than one percent (1%) of total fuel input.

Total woodwaste feed rate to the woodwaste boiler shall not exceed 9,375 lbs/hr.

Sulfur content of the fuel oil fired in the oil-fired boiler shall not exceed 0.5% by weight.

Proposed Permit Application Summary Form

General Facility Information

Facility Name: Koppers Industries, Inc.
Facility Address: 436 Seventh Avenue, Pittsburgh, PA 15219
Facility City, State, Zip: Tie Plant, MS 38960
Source Description: The facility is an existing creosote and pentachlorophenol wood treating plant.
SIC Code of Major Product: 2491
AFS ID: 280430012
Date Application Received: June 24, 1996 (final version, originally submitted Title V application with Synthetic Minor addendum on April 3, 1995)
Application Number:
Permit Number(s):

Application Type/Permit Activity

☒ Initial Issuance ☐ General Permit ☐ Conditional Major
☐ Permit Modification ☐ Permit Renewal

Facility Emissions Summary

Pollutant	Actual (tpy)	Potential (tpy)
PM		176.36
SO_2		109.94
NO_x		63.37
CO		13.29
VOC		Between 100 and 250
LEAD		0.01
HAP ≥ 10 TPY (by CAS)		16.73
TOTAL EMISSIONS		

Compliance Summary

☐ Source is out of compliance ☐ Compliance schedule included ☒ Compliance certification signed

Applicable Requirements List

☐ NSR ☐ NSPS ☒ SIP ☐ PSD ☐ NESHAPS ☐ Other

Miscellaneous

☐ Acid rain source
☐ Source applied for federally enforceable emissions cap
☐ Source provided terms for alternative operating scenarios
☐ Source requested case-by-case 112(g) or (j) determination
☐ Application proposes new control technology
☐ Confidential business (CBI) included
☐ Source Subject to 112(r)
☐ Source subject to a MACT standard
☒ Certified by responsible official
☐ Diagrams or drawings included

Wood treating facilities were removed as a source category for MACT development because the EPA found that there were no major sources in this category. This facility is a Title III major source because they will burn treated wood in the woodwaste boiler. If a MACT regulation doesn't apply under a combustion source

category, one will have to be developed specifically for this facility.

(b) the changes do not exceed the emissions allowable under this permit;

(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

(1) a brief description of the change(s),

(2) the date on which the change will occur,

(3) any change in emissions, and

(4) any permit term or condition that is no longer applicable as a result of the change;

(d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)

1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)

1.19 Except as otherwise provided by Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", or otherwise provided herein, a modification of the facility requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under

hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)

1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)

1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)

1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: APC-S-6, Section III.C.2.)

1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))

1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the DEQ for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9 (b))

by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: APC-S-1, Section 3.7)

1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Ref. No. 1, the 60.0 MMBTUH Wellons/Nebraska Woodwaste Boiler (firing treated and untreated wood) with multiclone collector
AA-002	Ref. No. 26, the 28.5 MMBTUH fuel oil fired Murray Boiler
AA-003	Ref. No. 5, Wood Treatment Facility consisting of five (5) treating cylinders, pumps, valves, blowers, and the following tanks: Ref. No. 6, the 30,000 gallon #5 Work Tank containing penta in oil Ref. No. 7, the 30,000 gallon #2 Work Tank containing creosote 60/40 Ref. No. 8, the 30,000 gallon #3 Work Tank containing creosote Ref. No. 9, the 22,420 gallon #4 Work Tank containing creosote #1 Ref. No. 10, the 30,000 gallon 2nd Decant Tank containing creosote/water Ref. No. 11, the 4,200 gallon Measuring Tank containing creosote #1 Ref. No. 12, the 100,000 gallon Creo Storage Tank containing creosote #1 Ref. No. 13, the 100,000 gallon Water Surge Tank containing process water Ref. No. 14, the 100,000 gallon Oil Storage Tank containing fuel oil Ref. No. 15, the 105,000 gallon Creo Storage Tank containing creosote 60/40 Ref. No. 16, the 300,000 gallon Process Water Surge Tank containing process water Ref. No. 17, the 250,000 gallon Storm Water Surge Tank containing storm water Ref. No. 18, the 2,700 gallon Coagulant Tank containing Dearfloc 4301 Ref. No. 19, the 4,500 gallon Decant Tank containing creo/oil/water Ref. No. 20, the 8,000 gallon Creo Blowdown Tank containing water/creosote Ref. No. 21, the 6 ft. dia. x 60 ft. long Air Receiver containing compressed air Ref. No. 22, the 7 ft. dia. x 40 ft. long Air Receiver containing compressed air Ref. No. 23, the 8,000 gallon Penta Blowdown Tank containing water/penta/oil Ref. No. 26, the 150,000 gallon Aeration Tank containing waste water Ref. No. 27, the 25,000 gallon Clarifier Tank containing waste water Ref. No. 28, the 15,000 gallon Discharge Tank containing waste water Ref. No. 29, the 4,000 gallon Creosote Dehydrator Ref. No. 30, the 14,000 gallon N. Penta Equalization Tank containing water/oil/penta Ref. No. 31, the 14,000 gallon S. Penta Equalization Tank containing water/oil/penta Ref. No. 32, the 11,500 gallon Penta Mix Tank containing oil/penta Ref. No. 33, the 5,000 gallon Penta Mix Tank containing oil/penta Ref. No. 34, the 10,500 gallon Penta Concentrate Storage Tank containing penta concentrate
AA-004	Ref. No. 27, the Tie Mill and Lumber Mill with cyclone
AA-005	Ref. No. 33, the Boiler House natural gas fired space heater rated at 0.2 MMBTUH
AA-006	Ref. No. 35, the natural gas fired steam cleaner rated at 0.44 MMBTUH
AA-007	Ref. No. 36, the Wood Stove Shop Heater rated at 0.10 MMBTUH
AA-008	Ref. No. 8, Treated Wood Storage

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: APC-S-1, Section 3.1)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-001 and AA-007	State Regulation APC-S-1, §3.4(b)	3.B.1	Particulate Matter	0.30 grains per standard dry cubic foot
AA-001, AA-002, AA-005, AA-006, AA-007, AA-015, and AA-016	State Regulation APC-S-1, §4.1(a)	3.B.2 and 1.19	Sulfur Dioxide	4.8 pounds per million BTU heat input or as otherwise limited by facility modification restrictions

3.B.3 For Emission Point AA-002, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

3.B.4 For Emission Points AA-005, AA-006, AA-015, and AA-016, the maximum permissible emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.

