

GRENADA COUNTY - TIE PLANT MS
KOPPERS INC
0960-00012
2000-----2003

AI 00876



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)	<p>Point Desc: PG- Plant Entrance (General). Data collected by Mike Hardy on 11/8/2005. Elevation 223 feet. Just inside entrance gate.</p> <p>Method: GPS Code (Psuedo Range) Standard Position (SA Off)</p> <p>Datum: NAD83</p> <p>Type: MDEQ</p>	<p>Section:</p> <p>Township:</p> <p>Range:</p>	<p>SWIMS</p> <p>TerraServer</p> <p>Map It</p>

12/20/2006 12:16:40 PM

Koppers Industries 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
04300012	Koppers Industries, Inc.	Air-AIRS AFS	10/12/2000	
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	10/12/2000	
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.	Official Site Name	11/09/1981	
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
Air	Title V - major
Hazardous Waste	TSD - Not Classified
Water	Baseline Stormwater
Water	PT CIU
Water	PT CIU - Timber Products Processing (Subpart 429)
Water	PT SIU

Locational Data

Latitude	Longitude	Method	Datum	S / T / R	Map Links
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Report Date: 3/2/2005 9:51:50 AM



Mississippi Department of Environmental Quality
Office of Pollution Control
Air Compliance Evaluation Report

Site Name: Koppers Industries Inc
 Energy and Transportation Branch

AFS ID: 04300012
 Air Permit No.:0960-00012 {Iss./Mod. Date:3/11/97 Exp. Date: 3/1/02}

Physical Address	Mailing Address
1 Koppers Drive	PO Box 160
Tie Plant, MS 38960	Tie Plant, Mississippi 38960
Grenada County	

Facility Contact:Thomas Henderson	CMS Source Category: Major - A
Facility Phone No.:662.226.4584	ECED Contact: Lee, David

Compliance Evaluation Activity Type: Semiannual Monitoring Report - PX

Date Due:7/31/03	Date Reviewed:9/29/03
Date Received:7/30/03	Date Observed: N/A
	Date Performed: N/A

Official Signing/Submitting Report:
 Name: Thomas Henderson Title: Plant manager

Air Program(s): (Check all applicable programs included in this evaluation)

SIP	<input checked="" type="checkbox"/>	NESHAPS	<input type="checkbox"/>
PSD	<input type="checkbox"/>	MACT	<input type="checkbox"/>
NSPS	<input type="checkbox"/>	Subparts:	_____

ECED Determined Compliance Status (applies only to ACC's): Not Applicable

EVALUATION OF FACILITY SUBMITTAL/REPORT		
Criteria	Rating	Comments
Timeliness	Yes	
Completeness	Yes	
Methodology/Basis	Satisfactory	
Compliance w/Permit Reqts	Compliant	

Compliance Assistance Provided: No If yes, describe:



Mississippi Department of Environmental Quality
Office of Pollution Control
Air Compliance Evaluation Report

Were any actions taken by the facility to come back into compliance during the on-site visit: Not Applicable If yes, describe:

Were any findings and/or recommendations relayed to the facility during the compliance evaluation: Not Applicable If yes, describe:

Comments:

Signature: David [Signature] Date: 9/29/03



876
Grenada Co.

July 25, 2003

CERTIFIED MAIL 7002 0460 0003 7596 1055 JUL 30 2003

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

Koppers Inc.
Utility Poles and Piling
P.O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584
Fax 662 226 4588
www.koppers.com

Subject: Title V Operating Permit - # 0960-00012
Semi-Annual Air Report January 2003- June 2003
Koppers Industries Inc. – Grenada, Mississippi


Dear Mr. Lee,

Enclosed you will find the Continuous Emissions Monitoring (CEM) report for the subject period containing information concerning opacity emissions. Information provided in this report is for emission point AA-001, which is the Wellons wood-fired boiler. A second (backup) boiler at the site, emission point AA-002 which is an oil-fired boiler, was not operated during the subject reporting period.

There was one incident whereby the opacity monitor was temporarily out of service on March 26, 2003. You were notified of this incident on March 26, 2003 by telephone. A letter pertaining to this incident was forwarded to you on March 27, 2003.

If you have any questions, please call me at 662-226-4584 extension 11.

Sincerely,


Thomas L. Henderson

Plant Manager

Cc: Tim Basilone, KII – Pittsburgh
Enclosures

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 01/01/03 00:00 to 03/31/03 23:59
 Generated: 07/25/2003
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
01/02/03 07:48	- 01/02/03 07:53	1: OV	43.817	/	40.000	(9.54%)	Preventive Maintenance	Blowing Soot
01/03/03 14:24	- 01/03/03 14:29	1: OV	47.250	/	40.000	(18.13%)	Preventive Maintenance	Blowing Soot
01/03/03 14:30	- 01/03/03 14:35	1: OV	50.800	/	40.000	(27.00%)	Preventive Maintenance	Blowing Soot
01/04/03 04:36	- 01/04/03 04:41	1: OV	40.117	/	40.000	(0.29%)	Preventive Maintenance	Blowing Soot
01/16/03 03:00	- 01/16/03 03:05	1: OV	40.540	/	40.000	(1.35%)	Preventive Maintenance	Blowing soot
01/23/03 10:48	- 01/23/03 10:53	1: OV	45.117	/	40.000	(12.79%)	Preventive Maintenance	Blowing soot
02/03/03 13:12	- 02/03/03 13:17	1: OV	44.950	/	40.000	(12.38%)	Preventive Maintenance	Blowing soot
02/22/03 02:54	- 02/22/03 02:59	1: OV	57.633	/	40.000	(44.08%)	Startup	No Action Needed
02/22/03 03:00	- 02/22/03 03:05	1: OV	40.833	/	40.000	(2.08%)	Startup	No Action Needed
03/10/03 08:18	- 03/10/03 08:23	1: OV	43.150	/	40.000	(7.88%)	Preventive Maintenance	blowing soot
03/10/03 08:30	- 03/10/03 08:35	1: OV	43.300	/	40.000	(8.25%)	Preventive Maintenance	blowing soot
03/10/03 08:36	- 03/10/03 08:41	1: OV	46.450	/	40.000	(16.13%)	Preventive Maintenance	blowing soot
03/10/03 08:48	- 03/10/03 08:53	1: OV	55.200	/	40.000	(38.00%)	Preventive Maintenance	blowing soot
03/10/03 11:12	- 03/10/03 11:17	1: OV	49.433	/	40.000	(23.58%)	Preventive Maintenance	blowing soot
03/10/03 11:42	- 03/10/03 11:47	1: OV	42.800	/	40.000	(7.00%)	Preventive Maintenance	blowing soot
03/10/03 21:24	- 03/10/03 21:29	1: OV	46.317	/	40.000	(15.79%)	Preventive Maintenance	blowing soot
03/12/03 11:18	- 03/12/03 11:23	1: OV	57.500	/	40.000	(43.75%)	Preventive Maintenance	blowing soot
03/18/03 08:48	- 03/18/03 08:53	1: OV	56.983	/	40.000	(42.46%)	Preventive Maintenance	Blowing soot
03/18/03 08:54	- 03/18/03 08:59	1: OV	52.450	/	40.000	(31.13%)	Preventive Maintenance	Blowing soot
03/18/03 09:00	- 03/18/03 09:05	1: OV	45.017	/	40.000	(12.54%)	Preventive Maintenance	Blowing soot
03/21/03 13:42	- 03/21/03 13:47	1: OV	43.700	/	40.000	(9.25%)	Preventive Maintenance	Blowing soot

Total Reported Time: 2160.0 hours

TOTAL DURATION = 2.10 hours

1: Over limit	=	2.10 hours
3: Startup	=	0.20 hours
15: Preventive Maintenance	=	1.90 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 04/01/03 00:00 to 06/30/03 23:59
 Generated: 07/25/2003
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit	(%dev)	Reason	Action
04/07/03 07:24	- 04/07/03 07:29	1: OV	45.950	/ 40.000	(14.88%)	Preventive Maintenance	Blowing soot
04/11/03 21:12	- 04/11/03 21:17	1: OV	40.267	/ 40.000	(0.67%)	Preventive Maintenance	Blowing soot
04/16/03 06:30	- 04/16/03 06:35	1: OV	54.167	/ 40.000	(35.42%)	Preventive Maintenance	Blowing soot
04/17/03 09:36	- 04/17/03 09:41	1: OV	44.883	/ 40.000	(12.21%)	Preventive Maintenance	Pulling ash
04/17/03 18:06	- 04/17/03 18:11	1: OV	58.967	/ 40.000	(47.42%)	Startup	No Action Needed
04/17/03 18:12	- 04/17/03 18:17	1: OV	52.583	/ 40.000	(31.46%)	Startup	No Action Needed
04/17/03 18:54	- 04/17/03 18:59	1: OV	40.333	/ 40.000	(0.83%)	Startup	No Action Needed
04/17/03 19:24	- 04/17/03 19:29	1: OV	43.667	/ 40.000	(9.17%)	Startup	No Action Needed
04/17/03 19:30	- 04/17/03 19:35	1: OV	44.783	/ 40.000	(11.96%)	Startup	No Action Needed
04/22/03 07:06	- 04/22/03 07:11	1: OV	42.275	/ 40.000	(5.69%)	Startup	No Action Needed
04/22/03 07:24	- 04/22/03 07:29	1: OV	48.483	/ 40.000	(21.21%)	Startup	No Action Needed
04/22/03 07:30	- 04/22/03 07:35	1: OV	40.217	/ 40.000	(0.54%)	Startup	No Action Needed
04/24/03 21:30	- 04/24/03 21:35	1: OV	41.867	/ 40.000	(4.67%)	Preventive Maintenance	Blowing soot
04/25/03 07:54	- 04/25/03 07:59	1: OV	40.550	/ 40.000	(1.37%)	Preventive Maintenance	Blowing soot
04/28/03 09:54	- 04/28/03 09:59	1: OV	42.440	/ 40.000	(6.10%)	Preventive Maintenance	Blowing soot
05/07/03 14:06	- 05/07/03 14:11	1: OV	48.583	/ 40.000	(21.46%)	Preventive Maintenance	Blowing soot
05/07/03 14:12	- 05/07/03 14:17	1: OV	59.833	/ 40.000	(49.58%)	Preventive Maintenance	Blowing soot
05/12/03 08:30	- 05/12/03 08:35	1: OV	48.783	/ 40.000	(21.96%)	Preventive Maintenance	Blowing soot
05/12/03 08:36	- 05/12/03 08:41	1: OV	51.800	/ 40.000	(29.50%)	Preventive Maintenance	Blowing soot
05/16/03 02:24	- 05/16/03 02:29	1: OV	52.733	/ 40.000	(31.83%)	Known Excess Cause	Startup
05/16/03 02:30	- 05/16/03 02:35	1: OV	56.417	/ 40.000	(41.04%)	Known Excess Cause	Startup
05/31/03 09:00	- 05/31/03 09:05	1: OV	44.883	/ 40.000	(12.21%)	Preventive Maintenance	Blowing soot
06/10/03 18:12	- 06/10/03 18:17	1: OV	41.667	/ 40.000	(4.17%)	Known Excess Cause	Startup
06/10/03 18:18	- 06/10/03 18:23	1: OV	43.383	/ 40.000	(8.46%)	Known Excess Cause	Startup
06/16/03 08:30	- 06/16/03 08:35	1: OV	41.667	/ 40.000	(4.17%)	Preventive Maintenance	Blowing soot
06/20/03 08:36	- 06/20/03 08:41	1: OV	46.383	/ 40.000	(15.96%)	Preventive Maintenance	Blowing soot
06/20/03 08:42	- 06/20/03 08:47	1: OV	55.533	/ 40.000	(38.83%)	Preventive Maintenance	Blowing soot
06/20/03 10:00	- 06/20/03 10:05	1: OV	52.933	/ 40.000	(32.33%)	Preventive Maintenance	Blowing soot
06/23/03 11:42	- 06/23/03 11:47	1: OV	40.433	/ 40.000	(1.08%)	Preventive Maintenance	Blowing soot
06/23/03 12:06	- 06/23/03 12:11	1: OV	43.350	/ 40.000	(8.37%)	Preventive Maintenance	Blowing soot
06/23/03 13:42	- 06/23/03 13:47	1: OV	40.283	/ 40.000	(0.71%)	Preventive Maintenance	Pulling ash
06/30/03 08:12	- 06/30/03 08:17	1: OV	40.967	/ 40.000	(2.42%)	Known Excess Cause	Startup
06/30/03 08:18	- 06/30/03 08:23	1: OV	40.550	/ 40.000	(1.37%)	Known Excess Cause	Startup

Total Reported Time: 2184.0 hours

TOTAL DURATION = 3.30 hours

1: Over limit	= 3.30 hours	
3: Startup	=	0.80 hours
9: Known Excess Cause	=	0.60 hours
15: Preventive Maintenance	=	1.90 hours

January 23, 2003

CERTIFIED MAIL 7099 3400 0002 5201 0963



Ms. Rosalyn D. Hughes
USEPA – Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960

Subject: 2002 Title V Air Permit Compliance Certification
Title V Permit #0960-00012
Koppers Industries, Inc
Grenada, Mississippi

Dear Ms. Hughes,

Enclosed please find the subject information submitted pursuant to Section 4.2 of the Title V Operation Permit for the Koppers Industries, Inc. facility in Grenada, Mississippi.

CERTIFICATION:

I certify based on information and belief formed after reasonable inquiry, the statements and information enclosed are true, accurate, and complete.

Thomas L. Henderson **Thomas L. Henderson** Date: 01/29/2003
Plant Manager

Please contact me at 662-226-4584 extension 11 if you have any questions or concerns.

Sincerely,

Thomas L. Henderson
Thomas L. Henderson
Plant Manager

Enclosure

Cc: Tim Basilone – Koppers, Pittsburgh
David Lee – MS Department of Environmental Quality

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 2002

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.)	NO	CONTINUOUS	NOTIFICATION LETTER WAS SENT TO MSDEQ ON JULY 17, 2002 (ATTACHED) INFORMING THEM THAT THE CO MONITOR ON THE WOOD FIRED BOILER HAD MALFUNCTIONED. A REQUEST TO OMIT THE CO MONITORING REQUIREMENTS WAS MADE TO MDEQ ON AUGUST 19, 2002, ANSWER PENDING. THE BOILER WAS ORIGINALLY PERMITTED WHEN TREATED WOOD WAS BEING USED AS FUEL. TREATED WOOD IS NO LONGER USED AS FUEL, THEREFORE, THE CONCERN FOR CO EMISSIONS IS SIGNIFICANTLY REDUCED.
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.)	NO	CONTINUOUS	PERMIT RENEWAL APPLICATION WAS SENT TO MSDEQ ON SEPTEMBER 26, 2001. MODIFICATION TO THE PERMIT RENEWAL APPLICATION WAS SENT AUGUST 19, 2002. CO IS CURRENTLY NOT BEING MONITORED AT THE WOOD FIRED BOILER. THE CO MONITOR IS NOT FUNCTIONAL. A REQUEST TO OMIT

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
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	THE CO MONITORING REQUIREMENT WAS MADE TO MDEQ ON AUGUST 19, 2002. ANSWER PENDING. SEE ITEM 1.1 ABOVE. 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	PERMIT RENEWAL APPLICATION WAS SENT TO MSDEQ ON SEPTEMBER 26, 2001. MODIFICATION TO THE PERMIT RENEWAL APPLICATION WAS SENT AUGUST 19, 2002.
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, 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.)	YES	CONTINUOUS	NO ACTION BY KOPPERS IS NECESSARY.
1.7 (CONT)	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.	YES	INTERMITTENT	MSDEQ REQUESTED EMISSION INFORMATION. KOPPERS PROVIDED EMISSIONS INFORMATION TO MSDEQ ON JUNE 18, 2002. EMISSION FEE REQUEST WAS PAID TO MSDEQ IN AUGUST 2002. ACTUAL EMISSIONS WERE USED AS THE BASIS FOR THE FEE.
	(a) For purposes of fee assessment and collection, the			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>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.)</p> <p>(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</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	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.)			
1.8	(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.)	YES	CONTINUOUS	NO PERMIT REVISIONS OF THIS NATURE HAVE BEEN REQUESTED BY PERMITTEE.
1.9	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	INTERMITTENT	ALL REQUIRED DOCUMENTS SUBMITTED HAVE BEEN CERTIFIED.
1.10	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	MSDEQ AIR QUALITY INSPECTORS

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:</p> <p>(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;</p> <p>(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;</p> <p>(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</p> <p>(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.)</p>			<p>WERE NOT ON-SITE IN 2002. THERE WERE NO REQUESTS FOR SAMPLING OR MONITORING.</p>
1.11	<p>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))</p>	YES	CONTINUOUS	<p>ALL NECESSARY SAMPLING PORTS ARE INSTALLED.</p>
1.12	<p>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))</p>	YES	CONTINUOUS	<p>ALL NECESSARY SAMPLING PORTS ARE INSTALLED.</p>
1.13	<p>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</p>	YES	CONTINUOUS	<p>PLANT RECORDS.</p>

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)			
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 2002.
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.)	YES	CONTINUOUS	NOT AVAILABLE UNDER CAA SECTION 112 (r)(7)(B)(II).
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	YES	CONTINUOUS	THIS PERMIT EXPIRED IN 2002. RENEWAL APPLICATION SENT TO MSDEQ ON SEPTEMBER 26, 2001. MSDEQ ACKNOWLEDGED RECEIPT OF APPLICATION SENT ON SEPTEMBER 26, 2001 MSDEQ ACKNOWLEDGED ON

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.17	<p>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:</p> <p>(a) the changes are not modifications under any provision of Title I of the Act;</p> <p>(b) the changes do not exceed the emissions allowable under this permit;</p> <p>(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:</p> <p>(1) a brief description of the change(s),</p> <p>(2) the date on which the change will occur,</p> <p>(3) any change in emissions, and</p> <p>(4) any permit term or condition that is no longer applicable as a result of the change;</p> <p>(d) the permit shield shall not apply to any Section 502(b)(10)</p>	YES	CONTINUOUS	<p>MSDEQ ACKNOWLEDGED AND APPROVED A REQUEST FOR A 502(b)(10) CHANGE OR OPERATIONAL FLEXIBILITY BY KOPPERS ON MAY 8, 2002. NOTIFICATION WAS GIVEN TO MSDEQ FULFILLING THE REQUIREMENTS OF 1.17C.(1)(2)(3)(4).</p> <p>A REQUEST FOR A 502(b)(10) CHANGE OR OPERATIONAL FLEXIBILITY BY KOPPERS WAS SUBMITTED ON JULY 24, 2002. NOTIFICATION WAS GIVEN TO MSDEQ FULFILLING THE REQUIREMENTS OF 1.17C.(1)(2)(3)(4).</p> <p>A REQUEST FOR A 502(b)(10) CHANGE OR OPERATIONAL FLEXIBILITY BY</p>
	<p>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.)</p>			<p>NOVEMBER 27, 2001 THAT THE APPLICATION SUBMITTED ABOVE AS COMPLETE AS SUBMITTED.</p> <p>A REVISED APPLICATION WAS SUBMITTED TO MSDEQ OCTOBER 28, 2002.</p> <p>MSDEQ ACKNOWLEDGED THE RECEIPT OF THE APPLICATION ON OCTOBER 30, 2002</p>

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	change. (Ref.: APC-S-6, Section IV.F.)			KOPPERS WAS SUBMITTED ON AUGUST 23, 2002. NOTIFICATION WAS GIVEN TO MSDEQ FULFILLING THE REQUIREMENTS OF 1.17C.(1)(2)(3)(4).
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 2002.
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;	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
1.20	<p>(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;</p> <p>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</p> <p>(d) use of an alternative fuel or raw material by a stationary source which:</p> <p>(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</p> <p>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;</p> <p>(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</p> <p>(f) any change in ownership of the stationary source."</p>	YES	CONTINUOUS	NO CHANGE OF OWNERSHIP HAS OCCURRED.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.21	(V.D.4.) 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.1)	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS.
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.	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 2002.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.23	<p>owner or operator. (Ref.: APC-S-1, Section 3.7)</p> <p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency.</p>	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT OCCURRED IN 2002.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.24	<p>(2) the permitted facility was at the time being properly operated;</p> <p>(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</p> <p>(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.</p> <p>(c) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(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.)</p>	YES	INTERMITTENT	<p>THE MSDEQ WAS NOTIFIED OF ALL NON-COMPLIANCE EVENTS WHEN 40% CAPACITY WAS EXCEEDED. NOTIFICATION WAS MADE IN REPORTS ISSUED ON JULY 8, 2002 COVERING THE TIME PERIOD OF JAN. 02 - JUNE 02, AND ON JANUARY 17, 2003 COVERING THE TIME PERIOD OF JULY 02 - DEC. 02 (SEMI-ANNUAL REPORT).</p>

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>operating logs, or other relevant evidence that include information as follows:</p> <p>(a) an upset occurred and that the permittee can identify the cause(s) of the upset;</p> <p>(b) the source was at the time being properly operated;</p> <p>(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 Regulations or any applicable permit;</p> <p>(d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and</p> <p>(e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p> <p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>subject to the requirements above;</p> <p>(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</p> <p>(c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(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.</p> <p>(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(C) Maintenance.</p> <p>(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:</p> <p>(a) the permittee can identify the need for the maintenance;</p> <p>(b) the source was at the time being properly operated;</p>			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>(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;</p> <p>(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</p> <p>(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(Ref.: APC-S-1, Section 10)</p>			
1.25	<p>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.</p>	YES	CONTINUOUS	<p>PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 2002.</p>

July 30, 2002

CERTIFIED MAIL #7000 0520 0021 7551 8708

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



**RE: Title V Operating Permit- #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

Our ability to accurately monitor Carbon Monoxide (CO) being emitted from our wood fired boiler has been interrupted. Although the system is currently running it has failed calibration the last few days of operation. The problem was discovered around 1:00 p.m. on Thursday, July 25, 2002. At that time we attempted to calibrate the system manually, which failed. The boiler was shut down on Friday morning the 26th of July and remained down until Monday morning around 9:30a.m.. At this time the calibration failed again.

GE Energy Services has been contacted and we are currently working to solve the issue, which may require a service visit. We are reporting this as non-compliance because of a malfunction in our monitoring equipment. Please be advised that all other aspects of the system are performing properly. I left a message on your voice mail Friday the 26th of July notifying you of this problem.

Please contact me at (662) 226-4584 extension 40 if you have any questions.

Thank you for your understanding.

Sincerely,

Haley P. Bidy
Safety, Health, & Environmental Supervisor

January 17, 2002



CERTIFIED MAIL # 7099 3400 0002 5201 1052

Mr. David Lee

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

**RE: Title V Operating Permit- #0960-00012
Semi-Annual Air Report July 1, 2002- December 31, 2002
Koppers Industries Inc., Grenada, Mississippi**

Dear Mr. Lee,


Enclosed you will find the Continuous Emissions Monitoring (CEM) report for the subject period containing information concerning opacity emissions. Information provided in this report is for emission point AA-001, which is the Wellons wood-fired boiler. A second (back up) boiler at the site, emissions point AA-002, which is an oil-fired boiler, was not operated during the subject reporting period.

The attached information reflects that no reportable episodes of excess opacity emissions at AA-001 occurred between July 1st and December 31st 2002.

All other deviations have been reported in accordance with applicable conditions

If you have any questions, Please call me at (662) 226-4584 ext. 11.

Sincerely,


Thomas L. Henderson
Plant Manager

Cc. Tim Basilone, KII-Pittsburgh
Enclosures

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 07/01/02 00:00 to 09/30/02 23:59
 Generated: 01/08/2003
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
07/10/02 16:12	- 07/10/02 16:17	1: OV	43.217	/	40.000	(8.04%)	Preventive Maintenance	Blowing soot
07/24/02 21:24	- 07/24/02 21:29	1: OV	72.817	/	40.000	(82.04%)	Preventive Maintenance	Blowing soot
07/24/02 22:18	- 07/24/02 22:23	1: OV	51.367	/	40.000	(28.42%)	Preventive Maintenance	Blowing soot

Total Reported Time: 2208.0 hours

TOTAL DURATION = 0.30 hours

1: Over limit = 0.30 hours
 15: Preventive Maintenance = 0.30 hours

Enertec NTDahs®
Episode List Report
Koppers Industries
Tie Plant Road
Tie Plant, Miss. 38960
from 10/01/02 00:00 to 12/31/02 23:59
Generated: 01/08/2003
Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
12/10/02 14:12	- 12/10/02 14:17	1: OV	47.300	/	40.000	(18.25%)	Preventive Maintenance	Blowing soot

Total Reported Time: 2208.0 hours

TOTAL DURATION = 0.10 hours

1: Over limit = 0.10 hours
15: Preventive Maintenance = 0.10 hours



July 3, 2002

CERTIFIED MAIL 7000 0520 0021 7551 8760

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

Subject: Title V Operating Permit - # 0960-00012
Semi-Annual Air Report January 2002- June 2002
Koppers Industries Inc. – Grenada, Mississippi

Dear Mr. Lee,


Enclosed you will find the Continuous Emissions Monitoring (CEM) report for the subject period containing information concerning opacity emissions. Information provided in this report is for emission point AA-001, which is the Wellons wood-fired boiler. A second (backup) boiler at the site, emission point AA-002 which is an oil-fired boiler, was not operated during the subject reporting period.

The attached information reflects that the episodes of excess opacity emissions at AA-001 occurred over a two-day period from January 31 through February 1, primarily as a result of wet fuel (untreated wood) being used in the boiler. Notification of your office was provided by telephone on February 1, and written correspondence dated February 2 with explanation for the excursion.

All other deviations have been reported in accordance with applicable conditions.

If you have any questions, please call me at 662-226-4584 extension 11.