3.B.5 For Emission Points AA-003, AA-004, and AA-008 through AA-012, the particulate matter emission rate shall not exceed the amount determined by the relationship

$$E = 4.1\ p^{0.67}$$

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

(a) the identification of each term or condition of the permit that is the basis of the certification;

(b) the compliance status;

(c) whether compliance was continuous or intermittent;

(d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

(a) the date, place as defined in the permit, and time of sampling or measurements;
(b) the date(s) analyses were performed;
(c) the company or entity that performed the analyses;
(d) the analytical techniques or methods used;
(e) the results of such analyses; and
(f) the operating conditions existing at the time of sampling or measurement.

5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E.

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken within five (5) days of the time the deviation began.

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions, or their equivalents approved by the DEQ and the EPA.

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit.

7.1 **If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:**

(a) **All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.**

(b) **The placement of the required warning statement must comply with the requirements pursuant to § 82.108.**

(c) **The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.**

(d) **No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.**

7.2 **If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:**

(a) **Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.**

(b) **Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.**

(c) **Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.**

(d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)

(e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

(f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle as not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

APPENDIX A

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 μm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

REQUIREMENTS RELATIVE TO THE PROTECTION OF STRATOSPHERIC OZONE

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39289-0385
Telephone No. (601) 961-5171
January 24, 1997

Public Notice No. 97A-TV-012

Koppers Industries, Inc., Facility No. 0960-00012, located at Tie Plant Road, Tie Plant, MS 38960, (601) 226-4584 has applied to the Mississippi Department of Environmental Quality for a Title V Permit to Operate an existing creosote and pentachlorophenol wood treating plant. The applicant's operations fall within SIC Code 2491. A Title V Permit to Operate is a permit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law.

The application has been evaluated and the staff of the Department believes that, with proper constraints and limitations on Koppers Industries, Inc., this operation meets all State and Federal air pollution control laws and standards. Therefore, the staff of the Board has developed a draft Title V permit containing numerous regulatory constraints specifically stated in the draft permit.

Persons wishing to comment upon or object to the proposed determinations and draft permit are invited to submit comments in writing to David Burchfield at the above Permit Board address no later than thirty (30) days from the date of publication of this notice. All comments received by that date will be considered in the formulation of the staff recommendation regarding the application as well as the Board decision. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

After receipt of public comments and thorough consideration of all comments, the staff will formulate its recommendations for permit issuance and a proposed Title V permit if that is the recommendation. The Title V permit is a Federally-enforceable permit as well as a State permit. Therefore, the U.S. Environmental Protection Agency (EPA) will also be allowed an opportunity to review the application, proposed permit, and all comments received during the public comment period prior to Permit Board action on the application. Also, EPA has agreed to treat this draft permit as a proposed permit and to perform its 45-day review provided by the law and regulations concurrently with the public notice period. The EPA review period will expire on or about February 24, 1997. Additional details, the application, and a copy of the draft permit, are available by writing or calling David Burchfield at the above Permit Board address and telephone number. This information is also available for review at the following location(s) during normal business hours.

Mississippi Department of Environmental Quality
Air Division
101 West Capitol
Jackson, MS 39201

Please bring the foregoing to the attention of persons whom you know will be interested.

K:\DOCS\TV-NOTIC\97ATV012.1

MESSAGE CONFIRMATION

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EMISSION INVENTORY -- GENERAL

County ID: 0960 Facility ID: 00012 Date: 23-Jan-97
AFS No. : 280430012

Facility Name: Koppers Industries, Inc.

Mailing Address:		Site Address:	
Street:	436 Seventh Avenue	Street:	Tie Plant Road
City:	Pittsburgh	City:	Tie Plant
State:	PA	State:	MS
Zip Code:	15219	Zip Code:	38960
Telephone:	(412) 227-2677	Telephone:	(601) 226-4584
Contact & Title:	Stephen Smith	Contact & Title:	Thomas L. Henderson, Plant Manager

Facility / Plant Type: Wood treating
SIC Code(s): 2491 AQCR: 135 Northeast Mississippi Intrastate
UTM Zone: 16 East: 242.3 North: 3735.5

EMISSION SUMMARY (TOTAL for EACH POLLUTANT from ALL SOURCES)

POLLUTANT	ACTUAL, TPY	POTENTIAL, TPY		NOTES
PARTICULATE MATTER	0.00	200.13		Potential shown here is not counting 3.94 TPY of fugitives.
PM10	0.00	61.17		Potential shown here is not counting 3.94 TPY of fugitives.
SO2	0.00	109.94		
NOx	0.00	63.37		
CO	0.00	13.29		
VOC	0.00	85.22		Potential is not counting 33.01 TPY of fugitives.
TRS	0.00	0.00		
LEAD	0.00	0.01		See Note 6
Total HAPs	0.00	24.90		
HAP > 10 TPY (List 3 with greatest Potential emissions below)				
Hydrogen Chloride		16.7316		HCl is the only HAP known to exceed 10 TPY.
OTHER:				
OTHER:				

REGULATION APPLICABILITY

NSPS Subpart(s):		Title V Major Source:	YES
Part 61 NESHAP(s)		Title V Synthetic Minor:	NO
Part 63 NESHAP(s)		Title V True Minor:	NO
Title III Major Source:	YES	PSD Major Source:	NO
Title III Syn. Minor Source:	NO	PSD Moderate Source:	NO
Title III True Minor Source:	NO	PSD Listed Source:	NO

SR Number: WDB-004b.TV Last Revision by DAVID-B on 01/23/97
DEQ ENGINEER: David Burchfield Author is DAVID-B

EMISSION INVENTORY -- SOURCES

Koppers Industries, Inc.
FACILITY NO.: 0960 - 00012
AQCR: 135 Northeast Mississippi Intrastate

UTM ZONE: 16
UTM EAST: 242.3
UTM NORTH: 3735.5

SOURCES		UTM COORDINATES		STACK PARAMETERS			
EMISSION POINT	DESCRIPTION	EAST	NORTH	HEIGHT (ft)	DIAMETER (ft)	VELOCITY (ft/sec)	TEMP (°F)
AA-001	Ref. No. 1, the 60.0 MMBTU/hr Wellons/Nebraska Woodwaste Boiler (firing treated and untreated wood) with multiclone collector	242.3	3735.5	80	3	60	350
AA-002	Ref. No. 26, the 28.5 MMBTU/hr fuel oil fired Murray Boiler	242.3	3735.5	36	2.5	32	570
AA-003	Ref. No. 5, Wood Treatment Facility consisting of five (5) treating cylinders, pumps, valves, blowers, and the following tanks:	242.3	3735.5				
	Ref. No. 6, the 30,000 gallon #5 Work Tank containing penta in oil	242.3	3735.5				
	Ref. No. 7, the 30,000 gallon #2 Work Tank containing creosote 60/40	242.3	3735.5				
	Ref. No. 8, the 30,000 gallon #3 Work Tank containing creosote	242.3	3735.5				
	Ref. No. 9, the 22,420 gallon #4 Work Tank containing creosote #1	242.3	3735.5				
	Ref. No. 10, the 30,000 gallon 2nd Decant Tank containing creosote/water	242.3	3735.5				
	Ref. No. 11, the 4,200 gallon Measuring Tank containing creosote #1	242.3	3735.5				
	Ref. No. 12, the 100,000 gallon Creo Storage Tank containing creosote #1	242.3	3735.5				
	Ref. No. 13, the 100,000 gallon Water Surge Tank containing process water	242.3	3735.5				
	Ref. No. 14, the 100,000 gallon Oil Storage Tank containing fuel oil	242.3	3735.5				
	Ref. No. 15, the 105,000 gallon Creo Storage Tank containing creosote 60/40	242.3	3735.5				
	Ref. No. 16, the 300,000 gallon Process Water Surge Tank containing process water	242.3	3735.5				
	Ref. No. 17, the 250,000 gallon Storm Water Surge Tank containing storm water	242.3	3735.5				
	Ref. No. 18, the 2,700 gallon Coagulant Tank containing Dearfloc 4301	242.3	3735.5				
	Ref. No. 19, the 4,500 gallon Decant Tank containing creo/oil/water	242.3	3735.5				
	Ref. No. 20, the 8,000 gallon Creo Blowdown Tank containing water/creosote	242.3	3735.5				
	Ref. No. 21, the 6 ft. dia. x 60 ft. long Air Receiver containing compressed air	242.3	3735.5				
	Ref. No. 22, the 7 ft. dia. x 40 ft. long Air Receiver containing compressed air	242.3	3735.5				
	Ref. No. 23, the 8,000 gallon Penta Blowdown Tank containing water/penta/oil	242.3	3735.5				
	Ref. No. 26, the 150,000 gallon Aeration Tank containing waste water	242.3	3735.5				
	Ref. No. 27, the 25,000 gallon Clarifier Tank containing waste water	242.3	3735.5				
	Ref. No. 28, the 15,000 gallon Discharge Tank containing waste water	242.3	3735.5				
	Ref. No. 29, the 4,000 gallon Creosote Dehydrator	242.3	3735.5				
	Ref. No. 30, the 14,000 gallon N. Penta Equalization Tank containing water/oil/penta	242.3	3735.5				
	Ref. No. 31, the 14,000 gallon S. Penta Equalization Tank containing water/oil/penta	242.3	3735.5				
	Ref. No. 32, the 11,500 gallon Penta Mix Tank containing oil/penta	242.3	3735.5				
	Ref. No. 33, the 5,000 gallon Penta Mix Tank containing oil/penta	242.3	3735.5				
	Ref. No. 34, the 10,500 gallon Penta Concentrate Storage Tank containing penta concentrate	242.3	3735.5				
AA-004	Ref. No. 27, the Tie Mill and Lumber Mill with cyclone	242.3	3735.5	NA	NA	NA	ambient
AA-005	Ref. No. 33, the Boiler House natural gas fired space heater rated at 0.2 MMBTU/hr	242.3	3735.5	Data not provided			
AA-006	Ref. No. 35, the natural gas fired steam cleaner rated at 0.44 MMBTU/hr	242.3	3735.5	Data not provided			
AA-007	Ref. No. 36, the Wood Stove Shop Heater rated at 0.10 MMBTU/hr	242.3	3735.5	Data not provided			
AA-008	Ref. No. 8, Treated Wood Storage	242.3	3735.5	Ground level - no stack			
AA-009	Ref. No. 31, the Pole Kiln	242.3	3735.5				
AA-010	Ref. No. 32, the Pole Peeler	242.3	3735.5	No stack			
AA-011	Ref. No. 34, Wood Fuel Preparation and Handling including grinding, conveying, and silo loading	242.3	3735.5	Data not provided			
AA-012	Ref. No. 37, the two (2) Parts Cleaners/Degreasers	242.3	3735.5	No stack - ground level			
AA-013	Ref. No. 24, the 1,000 gallon Gasoline Storage Tank	242.3	3735.5				
AA-014	Ref. No. 25, the 20,000 gallon Diesel Storage Tank	242.3	3735.5				
Facility Wide Mfg. Processes Total	AA-003, AA-004, AA-008 through AA-010, AA-012 through AA-014	242.3	3735.5				
AA-015	Ref. No. 33, the Standby Boiler Room natural gas fired space heater rated at 0.1 MMBTU/hr	242.3	3735.5	Data not provided			
AA-016	Ref. No. 33, the Fire Pump Building natural gas fired space heater rated at 0.02 MMBTU/hr	242.3	3735.5	Data not provided			
AA-017	Fugitives	242.3	3735.5				