Sincerely,


Thomas L. Henderson
Plant Manager

Cc: Tim Basilone, KII – Pittsburgh
Enclosures

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 01/01/02 00:00 to 03/31/02 23:59
 Generated: 07/02/2002
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
01/05/02 04:30	- 01/05/02 04:35	1: OV	49.700	/	40.000	(24.25%)	Shutdown	No Action Needed
01/16/02 09:42	- 01/16/02 09:47	1: OV	45.333	/	40.000	(13.33%)	Preventive Maintenance	Pulling Ash
01/26/02 03:24	- 01/26/02 03:29	1: OV	43.833	/	40.000	(9.58%)	Preventive Maintenance	Blowing soot
01/31/02 13:30	- 01/31/02 13:35	1: OV	43.250	/	40.000	(8.13%)	Preventive Maintenance	Pulling Ash
01/31/02 21:30	- 01/31/02 21:35	1: OV	43.467	/	40.000	(8.67%)	Known Excess Cause	Wet fuel
01/31/02 21:54	- 01/31/02 21:59	1: OV	54.450	/	40.000	(36.13%)	Known Excess Cause	Wet fuel
01/31/02 22:12	- 01/31/02 22:17	1: OV	53.233	/	40.000	(33.08%)	Known Excess Cause	Wet fuel
01/31/02 22:18	- 01/31/02 22:23	1: OV	80.267	/	40.000	(100.67%)	Known Excess Cause	Wet fuel
01/31/02 22:24	- 01/31/02 22:29	1: OV	59.017	/	40.000	(47.54%)	Known Excess Cause	Wet fuel
01/31/02 22:30	- 01/31/02 22:35	1: OV	50.383	/	40.000	(25.96%)	Known Excess Cause	Wet fuel
01/31/02 22:36	- 01/31/02 22:41	1: OV	53.600	/	40.000	(34.00%)	Known Excess Cause	Wet fuel
01/31/02 22:48	- 01/31/02 22:53	1: OV	41.083	/	40.000	(2.71%)	Known Excess Cause	Wet fuel
01/31/02 23:00	- 01/31/02 23:05	1: OV	63.100	/	40.000	(57.75%)	Known Excess Cause	Wet fuel
01/31/02 23:06	- 01/31/02 23:11	1: OV	40.500	/	40.000	(1.25%)	Known Excess Cause	Wet fuel
01/31/02 23:12	- 01/31/02 23:17	1: OV	59.800	/	40.000	(49.50%)	Known Excess Cause	Wet fuel
01/31/02 23:18	- 01/31/02 23:23	1: OV	49.933	/	40.000	(24.83%)	Known Excess Cause	Wet fuel
01/31/02 23:24	- 01/31/02 23:29	1: OV	45.467	/	40.000	(13.67%)	Known Excess Cause	Wet fuel
01/31/02 23:30	- 01/31/02 23:35	1: OV	56.883	/	40.000	(42.21%)	Known Excess Cause	Wet fuel
01/31/02 23:36	- 01/31/02 23:41	1: OV	73.833	/	40.000	(84.58%)	Known Excess Cause	Wet fuel
01/31/02 23:42	- 01/31/02 23:47	1: OV	62.900	/	40.000	(57.25%)	Known Excess Cause	Wet fuel
01/31/02 23:48	- 01/31/02 23:53	1: OV	56.800	/	40.000	(42.00%)	Known Excess Cause	Wet fuel
01/31/02 23:54	- 01/31/02 23:59	1: OV	41.833	/	40.000	(4.58%)	Known Excess Cause	Wet fuel
02/01/02 00:00	- 02/01/02 00:05	1: OV	76.300	/	40.000	(90.75%)	Known Excess Cause	Wet Fuel
02/01/02 00:06	- 02/01/02 00:11	1: OV	77.167	/	40.000	(92.92%)	Known Excess Cause	Wet Fuel
02/01/02 00:12	- 02/01/02 00:17	1: OV	69.600	/	40.000	(74.00%)	Known Excess Cause	Wet Fuel
02/01/02 00:18	- 02/01/02 00:23	1: OV	65.783	/	40.000	(64.46%)	Known Excess Cause	Wet Fuel
02/01/02 00:36	- 02/01/02 00:41	1: OV	43.417	/	40.000	(8.54%)	Known Excess Cause	Wet Fuel
02/01/02 00:48	- 02/01/02 00:53	1: OV	54.850	/	40.000	(37.13%)	Known Excess Cause	Wet Fuel
02/01/02 01:12	- 02/01/02 01:17	1: OV	45.033	/	40.000	(12.58%)	Known Excess Cause	Wet Fuel
02/01/02 01:18	- 02/01/02 01:23	1: OV	51.300	/	40.000	(28.25%)	Known Excess Cause	Wet Fuel
02/01/02 01:24	- 02/01/02 01:29	1: OV	43.200	/	40.000	(8.00%)	Known Excess Cause	Wet Fuel
02/01/02 01:30	- 02/01/02 01:35	1: OV	78.283	/	40.000	(95.71%)	Known Excess Cause	Wet Fuel
02/01/02 01:36	- 02/01/02 01:41	1: OV	82.950	/	40.000	(107.38%)	Known Excess Cause	Wet Fuel
02/01/02 01:42	- 02/01/02 01:47	1: OV	84.583	/	40.000	(111.46%)	Known Excess Cause	Wet Fuel
02/01/02 01:48	- 02/01/02 01:53	1: OV	87.317	/	40.000	(118.29%)	Known Excess Cause	Wet Fuel
02/01/02 01:54	- 02/01/02 01:59	1: OV	41.550	/	40.000	(3.87%)	Known Excess Cause	Wet Fuel
02/01/02 02:00	- 02/01/02 02:05	1: OV	86.550	/	40.000	(116.38%)	Known Excess Cause	Wet Fuel
02/01/02 02:06	- 02/01/02 02:11	1: OV	85.283	/	40.000	(113.21%)	Known Excess Cause	Wet Fuel
02/01/02 02:12	- 02/01/02 02:17	1: OV	77.600	/	40.000	(94.00%)	Known Excess Cause	Wet Fuel
02/01/02 02:18	- 02/01/02 02:23	1: OV	75.333	/	40.000	(88.33%)	Known Excess Cause	Wet Fuel
02/01/02 02:24	- 02/01/02 02:29	1: OV	62.383	/	40.000	(55.96%)	Known Excess Cause	Wet Fuel
02/01/02 02:30	- 02/01/02 02:35	1: OV	68.850	/	40.000	(72.12%)	Known Excess Cause	Wet Fuel
02/01/02 02:36	- 02/01/02 02:41	1: OV	80.450	/	40.000	(101.13%)	Known Excess Cause	Wet Fuel
02/01/02 02:42	- 02/01/02 02:47	1: OV	80.983	/	40.000	(102.46%)	Known Excess Cause	Wet Fuel
02/01/02 02:48	- 02/01/02 02:53	1: OV	77.300	/	40.000	(93.25%)	Known Excess Cause	Wet Fuel
02/01/02 02:54	- 02/01/02 02:59	1: OV	65.783	/	40.000	(64.46%)	Known Excess Cause	Wet Fuel
02/01/02 03:00	- 02/01/02 03:05	1: OV	67.500	/	40.000	(68.75%)	Known Excess Cause	Wet Fuel
02/01/02 03:06	- 02/01/02 03:11	1: OV	71.917	/	40.000	(79.79%)	Known Excess Cause	Wet Fuel
02/01/02 03:12	- 02/01/02 03:17	1: OV	70.650	/	40.000	(76.63%)	Known Excess Cause	Wet Fuel
02/01/02 03:18	- 02/01/02 03:23	1: OV	63.133	/	40.000	(57.83%)	Known Excess Cause	Wet Fuel
02/01/02 03:24	- 02/01/02 03:29	1: OV	66.917	/	40.000	(67.29%)	Known Excess Cause	Wet Fuel
02/01/02 03:30	- 02/01/02 03:35	1: OV	48.283	/	40.000	(20.71%)	Known Excess Cause	Wet Fuel
02/01/02 03:36	- 02/01/02 03:41	1: OV	60.267	/	40.000	(50.67%)	Known Excess Cause	Wet Fuel
02/01/02 03:42	- 02/01/02 03:47	1: OV	73.550	/	40.000	(83.88%)	Known Excess Cause	Wet Fuel
02/01/02 04:00	- 02/01/02 04:05	1: OV	65.700	/	40.000	(64.25%)	Known Excess Cause	Wet Fuel
02/01/02 04:06	- 02/01/02 04:11	1: OV	72.583	/	40.000	(81.46%)	Known Excess Cause	Wet Fuel
02/01/02 04:12	- 02/01/02 04:17	1: OV	45.967	/	40.000	(14.92%)	Known Excess Cause	Wet Fuel
02/01/02 04:18	- 02/01/02 04:23	1: OV	45.383	/	40.000	(13.46%)	Known Excess Cause	Wet Fuel
02/01/02 04:24	- 02/01/02 04:29	1: OV	80.100	/	40.000	(100.25%)	Known Excess Cause	Wet Fuel
02/01/02 04:30	- 02/01/02 04:35	1: OV	69.250	/	40.000	(73.13%)	Known Excess Cause	Wet Fuel
02/01/02 04:42	- 02/01/02 04:47	1: OV	79.450	/	40.000	(98.62%)	Known Excess Cause	Wet Fuel
02/01/02 04:48	- 02/01/02 04:53	1: OV	64.183	/	40.000	(60.46%)	Known Excess Cause	Wet Fuel
02/01/02 04:54	- 02/01/02 04:59	1: OV	69.233	/	40.000	(73.08%)	Known Excess Cause	Wet Fuel
02/01/02 05:00	- 02/01/02 05:05	1: OV	84.383	/	40.000	(110.96%)	Known Excess Cause	Wet Fuel
02/01/02 05:06	- 02/01/02 05:11	1: OV	44.100	/	40.000	(10.25%)	Known Excess Cause	Wet Fuel
02/01/02 05:18	- 02/01/02 05:23	1: OV	64.733	/	40.000	(61.83%)	Known Excess Cause	Wet Fuel
02/01/02 05:24	- 02/01/02 05:29	1: OV	90.267	/	40.000	(125.67%)	Known Excess Cause	Wet Fuel
02/01/02 05:30	- 02/01/02 05:35	1: OV	83.967	/	40.000	(109.92%)	Known Excess Cause	Wet Fuel
02/01/02 05:36	- 02/01/02 05:41	1: OV	82.767	/	40.000	(106.92%)	Known Excess Cause	Wet Fuel
02/01/02 05:42	- 02/01/02 05:47	1: OV	68.100	/	40.000	(70.25%)	Known Excess Cause	Wet Fuel
02/01/02 05:48	- 02/01/02 05:53	1: OV	71.333	/	40.000	(78.33%)	Known Excess Cause	Wet Fuel

02/01/02	06:06	-	02/01/02	06:11		1	60.533	/	40.000	(51.33%)		Known Excess Cause		Wet Fuel
02/01/02	06:12	-	02/01/02	06:17		1: OV	65.717	/	40.000	(64.29%)		Known Excess Cause		Wet Fuel
02/01/02	06:18	-	02/01/02	06:23		1: OV	75.550	/	40.000	(88.88%)		Known Excess Cause		Wet Fuel
02/01/02	06:24	-	02/01/02	06:29		1: OV	76.983	/	40.000	(92.46%)		Known Excess Cause		Wet Fuel
02/01/02	06:30	-	02/01/02	06:35		1: OV	55.883	/	40.000	(39.71%)		Known Excess Cause		Wet Fuel
02/01/02	06:36	-	02/01/02	06:41		1: OV	41.250	/	40.000	(3.13%)		Known Excess Cause		Wet Fuel
02/01/02	06:42	-	02/01/02	06:47		1: OV	69.883	/	40.000	(74.71%)		Known Excess Cause		Wet Fuel
02/01/02	06:48	-	02/01/02	06:53		1: OV	59.317	/	40.000	(48.29%)		Known Excess Cause		Wet Fuel
02/01/02	06:54	-	02/01/02	06:59		1: OV	40.067	/	40.000	(0.17%)		Known Excess Cause		Wet Fuel
02/01/02	10:06	-	02/01/02	10:11		1: OV	49.500	/	40.000	(23.75%)		Preventive Maintenance		Blowing soot
02/16/02	17:00	-	02/16/02	17:05		1: OV	40.983	/	40.000	(2.46%)		Not in exceedance		Startup
02/20/02	10:00	-	02/20/02	10:05		1: OV	50.817	/	40.000	(27.04%)		Preventive Maintenance		Pulling Ash
02/21/02	08:54	-	02/21/02	08:59		1: OV	46.600	/	40.000	(16.50%)		Preventive Maintenance		Pulling Ash
03/10/02	16:30	-	03/10/02	16:35		1: OV	47.167	/	40.000	(17.92%)		Preventive Maintenance		Pulling Ash
03/10/02	16:54	-	03/10/02	16:59		1: OV	45.983	/	40.000	(14.96%)		Preventive Maintenance		Pulling Ash

Total Reported Time: 2160.0 hours

TOTAL DURATION = 8.80 hours

1: Over limit	=	8.80 hours
4: Shutdown	=	0.10 hours
9: Known Excess Cause	=	7.80 hours
15: Preventive Maintenance	=	0.80 hours
50: Not in exceedance	=	0.10 hours

Ewertec NTDahs®
 Episode List Report
 oppers Industries
 The Plant Road
 The Plant, Miss. 38960
 from 04/01/02 00:00 to 06/30/02 23:59
 Generated: 07/02/2002
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
04/06/02 12:42	- 04/06/02 12:47	1: OV	45.850	/	40.000	(14.63%)	Preventive Maintenance	Pulling Ash
05/03/02 13:36	- 05/03/02 13:41	1: OV	40.767	/	40.000	(1.92%)	Preventive Maintenance	Pulling Ash

Total Reported Time: 2184.0 hours

TOTAL DURATION = 0.20 hours

1: Over limit = 0.20 hours
 15: Preventive Maintenance = 0.20 hours

**KOPPERS
INDUSTRIES**

Date: AUGUST 001

442011 80-160
433

Pay To The Order of: MISSISSIPPI ST DEPT ENVIRONMEN

Amount
\$2,154.60

TWO THOUSAND ONE HUNDRED FIFTY FOUR AND 60/100 ONLY

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

Mellon Bank, N.A., Pittsburgh, PA 15259

DE
McKerning
KOPPERS INDUSTRIES, INC.
V.P. AND C.F.O. TREASURER

⑈442011⑈ ⑆043301601⑆ 069⑈1665⑈

442011

KOPPERS INDUSTRIES, INC. PITTSBURGH PA

SP	CD	VENDOR	DIV	OUR	AUDIT	YOUR	INVOICE	NBR	MO/DA	INV	INV	DISC	NET AMT
										AMOUNT			PAYABLE
*****		940505031	477	02401080867	3039				0701	2154.60	0.00	***	2154.60

0960-00012



Enertec Midsize
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 01/01/01 00:00 to 03/31/01 23:59
 Generated: 07/16/2001
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	Limit	(%dev)	Reason	Action
01/02/01 08:18	- 01/02/01 08:23	1: OV	51.800	/ 40.000	(29.50%)	Startup	Startup for week
01/02/01 08:24	- 01/02/01 08:29	1: OV	45.600	/ 40.000	(14.00%)	Startup	Startup for week
01/03/01 23:54	- 01/03/01 23:59	1: OV	42.067	/ 40.000	(5.17%)	Changing Fuels	Untreated to treat
01/04/01 00:48	- 01/04/01 00:53	1: OV	45.717	/ 40.000	(14.29%)	Known Excess Cause	operator error, op
01/04/01 01:36	- 01/04/01 01:41	1: OV	44.017	/ 40.000	(10.04%)	Known Excess Cause	operator error, op
01/04/01 01:42	- 01/04/01 01:47	1: OV	47.650	/ 40.000	(19.13%)	Known Excess Cause	operator error, op
01/04/01 01:54	- 01/04/01 01:59	1: OV	40.633	/ 40.000	(1.58%)	Known Excess Cause	operator error, op
01/04/01 02:00	- 01/04/01 02:05	1: OV	44.033	/ 40.000	(10.08%)	Known Excess Cause	operator error, op
01/04/01 02:06	- 01/04/01 02:11	1: OV	49.117	/ 40.000	(22.79%)	Known Excess Cause	operator error, op
01/04/01 02:12	- 01/04/01 02:17	1: OV	47.800	/ 40.000	(19.50%)	Known Excess Cause	operator error, op
01/04/01 02:18	- 01/04/01 02:23	1: OV	43.933	/ 40.000	(9.83%)	Known Excess Cause	operator error, op
01/04/01 07:00	- 01/04/01 07:05	1: OV	41.017	/ 40.000	(2.54%)	Preventive Maintenance	Blowing soot
01/05/01 05:12	- 01/05/01 05:17	1: OV	45.700	/ 40.000	(14.25%)	Changing Fuels	Untreated to treat
01/14/01 01:18	- 01/14/01 01:23	1: OV	50.983	/ 40.000	(27.46%)	Known Excess Cause	wet fuel
01/14/01 01:30	- 01/14/01 01:35	1: OV	45.867	/ 40.000	(14.67%)	Known Excess Cause	wet fuel
01/14/01 02:12	- 01/14/01 02:17	1: OV	43.817	/ 40.000	(9.54%)	Changing Fuels	treated to untreated
01/14/01 02:24	- 01/14/01 02:29	1: OV	42.433	/ 40.000	(6.08%)	Preventive Maintenance	blowing soot
01/16/01 23:48	- 01/16/01 23:53	1: OV	40.583	/ 40.000	(1.46%)	Known Excess Cause	overfeed
01/17/01 02:06	- 01/17/01 02:11	1: OV	44.283	/ 40.000	(10.71%)	Preventive Maintenance	pulling ash
01/17/01 14:54	- 01/17/01 14:59	1: OV	47.733	/ 40.000	(19.33%)	Startup	wet fuel
01/17/01 15:42	- 01/17/01 15:47	1: OV	53.550	/ 40.000	(33.88%)	Startup	wet fuel
01/17/01 16:00	- 01/17/01 16:05	1: OV	52.117	/ 40.000	(30.29%)	Startup	wet fuel
01/17/01 16:06	- 01/17/01 16:11	1: OV	60.983	/ 40.000	(52.46%)	Startup	wet fuel
01/29/01 05:24	- 01/29/01 05:29	1: OV	43.450	/ 40.000	(8.63%)	Changing Fuels	untreated to treat
02/16/01 11:48	- 02/16/01 11:53	1: OV	40.800	/ 40.000	(2.00%)	Changing Operating Level	Other Mechanical C
02/16/01 15:30	- 02/16/01 15:35	1: OV	41.333	/ 40.000	(3.33%)	Preventive Maintenance	No Action Needed
02/21/01 18:42	- 02/21/01 18:47	1: OV	48.033	/ 40.000	(20.08%)	Startup	No Action Needed
03/12/01 13:12	- 03/12/01 13:17	1: OV	69.017	/ 40.000	(72.54%)	Control Equip. Malfunction	Repaired Control E
03/12/01 13:18	- 03/12/01 13:23	1: OV	51.333	/ 40.000	(28.33%)	Control Equip. Malfunction	Repaired Control E
03/13/01 17:24	- 03/13/01 17:29	1: OV	42.350	/ 40.000	(5.87%)	Known Excess Cause	Wet Fuel

Total Reported Time: 4344.0 hours

TOTAL DURATION = 3.00 hours

1: Over limit	=	3.00 hours
1: Changing Fuels	=	0.40 hours
2: Control Equip. Malfunction	=	0.20 hours
3: Startup	=	0.70 hours
5: Changing Operating Level	=	0.10 hours
9: Known Excess Cause	=	1.20 hours
15: Preventive Maintenance	=	0.40 hours

Enertec NTDans®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 04/01/01 00:00 to 06/30/01 23:59
 Generated: 07/17/2001
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	Limit	(%dev)	Reason	Action
04/02/01 08:18	04/02/01 08:23	1: OV	43.050	40.000	(7.62%)	Startup	No Action Needed -
04/11/01 18:42	04/11/01 18:47	1: OV	46.750	40.000	(16.88%)	Preventive Maintenance	Blowing soot
04/17/01 14:42	04/17/01 14:47	1: OV	48.083	40.000	(20.21%)	Known Excess Cause	Overfeed of fuel
04/18/01 11:42	04/18/01 11:47	1: OV	44.200	40.000	(10.50%)	Known Excess Cause	Overfeed of fuel
04/19/01 06:06	04/19/01 06:11	1: OV	60.033	40.000	(50.08%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 06:12	04/19/01 06:17	1: OV	62.433	40.000	(56.08%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 06:18	04/19/01 06:23	1: OV	62.967	40.000	(57.42%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 06:24	04/19/01 06:29	1: OV	70.767	40.000	(76.92%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 06:30	04/19/01 06:35	1: OV	62.083	40.000	(55.21%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 06:36	04/19/01 06:41	1: OV	61.350	40.000	(53.37%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 06:48	04/19/01 06:53	1: OV	61.450	40.000	(53.63%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 06:54	04/19/01 06:59	1: OV	60.483	40.000	(51.21%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:00	04/19/01 07:05	1: OV	61.350	40.000	(53.37%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:06	04/19/01 07:11	1: OV	61.150	40.000	(52.88%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:12	04/19/01 07:17	1: OV	60.767	40.000	(51.92%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:18	04/19/01 07:23	1: OV	60.733	40.000	(51.83%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:24	04/19/01 07:29	1: OV	61.383	40.000	(53.46%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:30	04/19/01 07:35	1: OV	60.700	40.000	(51.75%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:36	04/19/01 07:41	1: OV	60.733	40.000	(51.83%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:42	04/19/01 07:47	1: OV	61.300	40.000	(53.25%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:48	04/19/01 07:53	1: OV	60.817	40.000	(52.04%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 07:54	04/19/01 07:59	1: OV	61.050	40.000	(52.63%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:06	04/19/01 08:11	1: OV	60.925	40.000	(52.31%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:12	04/19/01 08:17	1: OV	60.750	40.000	(51.88%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:18	04/19/01 08:23	1: OV	60.233	40.000	(50.58%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:24	04/19/01 08:29	1: OV	61.333	40.000	(53.33%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:30	04/19/01 08:35	1: OV	62.533	40.000	(56.33%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:36	04/19/01 08:41	1: OV	61.933	40.000	(54.83%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:48	04/19/01 08:53	1: OV	62.075	40.000	(55.19%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 08:54	04/19/01 08:59	1: OV	61.800	40.000	(54.50%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:00	04/19/01 09:05	1: OV	61.400	40.000	(53.50%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:06	04/19/01 09:11	1: OV	62.333	40.000	(55.83%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:12	04/19/01 09:17	1: OV	64.083	40.000	(60.21%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:18	04/19/01 09:23	1: OV	61.783	40.000	(54.46%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:36	04/19/01 09:41	1: OV	62.417	40.000	(56.04%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:42	04/19/01 09:47	1: OV	61.783	40.000	(54.46%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:48	04/19/01 09:53	1: OV	62.400	40.000	(56.00%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 09:54	04/19/01 09:59	1: OV	61.250	40.000	(53.13%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:00	04/19/01 10:05	1: OV	61.350	40.000	(53.37%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:06	04/19/01 10:11	1: OV	62.500	40.000	(56.25%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:12	04/19/01 10:17	1: OV	62.067	40.000	(55.17%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:18	04/19/01 10:23	1: OV	61.733	40.000	(54.33%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:24	04/19/01 10:29	1: OV	63.317	40.000	(58.29%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:30	04/19/01 10:35	1: OV	61.767	40.000	(54.42%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:36	04/19/01 10:41	1: OV	52.867	40.000	(32.17%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:42	04/19/01 10:47	1: OV	61.800	40.000	(54.50%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:48	04/19/01 10:53	1: OV	61.467	40.000	(53.67%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 10:54	04/19/01 10:59	1: OV	62.433	40.000	(56.08%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:00	04/19/01 11:05	1: OV	61.017	40.000	(52.54%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:06	04/19/01 11:11	1: OV	62.850	40.000	(57.13%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:12	04/19/01 11:17	1: OV	62.117	40.000	(55.29%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:18	04/19/01 11:23	1: OV	62.533	40.000	(56.33%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:24	04/19/01 11:29	1: OV	62.450	40.000	(56.13%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:30	04/19/01 11:35	1: OV	62.200	40.000	(55.50%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:36	04/19/01 11:41	1: OV	62.383	40.000	(55.96%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:42	04/19/01 11:47	1: OV	61.850	40.000	(54.63%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:48	04/19/01 11:53	1: OV	62.917	40.000	(57.29%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 11:54	04/19/01 11:59	1: OV	61.483	40.000	(53.71%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:00	04/19/01 12:05	1: OV	61.100	40.000	(52.75%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:06	04/19/01 12:11	1: OV	61.883	40.000	(54.71%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:12	04/19/01 12:17	1: OV	62.417	40.000	(56.04%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:18	04/19/01 12:23	1: OV	62.050	40.000	(55.13%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:24	04/19/01 12:29	1: OV	63.133	40.000	(57.83%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:36	04/19/01 12:41	1: OV	64.167	40.000	(60.42%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:42	04/19/01 12:47	1: OV	64.617	40.000	(61.54%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:48	04/19/01 12:53	1: OV	63.733	40.000	(59.33%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 12:54	04/19/01 12:59	1: OV	63.667	40.000	(59.17%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 13:00	04/19/01 13:05	1: OV	63.783	40.000	(59.46%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 13:06	04/19/01 13:11	1: OV	63.833	40.000	(59.58%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 13:12	04/19/01 13:17	1: OV	64.500	40.000	(61.25%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 13:18	04/19/01 13:23	1: OV	63.417	40.000	(58.54%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 13:24	04/19/01 13:29	1: OV	63.150	40.000	(57.88%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 13:30	04/19/01 13:35	1: OV	62.833	40.000	(57.08%)	Control Equip. Malfunctioni	Opacity Monitor Ch
04/19/01 15:30	04/19/01 15:35	1: OV	62.550	40.000	(56.38%)	Control Equip. Malfunctioni	Opacity Monitor Ch