EMISSION INVENTORY -- HAZARDOUS AIR POLLUTANTS

Koppers Industries, Inc.

FACILITY NO.: 0960 - 00012
AQCR: 135 Northeast Mississippi Intrastate

UTM ZONE: 16
UTM EAST: 242.3
UTM NORTH: 3735.5

EMISSION POINT	OPERATING SCHEDULE				HAP		ACTUAL		POTENTIAL	
	HOURS/ DAY	DAYS/ WEEK	WEEKS/ YEAR	HOURS/ YEAR	CAS RN	NAME	LB/HR	TPY	LB/HR	TPY
AA-001	24	7	52.14286	8760		Hydrogen Chloride	3.8200000		3.8200000	16.7316
AA-001	24	7	52.14286	8760		Acenaphthalene	0.0000072		0.0000072	0.0000
AA-001	24	7	52.14286	8760		Acenaphthene	0.0000077		0.0000077	0.0000
AA-001	24	7	52.14286	8760		Anthracene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Benzo(a)anthracene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Benzo(a)pyrene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Benzo(b)fluoranthene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Benzo(g,h,i)perylene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Benzo(k)fluoranthene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Chrysene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Dibenzo(a,h)anthracene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Fluoranthene	0.0000066		0.0000066	0.0000
AA-001	24	7	52.14286	8760		Fluorene	0.0000067		0.0000067	0.0000
AA-001	24	7	52.14286	8760		Indeno(1,2,3-c,d)pyrene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Naphthalene	0.0006724		0.0006724	0.0029
AA-001	24	7	52.14286	8760		Phenanthrene	0.0000517		0.0000517	0.0002
AA-001	24	7	52.14286	8760		Pyrene	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		Pentachlorophenol	0.0000265		0.0000265	0.0001
AA-001	24	7	52.14286	8760		2-Chlorophenol	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		2,4-Dichlorophenol	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		4-Chloro-3-methylphenol	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		2,4,6-Trichlorophenol	0.0000053		0.0000053	0.0000
AA-001	24	7	52.14286	8760		2,4,5-Trichlorophenol	0.0000403		0.0000403	0.0002
AA-001	24	7	52.14286	8760		Arsenic				0.0017
AA-001	24	7	52.14286	8760		Cadmium				0.0003
AA-001	24	7	52.14286	8760		Chromium				0.0024
AA-001	24	7	52.14286	8760		Manganese				0.1672
AA-001	24	7	52.14286	8760		Nickel				0.0105
AA-001	24	7	52.14286	8760		Selenium				0.0003
AA-001	24	7	52.14286	8760		Mercury				0.0001
AA-003 and AA-008	24	7	52.14286	8760		Pentachlorophenol				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Naphthalene				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Benzene				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Biphenol				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Cresols				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Dibenzofurans				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		p-Xylene				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Phenol				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Quinoline				See Note 14
AA-003 and AA-008	24	7	52.14286	8760		Toluene				See Note 14
AA-012	24	7	52.14286	8760		HAP (See Note 27)				See Note 27
END										
						TOTAL		0.00		24.9000

EMISSION INVENTORY -- CRITERIA POLLUTANTS (ACTUAL)

Koppers Industries, Inc.
FACILITY NO.: 0960 - 00012
AQCR: 135 Northeast Mississippi Intrastate

UTM ZONE: 16
UTM EAST: 242.3
UTM NORTH: 3735.5

	OPERATING SCHEDULE				ACTUAL EMISSIONS															
					PARTICULATE MATTE		PM10		SO2		NOx		CO		VOC		TRS		LEAD	
EMISSION POINT	HOURS/ DAY	DAYS/ WEEK	WEEKS/ YEAR	HOURS/ YEAR	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY
AA-001	5	5	52.14286	8760																
AA-002	24	7	52.14286	8760																
AA-003	24	7	52.14286	8760																
	24	7	52.14286	8760																
	24	7	52.14286	8760																
	24	7	52.14286	8760																
	24	7	52.14286	8760																
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	24	7	52.14286	8760																
	24	7	52.14286	8760																
AA-004	24	7	52.14286	8760																
AA-005	24	7	52.14286	8760																
AA-006	24	7	52.14286	8760																
AA-007	24	7	52.14286	8760																
AA-008	24	7	52.14286	8760																
AA-009	24	7	52.14286	8760																
AA-010	24	7	52.14286	8760																
AA-011	24	7	52.14286	8760																
AA-012	24	7	52.14286	8760																
AA-013	24	7	52.14286	8760																
AA-014	24	7	52.14286	8760																
Facility Wide Mfg. Processes Total																				
AA-015																				
AA-016																				
AA-017																				
END																				
TOTALS						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00

EMISSION INVENTORY -- CRITERIA POLLUTANTS (POTENTIAL)

Koppers Industries, Inc.
FACILITY NO.: 0960 - 00012
AQCR: 135 Northeast Mississippi Intrastate

UTM ZONE: 16
UTM EAST: 242.3
UTM NORTH: 3735.5

					POTENTIAL EMISSIONS															
	OPERATING SCHEDULE				PARTICULATE MATTE		PM10		SO2		NOx		CO		VOC		TRS		LEAD	
EMISSION POINT	HOURS/ DAY	DAYS/ WEEK	WEEKS/ YEAR	HOURS/ YEAR	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY	LB/HR	TPY
AA-001	24	7	52.14286	8760	9.700	42.49		42.49	9.700	42.49	10.050	44.02	1.860	8.15	0.200	0.88				0.01
AA-002	24	7	52.14286	8760	0.429	1.88	0.429	1.88	15.400	67.45	4.340	19.01	1.080	4.73	0.040	0.18				
AA-003	24	7	52.14286	8760											9.990	43.76				
	24	7	52.14286	8760																
	24	7	52.14286	8760																
	24	7	52.14286	8760																
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	24	7	52.14286	8760																
AA-004	24	7	52.14286	8760																
AA-005	24	7	52.14286	8760	0.000	0.00	0.002	0.01	0.000	0.00	0.019	0.08	0.008	0.04	0.001	0.01				
AA-006	24	7	52.14286	8760	0.006	0.02	0.003	0.01	0.000	0.00	0.044	0.19	0.009	0.04	0.003	0.01				
AA-007	24	7	52.14286	8760		0.18	0.428	0.18	0.001	0.00	0.004	0.02	0.073	0.32	0.002	0.01				
AA-008	24	7	52.14286	8760	Emissions from this emission point are fugitive!															
AA-009	24	7	52.14286	8760											9.13242	40.00				
AA-010	24	7	52.14286	8760																
AA-011	24	7	52.14286	8760	12.000	20.53		20.53												
AA-012	24	7	52.14286	8760												0.17				
AA-013	24	7	52.14286	8760												0.19				
AA-014	24	7	52.14286	8760												0.03				
Facility Wide Mfg. Processes Total	24	7	52.14286	8760	31.727	138.96		0.00												
AA-015	24	7	52.14286	8760	0.000	0.00	0.001	0.00	0.000	0.00	0.009	0.04	0.004	0.02	0.001	0.00				
AA-016	24	7	52.14286	8760	0.000	0.00	0.000	0.00	0.000	0.00	0.002	0.01	0.001	0.00	0.000	0.00				
AA-017	24	7	52.14286	8760	3.465	3.94	3.465	3.94							7.537	33.01				
END																				
	TOTALS					204.07		65.11		109.94		63.37		13.29		118.23		0.00		0.01

NOTES

Koppers Industries, Inc.
Facility No. 0960-00012

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1) Waste wood from this facility is shipped off-site. Fuel for the woodwaste boiler is purchased. Therefore, Wood Fuel Preparation and Handling, Em. Pt. AA-011, is considered a separate process subject to the process weight equation. Note that potential is based on uncontrolled emissions which are less than the process weight allowable.

2) AA-001 potential SO2 emission rate not based on APC-S-1 limit of 4.8 lb/MMBTUH or 5.07 lb/hr high-fire average test results, but proposed allowable in Title V application.

3) AA-001 potential NOx emission rates based on test results, high-fire average.

4) AA-001 potential CO emission rates based on test results, high-fire average.

5) AA-001 potential VOC emission rates based on test results, high-fire average.

6) AA-001 potential HAP emissions are based on test results., high-fire average, except Arsenic, Cadmium, Chromium, Lead, Manganese, Nickel, Selenium, and Mercury which were reported in the Title V application.

7) AA-002 potential PM emission rates based on AP-42 calculations @ 2 lb/1,000 gal. See calculations in file from PTC issuance.

8) AA-002 potential SO2 emission rates based on AP-42 calculations @ (71 + 1) lb/1,000 gal. See calculations in file from PTC issuance.

9) AA-002 potential NOx emission rates based on AP-42 calculations @ 20 lb/1,000 gal. See calculations in file from PTC issuance.

10) AA-002 potential CO emission rates based on AP-42 calculations @ 5 lb/1,000 gal. See calculations in file from PTC issuance.

11) AA-002 potential NMVOC emission rates based on AP-42 calculations @ 0.2 lb/1,000 gal. See calculations in file from PTC issuance.

12) AA-003 - these processes are not considered sources of PM.

13) AA-003, AA-004 and AA-008 through AA-014 are not considered to be sources of SO2, NOx, or CO.

14) AA-003 and AA-008 minimum HAP data available; however, EPA has determined that wood treaters are not major HAP sources.

15) PM10 is assumed to be the same emission rate as PM unless otherwise noted.

16) AA-004, AA-010, and AA-011 are not considered sources of VOC or HAPs.

17) AA-005, AA-015 and AA-016 potential PM, PM10 emissions are based on AP-42 without any air pollution control equipment or operational restriction. AA-006 potential PM emission rate is increased to reflect values in Koppers 11/4/96 letter.

NOTES

Koppers Industries, Inc.
Facility No. 0960-00012

18) AA-005, AA-006, AA-015 and AA-016 potential SO2, NOx, CO, and VOC emission rates are estimates using AP-42 data.

19) AA-007 SO2, NOx, CO, and VOC potential emission rates are from AP-42 fifth edition Section 1.6 Wood Waste Combustion in Boilers. Note that Koppers' application uses higher values than these.