06/14/01	22:12	-	06/14/01	22:17		1:	OV	69.267	/	40.000	(73.17%)		Startup		Problems starting
06/15/01	10:12	-	06/15/01	10:17		1:	OV	46.050	/	40.000	(15.13%)		Preventive Maintenance		Pulling Ash
06/19/01	10:24	-	06/15/01	10:29		1:	OV	40.167	/	40.000	(0.42%)		Preventive Maintenance		Pulling Ash
06/20/01	20:06	-	06/20/01	20:11		1:	OV	46.733	/	40.000	(16.83%)		Preventive Maintenance		Pulling Ash
06/21/01	17:36	-	06/21/01	17:41		1:	OV	47.400	/	40.000	(18.50%)		Preventive Maintenance		Blowing Soot
06/25/01	08:30	-	06/25/01	08:35		1:	OV	52.883	/	40.000	(32.21%)		Startup		Startup from weeke
06/27/01	08:36	-	06/27/01	08:41		1:	OV	54.533	/	40.000	(36.33%)		Preventive Maintenance		Pulling Ash
06/27/01	22:12	-	06/27/01	22:17		1:	OV	43.417	/	40.000	(8.54%)		Changing Fuels		No Action Needed
06/28/01	01:24	-	06/28/01	01:29		1:	OV	78.783	/	40.000	(96.96%)		Known Excess Cause		Fuel Feed rates no
06/28/01	01:36	-	06/28/01	01:41		1:	OV	63.100	/	40.000	(57.75%)		Known Excess Cause		Fuel Feed rates no
06/28/01	01:54	-	06/28/01	01:59		1:	OV	47.117	/	40.000	(17.79%)		Known Excess Cause		Fuel Feed rates no
06/28/01	02:06	-	06/28/01	02:11		1:	OV	51.683	/	40.000	(29.21%)		Known Excess Cause		Fuel Feed rates no
06/28/01	02:24	-	06/28/01	02:29		1:	OV	42.200	/	40.000	(5.50%)		Known Excess Cause		Fuel Feed rates no
06/28/01	02:36	-	06/28/01	02:41		1:	OV	85.183	/	40.000	(112.96%)		Known Excess Cause		Fuel Feed rates no
06/28/01	02:54	-	06/28/01	02:59		1:	OV	57.600	/	40.000	(44.00%)		Known Excess Cause		Fuel Feed rates no

Total Reported Time: 2184.0 hours

TOTAL DURATION = 90.20 hours

1: Over limit	=	90.20 hours
1: Changing Fuels	=	0.50 hours
2: Control Equip. Malfunction	=	86.90 hours
3: Startup	=	0.60 hours
9: Known Excess Cause	=	1.00 hours
15: Preventive Maintenance	=	1.20 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 07/01/00 00:00 to 09/30/00 23:59
 Generated: 01/03/2001
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	Limit	(%dev)	Reason	Action
07/05/00 07:42	- 07/05/00 07:47	1: OV	46.750	/ 40.000	(16.88%)	Startup	Holiday startup
07/06/00 09:54	- 07/06/00 09:59	1: OV	44.283	/ 40.000	(10.71%)	Control Equip. Malfunction	Burnt wire on F.D.
07/08/00 06:42	- 07/08/00 06:47	1: OV	40.767	/ 40.000	(1.92%)	Process Down	Repairing boiler
07/09/00 10:42	- 07/09/00 10:53	1: OV	57.683	/ 40.000	(44.21%)	Process Down	Repairing boiler
07/09/00 13:00	- 07/09/00 13:05	1: OV	42.750	/ 40.000	(6.88%)	Process Down	Repairing boiler
07/09/00 14:30	- 07/09/00 14:35	1: OV	40.700	/ 40.000	(1.75%)	Process Down	Repairing boiler
07/10/00 05:12	- 07/10/00 07:29	1: OV	60.250	/ 40.000	(50.63%)	Process Down	Repairing boiler
07/27/00 15:00	- 07/27/00 15:05	1: OV	43.467	/ 40.000	(8.67%)	Control Equip. Malfunction	Burnt belts on F.D
07/27/00 15:12	- 07/27/00 15:17	1: OV	48.150	/ 40.000	(20.38%)	Control Equip. Malfunction	Burnt belts on F.D
07/27/00 15:24	- 07/27/00 15:29	1: OV	44.033	/ 40.000	(10.08%)	Control Equip. Malfunction	Burnt belts on F.D
07/29/00 11:48	- 07/29/00 11:53	1: OV	49.500	/ 40.000	(23.75%)	Preventive Maintenance	Pulling ash
07/31/00 06:48	- 07/31/00 06:53	1: OV	47.017	/ 40.000	(17.54%)	Startup	Startup after clea
07/31/00 20:24	- 07/31/00 20:29	1: OV	47.617	/ 40.000	(19.04%)	Preventive Maintenance	Pulling ash
08/01/00 02:36	- 08/01/00 02:41	1: OV	42.450	/ 40.000	(6.13%)	Preventive Maintenance	Blowing soot
08/01/00 20:06	- 08/01/00 20:11	1: OV	50.333	/ 40.000	(25.83%)	Preventive Maintenance	Pulling ash
08/07/00 11:30	- 08/07/00 11:35	1: OV	43.775	/ 40.000	(9.44%)	Startup	Startup for week
08/12/00 06:48	- 08/12/00 06:53	1: OV	46.000	/ 40.000	(15.00%)	Preventive Maintenance	Pulling ash
08/16/00 07:18	- 08/16/00 07:23	1: OV	53.167	/ 40.000	(32.92%)	Startup	Boiler Down
08/19/00 04:54	- 08/19/00 04:59	1: OV	53.350	/ 40.000	(33.37%)	Preventive Maintenance	Pulling ash
08/21/00 07:12	- 08/21/00 07:17	1: OV	40.233	/ 40.000	(0.58%)	Startup	Startup for week
08/29/00 02:42	- 08/29/00 02:47	1: OV	46.383	/ 40.000	(15.96%)	Preventive Maintenance	Blowing soot
09/18/00 12:30	- 09/18/00 12:35	1: OV	44.583	/ 40.000	(11.46%)	Startup	Startup for week
09/25/00 11:12	- 09/25/00 11:17	1: OV	54.125	/ 40.000	(35.31%)	Startup	Startup for week

Total Reported Time: 2208.0 hours

TOTAL DURATION = 4.60 hours

1: Over limit	= 4.60 hours
2: Control Equip. Malfunction	= 0.40 hours
3: Startup	= 0.70 hours
13: Process Down	= 2.80 hours
15: Preventive Maintenance	= 0.70 hours

Enertec NTDans®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 10/01/00 00:00 to 12/31/00 23:59
 Generated: 01/03/2001
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit	(%dev)	Reason	Action
10/05/00 23:06	- 10/05/00 23:11	1: OV	40.067	/ 40.000	(0.17%)	Changing Fuels	untreated to treat
10/13/00 12:36	- 10/13/00 12:41	1: OV	43.367	/ 40.000	(8.42%)	Preventive Maintenance	Blowing soot
10/17/00 12:42	- 10/17/00 12:47	1: OV	44.050	/ 40.000	(10.13%)	Preventive Maintenance	Blowing soot
10/28/00 05:36	- 10/28/00 05:41	1: OV	43.617	/ 40.000	(9.04%)	Changing Fuels	Untreated to treat
11/02/00 20:18	- 11/02/00 20:23	1: OV	48.467	/ 40.000	(21.17%)	Preventive Maintenance	Blowing soot
11/08/00 16:36	- 11/08/00 16:41	1: OV	52.900	/ 40.000	(32.25%)	Preventive Maintenance	Cleaning cells
11/09/00 11:36	- 11/09/00 11:41	1: OV	49.383	/ 40.000	(23.46%)	Changing Fuels	Untreated to treat
11/10/00 01:12	- 11/10/00 01:17	1: OV	41.550	/ 40.000	(3.87%)	Changing Fuels	Untreated to treat
11/10/00 14:00	- 11/10/00 14:05	1: OV	40.450	/ 40.000	(1.13%)	Preventive Maintenance	Blowing soot
11/15/00 07:06	- 11/15/00 07:11	1: OV	40.283	/ 40.000	(0.71%)	Startup	Restart boiler-sil
11/15/00 10:18	- 11/15/00 10:23	1: OV	41.900	/ 40.000	(4.75%)	Preventive Maintenance	Pulling ash
11/15/00 20:00	- 11/15/00 20:05	1: OV	43.733	/ 40.000	(9.33%)	Changing Fuels	Untreated to Treat
11/16/00 02:30	- 11/16/00 02:35	1: OV	40.817	/ 40.000	(2.04%)	Preventive Maintenance	Blowing soot
11/16/00 02:42	- 11/16/00 02:47	1: OV	53.417	/ 40.000	(33.54%)	Preventive Maintenance	Blowing soot
11/17/00 08:36	- 11/17/00 08:41	1: OV	41.400	/ 40.000	(3.50%)	Changing Fuels	Untreated to Treat
11/18/00 18:12	- 11/18/00 18:17	1: OV	42.633	/ 40.000	(6.58%)	Startup	Restart boiler
11/18/00 22:54	- 11/18/00 22:59	1: OV	44.625	/ 40.000	(11.56%)	Startup	Restart boiler
11/19/00 03:36	- 11/19/00 03:41	1: OV	63.833	/ 40.000	(59.58%)	Startup	Restart - silo pro
11/21/00 07:12	- 11/21/00 07:17	1: OV	49.725	/ 40.000	(24.31%)	Startup	Startup of boiler
11/22/00 01:48	- 11/22/00 01:59	1: OV	40.583	/ 40.000	(1.46%)	Preventive Maintenance	Cleaning cells
11/23/00 02:54	- 11/23/00 02:59	1: OV	45.333	/ 40.000	(13.33%)	Control Equip. Malfuncti	Turbine problems c
11/23/00 03:24	- 11/23/00 03:29	1: OV	58.583	/ 40.000	(46.46%)	Control Equip. Malfuncti	Turbine problems c
11/23/00 04:42	- 11/23/00 04:47	1: OV	44.717	/ 40.000	(11.79%)	Preventive Maintenance	Blowing soot
11/25/00 08:48	- 11/25/00 08:53	1: OV	43.600	/ 40.000	(9.00%)	Startup	Startup after holi
11/25/00 12:18	- 11/25/00 12:23	1: OV	40.133	/ 40.000	(0.33%)	Preventive Maintenance	Blowing soot
11/27/00 00:00	- 11/27/00 00:05	1: OV	40.383	/ 40.000	(0.96%)	Control Equip. Malfuncti	Silo problem made
11/27/00 07:42	- 11/27/00 07:47	1: OV	50.533	/ 40.000	(26.33%)	Changing Fuels	Wet fuel causing b
11/27/00 08:48	- 11/27/00 08:53	1: OV	40.217	/ 40.000	(0.54%)	Preventive Maintenance	Pulling ash
11/27/00 10:12	- 11/27/00 10:17	1: OV	57.867	/ 40.000	(44.67%)	Changing Fuels	Wet fuel causing b
11/30/00 10:12	- 11/30/00 10:23	1: OV	43.250	/ 40.000	(8.13%)	Startup	Restart boiler
12/01/00 03:18	- 12/01/00 03:29	1: OV	46.717	/ 40.000	(16.79%)	Startup	Restart boiler, Si
12/01/00 20:30	- 12/01/00 20:41	1: OV	47.633	/ 40.000	(19.08%)	Process Down	Silo problems
12/01/00 22:18	- 12/01/00 22:23	1: OV	48.250	/ 40.000	(20.63%)	Startup	Restart after prob
12/01/00 22:30	- 12/01/00 22:41	1: OV	49.800	/ 40.000	(24.50%)	Startup	Restart after prob
12/02/00 00:24	- 12/02/00 00:29	1: OV	40.917	/ 40.000	(2.29%)	Changing Fuels	Untreated to Treat
12/09/00 06:54	- 12/09/00 06:59	1: OV	40.433	/ 40.000	(1.08%)	Shutdown	Shutdown for one d
12/11/00 14:42	- 12/11/00 14:53	1: OV	45.150	/ 40.000	(12.88%)	Startup	Startup for week
12/14/00 14:30	- 12/14/00 14:35	1: OV	50.917	/ 40.000	(27.29%)	Preventive Maintenance	Blowing soot
12/15/00 17:54	- 12/15/00 17:59	1: OV	43.317	/ 40.000	(8.29%)	Changing Fuels	Untreated to treat
12/23/00 01:48	- 12/23/00 01:59	1: OV	53.950	/ 40.000	(34.88%)	Control Equip. Malfuncti	Fuel conveyor belt
12/23/00 03:00	- 12/23/00 03:05	1: OV	47.983	/ 40.000	(19.96%)	Control Equip. Malfuncti	Fuel conveyor belt
12/27/00 07:48	- 12/27/00 07:53	1: OV	45.250	/ 40.000	(13.13%)	Startup	Startup for week
12/27/00 08:06	- 12/27/00 08:11	1: OV	47.575	/ 40.000	(18.94%)	Startup	Startup for week
12/27/00 08:18	- 12/27/00 08:53	1: OV	42.650	/ 40.000	(6.63%)	Startup	Startup for week
12/27/00 23:36	- 12/27/00 23:41	1: OV	52.300	/ 40.000	(30.75%)	Changing Fuels	Untreated to treat
12/28/00 11:36	- 12/28/00 11:41	1: OV	52.417	/ 40.000	(31.04%)	Preventive Maintenance	Blowing soot
12/29/00 14:00	- 12/29/00 14:05	1: OV	44.533	/ 40.000	(11.33%)	Preventive Maintenance	Pulling ash

Total Reported Time: 2208.0 hours

TOTAL DURATION = 5.90 hours

1: Over limit	=	5.90 hours
1: Changing Fuels	=	1.10 hours
2: Control Equip. Malfunction	=	0.60 hours
3: Startup	=	2.30 hours
4: Shutdown	=	0.10 hours
13: Process Down	=	0.20 hours
15: Preventive Maintenance	=	1.60 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 07/01/01 00:00 to 09/30/01 23:59
 Generated: 01/04/2002
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	Limit	(%dev)	Reason	Action
07/04/01 15:12	- 07/04/01 15:17	1: OV	45.000	/ 40.000	(12.50%)	Known Excess Cause	Overfeed of fuel
07/13/01 09:24	- 07/13/01 09:29	1: OV	45.250	/ 40.000	(13.13%)	Preventive Maintenance	Pulling Ash
07/16/01 11:30	- 07/16/01 11:35	1: OV	47.733	/ 40.000	(19.33%)	Known Excess Cause	Overfeed of fuel
07/17/01 22:36	- 07/17/01 22:41	1: OV	46.367	/ 40.000	(15.92%)	Known Excess Cause	Change of fuel
07/21/01 01:42	- 07/21/01 01:47	1: OV	42.283	/ 40.000	(5.71%)	Preventive Maintenance	Blowing soot
07/25/01 08:06	- 07/25/01 08:11	1: OV	49.200	/ 40.000	(23.00%)	Known Excess Cause	Overfeed of fuel
07/25/01 08:18	- 07/25/01 08:23	1: OV	54.383	/ 40.000	(35.96%)	Known Excess Cause	Overfeed of fuel
07/28/01 04:12	- 07/28/01 04:17	1: OV	41.717	/ 40.000	(4.29%)	Preventive Maintenance	Blowing Soot
08/02/01 12:42	- 08/02/01 12:47	1: OV	54.583	/ 40.000	(36.46%)	Preventive Maintenance	Blowing soot
08/03/01 01:12	- 08/03/01 01:17	1: OV	42.383	/ 40.000	(5.96%)	Known Excess Cause	Overfeed of fuel
08/03/01 03:12	- 08/03/01 03:17	1: OV	63.900	/ 40.000	(59.75%)	Preventive Maintenance	Blowing soot
08/03/01 10:00	- 08/03/01 10:05	1: OV	43.000	/ 40.000	(7.50%)	Changing Fuels	Changing fuel to u
08/03/01 13:00	- 08/03/01 13:05	1: OV	41.150	/ 40.000	(2.88%)	Changing Fuels	Change of fuel
08/14/01 18:36	- 08/14/01 18:41	1: OV	49.383	/ 40.000	(23.46%)	Preventive Maintenance	Blowing soot
08/15/01 12:48	- 08/15/01 12:53	1: OV	52.300	/ 40.000	(30.75%)	Known Excess Cause	Overfeed of fuel
08/15/01 13:06	- 08/15/01 13:11	1: OV	53.400	/ 40.000	(33.50%)	Preventive Maintenance	Blowing soot
08/15/01 13:24	- 08/15/01 13:29	1: OV	44.167	/ 40.000	(10.42%)	Preventive Maintenance	Pulling Ash
08/16/01 13:54	- 08/16/01 13:59	1: OV	49.883	/ 40.000	(24.71%)	Preventive Maintenance	Blowing soot
08/17/01 13:24	- 08/17/01 13:29	1: OV	43.317	/ 40.000	(8.29%)	Preventive Maintenance	Blowing soot
08/20/01 12:24	- 08/20/01 12:29	1: OV	66.800	/ 40.000	(67.00%)	Startup	No Action Needed
08/20/01 12:30	- 08/20/01 12:35	1: OV	45.117	/ 40.000	(12.79%)	Startup	No Action Needed
08/22/01 09:00	- 08/22/01 09:05	1: OV	45.500	/ 40.000	(13.75%)	Known Excess Cause	Pulling Ash
08/23/01 13:00	- 08/23/01 13:05	1: OV	46.417	/ 40.000	(16.04%)	Preventive Maintenance	Blowing soot
08/24/01 07:00	- 08/24/01 07:05	1: OV	53.167	/ 40.000	(32.92%)	Preventive Maintenance	Pulling Ash
08/24/01 09:18	- 08/24/01 09:23	1: OV	61.833	/ 40.000	(54.58%)	Changing Fuels	Change of fuel
08/24/01 13:30	- 08/24/01 13:35	1: OV	41.283	/ 40.000	(3.21%)	Preventive Maintenance	Blowing Soot
08/25/01 02:42	- 08/25/01 02:47	1: OV	47.200	/ 40.000	(18.00%)	Known Excess Cause	Overfeed of fuel
08/25/01 02:48	- 08/25/01 02:53	1: OV	48.217	/ 40.000	(20.54%)	Known Excess Cause	Overfeed of fuel
08/28/01 18:00	- 08/28/01 18:05	1: OV	43.433	/ 40.000	(8.58%)	Known Excess Cause	Change of fuel
08/28/01 20:18	- 08/28/01 20:23	1: OV	43.300	/ 40.000	(8.25%)	Preventive Maintenance	Blowing soot
08/28/01 20:54	- 08/28/01 20:59	1: OV	40.650	/ 40.000	(1.63%)	Preventive Maintenance	Pulling Ash
08/29/01 05:42	- 08/29/01 05:47	1: OV	43.600	/ 40.000	(9.00%)	Preventive Maintenance	Blowing soot
09/18/01 18:00	- 09/18/01 18:05	1: OV	57.617	/ 40.000	(44.04%)	Preventive Maintenance	Blowing soot

Total Reported Time: 3696.0 hours

TOTAL DURATION = 3.30 hours

1: Over limit	= 3.30 hours
1: Changing Fuels	= 0.30 hours
3: Startup	= 0.20 hours
9: Known Excess Cause	= 1.10 hours
15: Preventive Maintenance	= 1.70 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 10/01/01 00:00 to 12/31/01 23:59
 Generated: 01/04/2002
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit	(%dev)	Reason	Action
10/01/01 17:12	- 10/01/01 17:17	1: OV	43.450	/ 40.000	(8.63%)	Startup	No Action Needed
10/30/01 03:24	- 10/30/01 03:29	1: OV	47.433	/ 40.000	(18.58%)	Known Excess Cause	Repaired Process E
10/30/01 03:30	- 10/30/01 03:35	1: OV	50.850	/ 40.000	(27.12%)	Known Excess Cause	Repaired Process E
10/30/01 03:36	- 10/30/01 03:41	1: OV	42.750	/ 40.000	(6.88%)	Known Excess Cause	Repaired Process E
10/30/01 03:42	- 10/30/01 03:47	1: OV	48.917	/ 40.000	(22.29%)	Known Excess Cause	Repaired Process E
10/30/01 03:48	- 10/30/01 03:53	1: OV	48.283	/ 40.000	(20.71%)	Known Excess Cause	Repaired Process E
10/30/01 03:54	- 10/30/01 03:59	1: OV	53.450	/ 40.000	(33.63%)	Known Excess Cause	Repaired Process E
10/30/01 04:00	- 10/30/01 04:05	1: OV	58.833	/ 40.000	(47.08%)	Known Excess Cause	Repaired Process E
10/30/01 04:06	- 10/30/01 04:11	1: OV	59.983	/ 40.000	(49.96%)	Known Excess Cause	Repaired Process E
10/30/01 04:12	- 10/30/01 04:17	1: OV	51.400	/ 40.000	(28.50%)	Known Excess Cause	Repaired Process E
10/30/01 04:18	- 10/30/01 04:23	1: OV	53.567	/ 40.000	(33.92%)	Known Excess Cause	Repaired Process E
10/30/01 04:24	- 10/30/01 04:29	1: OV	58.900	/ 40.000	(47.25%)	Known Excess Cause	Repaired Process E
10/30/01 04:30	- 10/30/01 04:35	1: OV	61.317	/ 40.000	(53.29%)	Known Excess Cause	Repaired Process E
10/30/01 04:36	- 10/30/01 04:41	1: OV	65.633	/ 40.000	(64.08%)	Known Excess Cause	Repaired Process E
10/30/01 04:42	- 10/30/01 04:47	1: OV	66.467	/ 40.000	(66.17%)	Known Excess Cause	Repaired Process E
10/30/01 04:48	- 10/30/01 04:53	1: OV	72.500	/ 40.000	(81.25%)	Known Excess Cause	Repaired Process E
10/30/01 04:54	- 10/30/01 04:59	1: OV	68.483	/ 40.000	(71.21%)	Known Excess Cause	Repaired Process E
10/30/01 05:00	- 10/30/01 05:05	1: OV	41.617	/ 40.000	(4.04%)	Known Excess Cause	Repaired Process E
10/30/01 05:06	- 10/30/01 05:11	1: OV	47.100	/ 40.000	(17.75%)	Known Excess Cause	Repaired Process E
10/30/01 05:12	- 10/30/01 05:17	1: OV	51.433	/ 40.000	(28.58%)	Known Excess Cause	Repaired Process E
11/17/01 05:36	- 11/17/01 05:41	1: OV	42.650	/ 40.000	(6.63%)	Preventive Maintenance	Pulling Ash
12/13/01 10:06	- 12/13/01 10:11	1: OV	47.133	/ 40.000	(17.83%)	Preventive Maintenance	Pulling Ash
12/18/01 11:06	- 12/18/01 11:11	1: OV	41.283	/ 40.000	(3.21%)	Startup	No Action Needed
12/19/01 13:06	- 12/19/01 13:11	1: OV	59.983	/ 40.000	(49.96%)	Preventive Maintenance	Pulling Ash

Total Reported Time: 2208.0 hours

TOTAL DURATION = 2.40 hours

1: Over limit	= 2.40 hours
3: Startup	= 0.20 hours
9: Known Excess Cause	= 1.90 hours
15: Preventive Maintenance	= 0.30 hours

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 RENEWAL APPLICATION WAS SENT TO MSDEQ ON SEPTEMBER 26, 2001.
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	PERMIT RENEWAL APPLICATION WAS SENT TO MSDEQ ON SEPTEMBER 26, 2001.
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	<p>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.</p> <p>(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.)</p>	YES	INTERMITTENT	MSDEQ REQUESTED EMISSION INFORMATION. KOPPERS PROVIDED EMISSIONS INFORMATION TO MSDEQ ON June 1, 2001. EMISSION FEE REQUEST WAS PAID TO MSDEQ IN AUGUST 2001. 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
	<p>(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.)</p> <p>(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.)</p> <p>(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.)</p>			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.1	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.)	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	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.6 (CON'T)	SECTION 1. GENERAL CONDITIONS			
1.7	<p>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.)</p> <p>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.</p> <p>(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 as 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.)</p>	YES	INTERMITTENT	<p>MSDEQ REQUESTED EMISSION INFORMATION ON 26 MAY 1999. KOPPERS PROVIDED EMISSIONS INFORMATION TO MSDEQ ON 30 JUNE 1999. EMISSION FEE REQUEST WAS PAID TO MSDEQ IN AUGUST 1999. ACTUAL EMISSIONS WERE USED AS THE BASIS</p>

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>(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.)</p> <p>(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.)</p> <p>(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.)</p>			

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 1999

ITEM	PERMIT CONDITION	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 2 MARCH 1999. 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,	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.

KOPPERS INDUSTRIES, INC.
 GRENADE, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 2001

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))			
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 all 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 2001.
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	YES	CONTINUOUS	NOT AVAILABLE UNDER CAA SECTION 112 (r)(7)(B)(ii).