20) AA-008 and AA-012 through AA-014 are not considered sources of PM.

21) AA-009 PM10 emission rate is from AP-42 fifth edition Table 10.1-2.

22) AA-009 VOC emission rates are from 1,600,000 cf/yr * 0.05lb of VOC/cf.

23) AA-012 VOC potential emissions are on a "use it /lose it" basis, 50 gal/yr at 6.6 lb/gal.

24) AA-013 and AA-014 VOC potential emission rates are calculated using AP-42 data.

25) Note that diesel fuel is used in the process as well as for fuel in yard equipment and boilers.

26) Note that facility-wide manufacturing process input weight rate used in the process weight equation is based on a bottleneck at the treating cylinders.

27) Note that Koppers says AA-012 Parts Cleaners/Degreasers emissions are HAP but the Chemical Abstract Service Registry Number given is not listed.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit.

7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

(a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.
(b) The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
(c) The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
(d) No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
(b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
(d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)
(e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
(f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle as not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

INFORMATION RELATIVE TO THE DRAFT TITLE V OPERATING PERMIT

FOR:

Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi
Facility No. 0960-00012

FACILITY DESCRIPTION

The facility is an existing creosote and pentachlorophenol wood treating plant. Fuel for the woodwaste boiler includes purchased treated and untreated woodwaste and office paper generated at the facility.

TITLE V PROGRAM APPLICABILITY BASIS

This facility has the potential to emit particulate matter, PM_{10}, and SO_2 at rates in excess of 100 tons per year and the Hazardous Air Pollutant Hydrogen Chloride in excess of 10 tons per year. Therefore, the facility is subject to Title V requirements.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (APC-S-6), and applicable requirements. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

1. any standard or other requirement set forth in the State Implementation Plan (SIP) approved or promulgated by EPA through rulemaking under Title I of the Federal Clean Air Act (Federal Act) including :

    a. most of the State of Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (APC-S-1) amended December 9, 1993, (most recent version submitted for EPA SIP approval),
    b. the State of Mississippi Regulations for the Prevention of Air Pollution Emergency Episodes (APC-S-3) amended April 25, 1988,
    c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (APC-S-5) amended December 9, 1993, and 40 CFR Part 52.21 by reference, and
    d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (APC-S-2) amended December 9, 1993, relating to construction permits and synthetic minor operating permits;

2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;

3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of APC-S-1;

4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of APC-S-1 and 40 CFR Parts 61, 63, and 68;

5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (APC-S-7) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;

6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act;

7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act;

8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;

9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;

10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;

11. any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Act;

12. any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Federal Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of APC-S-6 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

SPECIFIC APPLICABLE REQUIREMENTS

The fuel burning and manufacturing processes must comply with the specific applicable requirements per the following table.

EMISSION LIMITS					
Emission Point No.	Pollutant	Draft Permit Emission Limits	Equivalent Mass Emission Rate		
			lb/hr	TPY	Other
AA-001	Particulate Matter	0.30 gr/dscf	9.7	42.49	
AA-007	Particulate Matter	0.30 gr/dscf	0.428	0.18	
AA-001	Sulfur Dioxide	4.8 lbs/mmbtu	9.7	42.49	
AA-002	Sulfur Dioxide	4.8 lbs/mmbtu	136.8	599.18	
AA-005	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	

EMISSION LIMITS					
Emission Point No.	Pollutant	Draft Permit Emission Limits	Equivalent Mass Emission Rate		
			lb/hr	TPY	Other
AA-006	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-007	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-015	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-016	Sulfur Dioxide	4.8 lbs/mmbtu	<0.001	<0.01	
AA-002	Ash and/or Particulate Matter	$E = 0.8808 * I^{-0.1667}$	0.429	1.88	
	Sulfur Dioxide	0.5% sulfur by weight.	15.4	67.45	
AA-003, AA-004, AA-008, AA-009, AA-010, and AA-012	Particulate Matter	$E = 4.1\ p^{0.67}$	31.727	138.96	
AA-011	Particulate Matter	$E = 4.1\ p^{0.67}$	12.0	20.53	
AA-005	Ash and/or Particulate Matter	0.6 lbs/mmbtu	<0.001	<0.01	
AA-006	Ash and/or Particulate Matter	0.6 lbs/mmbtu	0.006	0.02	
AA-015	Ash and/or Particulate Matter	0.6 lbs/mmbtu	<0.001	<0.01	
AA-016	Ash and/or Particulate Matter	0.6 lbs/mmbtu	<0.001	<0.01	

OTHER LIMITS:

The temperature in the Woodwaste Boiler must be maintained at 1140°F or greater when firing treated wood.

Materials other than untreated wood, creosote treated wood, pentachlorophenol treated wood, or office waste paper are prohibited in the woodwaste boiler . The office waste paper shall be limited to waste paper generated on site by Kopper's office operations and shall not contain plastic or non-combustible wastes.

The total amount of office waste paper burned in the woodwaste boiler shall be less than one percent (1%) of total fuel input.

Total woodwaste feed rate to the woodwaste boiler shall not exceed 9,375 lbs/hr.

Sulfur content of the fuel oil fired in the oil-fired boiler shall not exceed 0.5% by weight.

Proposed Permit Application Summary Form

General Facility Information

Facility Name: Koppers Industries, Inc.
Facility Address: 436 Seventh Avenue, Pittsburgh, PA 15219
Facility City, State, Zip: Tie Plant, MS 38960
Source Description: The facility is an existing creosote and pentachlorophenol wood treating plant.
SIC Code of Major Product: 2491
AFS ID: 280430012
Date Application Received: June 24, 1996 (final version, originally submitted Title V application with Synthetic Minor addendum on April 3, 1995)
Application Number:
Permit Number(s):

Application Type/Permit Activity

☒ Initial Issuance ☐ General Permit ☐ Conditional Major
☐ Permit Modification ☐ Permit Renewal

Facility Emissions Summary

Pollutant	Actual (tpy)	Potential (tpy)
PM		176.36
SO_2		109.94
NO_x		63.37
CO		13.29
VOC		Between 100 and 250
LEAD		0.01
HAP ≥ 10 TPY (by CAS)		16.73
TOTAL EMISSIONS		

Compliance Summary

☐ Source is out of compliance ☐ Compliance schedule included ☒ Compliance certification signed

Applicable Requirements List

☐ NSR ☐ NSPS ☒ SIP ☐ PSD ☐ NESHAPS ☐ Other

Miscellaneous

☐ Acid rain source
☐ Source applied for federally enforceable emissions cap
☐ Source provided terms for alternative operating scenarios
☐ Source requested case-by-case 112(g) or (j) determination
☐ Application proposes new control technology
☐ Source Subject to 112(r)
☐ Source subject to a MACT standard
☒ Certified by responsible official
☐ Diagrams or drawings included
☐ Confidential business (CBI) included

Wood treating facilities were removed as a source category for MACT development because the EPA found that there were no major sources in this category. This facility is a Title III major source because they will burn treated wood in the woodwaste boiler. If a MACT regulation doesn't apply under a combustion source

category, one will have to be developed specifically for this facility.

RECORD OF PUBLIC & AFFECTED STATE COMMENTS ON THE DRAFT TITLE V OPERATING PERMIT

FOR:

Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi
Facility No. 0960-00012

SUMMARY OF PUBLIC & AFFECTED STATE COMMENTS

OR

No comments were received during the comment period.

RESPONSE(S) TO PUBLIC & AFFECTED STATE COMMENTS

OR

The proposed permit is unchanged from the draft permit.

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT
TO CONSTRUCT AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT

Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Issued this 8th day of November, 1994

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____
HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Permit No. 0960-00012

Permit Modified: January 14, 1997

PART I
GENERAL CONDITIONS

1. The plans, specifications, schedules, dates and other data submitted to the Permit Board are filed with and considered as a part of this permit.

2. All air pollution control facilities shall be designed and constructed such as to allow proper operation and maintenance of the facilities.

3. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Environmental Quality Permit Board.

5. The construction of facilities shall be performed in such a manner as to reduce both point source and fugitive dust emissions to a minimum.

6. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.

7. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts, or

   c. A change in any condition that requires either a temporary or permanent reduction or elimination of authorized air emissions.

8. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

9. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

11. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

12. This permit is for air pollution control purposes only.

13. Approval to construct will expire should construction not begin within eighteen (18) months of the issuance of this permit, or should construction be suspended for eighteen (18) months.

14. Prior to startup of air emissions equipment at this source, the permittee must obtain a Permit to Operate and submit certification that construction was completed in accordance with the approved plans and specifications.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning January 14, 1997, the permittee is authorized to construct modifications (change in the method of operation by the addition of creosote and pentachlorophenol treated wood as fuel) to air emissions equipment for the emission of air contaminants from Emission Point AA-001, the 60.0 MMBTUH Wellons/Nebraska Woodwaste Boiler with multiclone collector (Reference No. 01).

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

Particulate Matter	0.30 gr/dscf, per APC-S-1, Section 3.4(b), as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect January 14, 1997.

The temperature in the Woodwaste Boiler must be maintained at 1140^{0}F or greater when firing treated wood.

The Woodwaste Boiler shall comply with a minimum destruction removal efficiency (DRE) of 99.9% for all principal organic hazardous components (POHC).

OPERATING LIMITATIONS

Materials other than untreated wood, creosote treated wood, pentachlorophenol treated wood, or office waste paper are prohibited in the boiler. The office waste paper shall be limited to waste paper generated on site by Kopper's office operations and shall not contain plastic or non-combustible wastes and the total amount fired shall be less than one percent (1%) of total fuel input.

Total woodwaste feed rate shall not exceed 9,375 lbs/hr.

PART II
EMISSION LIMITATIONS & MONITORING REQUIREMENTS

Continued from Previous Page

RECORDKEEPING & REPORTING REQUIREMENTS

The permittee shall monitor and document with recordkeeping the following operating parameters:

- Temperature in the woodwaste boiler, on a continuous basis, with notations indicating when treated wood is being fired.

- In-stack opacity.

- CO concentration at the exit of the boiler stack, on a continuous basis.

  The CO continuous monitoring system shall include the capacity to correct the CO concentrations to a reference O_2 concentration and shall be collocated with the stack sampling ports.

These records shall be maintained at the facility and made available to the Office of Pollution Control (OPC) upon request. In addition, a quarterly report summarizing the temperature and opacity monitoring data shall be submitted to the OPC within thirty (30) days of the close of the calendar quarter.

PART III
OTHER REQUIREMENTS

(1) The permittee shall demonstrate compliance with PM, SO_2, NO_x, CO, & NMVOC lbs/hr emission limitations, opacity limitations, and minimum DRE in PART II for Emission Point AA-001 by stack testing in accordance with applicable EPA Reference Methods and submittal of a test report(s).

(2) The permittee shall demonstrate compliance as set forth in Item (1), above, within 60 days after achieving the maximum production rate at which Emission Point AA-001 will be operated, but no later than 180 days after initial startup.

(3) Testing for the purpose of demonstrating compliance with the lb/hr emission limitations and minimum DRE shall be conducted at maximum production rates and peak pollutant generation rates.