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.16	<p>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.)</p>	YES	CONTINUOUS	THIS PERMIT EXPIRES IN 2002. RENEWAL APPLICATION NOT DUE UNTIL 1 SEPTEMBER 2001.
1.17	<p>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:</p> <p>(a) the changes are not modifications under any provision of Title I of the Act;</p> <p>(b) the changes do not exceed the emissions allowable under this permit;</p> <p>(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:</p> <p>(1) a brief description of the change(s),</p> <p>(2) the date on which the change will occur,</p> <p>(3) any change in emissions, and</p> <p>(4) any permit term or condition that is no longer applicable as a result of the change;</p> <p>(d) the permit shield shall not apply to any Section 502(b)(10)</p>	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 1999.
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	YES	CONTINUOUS	NO CHANGES AFFECTED BY THIS REQUIREMENT WERE MADE IN 1999.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	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 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; or (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 of 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	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	<p>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.1)</p> <p>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.</p> <p>(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.</p> <p>(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.</p> <p>(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)</p>	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 2001.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.23	<p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;</p> <p>(2) the permitted facility was at the time being properly operated;</p>	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT OCCURRED IN 2000.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.24	<p>(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</p> <p>(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.</p> <p>(c) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(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.)</p>	YES	INTERMITTENT	<p>THE MSDEQ WAS NOTIFIED OF ALL EVENTS EXCEEDING THE 40% OPACITY IN REPORTS ISSUED ON JULY 18, 2001 COVERING THE TIME PERIOD OF JAN. 01 – JUNE 01, AND ON JANUARY 7, 2002 COVERING THE TIME PERIOD OF JULY 01 – DEC. 01 (SEMI-ANNUAL REPORT).</p>
1.24	<p>1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.</p> <p>(a) Upsets (as defined by APC-S-1, Section 2.34)</p> <p>(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:</p> <p>(a) an upset occurred and that the permittee can identify the</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>cause(s) of the upset;</p> <p>(b) the source was at the time being properly operated;</p> <p>(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 Regulations or any applicable permit;</p> <p>(d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and</p> <p>(e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p> <p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;</p> <p>(b) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or</p> <p>(c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(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.</p> <p>(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(C) Maintenance.</p> <p>(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:</p> <p>(a) the permittee can identify the need for the maintenance;</p> <p>(b) the source was at the time being properly operated;</p> <p>(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</p>			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.25	<p>SECTION 1. GENERAL CONDITIONS</p> <p>and Regulations or any applicable permit:</p> <p>(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</p> <p>(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(Ref.: APC-S-1, Section 10)</p>	YES	CONTINUOUS	PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 2000.
	<p>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.</p>			

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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 (CONT)	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	<p>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.</p> <p>(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 as 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.)</p>	YES	INTERMITTENT	MSDEQ REQUESTED EMISSION INFORMATION. KOPPERS PROVIDED EMISSIONS INFORMATION TO MSDEQ ON June 22, 2000. EMISSION FEE REQUEST WAS PAID TO MSDEQ IN AUGUST 2000. 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
	<p>(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.)</p> <p>(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.)</p> <p>(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.)</p>			

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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 NOT ON-SITE IN 2000. THERE WERE NO REQUESTS FOR SAMPLING OR MONITORING.
1.11	1.11 Except as otherwise specified of limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment,	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	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.
1.13	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	PLANT RECORDS.
1.14	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.) 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 2000.
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	YES	CONTINUOUS	NOT AVAILABLE UNDER CAA SECTION 112 (r)(7)(B)(ii).

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS plan. (Ref.: APC-S-6, Section III.H.)	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.16	<p>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.)</p>	YES	CONTINUOUS	THIS PERMIT EXPIRES IN 2002. RENEWAL APPLICATION NOT DUE UNTIL 1 SEPTEMBER 2001.
1.17	<p>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:</p> <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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). 	YES	CONTINUOUS	NO CHANGES IN OPERATION HAVE BEEN MADE UNDER THIS CONDITION.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS change. (Ref.: APC-S-6, Section IV.F.)	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 2000.
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	YES	CONTINUOUS	NO CHANGES AFFECTED BY THIS REQUIREMENT WERE MADE IN 2000. MSDAQ WAS NOTIFIED ON MAY 19, 2000 AND JUNE 19, 2000 THAT KOPPERS INDUSTRIES WOULD PERFORM ROUTINE MAINTENANCE BETWEEN JULY 1 0 TH THROUGH JULY 24 TH . NO INCREASED EMISSIONS OCCURRED FROM THIS PROJECT.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	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 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	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.22	<p>SECTION 1. GENERAL CONDITIONS</p> <p>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)</p> <p>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 ordinance. 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.</p> <p>(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.</p> <p>(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.</p> <p>(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)</p>	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 2000.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.23	<p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;</p> <p>(2) the permitted facility was at the time being properly operated;</p>	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT OCCURRED IN 2001.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>(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</p> <p>(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.</p> <p>(c) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(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.)</p>			
1.24	<p>1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.</p> <p>(a) Upsets (as defined by APC-S-1, Section 2.34)</p> <p>(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:</p> <p>(a) an upset occurred and that the permittee can identify the</p>	YES	INTERMITTENT	THE MSDEQ WAS NOTIFIED OF ALL EVENTS EXCEEDING THE 40% OPACITY IN REPORTS ISSUED ON 19 JULY 2000 AND 10 JANUARY 2000 (SEMI-ANNUAL REPORT).

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>cause(s) of the upset;</p> <p>(b) the source was at the time being properly operated;</p> <p>(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 Regulations or any applicable permit;</p> <p>(d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and</p> <p>(e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p> <p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;</p> <p>(b) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the</p>			

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	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or</p> <p>(c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(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.</p> <p>(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(C) Maintenance.</p> <p>(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:</p> <p>(a) the permittee can identify the need for the maintenance;</p> <p>(b) the source was at the time being properly operated;</p> <p>(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</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS and Regulations or any applicable permit;	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.25	<p>(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</p> <p>(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(Ref.: APC-S-1, Section 10)</p>	YES	CONTINUOUS	PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 2001.
	<p>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.</p>			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
3.A.1	<p>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).</p> <p>(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.</p> <p>(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)</p>	YES	INTERMITTENT	<p>PLANT RECORDS. DURING STARTUP AND SOOT BLOWING, PROCEDURES USED LIMIT OPACITY.</p> <p>ANY EVENTS THAT EXCEEDED 40% OPACITY WERE REPORTED IN THE SEMI-ANNUAL REPORTS.</p>
3.A.2	<p>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 undomblined water droplets. (Ref.: APC-S-1, Section 3.2)</p>	YES	CONTINUOUS	<p>PLANT RECORDS. OPERATIONS DO NOT PRODUCE OPACITY AT THIS LEVEL.</p>

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
3.B.1	SECTION 3. EMISSION LIMITATIONS & STANDARDS 3.B.1 For Emission Points AA-001 and AA-07, 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 ON September 22, 2000 AND DEMONSTRATED COMPLIANCE.
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 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.	YES	CONTINUOUS	PLANT RECORDS. EMISSION POINT AA-002 WAS NOT OPERATED IN 2000.
3.B.4	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.	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMIT.

ITEM	PERMIT CONDITION	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.

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 NOT ON-SITE IN 2001. 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.	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 1. GENERAL CONDITIONS			
	obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))			
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 1999.
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	YES	CONTINUOUS	NOT AVAILABLE UNDER CAA SECTION 112 (r)(7)(B)(ii).

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS plan. (Ref.: APC-S-6, Section III.H.)	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 SENT TO MSDEQ ON SEPTEMBER 26, 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)	YES	CONTINUOUS	MSDEQ ACKNOWLEDGED AND APPROVED A REQUEST FOR A 502(b)(10) CHANGE OR OPERATIONAL FLEXIBILITY BY KOPPERS ON MAY 10, 2001. NOTIFICATION WAS GIVEN TO MSDEQ FULFILLING THE REQUIREMENTS OF 1.17C.(1)(2)(3)(4).

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 2001.
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	YES	CONTINUOUS	MSDEQ ACKNOWLEDGED RECEIPT OF NOTIFICATION OF FUEL-CELL REFRACTORARY REPAIR AND REPLACEMENT ON MAY 10, 2001. ALSO MSDEQ ACKNOWLEDGED RECEIPT OF NOTIFICATION OF THE USE BY KOPPERS OF A RENTED PACKAGE Cleaver-Brooks Model 200-200 diesel fired boiler DURING THE REPAIR WORK TIME FRAME. NO INCREASED EMISSIONS OCCURRED FROM THIS PROJECT SINCE EMISSION SOURCE AA-001, THE WELLONS WOOD-FIRED BOILER WAS NOT OPERATIONAL.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 1. GENERAL CONDITIONS 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 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	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	<p>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.1)</p> <p>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.</p> <p>(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.</p> <p>(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.</p> <p>(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)</p>	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 1999.
1.23	<p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>emergencies.</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;</p> <p>(2) the permitted facility was at the time being properly operated;</p> <p>(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that</p>	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT OCCURRED IN 1999.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.24	<p>SECTION 1. GENERAL CONDITIONS</p> <p>exceeded the emission standards, or other requirements in the permit; and</p> <p>(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.</p> <p>(c) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(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.)</p> <p>1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.</p> <p>(a) Upsets (as defined by APC-S-1, Section 2.34)</p> <p>(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:</p> <p>(a) an upset occurred and that the permittee can identify the cause(s) of the upset;</p> <p>(b) the source was at the time being properly operated;</p>	YES	INTERMITTENT	<p>THE MSDEQ WAS NOTIFIED OF ALL EVENTS EXCEEDING THE 40% OPACITY IN REPORTS ISSUED ON 13 JULY 1999 AND 26 JANUARY 2000 (SEMI-ANNUAL REPORT). MSDEQ WAS ADVISED OF NEW COMPUTER EMISSIONS MONITOR INSTALLED IN SEPTEMBER 1999.</p>

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>(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 Regulations or any applicable permit;</p> <p>(d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and</p> <p>(e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p> <p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;</p> <p>(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</p>			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>(c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(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.</p> <p>(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(C) Maintenance.</p> <p>(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:</p> <p>(a) the permittee can identify the need for the maintenance;</p> <p>(b) the source was at the time being properly operated;</p> <p>(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;</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.25	<p>(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</p> <p>(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(Ref.: APC-S-1, Section 10)</p>	YES	CONTINUOUS	PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 1999.
	<p>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.</p>			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
3.A.1	<p>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).</p> <p>(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.</p> <p>(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)</p>	YES	INTERMITTENT	<p>PLANT RECORDS. DURING STARTUP AND SOOT BLOWING, PROCEDURES USED LIMIT OPACITY.</p> <p>ANY EVENTS THAT EXCEEDED 40% OPACITY WERE REPORTED IN THE SEMI-ANNUAL REPORTS.</p>
3.A.2	<p>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)</p>	YES	CONTINUOUS	<p>PLANT RECORDS. OPERATIONS DO NOT PRODUCE OPACITY AT THIS LEVEL.</p>

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
3.B.1	SECTION 3. EMISSION LIMITATIONS & STANDARDS 3.B.1 For Emission Points AA-001 and AA-07, 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 ON 15 DECEMBER 1998 AND DEMONSTRATED COMPLIANCE. IT WILL BE TESTED AGAIN IN 2000.
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 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.	YES	CONTINUOUS	PLANT RECORDS. EMISSION POINT AA-002 WAS NOT OPERATED IN 1999.
3.B.4	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.	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMIT.

ITEM	PERMIT CONDITION	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.

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 Tie Plant
(Street Location) (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	
SO2	109.94	0.85	
NOX	63.37	21.79	
CO	13.29	54.71	
VOC*	85.22	19.39	
TRS	0.00	0	
LEAD	0.01	0.002	
CFCs/HCFCs	0.00	0	
Other	0.00	0	
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.

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.

Signature

Date

METHODS FOR CALCULATION OF ACTUAL EMISSIONS

Acceptable methods of calculating actual emissions are as follows:

- ▶ By use of emission monitoring data or direct emissions measurements for the pollutant(s).
- ▶ By use of mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment. Where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied.
- ▶ By use of published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors).
- ▶ By use of engineering calculations (e.g., estimating volatilization using published mathematical formulas).
- ▶ By use of best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emissions.

If the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions or, 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. In the event of an appeal, the permit holder is required to pay the undisputed amount until such time as the appeal is resolved.

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	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.6 (CONT)	SECTION 1. GENERAL CONDITIONS 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	<p>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.</p> <p>(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.)</p>	YES	INTERMITTENT	MSDEQ REQUESTED EMISSION INFORMATION ON MAY 29, 1998. KOPPERS PROVIDED EMISSIONS INFORMATION TO MSDEQ ON JULY 2, 1998. EMISSION FEE REQUEST WAS PAID TO MSDEQ ON AUGUST 14, 1998. ACTUAL EMISSIONS WERE USED AS THE BASIS

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p align="center">SECTION 1. GENERAL CONDITIONS</p> <p>(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.)</p> <p>(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.)</p> <p>(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.)</p>			

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 1998

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 JANUARY 18, 1998. 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.	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
	obtained after May 8, 1970 and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))			
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 1998.
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(f) of the Act to register such a	NOT DETERMINED		DEADLINE FOR APPLICABILITY HAS NOT PASSED. DETERMINATION OF APPLICABILITY HAS NOT YET BEEN

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS plan. (Ref.: APC-S-6, Section III.H.)	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)	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 1998.
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	YES	CONTINUOUS	NO CHANGES AFFECTED BY THIS REQUIREMENT WERE MADE IN 1998.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p align="center">SECTION 1. GENERAL CONDITIONS</p> <p>curtailment plan pursuant to the Federal Power Act;</p> <p>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</p> <p>(d) use of an alternative fuel or raw material by a stationary source which:</p> <p>(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</p> <p>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; or</p> <p>(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</p> <p>(f) any change in ownership of the stationary source."</p>			
1.20	1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section I.V.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	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS.

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 1998

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.22	<p>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.1)</p> <p>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.</p> <p>(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.</p> <p>(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.</p> <p>(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)</p>	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 1998.
1.23	<p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to</p>	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>emergencies.</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;</p> <p>(2) the permitted facility was at the time being properly operated;</p> <p>(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that</p>			OCCURRED IN 1998.

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.24	<p>exceeded the emission standards, or other requirements in the permit; and</p> <p>(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.</p> <p>(c) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(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.)</p> <p>1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.</p> <p>(a) Upsets (as defined by APC-S-1, Section 2.34)</p> <p>(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:</p> <p>(a) an upset occurred and that the permittee can identify the cause(s) of the upset;</p> <p>(b) the source was at the time being properly operated;</p>	YES	INTERMITTENT	<p>THE DEPARTMENT WAS NOTIFIED ON 7/29/98 OF PROBLEMS WITH THE OPACITY MONITOR, TEMPERATURE PROBES, AND TEMPERATURE DEVIATIONS.</p>

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>(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 Regulations or any applicable permit;</p> <p>(d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and</p> <p>(e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p> <p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;</p> <p>(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</p>			

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	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>(c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(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.</p> <p>(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(C) Maintenance.</p> <p>(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:</p> <p>(a) the permittee can identify the need for the maintenance;</p> <p>(b) the source was at the time being properly operated;</p> <p>(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;</p>			

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.25	<p>(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</p> <p>(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(Ref.: APC-S-1, Section 10)</p>	YES	CONTINUOUS	PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 1998.
1.25	<p>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.</p>			

ITEM	PERMIT CONDITION	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).	YES	INTERMITTENT	PLANT RECORDS, DURING STARTUP AND SOOT BLOWING, PROCEDURES USED LIMIT OPACITY. ANY EVENTS THAT EXCEEDED 40% OPACITY WAS REPORTED IN THE SEMI-ANNUAL REPORTS.
	(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	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	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.B.1	3.B.1 For Emission Points AA-001 and AA-07, 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 1998 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 maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{-0.1887}$ 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. EMISSION POINT AA-002 WAS NOT OPERATED IN 1998.
3.B.4	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.	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMIT.

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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 $E = 4.1 p^{0.67}$	YES	CONTINUOUS	PLANT RECORDS AND DATA SUBMITTED WITH APPLICATION. THESE SOURCES DO NOT PRODUCE PARTICULATE EMISSIONS IN EXCESS OF THIS LIMIT.
	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.			

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: 436 Seventh Avenue Pittsburgh 15219
(Street Location) (City) (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1999. 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 1998	Actual Annual (1999) Emission Rate (TPY)
Particulate Matter (PM)	200.13	19.37	
SO2	109.94	11.2	
NOX	63.37	27.45	
CO	13.29	70.21	
VOC*	85.22	37.64	
TRS	0.00	0	
LEAD	0.01	0.0026	
CFCs/HCFCs	0.00	0	
Other	0.00	0	
Total HAPs (Voc)	0.00	2.21	
Total HAPs (Non-Voc)	16.73	0.08	

* 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

Enertec NTDahs@
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 07/01/99 00:00 to 09/30/99 23:59
 Report Date: 01/17/2000
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit (%dev)	Reason	Action
07/12/99 06:30	- 07/12/99 06:35	1: OV	48.900	/ 40.000 (22.25%)	Startup	Startup for week
07/15/99 02:42	- 07/15/99 02:47	1: OV	46.500	/ 40.000 (16.25%)	Control Equip. Malfuncti	Sweep auger contac
07/21/99 05:24	- 07/21/99 05:29	1: OV	50.100	/ 40.000 (25.25%)	Control Equip. Malfuncti	I. D. Fan tripped
07/26/99 06:12	- 07/26/99 06:17	1: OV	72.880	/ 40.000 (82.20%)	Startup	Startup for week
07/26/99 16:06	- 07/26/99 16:29	1: OV	48.250	/ 40.000 (20.63%)	Changing Operating Level	Boiler had kicked
07/26/99 16:36	- 07/26/99 16:41	1: OV	43.517	/ 40.000 (8.79%)	Changing Operating Level	Boiler had kicked
08/02/99 06:42	- 08/02/99 06:53	1: OV	68.317	/ 40.000 (70.79%)	Startup	Startup for week
08/02/99 07:00	- 08/02/99 07:05	1: OV	44.767	/ 40.000 (11.92%)	Startup	Startup for week
08/05/99 17:18	- 08/05/99 17:23	1: OV	51.367	/ 40.000 (28.42%)	Control Equip. Malfuncti	Belts on F. D. fan
08/06/99 06:06	- 08/06/99 06:11	1: OV	43.783	/ 40.000 (9.46%)	Preventive Maintenance	Pull ash and clean
08/09/99 08:12	- 08/09/99 08:17	1: OV	50.233	/ 40.000 (25.58%)	Startup	Startup for week
08/09/99 08:24	- 08/09/99 08:35	1: OV	52.367	/ 40.000 (30.92%)	Startup	Startup for week
08/10/99 14:30	- 08/10/99 14:35	1: OV	42.133	/ 40.000 (5.33%)	Preventive Maintenance	Pull ash and clean
08/14/99 05:18	- 08/14/99 05:23	1: OV	48.250	/ 40.000 (20.63%)	Preventive Maintenance	Pull ash and clean
08/14/99 05:30	- 08/14/99 05:35	1: OV	41.283	/ 40.000 (3.21%)	Preventive Maintenance	Pull ash and clean
08/16/99 05:36	- 08/16/99 05:47	1: OV	83.560	/ 40.000 (108.90%)	Startup	Startup for week
08/20/99 05:18	- 08/20/99 05:23	1: OV	45.750	/ 40.000 (14.38%)	Shutdown	Shutdown for weeke
08/23/99 06:00	- 08/23/99 06:11	1: OV	42.617	/ 40.000 (6.54%)	Startup	Startup for week
08/24/99 07:18	- 08/24/99 07:35	1: OV	42.250	/ 40.000 (5.63%)	Process Down	Power went out at
08/30/99 06:06	- 08/30/99 06:11	1: OV	43.283	/ 40.000 (8.21%)	Startup	Startup for week
09/04/99 06:18	- 09/04/99 06:23	1: OV	41.467	/ 40.000 (3.67%)	Shutdown	Shutdown for weeke
09/09/99 10:18	- 09/09/99 10:23	1: OV	52.400	/ 40.000 (31.00%)	Preventive Maintenance	Pull ash and clean
09/22/99 08:18	- 09/22/99 09:29	1: OV	59.317	/ 40.000 (48.29%)	Communication Failure	Working on PLC
09/22/99 17:06	- 09/22/99 17:23	1: OV	55.833	/ 40.000 (39.58%)	Communication Failure	Working on CEM
09/28/99 08:06	- 09/28/99 08:11	1: OV	57.700	/ 40.000 (44.25%)	Startup	Startup after week

Total Reported Time: 2208.0 hours

TOTAL DURATION = 4.70 hours

1: Over limit	=	4.70 hours
2: Control Equip. Malfunction	=	0.30 hours
3: Startup	=	1.40 hours
4: Shutdown	=	0.20 hours
5: Changing Operating Level	=	0.50 hours
13: Process Down	=	0.30 hours
15: Preventive Maintenance	=	0.50 hours
23: Communication Failure	=	1.50 hours

Enertec NTDahs@
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 10/01/99 00:00 to 12/31/99 23:59
 Report Date: 01/04/2000
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	Limit	(%dev)	Reason	Action
10/04 06:30	- 10/04 06:35	1: OV	65.075	/ 40.000	(62.69%)	Startup	Startup after week
10/08 21:54	- 10/08 21:59	1: OV	40.383	/ 40.000	(0.96%)	Preventive Maintenance	Pull ash and clean
10/09 05:24	- 10/09 05:29	1: OV	49.317	/ 40.000	(23.29%)	Preventive Maintenance	Pull ash and clean
10/12 11:00	- 10/12 11:05	1: OV	45.800	/ 40.000	(14.50%)	Changing Fuels	Start burning trea
10/14 12:12	- 10/14 12:17	1: OV	41.633	/ 40.000	(4.08%)	Startup	To burn untreated
10/15 07:30	- 10/15 07:35	1: OV	41.933	/ 40.000	(4.83%)	Preventive Maintenance	Pull ash and clean
10/19 06:42	- 10/19 06:47	1: OV	50.417	/ 40.000	(26.04%)	Preventive Maintenance	Pull ash and clean
10/19 19:00	- 10/19 19:05	1: OV	41.417	/ 40.000	(3.54%)	Control Equip. Malfuncti	Air and Fuel contr
10/19 19:12	- 10/19 19:17	1: OV	42.833	/ 40.000	(7.08%)	Control Equip. Malfuncti	Air and Fuel contr
10/19 19:24	- 10/19 19:29	1: OV	41.683	/ 40.000	(4.21%)	Control Equip. Malfuncti	Air and Fuel contr
10/19 19:42	- 10/19 19:47	1: OV	45.983	/ 40.000	(14.96%)	Control Equip. Malfuncti	Air and Fuel contr
10/21 04:42	- 10/21 04:47	1: OV	42.933	/ 40.000	(7.33%)	Preventive Maintenance	Pull ash and clean
10/21 05:00	- 10/21 05:05	1: OV	43.850	/ 40.000	(9.62%)	Preventive Maintenance	Pull ash and clean
10/21 05:12	- 10/21 05:17	1: OV	41.100	/ 40.000	(2.75%)	Preventive Maintenance	Pull ash and clean
10/22 05:54	- 10/22 06:05	1: OV	42.683	/ 40.000	(6.71%)	Changing Fuels	Start burning trea
10/22 11:36	- 10/22 11:41	1: OV	43.700	/ 40.000	(9.25%)	Changing Fuels	Started burning un
10/22 12:36	- 10/22 12:41	1: OV	42.933	/ 40.000	(7.33%)	Preventive Maintenance	Pull ash and clean
10/22 14:24	- 10/22 14:35	1: OV	44.883	/ 40.000	(12.21%)	Changing Fuels	Start back burning
10/22 16:24	- 10/22 16:29	1: OV	41.717	/ 40.000	(4.29%)	Changing Fuels	Start back burning
11/01 06:24	- 11/01 06:41	1: OV	72.100	/ 40.000	(80.25%)	Startup	After weekend
11/03 06:00	- 11/03 06:05	1: OV	43.750	/ 40.000	(9.38%)	Preventive Maintenance	Pull ash and clean
11/03 18:54	- 11/03 18:59	1: OV	47.217	/ 40.000	(18.04%)	Control Equip. Malfuncti	Fuel feed shut off
11/04 07:48	- 11/04 07:53	1: OV	40.967	/ 40.000	(2.42%)	Changing Fuels	Start w/ treated b
11/04 12:24	- 11/04 12:29	1: OV	41.533	/ 40.000	(3.83%)	Changing Fuels	Start w/ treated b
11/04 15:30	- 11/04 15:35	1: OV	58.417	/ 40.000	(46.04%)	Changing Fuels	Start w/ treated b
11/04 17:00	- 11/04 17:05	1: OV	43.633	/ 40.000	(9.08%)	Changing Fuels	Start w/ treated b
11/06 06:06	- 11/06 06:11	1: OV	46.000	/ 40.000	(15.00%)	Preventive Maintenance	Pull ash and clean
11/08 07:24	- 11/08 07:29	1: OV	58.250	/ 40.000	(45.63%)	Startup	After weekend shut
11/15 06:54	- 11/15 07:05	1: OV	76.817	/ 40.000	(92.04%)	Startup	After weekend shut
11/18 07:12	- 11/18 07:17	1: OV	62.333	/ 40.000	(55.83%)	Preventive Maintenance	Pull ash and clean
11/19 06:48	- 11/19 06:53	1: OV	43.083	/ 40.000	(7.71%)	Preventive Maintenance	Pull ash and clean
11/22 07:00	- 11/22 07:11	1: OV	54.017	/ 40.000	(35.04%)	Startup	startup after week
11/23 18:30	- 11/23 18:35	1: OV	43.850	/ 40.000	(9.62%)	Changing Fuels	Started back burni
11/30 06:42	- 11/30 06:47	1: OV	48.167	/ 40.000	(20.42%)	Startup	Startup - Boiler i
12/02 01:00	- 12/02 01:11	1: OV	40.217	/ 40.000	(0.54%)	Preventive Maintenance	Replace belts and
12/06 11:54	- 12/06 12:05	1: OV	56.683	/ 40.000	(41.71%)	Startup	Boiler had been do
12/09 08:36	- 12/09 08:41	1: OV	43.083	/ 40.000	(7.71%)	Preventive Maintenance	Clean cells and pu
12/10 20:00	- 12/10 20:05	1: OV	59.883	/ 40.000	(49.71%)	Preventive Maintenance	Clean cells and pu
12/12 00:24	- 12/12 00:29	1: OV	42.217	/ 40.000	(5.54%)	Preventive Maintenance	Cleaning ash colle
12/13 06:42	- 12/13 06:59	1: OV	64.640	/ 40.000	(61.60%)	Startup	Startup after week
12/13 16:30	- 12/13 16:35	1: OV	48.900	/ 40.000	(22.25%)	Changing Fuels	Start back burning
12/16 03:42	- 12/16 03:47	1: OV	43.733	/ 40.000	(9.33%)	Process Down	#2 Relay kicked of
12/17 10:48	- 12/17 10:53	1: OV	51.033	/ 40.000	(27.58%)	Control Equip. Malfuncti	G.E. drive kicked
12/20 06:42	- 12/20 06:59	1: OV	47.425	/ 40.000	(18.56%)	Startup	Startup after week
12/27 06:36	- 12/27 06:53	1: OV	46.825	/ 40.000	(17.06%)	Startup	Startup after week
12/28 08:24	- 12/28 08:29	1: OV	40.367	/ 40.000	(0.92%)	Preventive Maintenance	Pull ash and clean
12/31 05:24	- 12/31 05:29	1: OV	42.867	/ 40.000	(7.17%)	Shutdown	Shutdown for weeke

Total Reported Time: 2208.0 hours

TOTAL DURATION = 6.10 hours

1: Over limit	= 6.10 hours
1: Changing Fuels	= 1.30 hours
2: Control Equip. Malfunction	= 0.60 hours
3: Startup	= 2.20 hours
4: Shutdown	= 0.10 hours
13: Process Down	= 0.10 hours
15: Preventive Maintenance	= 1.80 hours

Haley P. Bidy
Treating Supervisor
S,H,& E Coordinator

RECEIVED
NOV 7 - 2003
Dept. of Environmental Quality
Office of Pollution Control



Grenada

November 4, 2003

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 ext. 40
Fax 662 226 4588
BiddyHP@koppers.com
www.koppers.com

CERTIFIED MAIL 7002 0460 0003 7596 1048

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Title V Operating Permit - #0960-00012
Koppers Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

This letter is to serve as written notification of a deviation from permit requirements. At start up 8:30 a.m. Monday November 3, 2003 it was discovered that opacity readings from our Continuous Emission Monitoring System for boiler stack emissions were not calibrating properly. Several attempts to recalibrate the equipment manually were made, with no success.

You were notified by phone at around 3:45 pm on Monday November 3, 2003 of this occurrence.

Our service provider was notified of the problem and is currently making arrangements for a service visit to make repairs.

If you have any questions please call me at 662-226-4584, extension 40.

Yours truly,

A handwritten signature in black ink that reads "Haley P. Bidy". The signature is written in a cursive, flowing style.

Haley P. Bidy
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, Koppers Inc. – Pittsburgh
Plant File

Grenada Co.
D Lee

Haley P. Bidy
Treating Supervisor
S,H,& E Coordinator



October 29, 2003

RECEIVED
NOV 3 - 2003
Dept. of Environmental Quality
Office of Pollution Control

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 ext. 40
Fax 662 226 4588
BiddyHP@koppers.com
www.koppers.com

CERTIFIED MAIL 7002 0460 0003 7596 1024

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Title V Operating Permit - #0960-00012
Koppers Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

This letter is to serve as written notification of a deviation from permit requirements. At start up 8:30 a.m. Monday October 27, 2003 it was discovered that opacity readings from our Continuous Emission Monitoring System for boiler stack emissions were not calibrating properly. Several attempts to recalibrate the equipment manually were made, with no success.

You were notified by phone at around 2:30 pm on Monday October 27, 2003 of this occurrence.

Upon inspection of the unit on Wednesday October, 29th it was discovered that the system passed auto calibration at 8:00 a.m. Tuesday October 28th and has been functioning properly since that time.

If you have any questions please call me at 662-226-4584, extension 40.

Yours truly,

A handwritten signature in cursive script, appearing to read "Haley P. Bidy".

Haley P. Bidy
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, Koppers Inc. - Pittsburgh



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

October 20, 2003

The Daily Sentinal Star
PO Box 907
Grenada, MS 38901


Dear Sir/Madam:

Re: **Koppers Inc.**
Grenada County
Air Ref No. 0960-00012

Enclosed herewith is a legal notice to be published in your newspaper on or before October 24, 2003. Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact Maya Rao of my staff at (601) 961-5242.

Sincerely,

for 
Jerry W. Cain, P.E., DEE
Chief, Environmental Permits Division

Enclosure

cc: Ms. Linda Stanford, OPC (9701) w/enclosures

876 PER20010001



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

October 20, 2003

Postmaster
Tie Plant, Mississippi 38960

Dear Postmaster:

Re: Koppers Inc.
Grenada County
Air Ref No. 0960-00012

Please post the attached public notice in your post office on or before October 24, 2003.

If you are unable to do so or if you have any questions, please contact Kyle Hubbard at (601) 961-5713.

Sincerely,

A handwritten signature in cursive script that reads "Maya Rao".

Maya Rao
Environmental Permits Division

Enclosure



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

October 20, 2003

Mr. Thomas L. Henderson
Plant Manager
Koppers Inc
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219-1800

Dear Mr. Henderson:

Re: Koppers Inc
Grenada County
Air Ref No. 0960-00012

Enclosed is the public notice and draft of the above referenced permits. If you have not already done so, you are invited to submit written comments by no later than November 24, 2003. A decision regarding the proposed permit(s) will be made after all public comments have been duly considered.

If you have any questions, please contact Kyle Hubbard at (601) 961-5713.

Sincerely,

A handwritten signature in cursive script that reads "Maya Rao".

Maya Rao
Environmental Permits Division

Enclosures

876 PER20010001



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

October 20, 2003

Elizabeth Jones Library
PO Box 130
Grenada, MS 38901

Dear Librarian:

Re: Koppers Inc
Grenada County
Air Ref No. 0960-00012

Enclosed is a copy of the public notice for comment on the above referenced environmental permits. Please post this notice in your library.

Also, enclosed is a copy of information pertinent to the permits. This information should be kept on hand for review by the public until November 24, 2003, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

Finally, enclosed please find a duplication of this letter with a place for your signature and the date acknowledging your receipt of the package and your agreement to carry out our request. A self-addressed stamped envelope is enclosed for your convenience.

We are attempting to better keep the public informed of and involved in this Office's actions regarding permitting of new and expanding industry. Since access to the public library is so convenient for so many we hope to use these facilities as often as possible. Your cooperation in this matter is greatly appreciated.

If you have any questions, please let Kyle Hubbard know at (601) 961-5713.

Sincerely,

A handwritten signature in cursive script that reads "Maya Rao".

Maya Rao
Environmental Permits Division

Enclosure



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

FILE COPY

September 19, 2003

Mr. Thomas L. Henderson
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219-1800

Dear Mr. Thomas L. Henderson:

Re: Koppers Inc
Grenada County
Air Ref. No. 0960-00012

Enclosed please find a copy of the proposed draft permit for the above referenced facility. The enclosed draft permit contains conditions that we intend to incorporate as part of the final permit.

If you have any comments concerning the contents of the draft permit, please notify this office in writing no later than 15 days from the transmittal date listed above. If you would like to contact me to discuss any of these concerns, please call Kyle Hubbard at (601) 961-5713.

Sincerely,

Maya Rao
Environmental Permits Division

Enclosures

cc:

876 PER20010001

Timothy R. Basilone
Senior Environmental Manager



Koppers Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800
Tel 412-227-2114
Fax 412-227-2423
BasiloneTR@koppers.com
www.koppers.com

August 14, 2003

Ms. Maya Rao
Mississippi Department of Environmental
Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

**RE: Title V Operating Permit - #0960-00012
Koppers Inc. – Grenada, Mississippi
Permit Application - Information Request**

Dear Ms. Rao,

This letter is pursuant to recent telephone conversations with you and Christen Davis concerning the application for renewal of our Title V Permit, and additional information you requested. Information you requested on emissions for the wood fired boiler using an increased fuel feed rate was transmitted to Ms. Davis via facsimile on August 7, 2003. Other information concerning the multiclone for the wood fired boiler and the cyclones for the wood milling equipment is provided below.

For Source AA-001, the Wellons Wood Fired Boiler, the multiclone was installed with boiler in 1978. At that time, the multiclone was integrated as part of the design of the boiler system. It is my understanding that the boiler could not be purchased from the manufacturer without the multiclone. Functionally, the multiclone serves two purposes including particulate emission control, and to keep particulates from re-entering the boiler system.

For Source AA-004, Cyclones for Wood Milling, the permit application is based on emission factors from an early (1980) edition of AP-42. These emission factors were compiled by the USEPA and are based on hours of operation of the cyclone rather than on throughput for the sawing operations. The USEPA used information from sawmills to derive this emission factor. The EPA did not report the control efficiency of the cyclone in the test report, nor did they report the inlet loading. However, for cyclones of this type, the control efficiency typically is in the range of 50-75%

It is believed that this emission factor is conservative for use in the Grenada Permit Application because the sawing operations at typical sawmills are more aggressive than at the Grenada plant. Sawmills typically make many cuts on a log to produce things like dimensioned lumber. For each unit of wood sawed, whether cubic feet or tons, the amount of sawdust would be greater at a typical sawmill than for the type of sawing

operations at the Grenada plant. Thus, for each hour of operation of the cyclone, much more sawdust would be fed into the cyclone at the sawmill. If the sawmill emissions are 2 lb/hr, it is expected that the Grenada emissions from the cyclone would be less because significantly less sawdust is expected to be fed to the cyclone. It is unlikely that particulate emissions from the milling operation at Grenada exceed 2.4 tons per year.

I trust that this information fulfills your request. Please call me if you have any questions or would like to discuss this matter in greater detail.

Yours truly,



Timothy R. Basilone
Senior Environmental Manager

cc. T. Henderson, Koppers Grenada
H. Bidy, Koppers Grenada

Haley P. Bidy
Treating Supervisor
S,H,& E Coordinator



D. Lee
Grenada Co.

RECEIVED
AUG 11 2003
Miss. Dept. of Environmental Quality
Division of Pollution Control

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 ext. 40
Fax 662 226 4588
BiddyHP@koppers.com
www.koppers.com

Aug 8,2003

CERTIFIED MAIL 7002 0460 0003 7596 1109

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RE: **Title V Operating Permit - #0960-00012**
Koppers Inc., Grenada, Mississippi
Compliance Incident Follow-up

Dear Mr. Lee,

This letter is in follow-up to a recent incident at the Koppers Inc. facility in Grenada, Mississippi. You were advised by telephone, and a letter dated July 23, 2003 was sent notifying you of a deviation from permit requirements whereby the Opacity Monitor Device for the wood fired boiler at our facility was not functioning.

Since you were notified our service provider conducted an analysis to identify the problem. The Opacity Monitor was repaired and began operating at approximately 3:00 PM on July 30, 2003. The Opacity Monitor is currently operating properly.

If you have any questions please call me at 662-226-4584, extension 40.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley P. Bidy".

Haley P. Bidy

CC: Tim Basilone – CSG Pittsburg



Grenada Co.
D LEE



Koppers Inc.
Utility Poles and Piling
P.O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584
Fax 662 226 4588
www.koppers.com

July 24, 2003

CERTIFIED MAIL

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Title V Operating Permit - #0960-00012
Koppers Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

This letter is to serve as written notification of deviation from permit requirements. At around 9:00 AM on Wednesday July 23, 2003 it was discovered that the opacity monitor on our Continuous Emission Monitoring System located on our boiler stack was not calibrating correctly. You were notified by voicemail at around 3:15 PM on Wednesday July 23, 2003 of this occurrence.

The equipment service provider was contacted immediately to investigate and correct the problem. The cause of this problem is not understood at this time. We estimate that repair work may take several days. Once this problem is corrected you will be notified by telephone, and a follow up letter will be provided to you.

If you have any questions please call me at 662-226-4584.

Yours truly,

A handwritten signature in black ink, appearing to read "Blair Simpson".

Blair Simpson
Assistant Plant Manager

Cc. T. Basilone, KII – Pittsburgh
EPA- Region IV- Atlanta



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR



K Davis
Grenada county
Air

July 25, 2003

Mr. Thomas L. Henderson
Koppers Industries Inc
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson

Re: **Koppers Industries Inc**
Grenada County
Air Ref. No. 0960-00012

This letter is to acknowledge receipt of your application on July 7, 2003, for a minor modification to add a new 29,786 gallon creosote tank. Please note that you can proceed with this modification. We will incorporate this modification into the draft/proposed Title V renewal permit for the referenced facility. We are currently working on the renewal permit.

If you have any questions regarding the application or the permitting process, please contact Kristin Davis at (601) 961-5713.

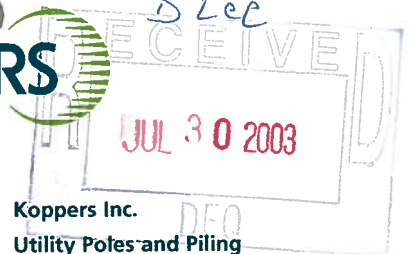
Sincerely,

Maya Rao
Environmental Permits Division

876 PER20010001

KOPPERS

Grenada Co.
D Lee



Koppers Inc.
Utility Poles and Piling

P.O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584
Fax 662 226 4588
www.koppers.com

July 18, 2003

CERTIFIED MAIL

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Title V Operating Permit - #0960-00012
Koppers Inc., Grenada, Mississippi
Notification of Compliance To Permit Requirements**

Dear Mr. Lee,

This letter is in follow-up to a recent incident at the Koppers Inc. facility in Grenada, Mississippi. You were advised by telephone, and a letter dated July 15, 2003 was sent notifying you of a deviation from permit requirements whereby the Continuous Emissions Monitoring (CEM) Data Recording Device was not functioning.

Since you were notified our service provider conducted an analysis to identify the problem, and provided replacement parts for the CEM system. The replacement parts were installed and the system began operating at approximately 3:30 PM on July 17, 2003. The CEM system is currently operating properly and information is being logged by the Data Recording Device.

If you have any questions please call me at 662-226-4584, extension 40.

Yours truly,

Haley P. Biddy
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, KII - Pittsburgh



Grenada Co.
Dlee

RECEIVED
JUL 16 2003
Dept. of Environmental Quality
Office of Pollution Control

Koppers Inc.
Utility Poles and Piling
P.O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584
Fax 662 226 4588
www.koppers.com

July 15, 2003

CERTIFIED MAIL 7000 0520 0021 7551 8913

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Title V Operating Permit - #0960-00012
Koppers Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

This letter is to serve as written notification of a deviation from permit requirements. At around 8:00 AM on Monday July 14, 2003 it was discovered that readings from our Continuous Emission Monitoring System from our boiler stack were not being recorded. You were notified by voicemail at around 10:00 AM on Monday July 14, 2003 of this occurrence.

The equipment service provider was contacted immediately to investigate and correct the problem. The preliminary assessment indicates that damage to the system may have been caused from an electrical surge, possible from a lightning strike. At this point in time it is estimated that repair work may take several days. Once corrected, you will be notified and a follow up letter will be provided to you.

If you have any questions please call me at 662-226-4584, extension 40.

Yours truly,

Haley P. Bidy
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, KII - Pittsburgh
EPA- Region IV- Atlanta



FILE COPY

STATE OF MISSISSIPPI
RONNIE MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

July 8, 2003

Mr. Thomas L. Henderson
Koppers Industries Inc
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson

Re: **Koppers Industries Inc**
Grenada County
Air Ref. No. 0960-00012 (Revised 2 Application)

This letter is to acknowledge receipt of your application on July 7, 2003. Within forty-five days after the date of receipt of the application, you will be notified either the submitted application is complete or of the major components required to complete the processing of your permit application.

If any of these actions involve construction activities, please notify us of your projected schedule for commencement of construction and completion of construction if this information is not already contained in the submitted application.

If you have any questions regarding the application or the permitting process, please contact Scott Hodges at (601) 961-5171.

Sincerely,

Teresa Dennington
Environmental Permits Division

cc:

876 PER20010001



Koppers Inc.
Utility Poles and Piling
P.O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584
Fax 662 226 4588
www.koppers.com

March 4, 2003

Title V operating Permit Program, AERF
Mississippi Department of Environmental Quality
Office of Pollution Control, Air Division
101 West Capitol Street
Jackson, MS 39201

Grenada Co.
AI 876

Dear Sir/ Madam

Concerning the mailing of the Annual Emissions Reporting Forms (AERF's) for the Koppers Inc. Tie Plant Mississippi facility (Facility # 0960-00012) these need to be mailed to the attention of:

Thomas L. Henderson
Plant Manager
Koppers Inc.
P.O. Box 160
Tie Plant MS 38960

If there are any questions please call 662-226-4584 x-11.

Sincerely,

Thomas L. Henderson
Thomas L. Henderson

Plant Manager
Koppers Inc.



AL 876

FILE COPY

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 16, 2003

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

Dear Mr. Henderson :

Re: Koppers Industries Inc
Grenada County
Air Ref. No. 0960-00012

We are in receipt of your letter regarding the name change of the referenced facility. To facilitate in executing this name change on all current permits and in our databases, please fill out the enclosed form. Once this is received and processed, you will be sent revised permits to reflect the facility's new name. If you have any questions, feel free to call me at (601) 961-5672.

Sincerely,

A handwritten signature in black ink that reads "Scott Hodges".

Scott Hodges, P.E.
Environmental Permits Division

Enclosure

Koppers Industries Inc PER20010001



Grenada Co.
D Lee

March 31, 2002

CERTIFIED MAIL 7000 0520 0021 7551 9194

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
APR 1 - 2003
Miss. Dept. of Environmental Quality
Office of Pollution Control

Koppers Inc.
Utility Poles and Piling
P.O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584
Fax 662 226 4588
www.koppers.com

**RE: Title V Operating Permit - #0960-00012
Koppers Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

As explained in a series of voice mail messages left at your phone extension on Wednesday March 26, 2003, the opacity monitor for the wood fired boiler was out of operation for approximately eight hours.

This problem was discovered at approximately 8:30 AM on March 26, 2003. Our equipment service provider was immediately notified and advised of this issue. At approximately 4:05 PM on March 26, 2003 our maintenance personnel advised me that the opacity monitor had been repaired and was in operation.

This opacity equipment malfunction is believed to have occurred as the result of lightning that struck during a storm that occurred during the morning of March 26, 2003.

Please call me at (662) 226-4584 Extension 40 if you have any questions or require additional information.

Yours truly,

Haley P. Biddy
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, KII - Pittsburgh



Koppers Inc.
Utility Poles and Piling
P.O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584
Fax 662 226 4588
www.koppers.com

Ms Linda Vaught
MSDEQ
Communications Director
P.O. Box 20305
Jackson, MS 39289

Re: Corporate Name Change

Dear Linda:

Please be advised that, effective February 24, 2003, Koppers Industries, Inc. changed its name to Koppers Inc. Effective immediately, Koppers Inc. will be using its new name on all submittals to your agency. There is no change in the structure of the company or change or transfer of ownership of the stock or assets associated with the name change.

Koppers Inc. has filed the necessary documents with the State of Pennsylvania to effect this name change and expects to receive documentation confirming the name change from the State within two to three weeks. Should you require a copy of these documents, please contact me.

Additionally, please forward to my attention any forms necessary to make changes to any permits or routine report forms and we will complete such forms and submit them as quickly as reasonably possible. Thank you for your attention to this matter.

Very truly yours,


Thomas L. Henderson
Plant Manager

Cc:
Corporate Services Group, Koppers Inc.
File

Grenada



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

February 27, 2003

Mr. Tim Basilone, Sr. Environmental Manager
Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219

Re: Facility No. 0960-00012

Dear Mr. Basilone:

On or about March 31, 2002, the annual mailing of the Annual Emissions Reporting Forms (AERFs) will occur. You are currently listed in the database as the contact to which such mail should be sent. If a correction needs to be made in this regard, please respond immediately in writing either by fax to 601.961.5742 or by letter to:

Title V Operating Permit Program, AERF
Mississippi Dept. of Environmental Quality
Office of Pollution Control, Air Division
101 West Capitol St.
Jackson, MS 39201

If any correction to the currently identified Responsible Official (RO) and/or Duly Authorized representative (DAR) is needed, please contact the Environmental Permits Division (EPD) to determine what will be needed to change or correct any of that information. The Title V fee database information for RO and DAR can be entered or updated only after the EPD confirms acceptability of the RO &/or DAR.

Correction to the contact name and/or address will be made and used for the AERF mailout if received by March 25, 2003. AERFs sent to incorrect addresses will not automatically be remailed upon receipt of late corrections unless requested by the contact, RO, or DAR.

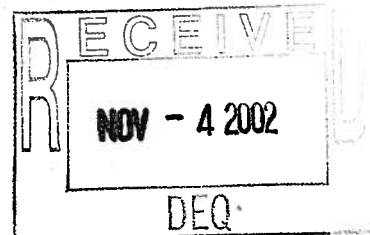
Thank you.

Very truly yours,

A handwritten signature in cursive script that reads "Wayne B. Anderson".

Wayne B. Anderson, PE
Air Facilities Branch

October 28, 2002

CERTIFIED MAIL
#7000 0520 0021 7551 9224Ms. Melissa Collier
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385**RE: Title V Operating Permit - #0960-00012
Koppers Industries Inc. - Grenada, Mississippi
Revisions to Renewal Application**

Dear Ms. Collier,

On 11 March 1997, Koppers Industries, Inc. was issued the Title V Operating Permit No. 0960-00012 for its wood treating plant (the Plant) at Tie Plant MS. An application for renewal of the Title V permit was submitted on September 26, 2001, in conformance with MDSEQ requirements. Since that time decisions were made that require several changes to be made at the facility, some of which will affect air emissions described in the Title V Renewal Application.

The attached sheets provide revised and updated information and summarize changes in plant operations that will affect air emissions. Changes that will be made to the operation are discussed below, and forms and supplemental information for replacement of information submitted in the original Title V Renewal Application are attached.

Koppers began using only untreated wood fuel in the wood fired boiler in November 2001. In the future only untreated wood fuel will be used. In the September 2001 renewal application the boiler operation was subject to an alternative operating scenario. Both a baseline operating scenario and an alternative operating scenario were presented with the September 2001 renewal application. This submission eliminates the baseline operating scenario for the boiler (Source AA-001), including the provision to use untreated and treated wood fuel. The Alternative Operating Scenario presented in the renewal application, which describes emissions at the wood fired boiler based on the use of only untreated wood fuel, now becomes the base (and only) operating scenario presented in the application. Despite this change, the plant remains a major source for purposes of the Title V Operating Permit Program.

Production schedules for creosote products at the plant indicate a need to produce more cross ties and less utility poles in the future. This submission adjusts the production amounts for cross ties and poles. The total volume of creosote treated wood used in calculating PTE figures that were presented in the renewal application (3.5 million cubic feet) remains the same with this submission, however, with this submission the number of cross ties has been changed from 2.0 million cubic feet to 2.4 million cubic feet, and the number of poles has been changed from 1.5 million cubic feet to 1.1 million cubic feet. Changes to emission estimates due to production

schedule modifications are included on the attached tables. The emission factors presented in the attached tables are conservatively based on 2001 reporting year production information.

Information from the most recent Stack Emissions Test on the wood fired boiler is included, for replacement of test information provided with the original renewal application from the test conducted in the year 2000.

The attached sections contain information that was modified as a result of the changes described above. These sections should be used to replace sections of the renewal application submitted earlier. The following table serves as a guide for making these replacements.

Attached Information	Replacement For: (Sections in the original renewal application to be removed and replaced with the attached information)
Renewal Application Narrative (cover sheet and 12 pages).	Narrative provided in former application (cover sheet and 12 pages).
Section C, Emissions Summary for the Entire Facility, including Emission Inventory Calculation – PTE Basis (6 pages)	<ol style="list-style-type: none"> 1. Section C, Emissions Summary for the Entire Facility, Normal Operating Scenario – Use of Treated and Untreated Wood Fuel, including Emission Inventory Calculation – PTE Basis (6 pages) 2. Section C, Emissions Summary for the Entire Facility, Alternative Operating Scenario – Use of Untreated Wood Fuel Only, including Emission Inventory Calculation – PTE Basis (6 pages)
Section D, Fuel Burning Equipment, Emission Point No. AA-001, Ref. No. 40 Wood Fired Boiler (2 pages)	<ol style="list-style-type: none"> 1. Section D, Fuel Burning Equipment, Emission Point No. AA-001, Ref. No. 40 - Use of Treated and Untreated Wood Fuel (2 pages) 2. Section D, Fuel Burning Equipment, Emission Point No. AA-001 Ref. No. 40 - Alternative Operating Scenario Use of Untreated Wood Fuel (2 pages)
Section E, Manufacturing Processes, Emission Point No. AA-003, Wood Preserving Process (2 pages)	Section E, Manufacturing Processes, Emission Point No. AA-003, Wood Preserving Process (2 pages)
Section E, Manufacturing Processes, Emission Point No. AA-008, Ref. No. 46, Treated Wood Storage (2 Pages)	Section E, Manufacturing Processes, Emission Point No. AA-008, Ref. No. 46, Treated Wood Storage (2 Pages)
Section M5, including Stack Emissions Test, September 23, 2002 (6 pages)	Section M5, including Stack Emissions Test, September 29, 2000 (5 pages)

If you have any questions or require additional information, please call me at (662) 226-4584 extension 11.

Sincerely,

Thomas L. Henderson
Thomas L. Henderson
Plant Manager

Enc.

cc. Steve Spengler – Environmental Permits Division MSDEQ
Tim Basilone – KII, Pittsburgh



FILE COPY

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

November 2, 2002

Mr. Thomas L. Henderson
Koppers Industries Inc
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson

Re: Koppers Industries Inc
Grenada County
Air Ref. No. 0960-00012 (Revised Application)

This letter is to acknowledge receipt of your application on October 30, 2002. Within forty-five days after the date of receipt of the application, you will be notified either the submitted application is complete or of the major components required to complete the processing of your permit application.

If any of these actions involve construction activities, please notify us of your projected schedule for commencement of construction and completion of construction if this information is not already contained in the submitted application.

If you have any questions regarding the application or the permitting process, please contact Celina Sumrall at (601) 961-5171.

Sincerely,

A handwritten signature in blue ink that reads "Teresa Dennington".

Teresa Dennington
Environmental Permits Division

cc:

876 PER20010001

September 17, 2002

CERTIFIED MAIL

Mr. Steve Spengler
MS Dept. of Environmental Quality
Air Facilities Branch
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
SEP 18 2002
MS Dept. of Environmental Quality
Air Facilities Branch

**Subject: Renewal Permit Application
 Title V Operating Permit - # 0960-00012
 Koppers Industries Inc. – Tie Plant, Mississippi**

Dear Mr. Spengler,

Pursuant to our recent telephone conversations, Koppers Industries Inc. (Koppers) will be submitting modifications to the subject application in light of recent changes in the production schedule at our plant located in Tie Plant, Mississippi. The changes in production will change the emissions estimates provided in the application that was submitted by Koppers and is currently under review by your department. We request that your review of our permit application consider the revised production levels as the basis for re-issuing our Title V Permit.

In addition to changes in production levels, in the past year Koppers made the decision to burn only untreated wood fuel in the boiler. Koppers plans to use only untreated wood fuel in the future. In the current application under review, this was presented as an "Alternative Operating Scenario". Koppers is requesting that the use of treated wood fuel in the boiler be eliminated from consideration, and that the Title V Permit that is issued reflect only the use of untreated wood fuel as described in the permit application under the "Alternative Operating Scenario".

Koppers will submit a modified permit application that accounts for the modifications described above. The modified application will be submitted by October 17, 2002.

If you have any questions, please call me at 662-226-4584, extension 11.

Sincerely,


Thomas L. Henderson
Plant Manager

Cc: Tim Basilone, KII – Pittsburgh
Enclosures

**KOPPERS
INDUSTRIES**

Grenada Co.
D. Lee

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

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

September 10, 2002

CERTIFIED MAIL #7000 0520 0021 7551 8814

RECEIVED
SEP 12 2002
Dept. of Environmental Quality
Office of Pollution Control

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

**Re: Stack test notification (10 day notice)
Title V Operating Permit # 0960-00012**

Dear Mr. Lee:

On September 23, 2002, Environmental Laboratories, Inc. will perform a stack test on Koppers wood fired boiler (emissions point AA-001). This notification is to inform any observer that may want to be present during the stack test.

If you have any questions I can be reached at (662) 226-4584, ext. 40.

Sincerely,



Haley P. Biddy
Environmental Supervisor

Cc. Tim Basilone KII-Pittsburgh



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

September 12, 2002

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

Dear Mr. Henderson:

Re: Koppers Industries Inc
Grenada County
Air Ref. No. 096000012

We acknowledge receipt on July 25, 2002 of your request for a 502(b)(10) change or operational flexibility change to your facility's Title V Operating Permit (TVOP) pursuant to Regulation, APC-S-6, Section IV.F. The approved change consists of replacement of the wood hog (grinder) from the wood fuel preparation area with an identical device. It is our understanding that there will be no change in emissions or current permit conditions as a result of this modification. A copy of the request will be attached to our file copy of the facility's TVOP, and it is recommended that you attach a copy of that request to your copy of the TVOP.

Unless comments are received from EPA Region 4 on your request, no other action will be necessary at this time to include this 502(b)(10) change in the TVOP. This change will be formally included when the TVOP is modified or renewed whichever occurs first.

If you have any questions or concerns, please contact Celina M. Sumrall of my staff at (601) 961-5746.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Spengler".

Steve Spengler
Chief, Timber and Wood Products

cc: Chief of the Operating Source Section, Air & Radiation Technology Branch
U.S. EPA Region IV, 61 Forsythe Street, Atlanta, GA 30303

876 PER20000003

August 26, 2002

CERTIFIED MAIL # 7000 0520 0021 7551 8807

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

RECEIVED
AUG 29 2002
Mississippi Department of Environmental Quality
Office of Pollution Control

**RE: Title V Operating Permit- #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Concerning Change in Operating Process**

Dear Mr. Lee,

This letter is to notify your office of a production change that affects Koppers Title V Operating Permit- #0960-00012. As of August 29, 2002 we intend to convert SPCC #3 and #8, to contain creosote. Both SPCC #'s 3 and 8 are currently in use and contain pentachlorophenol.

As noted in our permit, the yearly limit of creosote treated material may not exceed 3,000,000 cubic feet. For the year 2001 our plant only generated about 44% of this limit. It is unlikely that this change in operations will cause any portion of our Title V permit from being exceeded.

Please contact me at (662) 226-4584 ext. 40 if you have any questions.

Sincerely,



Haley P. Biddy
Safety, Health, & Environmental Supervisor



Grenada Co.
D. Lee

RECEIVED
AUG 14 2002
Miss. Dept. of Environmental Quality
Title V Operating Permits Section

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

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

August 13, 2002

CERTIFIED MAIL #7000 0520 0021 7551 8715

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

**Re: Stack test notification
And test protocol
Title V Operating Permit # 0960-00012**

Dear Mr. Lee:

On September 23, 2002, Environmental Laboratories, Inc. will perform a stack test on Koppers wood fired boiler (emissions point AA-001). Enclosed is a copy of the Test Protocol.

If you have any questions I can be reached at (662) 226-4584, ext. 40.

Sincerely,

Haley P. Bidy
Environmental Supervisor

Cc. Tim Basilone KII-Pittsburgh

ENVIRONMENTAL MONITORING LABORATORIES, INC.

P.O. Box 655 ☉ 624 Ridgewood Road
Ridgeland, Mississippi 39158

phone: 601/856-3092

fax : 601/853-2151

July 24, 2002

Mr. Haley Biddy
Koppers Industries
P.O. Box 160
Tie Plant, MS 38960

RE: Koppers Industries – Tie Plant, Mississippi
Emissions Testing Protocol

Dear Mr. Biddy:


Attached is our description of testing protocol for emissions testing to be done for the boiler at Koppers' Tie Plant facility in accordance with requirements of the Mississippi Department of Environmental Quality.

The boiler is to be tested for particulate and visible emissions. In brief, testing is to be done using Methods 1 through 5 and 9. Oxygen content will be continuously monitored during testing as described in Method 3A. Triplicate 60 minute sample runs are to be done. No deviations from standard methods are anticipated.

Attached is a more detailed test protocol, a copy of which can be submitted to the MDEQ under your cover letter. You can also establish protocol to the DEQ by referring to the report we made for testing the boiler on September 22, 2000.

Very truly yours,

ENVIRONMENTAL MONITORING LABORATORIES


Daniel G. Russell

KOPPERS INDUSTRIES – TIE PLANT, MISSISSIPPI

TEST PLAN

Environmental Monitoring Laboratories

July 24, 2002

1.0 SOURCE DESCRIPTION:

Koppers Industries uses a wood waste boiler to provide steam for process and for dry kilns. Fuel is wood waste generated from the manufacture of treated poles and pilings. The 30 MM Btu per hour Wellons boiler is equipped with a multiclone collector for flyash reduction. Heat input to the boiler during the test will be measured using an F factor and continuously monitored oxygen content. A copy of the boiler's steam rate chart record will be provided in the Appendix of the test report.

The boiler exhausts to the atmosphere by way of a 34.5 inch diameter vertical stack. Two sample ports at 90° are provided at a location that is 432 inches (12.5 diameters) below the stack exit and 356 inches (10.3 diameters) above an upstream stack tapered section

2.0 TEST METHODS:

Test Methods to be used are those described in CFR 40, part 60, Appendix A. Specifically, Methods 1 through 5 will be used for defining the volumetric flowrate and particulate emissions. Oxygen content will be measured as described in the continuous monitoring technique of Method 3A to determine heat input. Each test will consist of triplicate 60 minute samples. Visible emissions will be read in accordance with Method 9 concurrently with the particulate test.

Calibrations and quality assurance will be as described in the respective methods. Instrument calibration will be performed using Protocol 1 calibration gasses, an Environics Model 2020 gas diluter and Method 205.

3.0 TEST REPORT:

3.1 Introduction: The report introduction will contain a statement of the purpose of testing, an executive summary of test results, and, and names of test organizers and participants.

3.2 Test Results: This section will contain tables showing a technical summary of the measured stack flow parameters and emissions.

3.3 Source Description: Descriptions of the sampling locations will be provided here. Process descriptions will be brief for the purpose of identification. Detailed process descriptions and operating conditions during testing will be summarized in this section or will be referenced and included as an appendix supplied by Giles and Kendall.

3.4 Test Procedures: Sampling procedures will be named here by reference. Any deviations from standard procedures will be described in detail.

3.5 Data Reduction: Copies of input data, formulae, and calculated values will be presented here. A copy of the electronic spreadsheet used to perform these calculations will be provided.

3.6 Nomenclature:

3.7 Calibration Procedures:

3.8 Appendices: Appendices will include 1) sampling and analytical data, 2) calibration data, 3) Koppers supplied source operations data.

4.0 WORK SCHEDULE:

Testing will begin on the scheduled day and work will continue as late needed complete testing on the scheduled day.

August 19, 2002

CERTIFIED MAIL # 7000 0520 0021 7551 8722

RECEIVED
AUG 21 2002
Miss. Dept. of Environmental Quality,
Miss. Dept. of Pollution Control

Mr. Steve Spangler
Environmental Permit Division
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Permit Modification Request
Koppers Industries Inc.,
Tie Plant, Mississippi
Title V Operating Permit #0960-00012**

Dear Mr. Spangler:

Pursuant to our telephone conversation on August 7, 2002, Koppers Industries, Inc (Koppers) facility located in Tie Plant, Mississippi is requesting a modification to the above referenced permit.

We are requesting that the existing requirements to monitor stack emissions at point source AA-001 (Wood Fired Boiler) for opacity, oxygen, carbon monoxide, and temperature parameters using monitoring equipment on the stack be revised to eliminate monitoring which requires the use of stack equipment. Specifically, we request that required monitoring for oxygen, carbon monoxide, and temperature be removed from the permit, and that the permit be modified to allow monitoring for opacity to be accomplished by visual means. Stack tests that are required on a biennial basis will continue to be our means of assessing and monitoring actual emissions from our boiler.

This request is being made in light of the fact that Koppers has discontinued use of treated wood as a fuel for the wood fired boiler. Currently only un-treated wood is and will continue to be used as fuel for the boiler. This alternative operating scenario, providing for the use of only untreated wood fuel only, was provided in our application for renewal of the Title V Permit that was recently submitted.

The monitoring equipment that is currently in use requires considerable maintenance and will need to be upgraded. At this time repair of the existing system for carbon monoxide monitoring is not an option, and the only alternative is to replace the equipment.

We would appreciate your prompt attention to this matter for incorporation into our renewed Title V permit. If you have any questions, please contact me at 662-226-4584 Extension 11.

Yours truly,



Thomas L. Henderson
Plant Manager

cc: Chief of the Operating Source Section
Air & Radiation Technology Branch
U.S. EPA Region IV
61 Forsythe Street
Atlanta, GA 30303

Tim Basilone – Koppers Pittsburgh

Grenada Co.
D Lee

**KOPPERS
INDUSTRIES**

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

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

July 30, 2002

CERTIFIED MAIL #7000 0520 0021 7551 8708

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

RECEIVED
JUL 31 2002
Mississippi Department of Environmental Quality
Office of Pollution Control



RE: Title V Operating Permit- #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements

Dear Mr. Lee,

Our ability to accurately monitor Carbon Monoxide (CO) being emitted from our wood fired boiler has been interrupted. Although the system is currently running it has failed calibration the last few days of operation. The problem was discovered around 1:00 p.m. on Thursday, July 25, 2002. At that time we attempted to calibrate the system manually, which failed. The boiler was shut down on Friday morning the 26th of July and remained down until Monday morning around 9:30a.m.. At this time the calibration failed again.

GE Energy Services has been contacted and we are currently working to solve the issue, which may require a service visit. We are reporting this as non-compliance because of a malfunction in our monitoring equipment. Please be advised that all other aspects of the system are performing properly. I left a message on your voice mail Friday the 26th of July notifying you of this problem.

Please contact me at (662) 226-4584 extension 40 if you have any questions.

Thank you for your understanding.

Sincerely,

Haley P. Bidy
Safety, Health, & Environmental Supervisor

July 24, 2002

CERTIFIED MAIL # 7000 0520 0021 7551 8692

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

RECEIVED
JUL 25 2002
Mississippi Department of Environmental Quality
Office of Pollution Control

Re: Request for a 502 (b)(10) Change
Koppers Industries Inc.,
Tie Plant, Mississippi
Title V Operating Permit #0960-00012

Dear Mr. Lee:

The Koppers Industries, Inc (Koppers) facility located in Tie Plant, Mississippi made the following modification in July, 2002 pursuant to the Operational Flexibility Regulations 502(b)10 and APC-S-6, Section IV.F:

Replace, in kind, the wood hog (grinder) as part of the Wood Fuel Preparation and Handling operation at emission point AA-011 under the Title V permit referenced above.

The former equipment will be replaced with a Precision Husky Chipper with an in-feed conveyor that is located in the same area of the property. This equipment is used for processing untreated wood fuel for use in our wood fired boiler. As you were notified by past correspondence, only untreated wood has been used as fuel in the boiler since October 8, 2002. At this time, our plans are to continue using only untreated wood as fuel in the boiler. There is no change to the amount of fuel consumed by the boiler.

This change, since it is a replacement in kind, will not cause emissions that are currently allowable under the Title V permit to be exceeded. No new pollutants will be emitted as a result of this change. Koppers believes that no change is necessary in permit terms and conditions as a result of this modification.

This modification does not constitute a Title I modification and does not exceed the allowable emission rate for particulate emissions regulated under the existing Title V permit for the facility. This modification does not violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring, recordkeeping, reporting, or compliance certification requirements. Further, we understand that a permit shield will not be extended to this modification.

Based on information and belief formed after reasonable inquiry, the statements contained herein are true, accurate, and complete.

Sincerely,


Thomas L. Henderson
Plant Manager

cc: Chief of the Operating Source Section
Air & Radiation Technology Branch
U.S. EPA Region IV
61 Forsythe Street
Atlanta, GA 30303

Tim Basilone – Koppers Pittsburgh

July 10, 2002

CERTIFIED MAIL #7000 0520 0021 7551 8661

Mr. David Lee
Office of Pollution Control, MDEQ
Air Facilities Branch
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Title V Operating Permit- #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

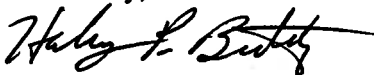
As explained in my voice mail left at your phone extension on July 10, 2002, a non-compliance episode occurred beginning on July 8, 2002 at 2:25 PM at the facility referenced above. This problem was discovered on July 9th around 11:30 a.m..

This episode occurred when our ability to accurately and continuously monitor the temperature of our wood fired boiler became limited as a result of the temperature probe on the boiler not functioning correctly. The probe was repaired and the temperature monitoring system was operating properly at around 4:30 PM on July 9, 2002.

All of the fuel being burned in the boiler throughout the period of this episode consisted of untreated wood. According to the permit we are required to continuously monitor the temperature in the boiler on a continuous basis with notations indicating when treated wood is being fired. This requirement was to assure that proper temperature was maintained while using treated wood in the boiler.

Please call me at (662) 226-4584 extension 40 if you have any questions.

Sincerely,



Haley P. Bidy
Safety, Health, & Environmental Supervisor

cc. T.R. Basilone, Koppers

RECEIVED
JUL 16 2002
Miss. Dept. of Environmental Quality
Office of Pollution Control



FILE COPY

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

June 27, 2002

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

Dear Mr. Henderson

Re: Koppers Industries Inc
Grenada County
Air Ref. No. 0960-00012

We acknowledge receipt on May 8, 2002 of your request for a 502(b)(10) change or operational flexibility change to your facility's Title V Operating Permit (TVOP) pursuant to Regulation, APC-S-6, Section IV.F. The changes include an in kind replacement of an existing oil/water separator with equipment. A copy of the request will be attached to our file copy of the facility's TVOP, and it is recommended that you attach a copy of that request to your copy of the TVOP.

Unless comments are received from EPA Region 4 on your request, no other action will be necessary at this time to include this 502(b)(10) change in the TVOP. This change will be formally included when the TVOP is modified or renewed whichever occurs first.

If you have any questions or concerns, please contact Dallas Baker of my staff at (601) 961-5670.

Sincerely,

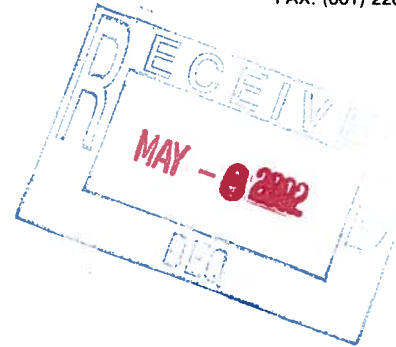
A handwritten signature in blue ink that reads "Maya Rao".

Maya Rao, P.E.
Chief, Energy and Transportation

April 24, 2002

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

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



Re: Request for a 502 (b)(10) Change
Koppers Industries Inc., Tie Plant, Mississippi
Title V Operating Permit #0960-00012

Dear Mr. Lee:

The Koppers Industries, Inc (Koppers) facility located in Tie, Plant, Mississippi plans to make the following modification in May 2002 pursuant to the Operational Flexibility Regulations 502(b)10 and APC-S-6, Section IV.F:

Replace, in kind, the existing oil/water separator with equipment that is located within secondary containment. Once the new equipment is installed, the existing separator will be taken out of service, and its use will be discontinued.

The existing oil/water separator consists of an above ground concrete structure with a capacity to hold approximately 66,000 gallons of wastewater. Emissions from this separator were included within the Title V Permit for the facility.

The new oil/water separator that will replace the existing equipment, in kind, will consist of an above ground tank with a capacity to hold approximately 40,000 gallons of wastewater. The tank will be constructed of steel, with an open top, and located within secondary containment in the wood treating area also in the vicinity of the existing separator.

This change, since it is a replacement in kind, will not cause emissions that are currently allowable under the Title V permit to be exceeded. . No new pollutants will be emitted as a result of this change.

Koppers believes that no change is necessary in permit terms and conditions as a result of this modification.

This modification does not constitute a Title I modification and does not exceed the allowable emission rate for pollutants regulated under the existing Title V permit for the facility. This modification does not violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring, recordkeeping, reporting, or compliance

certification requirements. Further, we understand that a permit shield will not be extended to this modification.

Based on information and belief formed after reasonable inquiry, the statements contained herein are true, accurate, and complete.

Sincerely,



Thomas L. Henderson

Plant Manager

cc: Chief of the Operating Source Section
Air & Radiation Technology Branch
U.S. EPA Region IV
61 Forsythe Street
Atlanta, GA 30303

Tim Basilone – Koppers Pittsburgh

May 23, 2002

CERTIFIED MAIL #7000 0520 0021 7551 8579

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

RECEIVED
MAY 24 2002
Mississippi Department of Environmental Quality,
Office of Pollution Control

**RE: Title V Operating Permit-#0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

On Wednesday May 22, 2002 it was discovered that opacity readings from our emissions monitoring system were not being collected. At the time, it was determined that this condition began around 12:05 PM on Saturday May 18, 2002.

After a thorough investigation of the system, it was determined that the problem related to a calibration malfunction in the opacity analyzer. After consultation with the system manufacturer, on Wednesday May 22, 2002 around 11:45 AM the problem was solved, and opacity readings were once again being collected by the emissions monitoring system. Opacity data was not collected from Saturday May 18, 2002 until May 22, 2002 at the respective times noted above.

Be advised that during the aforementioned period that no opacity data were collected, only untreated wood was burned in the boiler. Since converting our system several months ago to burn only untreated wood, only one excursion for opacity has occurred which was reported to your office on March 11, 2002. This being the case, it is unlikely that an opacity excursion occurred during the time in which readings were not being recorded.

A phone message was left on Thursday May 23, 2002 to notify you of this excursion. A call was also placed to Melissa Collier and we discussed the situation.

Please contact me at (662) 226-4584 extension 40 if you have any questions.

Sincerely,



Haley P. Bidy
Safety, Health, & Environmental Supervisor

cc. T. R. Basilone, Koppers - Pittsburgh

Shenada
04/16/2002
FILE COPY

April 12, 2002

Mr. Randall Collins
Vice President
Koppers Industries Inc
436 Seventh Avenue
Pittsburg, PA 15219

Dear Mr. Collins:

Subject: Clean Air Act, Section 112(j)
Equivalent Emission Limitation by Permit for Major Hazardous Air Pollutant Sources

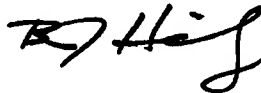
The purpose of this letter is to address the potential applicability of the above referenced requirements to your facility. The EPA will not be promulgating all of the listed source category Maximum Achievable Control Technology (MACT) standards by the statutory deadline of May 15, 2002. Because of this and the recently promulgated amendments in 40 CFR Part 63, Subpart B, major hazardous air pollutant facilities with operations in certain source categories are required to submit a copy of the enclosed Part 1 MACT application to our office and to EPA by May 15, 2002, and then a Part 2 MACT application twenty-four months after the Part 1 application submittal.

We are asking that all facilities in receipt of this letter respond with either a submittal of the Part 1 MACT application or with the notification of non-applicability. To assist you with your response, the following documents are enclosed for your convenience: instructions, a list of the affected source categories, a Part 1 MACT application, and a form for notification of non-applicability.

The submittal of a Part 1 MACT application will not affect any current or future renewal of a Title V Operating permit. Should EPA promulgate a MACT standard applicable to your facility prior to the date of submittal for the Part 2 MACT application, the requirements of that standard will be incorporated into your Title V Operating permit according to the time frame outlined in Mississippi's Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act, APC-S-6, Section IV.G. Also, the submittal of the Part 1 MACT application will not exempt any new construction or reconstruction of a major source of HAP emissions from a 112(g) case-by-case MACT determination prior to the issuance of the proposed project's construction permit.

If you are interested in more information concerning what is required under this rule, you can visit http://www.epa.gov/ttn/oarpg/t3/fr_notices/gprctd_fr.pdf for the March 6, 2002 amendments or [http://www.epa.gov/ttn/atw/112j/info/112\(j\)-table2.html](http://www.epa.gov/ttn/atw/112j/info/112(j)-table2.html) for applicability information concerning the remaining MACT standards. You may also contact me at 601-961-5783 with any other questions or concerns you may have.

Sincerely,



B.J. Hailey
Air Toxics Branch

Enclosures

cc: Mrs. Maya Rao, Chief, Energy and Transportation Branch

INSTRUCTIONS

1. Determine whether or not your facility is a major source of hazardous air pollutants (HAPs). A major source of HAPs is a stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.
2. If your facility is a major source of HAPs, please review the list of 112(j) affected MACT standards and determine if operations at your facility will be impacted by one of these standards. If you are unsure about a standard's applicability, you can visit [http://www.epa.gov/ttn/atw/112j/info/112\(j\)-table2.html](http://www.epa.gov/ttn/atw/112j/info/112(j)-table2.html) to get more information pertaining to a specific standard.
3. If your facility is **BOTH** a major source of HAP emissions and its operations fall within one of the source categories in the enclosed list of 112(j) affected MACT standards then please complete the enclosed Part 1 MACT Application and return a copy to the following addresses by **MAY 15, 2002**:

B.J. Hailey
MS Department of Environmental Quality
Office of Pollution Control
101 West Capitol St.
Jackson, MS 39201

Mr. Doug Neely
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960
4. If you do not feel you will be impacted by these regulations please sign, fold, staple and return the enclosed notification of non-applicability to our office by **MAY 15, 2002**.
5. If you are unsure as to whether or not one or more sources at a major source belong in a source category for which EPA has failed to promulgate an emission standard, you may request an applicability determination from our office by submitting an application by **MAY 15, 2002**. Such an application must contain the same information provided on the Part 1 MACT application (40 CFR Part 63.52(d)(1)).

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
PART 1 MACT APPLICATION
FOR A
112(j) MACT DETERMINATION**

Company Name: Koppers Industries Inc

Mailing Address:

Line 1 : PO Box 160
Line 2: <NO DATA FOUND>
Line 3: <NO DATA FOUND>
City: Tie Plant,
State: Mississippi
Zip: 38960

Corrections

Site Location:

Line 1 : 1 Koppers Drive
Line 2: <NO DATA FOUND>
Line 3: <NO DATA FOUND>
City: Tie Plant,
State: MS
Zip: 38960
Phone: (662) 226-4584

SIC Code(s): _____
Brief Description of the major source: _____

Relevant Source Category: _____
Type of emission points impacted by the source category: _____

List any affected sources for which a 112(g) determination has been made _____

EACH APPLICATION MUST BE SIGNED BY THE APPLICANT.

The application must be signed by a responsible official as defined in Regulation APC-S-6, Section I.A.26.
I certify that to the best of my knowledge and belief formed after reasonable inquiry, the statements and information in this application are true, complete, and accurate, and that, as a responsible official, my signature shall constitute an agreement that the applicant assumes the responsibility for any alteration, additions, or changes in operation that may be necessary to achieve and maintain compliance with all applicable Rules and Regulations.

Printed Name of Responsible Official

Title

Date Application Signed

Signature of Applicants Responsible Official

REMAINING MACT STANDARDS AFFECTED BY THE 112(J) REQUIREMENTS

Source Category Title	Subpart ID	Proposal Date
Asphalt Roofing and Processing	LLLLL	11/21/01
Auto & Light Duty Truck (Surface Coating)	IIII	
Brick & Structural Clay Products Manufacturing	JJJJJ	
Cellulose Production Manufacturing	UUUU	8/28/01
Chlorine Production	not assigned	
Clay Ceramics Manufacturing	KKKKK	
Coke Ovens: Pushing, Quenching, and Battery Stacks	CCCCC	7/03/01
Combustion Turbines	YYYY	
Engine Test Cells/Standards	PPPPP	
Flexible Polyurethane Foam Fabrication	MMMMM	8/08/01
Friction Materials Manufacturing	QQQQQ	10/4/01
Generic MACT:		
Ethylene Manufacturing	XX & YY	12/6/00
Carbon Black	YY	12/6/00
Spandex Production	YY	12/6/00
Cyanide Chemical Manufacturing	YY	12/6/00
Hydrochloric Acid Production	NNNNN	9/18/01
Industrial/Commercial/Institutional Boilers and Process Heaters	DDDDD	
Integrated Iron and Steel	FFFFF	7/13/01
Iron Foundries	EEEEE	
Large Appliances (Surface Coating)	NNNN	12/22/00
Lime Manufacturing	AAAAA	
Mercury Cell Chlor-Alkali Plants	IIIII	
Metal Can (Surface Coating)	KKKK	
Metal Coil (Surface Coating)	SSSS	7/18/00
Metal Furniture (Surface Coating)	RRRR	
Miscellaneous Metal Parts and Products (Surface Coating)	MMMM	
Miscellaneous Organic Chemical Production and Processes (23 different source categories potentially affected)	FFFF	2/20/02
Municipal Solid Waste Landfills	AAAA	11/7/00
Organic Liquids Distribution (non-gasoline)	EEEE	
Paint Stripping Operations	not assigned	
Paper and Other Web Coating	JJJ	9/13/00
Petroleum Refineries	UUU	9/11/98
Plastic Parts (Surface Coating)	PPPP	
Plywood and Composite Wood Products	DDDD	
Polyvinyl Chloride and Copolymers Production	J	12/8/00
Primary Copper	QQQ	4/20/98
Primary Magnesium Refining	not assigned	
Printing, Coating and Dyeing of Fabrics	OOOO	
Reciprocating Internal Combustion Engines	ZZZZ	
Refractory Products Manufacturing	SSSS	
Reinforced Plastic Composites Production	WWWW	8/02/01
Semiconductor Manufacturing	BBBB	
Site Remediation	GGGGG	
Taconite Iron Ore Processing	RRRRR	
Tire Manufacturing	XXXX	10/18/00
Wet-Formed Fiberglass Mat Production	HHHH	5/26/00
Wood Building Products (Surface Coating)	QQQQ	

**112(j) MACT Determination
Notification of Non-Applicability**

Company Name: Koppers Industries Inc

Mailing Address:

Line 1 : PO Box 160
Line 2: <NO DATA FOUND>
Line 3: <NO DATA FOUND>
City: Tie Plant,
State: Mississippi
Zip: 38960

Site Location:

Line 1 : 1 Koppers Drive
Line 2: <NO DATA FOUND>
Line 3: <NO DATA FOUND>
City: Tie Plant,
State: MS
Zip: 38960
Phone: (662) 226-4584

Corrections

Printed Name of Signatory

Title

Date Signed

Signature



RECEIVED
APR 10 2002
Mississippi Department of Environmental Quality
Office of Pollution Control

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

4-8-02

April 2, 2002

Mr. Thomas L. Henderson
Plant Manager
Koppers Industries Inc
PO Box 160
Tie Plant Road
Tie Plant, Mississippi 38960

Corrections/Additions
noted on page 3.

Thanks,

Blair A. Simpson

Dear Mr. Thomas L. Henderson :

Re: Koppers Industries Inc
Grenada County
Air Ref. No. 0960-00012

We recently implemented a new office-wide enterprise database which has replaced a number of legacy databases. In an effort to ensure that the information in the new database for the Office of Pollution Control is correct, we have attached a form listing the data that is currently recorded for the above referenced facility. This data consists of Responsible Official (RO), Duly Authorized Representative (DAR), Facility Contact, Facility Physical and Mailing Addresses and Facility Telephone Number. Please review this information and if any changes are required, please indicate so on the attached form.

Also, if you would like to change or add a DAR and/or Facility Contact(s) for the above referenced facility, please do so on the attached form. The definitions for a RO/DAR pursuant to APC-S-6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act, Section 1.26 are: *"Responsible Official means as follows: (a) for a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the company or corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (1) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in 1980 dollars); or (2) the delegation of authority to such representative is approved in advance by MDEQ; ..."*

I would like to apologize for any confusion that these circumstances may have created. Should you have any questions or comments, you may contact me at (601) 961-5073 or Mrs. Maya Rao at (601) 961-5171.

Sincerely,

Jeffery W. Cain, P.E., DEE
Environmental Permits Division

cc:

876 REV20020001

Koppers Industries Inc

876

MDEQ Industrial Sector Branch: Energy and Transportation Branch

Corrections

Primary SIC Code:2491

Physical Address

Line 1:1 Koppers Drive

Line 2:<NO DATA FOUND>

Line 3:<NO DATA FOUND>

Municipality:Tie Plant,

State:MS

Zip:38960

Phone:(662) 226-4584

Mailing Address

Line 1:PO Box 160

Line 2:<NO DATA FOUND>

Line 3:<NO DATA FOUND>

Municipality:Tie Plant,

State:Mississippi

Zip:38960

Contacts

Name	Address	City	State	Zip	Title	Contact Type
Randall Collins	436 Seventh Avenue	Pittsburg	PA	15219	Vice President	Responsible Official
Timothy Basilone	PO Box 160	Tie Plant	MS	38960	Environmental Manager	Facility Contact
Thomas Henderson	PO Box 160Tie Plant Road	Tie Plant	MS	38960	Plant Manager	Duly Authorized Representative

Responsible Official/Duly Authorized Representative Identification Form

(The following page is to be used for specifying facility contacts)

Facility Name: **Koppers Industries Inc** Facility Number: **<NO DATA FOUND>**

I hereby certify that I am qualified under the regulatory definition to be the responsible official for the above-named facility. Specifically, I, _____:
(Typed or printed name)

am an officer of the corporation. My title is _____.

perform policy or decision-making functions similar to that of an officer of the corporation.

Explain: _____

am a general partner in a partnership.

am the owner of a sole proprietorship.

am a principal executive officer or ranking elected official of a municipality, state, federal, or other public agency. My office/title is: _____.

My agency is: _____.

Note: A duly authorized representative may only be designated for corporations, and while a corporation may have several responsible officials, it can only have one duly authorized representative.

I hereby designate _____ as a duly authorized representative to act in my stead.
(Name of individual)

This individual's business title is: _____.

I also certify that this individual is responsible for the overall operation of one or more facilities applying for or subject to a permit under these regulations and that

the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or

approval of this delegation of authority has been previously requested of and given by the DEQ.

Signature of responsible official

Signature of duly authorized representative designee

Date

For MDEQ use only:

Acknowledged by

Date

Facility Contact Identification Form

Facility Name: **Koppers Industries Inc** Facility Number: **<NO DATA FOUND>**

- To correct information from page 1, indicate a correction by checking the "Correction" box, indicate the name of the facility contact and fill out only the information that is to be corrected.
- To add a facility contact, indicate an addition by checking the "Addition" box and complete all of the information.
- To remove a facility contact from page 1, indicate the contact is to be removed by checking the "Removal" box and fill out the name of the contact only.

Correction Addition Removal

Facility Contact: Tim Basilone Title: Environmental Manager

Facility Contact Mailing Address: 436 Seventh Avenue, Koppers Building
Pittsburgh, PA 15219

Facility Contact Telephone No: 412-227-2001

Correction Addition Removal

Facility Contact: Haley P. Bidy Title: Environmental Supervisor

Facility Contact Mailing Address: P.O. Box 160
Tie Plant, MS 38960

Facility Contact Telephone No: 662-226-4584

Correction Addition Removal

Facility Contact: _____ Title: _____

Facility Contact Mailing Address: _____

Facility Contact Telephone No: _____

Correction Addition Removal

Facility Contact: _____ Title: _____

Facility Contact Mailing Address: _____

Facility Contact Telephone No: _____



FILE COPY

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 2, 2002

Mr. Thomas L. Henderson
Plant Manager
Koppers Industries Inc
PO Box 160
Tie Plant Road
Tie Plant, Mississippi 38960

Dear Mr. Thomas L. Henderson :

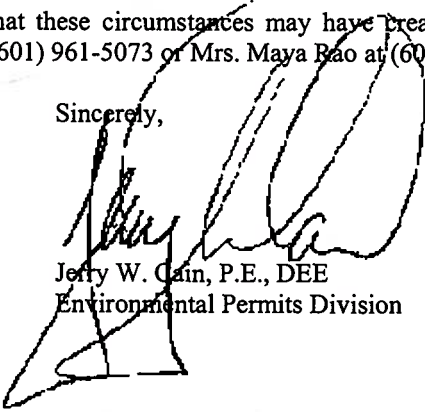
Re: Koppers Industries Inc
Grenada County
Air Ref. No. 0960-00012

We recently implemented a new office-wide enterprise database which has replaced a number of legacy databases. In an effort to ensure that the information in the new database for the Office of Pollution Control is correct, we have attached a form listing the data that is currently recorded for the above referenced facility. This data consists of Responsible Official (RO), Duly Authorized Representative (DAR), Facility Contact, Facility Physical and Mailing Addresses and Facility Telephone Number. Please review this information and if any changes are required, please indicate so on the attached form.

Also, if you would like to change or add a DAR and/or Facility Contact(s) for the above referenced facility, please do so on the attached form. The definitions for a RO/DAR pursuant to APC-S-6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act, Section I.26 are: *"Responsible Official means as follows: (a) for a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the company or corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (1) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in 1980 dollars); or (2) the delegation of authority to such representative is approved in advance by MDEQ;..."*

I would like to apologize for any confusion that these circumstances may have created. Should you have any questions or comments, you may contact me at (601) 961-5073 or Mrs. Maya Rao at (601) 961-5171.

Sincerely,



Jeff W. Cain, P.E., DEE
Environmental Permits Division

cc:

876 REV20020001

Koppers Industries Inc

876

MDEQ Industrial Sector Branch: Energy and Transportation Branch

Corrections

Primary SIC Code:2491

Physical Address

Line 1:1 Koppers Drive

Line 2:<NO DATA FOUND>

Line 3:<NO DATA FOUND>

Municipality:Tie Plant,

State:MS

Zip:38960

Phone:(662) 226-4584

Mailing Address

Line 1:PO Box 160

Line 2:<NO DATA FOUND>

Line 3:<NO DATA FOUND>

Municipality:Tie Plant,

State:Mississippi

Zip:38960

Contacts

Name	Address	City	State	Zip	Title	Contact Type
Randall Collins	436 Seventh Avenue	Pittsburg	PA	15219	Vice President	Responsible Official
Timothy Basilone	PO Box 160	Tie Plant	MS	38960	Environmental Manager	Facility Contact
Thomas Henderson	PO Box 160Tie Plant Road	Tie Plant	MS	38960	Plant Manager	Duly Authorized Representative

Responsible Official/Duly Authorized Representative Identification Form

(The following page is to be used for specifying facility contacts)

Facility Name: **Koppers Industries Inc** Facility Number: **<NO DATA FOUND>**

I hereby certify that I am qualified under the regulatory definition to be the responsible official for the above-named

facility. Specifically, I, _____:
(Typed or printed name)

am an officer of the corporation. My title is _____.

perform policy or decision-making functions similar to that of an officer of the corporation.

Explain: _____

am a general partner in a partnership.

am the owner of a sole proprietorship.

am a principal executive officer or ranking elected official of a municipality, state, federal, or other public agency. My office/title is: _____.

My agency is: _____.

Note: A duly authorized representative may only be designated for corporations, and while a corporation may have several responsible officials, it can only have one duly authorized representative.

I hereby designate _____ as a duly authorized representative to act in my stead.
(Name of individual)

This individual's business title is: _____.

I also certify that this individual is responsible for the overall operation of one or more facilities applying for or subject to a permit under these regulations and that

the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or

approval of this delegation of authority has been previously requested of and given by the DEQ.

Signature of responsible official

Signature of duly authorized representative designee

Date

For MDEQ use only:

Acknowledged by

Date

Facility Contact Identification Form

Facility Name: **Koppers Industries Inc** Facility Number: **<NO DATA FOUND>**

- To correct information from page 1, indicate a correction by checking the "Correction" box, indicate the name of the facility contact and fill out only the information that is to be corrected.
- To add a facility contact, indicate an addition by checking the "Addition" box and complete all of the information.
- To remove a facility contact from page 1, indicate the contact is to be removed by checking the "Removal" box and fill out the name of the contact only.

Correction Addition Removal
Facility Contact: _____ Title: _____

Facility Contact Mailing Address: _____

Facility Contact Telephone No: _____

Correction Addition Removal

Facility Contact: _____ Title: _____

Facility Contact Mailing Address: _____

Facility Contact Telephone No: _____

Correction Addition Removal

Facility Contact: _____ Title: _____

Facility Contact Mailing Address: _____

Facility Contact Telephone No: _____

Correction Addition Removal

Facility Contact: _____ Title: _____

Facility Contact Mailing Address: _____

Facility Contact Telephone No: _____

March 11, 2002

CERTIFIED MAIL # 7000 0520 0021 7551 8494

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
MAR 13 2002
Miss. Dept. of Environmental Quality
Office of Pollution Control

**RE: Title V Operating Permit - #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

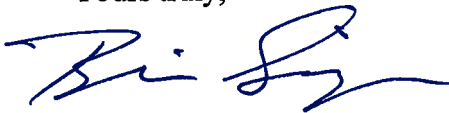
As explained in my voice mail left at your phone extension on March 11, 2002, two episodes occurred on March 10, 2002 at the facility referenced above, whereby the opacity limit associated with our Title V Operating Permit was exceeded. These episodes occurred at time intervals from 4:30 PM to 4:36 PM and 4:54 PM to 5:00 PM, representing a total of twelve minutes whereby average readings indicated opacity percentages between 45% and 47%.

This incident occurred as a result of ash being pulled from the boiler cells. A higher than usual amount of dirt had accumulated in the boiler cells. The increased amount of dirt in the cells resulted in a longer interval of disruption in the boiler combustion chamber during the time ash was being pulled, thereby affecting opacity. All of the fuel being burned during this period consisted of untreated wood.

We anticipate untreated wood fuel in the future will contain less dirt, and this problem will be eliminated.

Please call me at (662) 226-4584 extension 40 if you have any questions.

Yours truly,



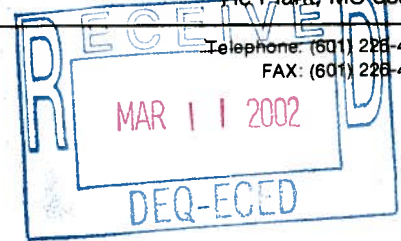
Blair Simpson
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, KII - Pittsburgh

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960
Telephone: (601) 226-4584
FAX: (601) 226-4588

March 8, 2002



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

RE: Facility Change Notification
Koppers Industries, Inc., Grenada, Mississippi
Title V Operating Permit #0960-00012

Dear Mr. Lee,

Koppers Industries, Inc. (Koppers) is providing this notification to the Mississippi Department of Environmental Quality (MDEQ) in accordance with Section 1.17 of our Title V Operating Permit referenced above. Plans to replace, in kind, the existing oil/water separator located at the Koppers facility in Grenada, Mississippi are currently being developed. This project is necessary in order to replace the existing oil/water separator with equipment that is located within secondary containment. The existing separator will be taken out of service, and its use will be discontinued.

The existing oil/water separator consists of an above ground concrete structure with a capacity to hold ~ 66,000 gallons of wastewater. Emissions from this separator were included within the Title V Permit for the facility.

The new oil/water separator, which will replace the existing separator in kind, will consist of an above ground tank with the capacity to hold ~ 40,000 gallons of wastewater. The tank will be constructed of steel, with an open top, and located in the general wood treating operating area near the existing separator.

This change, since it is a replacement in kind, will not cause emissions that are allowable under the Title V permit to be exceeded. In fact, emissions from the new separator will be less than those of the existing separator, due to a reduction in volume and liquid surface area that is exposed to the atmosphere. In addition, permit terms and conditions will remain applicable as written in the permit, without change.

Koppers will commence activities for the construction of the new separator in April 2002. Use of the new separator will begin during April or May 2002. At that time the former separator will be emptied, cleaned, and taken out of service.

If you have any questions or wish to discuss this matter, please call me at (662)226-4584, extension 11.

Based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate and complete.

Yours truly,


Thomas L. Henderson
Plant Manager

cc. T. Basilone, KII – Pittsburgh



Grenada Co.

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

VIA FACSIMILE
601-961-5725

RECEIVED
MAR 11 2002
Dept. of Environmental Quality
Office of Pollution Control

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

March 7, 2002

Mr. Wayne B. Anderson
Air Facilities Branch
Office of Pollution Control
Post Office Box 10385
Jackson, Mississippi 39289-0385

INV1 db updated
via fax of this letter
WBB

RE: Duly Authorized Representative
Koppers Industries Inc., Tie Plant, Mississippi
Facility No. 0960-00012

Dear Mr. Anderson:

This is in reply to your letter dated February 25, 2002, requesting information regarding the identified Responsible Official (RO) and/or Duly Authorized Representative (DAR) for the above referenced facility. I understand that the subject information will be entered in the Title V fee database after the acceptability of the RO and/or DAR is confirmed by your department.

Mr. Thomas Henderson has been designated as the Responsible Official and duly Authorized Representative for the Koppers Industries Inc. facility in Tie Plant, Mississippi. The attached letter provides information verifying Mr. Henderson's designation as such by a corporate official. Mr. Henderson's address at the facility is as follows:

Mr. Thomas Henderson
Koppers Industries Inc.
P.O. Box 160
Tie Plant Road
Tie Plant, Mississippi 38960

I trust that this information meets your request at this time, and that your database will be updated accordingly.

If you have any questions, please call me at 412-227-2114.

Yours truly,

Timothy R. Basilone
Senior Environmental Manager

Enc.

cc. T. Henderson
R. Collins

Randall D. Collins
Vice President and Secretary

Telephone: (412) 227-2456
FAX: (412) 227-2333

January 20, 2000

To Whom It May Concern:

In accordance with the policies of Koppers Industries, Inc. (Koppers), Plant Managers and Area Managers are authorized to sign Permit Applications, Permits, and Reports as required under the Federal Clean Water Act, Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and applicable related state laws. Such reports include, but are not limited to, Discharge Monitoring Reports, Pretreatment Monitoring Reports, Hazardous Waste Generator and Facility Reports, Air Pollution Control Monitoring Reports, and Hazardous Material Reports.

Sincerely,



Randall D. Collins
Vice President Environmental, Health and
Safety Affairs and Secretary

RDC:avd

576

Grenada



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

February 25, 2002

FILE COPY

Mr. Tim Basilone
Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219

Re: Facility No. 0960-00012

Dear Mr. Basilone:

On or about March 31, 2002, the annual mailing of the Annual Emissions Reporting Forms (AERFs) will occur. You are currently listed in the database as the contact to whom such mail should be sent. Also, please be advised that the database shows no one being identified as the Responsible Official (RO) and/or Duly Authorized Representative (DAR).

I suggest that you contact the Environmental Permits Division to determine what RO/DAR identification is contained in permit records and to determine what will be needed to change or correct any of that information. The Title V fee database information for RO and DAR can be entered or updated only after the EPD confirms acceptability of the RO &/or DAR.

If you are not the identified RO or DAR, you will be able to complete the AERF emissions information but you may not sign the AERF certification statement; only those persons accepted by EPD as RO and/or DAR may sign the certification. Unsigned AERFs and AERFs signed by unauthorized personnel will be treated the same and will not be accepted for review.

If any of the information above regarding you being the contact is not correct, please provide the name and full mailing address of the appropriate contact by March 25, 2002, so that we may correct our database records. Please make written notification either by letter or by fax to 601.961.5725.

Thank you.

Very truly yours,

Wayne B. Anderson, PE
Air Facilities Branch

February 2, 2002

CERTIFIED MAIL

Mr. David Lee
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**RE: Title V Operating Permit - #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements**

Dear Mr. Lee,

As explained in my voice mail left at your phone extension on February 1, 2002, an episode whereby the opacity limit associated with our Title V Operating Permit was exceeded occurred at the Koppers facility in Grenada, Mississippi during the night of January 31, 2002 and the early morning of February 1, 2002. The episodes occurred intermittently from 9:30 PM on January 31, 2002 until approximately 7 AM on February 1, 2002, and averaged an opacity percentage of above 40%.

This incident occurred as a result of very wet fuel being burned in the boiler. With all of the recent rain events, all of our current suppliers have had wet fuel. Adjustments were made throughout the episode, however the fuel on hand was increasingly difficult to burn without having opacity episodes. All of the fuel being burned during this period consisted of untreated wood.

During the morning of February 1, 2002 calls were made to a variety of fuel suppliers that could possibly supply dry wood fuel. Three new suppliers were found. It is our hope that drier weather and an expanded list of fuel suppliers will remedy this type of situation from occurring in the future.

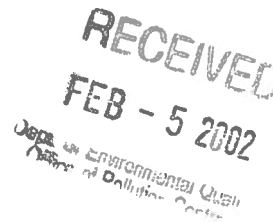
Please call me at (662) 226-4584 extension 40 if you have any questions.

Yours truly,

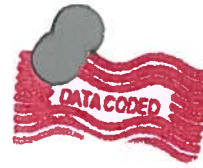


Blair Simpson
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, KII - Pittsburgh



**KOPPERS
INDUSTRIES**



Grenada Co.
D Lee

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

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

January 7, 2002

CERTIFIED MAIL

RECEIVED
JAN 10 2002
Dept. of Environmental Quality
Office of Pollution Control

Ms. Rosalyn D. Hughes
USEPA – Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960

Subject: 2001 Title V Air Permit Compliance Certification
Title V Permit #0960-00012
Koppers Industries, Inc
Grenada, Mississippi

Dear Ms. Hughes,

Enclosed please find the subject information submitted pursuant to Section 4.2 of the Title V Operation Permit for the Koppers Industries, Inc. facility in Grenada, Mississippi.

Please contact me at 662-226-4584 extension 11 if you have any questions or concerns.

Sincerely,

Thomas L. Henderson
Thomas L. Henderson
Plant Manager

Enclosure

Cc: Tim Basilone – Koppers, Pittsburgh
David Lee – MS Department of Environmental Quality



Grenada Co.
Lee

RECEIVED
JAN 9 - 2002
Miss. of Environmental Quality
Office of Pollution Control

Koppers Industries,
P.O. Box 1
Tie Plant, MS 389t

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

January 7, 2002

CERTIFIED MAIL



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

Subject: Title V Operating Permit - # 0960-00012
Semi-Annual Air Report July 2001- December 2001
Koppers Industries Inc. - Grenada, Mississippi

Dear Mr. Lee,

Enclosed you will find the Continuous Emissions Monitoring (CEM) report for the subject period containing information concerning opacity emissions. Information provided in this report is for emission point AA-001, which is the Wellons wood-fired boiler. A second (backup) boiler at the site, emission point AA-002 which is an oil-fired boiler, was not operated during the subject reporting period.

The attached information reflects that the episodes of excess opacity emissions at AA-001 occurred primarily during a failure of the No. 1 fuel-feed auger on 10-30-01 which caused an overfeed by the No. 2 fuel feed auger into the combustion cell. Notification was provided by letter on 10-31-01 to Mellissa Collier (MSDEQ) advising her of the situation and the corrective measures taken.

All other deviations have been reported in accordance with applicable conditions.

If you have any questions, please call me at 662-226-4584 extension 11.

Sincerely,

Thomas L. Henderson
Thomas L. Henderson
Plant Manager

Cc: Tim Basilone, KII - Pittsburgh
Enclosures



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

November 27, 2001

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

Dear Mr. Henderson:

Re: Koppers Industries Inc
Grenada County
Air Ref. No. 0960-00012

Based upon review of the above referenced application(s) received from Koppers Industries Inc on September 28, 2001, the application is complete as submitted. However, additional items may be identified during the detailed review for drafting the permit that may require clarification. If such information is necessary, you will be notified. Shortly, the Environmental Permits Division will transmit a draft of the permit for your review and comment.

If you have any questions regarding the application or the permitting process, please contact me at (601) 961-5746.

Sincerely,

A handwritten signature in blue ink that reads "Celina M. Sumrall".

Celina M. Sumrall, P.E.
Environmental Permits Division

876 PER20010001

FILE COPY

10-31-01

CERTIFIED MAIL

Ms. Melissa Collier
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
NOV 1 - 2001
Mississippi Department of Environmental Quality
Title V Air Quality Control

RE: Title V Operating Permit - #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Deviation from Permit Requirements

Dear Ms. Collier,

As explained in our telephone conversation on October 30, 2001, an episode whereby the opacity limit associated with our Title V Operating Permit was exceeded occurred at the Koppers facility in Grenada, Mississippi on October 30, 2001. The episode occurred at 3:24 AM and lasted until 5:18 AM, and averaged an opacity percentage of above 40%.

This incident occurred as a result of a malfunctioning fuel-feed auger leading to the No. 1 combustion cell. As a result, the No. 2 combustion cell overcompensated for the lack of fuel in the No. 1 combustion cell. The overcompensation resulted in the combustion chamber being fed too much fuel, which resulted in incomplete fuel combustion and the opacity episode. All of the fuel being burned during this period was untreated wood.

At approximately 3:45 AM plant maintenance was notified and responded to the incident. The No. 1 fuel feed auger belt was repaired and fuel feed rate was adjusted. The fuel feed rates will be monitored for a period of time to ensure the feed augers are operating properly, and compliance with the Title V is maintained.

Please call me at (662) 226-4584 extension 40 if you have any questions.

Yours truly,



Blair Simpson
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, KII - Pittsburgh

10-8-2001

CERTIFIED MAIL

Ms. Melissa Collier
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
OCT 10 2001
Dept. of Environmental Quality
Office of Pollution Control

RE: Title V Operating Permit - #0960-00012
Koppers Industries Inc., Grenada, Mississippi
Notification of Process Modification

Dear Ms. Collier,

This is to advise you of a change in operation of the wood fired boiler at the Koppers Industries, Inc. (Koppers) facility in Grenada, Mississippi. As of 10-8-2001, Koppers will be using primarily untreated wood fuel for an indefinite period of time.

This change is required since our contract has been terminated with our supplier of treated wood fuel. To accommodate this change, the silo for storing and supplying treated wood fuel to the boiler will now be used for storage of untreated wood fuel.

Operation of the boiler, and associated monitoring activities will continue to be implemented as required under the existing permit. If treated wood fuel is used in the future, operating conditions and monitoring requirements under the Permit will be adhered to.

Please call me at (662) 226-4584 extension 40 if you have any questions.

Yours truly,



Blair Simpson
Safety, Health, & Environmental Supervisor

Cc. T. Basilone, KII - Pittsburgh



FILE COPY

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

October 12, 2001

Mr. Thomas L. Henderson
Koppers Industries Inc
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219-1800

Dear Mr. Henderson

Re: Koppers Industries Inc
Grenada County
Air Ref. No. 0960-00012

This letter is to acknowledge receipt of your application on September 28, 2001. Within forty-five days after the date of receipt of the application, you will be notified either the submitted application is complete or of the major components required to complete the processing of your permit application.

If any of these actions involve construction activities, please notify us of your projected schedule for commencement of construction and completion of construction if this information is not already contained in the submitted application.

If you have any questions regarding the application or the permitting process, please contact Maya Rao at (601) 961-5171.

Sincerely,

A handwritten signature in blue ink that reads "Teresa Dennington".

Teresa Dennington
Environmental Permits Division

876 PER20010001

September 26, 2001

CERTIFIED MAIL
7000 0520 0021 7551 9576

Ms. Melissa Collier
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RE: Title V Operating Permit - #0960-00012
Koppers Industries, Inc. – Grenada, Mississippi
Renewal Application

RECEIVED
SEP 28 2001
Dept. of Environmental Quality
Office of Pollution Control

Dear Ms. Collier,

Enclosed is the renewal application for our existing Title V Operating Permit No. 0960-00012. The enclosed document addresses all requirements of the renewal application.

If you have any questions or concerns, please call me at (662) 226-4584 extension 11.

Sincerely,

Thomas L. Henderson
Thomas L. Henderson

Koppers Industries, Inc. – Grenada, Mississippi

Cc: Steve Spengler – Environmental permits division MSDEQ – (without site map)
Cc: Tim Basilone, KII – Pittsburgh
Attachments

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, Mississippi 39289-0385
Telephone No. (601) 961-5171
October 24, 2003

Koppers Inc located at 1 Koppers Drive, in Tie Plant, MS, (662) 226-4584 has applied to the Mississippi Department of Environmental Quality for the following permitting action(s): Title V Reissuance with Minor Modifications, Ref. No. 0960-00012. The applicant's operations fall within SIC Code 2491. The facility wide emissions are still below 250 tons/year for any criteria pollutants. Therefore prevention of significant deterioration (PSD) regulations do not apply.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Kyle Hubbard at the Permit Board's address shown above, no later than November 24, 2003. All comments received by this date will be considered in the formulation of final determinations regarding the application(s). A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit(s). 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 permit if that is the recommendation. The 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 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.

Additional details about the application(s), including a copy of the draft permit(s), are available by writing or calling Kyle Hubbard 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
Office of Pollution Control
Southport Center Building
2380 Highway 80 West
Jackson, Mississippi 39204

Elizabeth Jones Library
PO Box 130
Grenada, MS 38901

Please bring the foregoing to the attention of persons whom you know will be interested.

Kopper
Air Permit 0960-00012
MR

Grenada County
AIR-TV

The Daily Star



Proof of Publication

STATE OF MISSISSIPPI COUNTY OF GRENADA

Before me, the undersigned authority in and for the County and State aforesaid, this day personally appeared

Elizabeth Hust

who, being duly sworn, states on oath that she is the

Clerk

of The Daily Star, a newspaper published in the city of Grenada, state and county aforesaid, with a general circulation in said county, and which has been published for a period of more than one year, and that the publication of the notice, a copy of which is hereto attached, has been made in said paper times, at weekly intervals and in the regular entire issue of said newspaper for the numbers and dates hereinafter named to-wit:

Vol. *149* No. *76* on the *23* day of *Oct* 20*03*

Vol. No. on the day of 20.....

Vol. No. on the day of 20.....

Vol. No. on the day of 20.....

Vol. No. on the day of 20.....

Vol. No. on the day of 20.....

Vol. No. on the day of 20.....

Sworn to and subscribed before me, this *29th* day of

Oct 20*03*

Joyce Parks

(SEAL)

W.E. Jackson "The Printer"



My Commission Expires June 15, 2006

PUBLIC NOTICE
Mississippi Environmental Quality
Permit Board
P.O. Box 10385
Jackson, Mississippi 39289-0385
(601)961-5171
October 24, 2003

Koppers, Inc. located at 1 Koppers Drive, in Tie Plant, MS, (662) 226-4584 has applied to the Mississippi Department of Environmental Quality for the following permitting action(s): Title V Reissuance with Minor Modifications, Red. No 0960-00012. The applicant's operations fall within SIC Code 2491. The facility wide emissions are still below 250 tons/year for any criteria pollutants. Therefore prevention of significant deterioration (PSD) regulations do not apply.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Person wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Kyle Hubbard at the Permit Board's address shown above, no later than November 21, 2003. Comments received by this date will be considered in the formulation of final determinations regarding the application(s). A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit(s). 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 through consideration of all comments, the staff will formulate its recommendation for permit issuance and a proposed permit if that is the recommendation. The 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 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. Additional detail about the application(s), including a copy of the draft permit(s), are available by writing or calling Kyle Hubbard at the above 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
Office of Pollution Control
Southport Center Building
2380 Highway 80 West
Jackson, MS 39204

Elizabeth Jones Library
PO Box 130
Grenada, MS 38901

Please bring the foregoing to the attention of person whom you know will be interested.

10/23/03

Timothy R. Basilone
Senior Environmental Manager



RECEIVED
OCT 9 - 2003
Dept. of Environmental Quality
Office of Pollution Control

Koppers Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800
Tel 412-227-2114
Fax 412-227-2423
BasiloneTR@koppers.com
www.koppers.com

October 6, 2003

Ms. Maya Rao
Environmental Permits Division
Mississippi Department of Environmental Quality
Post Office Box 10385
Jackson, Mississippi 39289-0385

**Subject: Comments – Draft Title V Permit No. 0960-00012
Koppers Inc. – Grenada, Mississippi
Grenada County**

Dear Ms. Rao:

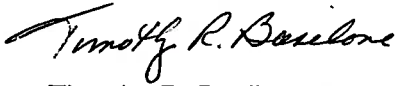
Koppers Inc. is in receipt of the subject draft Title V Permit for our facility located in Grenada, Mississippi. Comments based on our review of the draft Permit are provided in the following table.

Page(s)	Section	Reference	Comment
12	2.	Table	Ref. No. 35 is a duplicate of Ref. No. 12. Ref. No. 35 should be removed from the table
12	2.	Table	The volume of Ref. No. 19 should be changed from 2,500 gallons to 4,500 gallons
12	2.	Table	The volume of Ref. No. 32 should be changed from 9,400 gallons to 11,500 gallons
19	5.	Paragraph 5.B.3	To our knowledge, a Start up, Shut down, and Maintenance (SSM) Plan has no apparent basis in either the MSDEQ or USEPA Title V regulations. Condition 5.B.3, requiring preparation and submittal of a SSM Plan should be eliminated.
19	5.	Paragraph 5.C.1	In conjunction with the above comment for Paragraph 5.B.3, Condition 5.C.1 requiring semiannual submittal of information, should be eliminated. This information is already subject to a 5-day reporting requirement per Permit Condition 1.24.
20	5.	Paragraph 5.C.3	Language "certify and report the <i>fuel</i> content of the fuel oil" is confusing. If this is intended to read <i>fuel sulfur</i> content, the language should be revised to reflect this, and the reporting frequency and limit of sulfur in the fuel oil should be specified. If applicable, Koppers suggests that the <i>fuel sulfur</i> content be reported as part of the annual compliance certification.
23	7.	Paragraph 7.4	Typos located in first and second sentences, symbols used for "()".

In reference to comments above that pertain to the SSM Plan, Koppers is willing to participate in the development process for this requirement with the MSDEQ.

Please contact me at 412-227-2114 if you would like to discuss these comments in further detail.

Sincerely,



Timothy R. Basilone

cc: Kyle Hubbard, MSDEQ
Tom Henderson, Koppers - Grenada, MS
Haley Bidy, Koppers - Grenada, MS
Jim Healey, Koppers - Pittsburgh, PA



"Basilone Tim"
<BasiloneTR@koppers.com>

To: <kyle_hubbard@deq.state.ms.us>, <Maya_Rao@deq.state.ms.us>
Subject: FW: Draft Title V Permit - Comments

10/06/2003 11:33 AM

Kyle,

One more issue, please make sure that the Title V Certificate Page where the MDEQ Authorized Signature occurs, reads Koppers Inc. and not Koppers Industries Inc as written in the draft. Our name is now "Koppers Inc.". Thanks.
Tim

-----Original Message-----

From: Basilone Tim

Sent: Monday, October 06, 2003 11:37 AM

To: Kyle Hubbard (kyle_hubbard@deq.state.ms.us); Maya Rao (Maya_Rao@deq.state.ms.us)

Cc: Tom Zordan (tzordan@earthlink.net); Healey Jim; Henderson Tom; Biddy Haley P

Subject: Draft Title V Permit - Comments

Kyle,

Please access the attached document containing Koppers' comments on the draft Title V Permit you forwarded during September. A copy of this is being placed in the mail today. Please call me if you have any questions or comments. I can be contacted at 412-227-2114.
Thanks.



Tim Basilone TV Comments - Draft.doc



"Basilone Tim"
<BasiloneTR@koppers
.com>

To: "Kyle Hubbard" <kyle_hubbard@deq.state.ms.us>
Subject: Information

10/13/2003 11:11 AM

Kyle,

Pursuant to our telephone conversation last Friday, this is to advise you that Koppers would like to have the language which refers to a Start Up, Shut Down, and Maintenance Plan (SSM) removed from the permit. This would include paragraph 5.B.3 and 5.C.1 in the draft permit.

Please call me if you have any questions at 412-227-2114.

Thanks.

Tim Basilone



Koppers Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800
Tel 412-227-2114
Fax 412-227-2423
BasiloneTR@koppers.com
www.koppers.com

October 6, 2003

Ms. Maya Rao
Environmental Permits Division
Mississippi Department of Environmental Quality
Post Office Box 10385
Jackson, Mississippi 39289-0385

**Subject: Comments – Draft Title V
Permit No. 0960-00012
Koppers Inc. – Grenada,
Mississippi**

Grenada County

Dear Ms. Rao:

Koppers Inc. is in receipt of the subject draft Title V Permit for our facility located in Grenada, Mississippi. Comments based on our review of the draft Permit are provided in the following table.

Page(s)	Section	Reference	Comment
12	2.	Table	Ref. No. 35 is a duplicate of Ref. No. 12. Ref. No. 35 should be removed from the table
12	2.	Table	The volume of Ref. No. 19 should be changed from 2,500 gallons to 4,500 gallons
12	2.	Table	The volume of Ref. No. 32 should be changed from 9,400 gallons to 11,500 gallons
19	5.	Paragraph 5.B.3	To our knowledge, a Start up, Shut down, and Maintenance (SSM) Plan has no apparent basis in either the MSDEQ or USEPA Title V regulations. Condition 5.B.3, requiring preparation and submittal of a SSM Plan should be eliminated.
19	5.	Paragraph 5.C.1	In conjunction with the above comment for Paragraph 5.B.3, Condition 5.C.1 requiring semiannual submittal of information, should be eliminated. This information is already subject to a 5-day reporting requirement per Permit Condition 1.24.
20	5.	Paragraph 5.C.3	Language "certify and report the <i>fuel</i> content of the fuel oil" is confusing. If this is intended to read <i>fuel sulfur</i> content, the language should be revised to reflect this, and the reporting frequency and limit of sulfur in the fuel oil should be specified. If applicable, Koppers suggests that the <i>fuel sulfur</i> content be reported as part of the annual compliance certification.
23	7.	Paragraph 7.4	Typos located in first and second sentences, symbols used for "()".

In reference to comments above that pertain to the SSM Plan, Koppers is willing to participate in the development process for this requirement with the MSDEQ.

Please contact me at 412-227-2114 if you would like to discuss these comments in further detail.

Sincerely,

Timothy R. Basilone

cc: Kyle Hubbard, MSDEQ
Tom Henderson, Koppers - Grenada, MS
Haley Bidy, Koppers - Grenada, MS
Jim Healey, Koppers - Pittsburgh, PA

Grenada

KOPPERS INDUSTRIES, INC. PITTSBURGH PA

500257

SP	VENDOR	DIV	OUR AUDIT	YOUR INVOICE NBR	INV MO/DA	INV AMOUNT	DISC	NET AMT PAYABLE
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Date: SEPTEMBER 02 2003

500257 ⁶⁰⁻¹⁶⁰/₄₃₃

Pay To The Order Of: MISSISSIPPI ST DEPT ENVIRONMEN
THREE THOUSAND TWENTY NINE AND 63/100 ONLY

Amount
\$3,029.63

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

AP 3983 0960-00012

Ray McClain
KOPPERS INC.

Mellon Bank, N.A., Pittsburgh, PA 15259

⑈ 500257 ⑈ ⑆ 043301601 ⑆ 069 ⑈ 1665 ⑈



DRAFT

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Koppers Inc.
1 Koppers Drive
Tie Plant, Mississippi
Grenada County

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.

Permit Issued: [Issuance Date]

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: [Expiration Date]

Permit No.: 0960-00012

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS.....	3
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES	12
SECTION 3. EMISSION LIMITATIONS & STANDARDS	13
SECTION 4. COMPLIANCE SCHEDULE.....	16
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS	17
SECTION 6. ALTERNATIVE OPERATING SCENARIOS	20
SECTION 7. TITLE VI REQUIREMENTS.....	21
APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT	
APPENDIX B 40 CFR 82 - PROTECTION OF STRATOSPHERIC OZONE	
APPENDIX C 40 CFR 60 SUBPART Kb—STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS (INCLUDING PETROLEUM LIQUID STORAGE VESSELS) FOR WHICH CONSTRUCTION, RECONSTRUCTION, OR MODIFICATION COMMENCED AFTER JULY 23, 1984	

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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 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

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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 as 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.)

- (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.)
- 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

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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.)
- 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;

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- (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.)
- 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.)
- 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.)
- 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.)

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- 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 herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny 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
 - (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

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approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

- (f) any change in ownership of the stationary source."
- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)
- 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.1)
- 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-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

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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.
 - (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 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, shutdowns and maintenance.

- (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:

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- (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) 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 Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) 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:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) 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
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable 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.

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- (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:
 - (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) 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;
 - (iv) 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
 - (v) 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.

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SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Ref. No. 40, the 60.0 MMBTUH Wellons/Nebraska Woodwaste Boiler (firing untreated wood) with multiclone collector
AA-002	Ref. No. 41, the 28.5 MMBTUH fuel oil fired Murray Boiler
AA-003	Ref. No. 1, the 34,000 gallon treatment cylinder containing Penta in oil. Ref. No. 2, the 27,000 gallon treatment cylinder containing Creosote Ref. No. 3, the 27,000 gallon treatment cylinder containing Creosote Ref. No. 4, the 27,000 gallon treatment cylinder containing Creosote Ref. No. 5, the 27,000 gallon treatment cylinder containing Penta Ref. No. 6, the 29,786 gallon #1 Work Tank containing penta in oil Ref. No. 7, the 29,786 gallon #2 Work Tank containing creosote Ref. No. 8, the 29,786 gallon #3 Work Tank containing creosote Ref. No. 9, the 29,786 gallon #4 Work Tank containing creosote Ref. No. 10, the 29,786 gallon #5 Work Tank containing creosote/water Ref. No. 12, the 100,000 gallon Storm Water Surge Tank containing storm water 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 Creosote 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 1,500 gallon Coagulant Tank containing polymer additive Ref. No. 19, the 4,500 gallon Decant Tank containing creosote/oil/water Ref. No. 20, the 8,000 gallon Creosote Blowdown Tank containing water/creosote 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. 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. 42, the Tie Mill and Lumber Mill with cyclone
AA-008	Ref. No. 46, Treated Wood Storage Areas
AA-009	Ref. No. 47, the Pole Kiln

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Emission Point	Description
AA-010	Ref. No. 48, the Pole Peeler
AA-011	Ref. No. 49, Wood Fuel Preparation and Handling including grinding, conveying, and silo loading
AA-012	Ref. No. 50, the two (2) Parts Cleaners/Degreasers

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)

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B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001	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	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
AA-001	Permit to Construct issued November 8, 1994 and modified permit issuance date		Type and origin of materials burned	The permittee may burn untreated wood and office waste paper in the boiler only. The office waste paper shall be limited to waste paper generated on site by Koppers' office operations and shall not contain plastic or non-combustible wastes.
	Permit to Construct issued November 8, 1994		Relative amount of materials to be burned	The total amount of office waste paper burned shall be less than one percent (1%) of total fuel input.
	Permit to Construct issued November 8, 1994 and modified permit issuance date	1.19	Woodwaste feed rate	Total woodwaste feed rate shall not exceed 15,500 lbs/hr
AA-002	State Regulation APC-S-1, §3.4(a)(2)	3.B.3 and 1.19	Ash and/ or Particulate Matter	$E = 0.8808 * I^{-0.1667}$ or as otherwise limited by facility modification restrictions
	Permit to Construct issued November 8, 1994		Fuel oil sulfur content	The sulfur content of the fuel oil shall not exceed 0.5% by weight.
AA-003, Ref. No. 9	40 CFR Part 60, Subpart Kb	3.B.5	VOC	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
AA-004, and AA-008 through AA-012	State Regulation APC-S-1, §3.6(a)	3.B.4	Particulate Matter	$E = 4.1 p^{0.67}$

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- 3.B.1 For Emission Point AA-001, particulate matter emission rates shall not exceed 0.30 grains per standard dry cubic foot and the total woodwaste feed rate shall not exceed 15,500 lbs/hr.
- 3.B.2 For Emission Points AA-001 and AA-002, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.
- 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-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.

- 3.B.5 For Emission Point AA-003, Ref. No. 9, the permittee is subject to and shall comply with 40 CFR 60.110b, the New Source Performance Standards (NSPS) Subpart Kb--Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Storage vessels with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from the General Provisions (NSPS Subpart A) and from other provisions of Subpart Kb, except the monitoring requirements specified in 40 CFR 60.116b (see Condition 5.B.1). A copy of Subpart Kb is attached in Appendix C.

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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 of EPA Region IV 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.)

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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))

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- 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. Said report shall be made 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.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001	Opacity	The permittee shall monitor and document with recordkeeping the in-stack opacity on a continuous basis.	5.B.1	
	Woodwaste feed rate	The permittee shall record the woodwaste feed rate on an hourly basis.	5.B.4	
	PM & Opacity	The permittee shall monitor PM emissions and opacity by stack testing in accordance with EPA Reference Methods 1-5 and 9 during the fourth calendar quarter of 2004, and biennially thereafter. Such testing shall be performed simultaneously and while the boiler is operating at maximum capacity. The permittee shall also monitor the woodwaste feedrates during each hour of testing (lbs/hour).		
AA-002	Fuel oil sulfur content	The permittee shall monitor and document with recordkeeping the sulfur content of all fuel oil fired in Emission Point AA-002.		
AA-003, Ref. No. 9	Tank Dimensions	Recordkeeping	5.B.2	40 CFR60.116b

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- 5.B.1 The permittee shall record the time and duration of any opacity excursions and the corrective actions taken.
- 5.B.2 For Emission Point AA-003, Ref. No. 9, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records are required to be kept for the life of the source. (Ref.: 40 CFR 60.116b(a) & (b))
- 5.B.3 The permittee shall keep a record of the woodwaste feedrate and the office wastepaper as specified in 5.A.3.

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement
AA-001	PM and Opacity	The permittee shall submit a test report of the results of the stack test(s) required in Section 5.B within forty-five (45) days of the test.
	PM & Opacity Test Protocol & Schedule	The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

- 5.C.1 For Emission Point AA-001, the permittee shall submit a report with the time and duration of any opacity excursions and the corrective actions taken as specified in 5.A.4.
- 5.C.2 For Emission Point AA-002, the permittee shall submit a report certifying the fuel sulfur content of the fuel oil as specified in 5.A.4.

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SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

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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 with the recordkeeping requirements pursuant to ' 82.166. (AMVAC - 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 Amotor vehicle@ as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term AMVAC@ 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
NEHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOG	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 Φ m 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

40 CFR 82

PROTECTION OF STRATOSPHERIC OZONE

APPENDIX C

40 CFR 60 Subpart Kb

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INFORMATION RELATIVE TO THE DRAFT TITLE V OPERATING PERMIT

FOR:
Koppers Inc.
1 Koppers Drive
Tie Plant, MS 38960

FACILITY DESCRIPTION

Koppers Industries, Inc. is an existing Wood Preserving Facility (SIC 2491) located in Grenada, Mississippi (Grenada County). This is a renewal application with some modifications:

- The permittee cannot burn treated wood anymore. Therefore we have removed condition relating to this.
- There is an increase in the total woodwaste feedrate from 13,000 lbs/hr to 15,500 lbs/hr. However, even with the increase in emissions due to the increase in feed rate, the facility is still under 250 tons/year for each criteria pollutant and therefore is not subject to prevention of significant deterioration (PSD) regulation.
- Three tanks were removed from the facility and one new tank, Ref. No. 9 (Emission Point AA-003) was added. This tank is subject only to the recordkeeping requirement of Subpart Kb.

CONDITIONS REMOVED FROM THE INITIAL PERMIT

For Emission Point AA-001, the permittee had to measure Temperature and CO on a continuous basis while burning treated wood. Since the facility is no longer permitted to burn treated wood, we have removed continuous monitoring requirements for CO and Temperature.

TITLE V PROGRAM APPLICABILITY BASIS

This facility is a major source as defined by the Title V program due to its potential to emit more than 100 tons per year of the following criteria air pollutants: Carbon Monoxide (228.51 TPY), Particulate Matter (158 TPY), PM₁₀ (158 TPY), VOCs (101.63 TPY).

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 February 27, 2000,
 - 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 August 22, 1996, 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) October 28, 1999, 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

CAM APPLICABILITY

The only Emission point in this permit with pre-control Emissions greater than 100 TPY is AA-001, the wood fired boiler. This unit is installed with multiclones. The multiclone was installed as an integral part of the boiler in 1978. The multiclones keep the particulates from reentering the boiler system and therefore we believe that this unit is not subject to the CAM requirements.

Emission point AA-004 is equipped with cyclones. However, the precontrol emissions are less than 100 TPY. Therefore emission unit AA-004 is not subject to the CAM requirements.

MACT APPLICABILITY

The total HAP Emissions are less than 25 TPY and individual HAP Emissions are less than 10 TPY. Therefore they are not subject to MACT regulations.

EMISSION LIMITS			
Emission Point No.	Pollutant	Draft Permit Emission Limits	Monitoring Requirements
AA-001	Particulate Matter	0.3 grains per standard dry cubic foot	The permittee shall monitor PM emissions and opacity by stack testing in accordance with EPA Reference Methods 1-5 and 9 during the fourth calendar quarter of 2004, and biennially thereafter. Such testing shall be performed simultaneously and while the boiler is operating at maximum capacity. The permittee shall also monitor the woodwaste feedrates during each hour of testing (lbs/hour). The permittee has to measure in-stack opacity on a continuous basis.
	Woodwaste Feed rate	Shall not exceed 15,500 lbs/hr	The permittee shall keep a record of the woodwaste feed rate and the office wastepaper. 5.B.3.
	Sulfur Dioxide	4.8 lb/MMBTU	No monitoring is needed because of high margin of compliance.
AA-002	Fuel oil Sulfur Content	Sulfur content or the fuel 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.

AA-003	VOC	Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Recordkeeping requirement 5.B.2.
AA-004 and AA-008 through AA-0012	Particulate Matter	$E = 4.1 p^{0.67}$	Emission Point AA-004 is equipped with a cyclone. The emissions with the cyclone are well below the standards, therefore we are not proposing any type of monitoring.

Permit Application Summary Form

General Facility Information

Facility Name: Koppers Inc.
Facility Address: 1 Koppers Drive
Tie Plant, MS 38960
Source description: Koppers Industries, Inc. is an existing Wood Preserving Facility (SIC 2491) located in Grenada, Mississippi (Grenada County). This is a renewal application with some modifications.
SIC code of major product: 2491
AFS or CDS Plant ID: AFS
Date application Received: 9/28/2001
Permit No: 0960-00012
Permit Activity: PER20010001

Pollutant	Actual (tpy)	Potential (tpy)
PM		158.00
SO ₂		65.99
NO _x		72.18
CO		228.51
VOC		101.63
LEAD		0.0105
HAP \geq 10 tpy by CAS		12.25
Total Emissions		638.56

Compliance Summary

Source out of Compliance Compliance Schedule included Compliance Certification Signed

Applicable Requirements List

NSR NSPS SIP PSD NESHAPS Other

Miscellaneous

- Acid rain source
- Source subject to 112(r)
- Source requested synthetic PTE limit to avoid major source requirement (e.g., PSD, MACT)
- Source applied for federally enforceable emissions cap
- Source provided terms for alternative operating scenarios