(4) During emission testing, the permittee shall document the following operating parameters:

- Boiler operating temperature via continuous monitoring, with notations indicating when treated wood is being fired.
- Treated and untreated woodwaste feedrate during each hour of testing, lbs/hr.
- CO concentration at the exit of the boiler stack via continuous monitoring.
- In-stack opacity.

This data shall be included in the test report required in Item (1) above.

(5) A pretest conference at least thirty (30) days prior to the scheduled test date is needed to ensure that all test methods and procedures are acceptable to the Office of Pollution Control. Also, the Office of Pollution Control must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s).

(6) All records shall be maintained at the facility for at least (2) years and shall be made available to the Office of Pollution Control upon request.

(7) The permittee shall handle, store, and transport all materials in such a manner as to minimize fugitive emissions.

(8) Approval to construct air emissions equipment and modify Emission Point AA-001 has been granted contingent upon the permittee complying with the emission limitations and monitoring requirements for the existing air emissions equipment set forth in the following pages.

PART III
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Air emissions from Emission Point AA-002, the 28.5 MMBTU/hr fuel oil fired Murray Boiler (Reference No. 02), shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Particulate Matter	0.43 lbs/hr and 1.88 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.
PM_{10}	0.43 lbs/hr and 1.88 tons/year as determined by EPA Reference Method 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.
Sulfur Dioxide	15.40 lbs/hr and 67.45 tons/year, as determined by EPA Reference Method 6, 40 CFR 60, Appendix A.
Nitrogen Oxides	4.34 lbs/hr and 19.01 tons/year, as determined by EPA Reference Method 7, 40 CFR 60, Appendix A.
Carbon Monoxide	1.08 lbs/hr and 4.73 tons/year, as determined by EPA Reference Method 10, 40 CFR 60, Appendix A.
Volatile Organic Compounds	0.04 lbs/hr and 0.18 tons/year, as determined by EPA Reference Method 25, 40 CFR 60, Appendix A.
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect November 8, 1994.

ADDITIONAL CONDITIONS

The sulfur content of the fuel oil shall not exceed 0.5% by weight.

The permittee shall monitor and document with recordkeeping the sulfur content of all fuel oil fired in Emission Point AA-002. These records shall be maintained at the facility and made available to the Office of Pollution Control (OPC) upon request. In addition, a quarterly report summarizing this information shall be submitted to the OPC within thirty (30) days of the close of the calendar quarter.

PART III
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Air emissions from Emission Point AA-003, the Wood Treatment Facility including tanks and five (5) treating cylinders (Reference No. 03), shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

PART III
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Air emissions from Emission Point AA-004, the Tie Mill with cyclone (Reference No. 04), shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Particulate Matter	**2.0 lbs/hr and 8.76 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.**
PM_{10}	**2.0 lbs/hr and 8.76 tons/year as determined by EPA Reference Method 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.**
Opacity	**40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.**

All test methods specified above shall be those versions, or their approved equivalents, which are in effect November 8, 1994.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit.

7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

(a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.
(b) The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
(c) The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
(d) No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
(b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
(d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)
(e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
(f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle as not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

NEW SOURCE PERMIT REVIEW SUMMARY

Company Name: Koppers Industries, Inc.

Source Number: 0960-00012

Site Address: Tie Plant Road, Tie Plant, Mississippi (Grenada County)

PERMIT TYPE:

SOURCE CLASS:

For January 24, 1997 Permit Board

Review Engineer: David Burchfield

Date: January 8, 1997

APPLICABLE REGULATIONS:

X APC-S-1, Section(s):

____ NSPS, Subpart(s):

____ NESHAP, Subpart(s):

____ PSD, Pollutant(s)

____ Other:

FACILITY DESCRIPTION:

The facility is an existing creosote and pentachlorophenol wood treating plant.

PROJECT DESCRIPTION, IF DIFFERENT:

The permittee has proposed modification to the Permit to Construct issued November 8, 1994 which allowed the burning of treated wood in the woodwaste boiler. The modification consists of removal of emission limitations on the woodwaste boiler for which there are no applicable requirements. Also, based on recent compliance testing results, the minimum required combustion chamber temperature while firing treated wood was lowered from 1600°F to 1140°F.

SITING CRITERIA:

Applicable Criteria:

Siting Criteria Met?

If no, have they requested a variance?

If no, have they submitted letters of no objection?

PUBLIC NOTICE:

Did we go to notice? Yes

Why? Prior public interest, though no adverse comments.

Comment Period: A 30-day public notice period began November 29, 1996 with the publication of a notice in *The Daily Sentinel Star* and ended December 29, 1996.

Were Comments Received? No

If so, give brief description of comments & responses:

AIR QUALITY IMPACT ANALYSIS:

Has modeling been performed? No

By Whom?

What Pollutants?

Results?

If modeling was not performed, why? The increase in emissions was less than PSD significance levels

PERMIT LIMITS

Are any permit emission limitations based on something other than uncontrolled emissions or an applicable regulation? Yes. The minimum temperature while burning treated wood was limited as being an indicator of adequate combustion. The materials and amounts burned were limited to avoid certain regulations.

Is this an existing facility? Yes

If so, is the facility a major stationary source as defined by PSD? No

Is this a project a major source? No

Is this project a major modification? No

Is this project a moderate source? No

Is this project a moderate modification? No

Are potential uncontrolled emissions (as defined in APC-S-2) less than the applicable PSD thresholds? No

RECOMMENDATION:

The staff recommends modification of the permit as shown in the draft permit.

Koppers Industries, Inc.
Facility No. 0960-00012
Emissions Data for Proposed Source
January 8, 1997

Emission Point	Pollutants	Emission Rate Allowed by Regulations		Emission Rate Without Controls		Emission Rate Proposed as Allowable	
		lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY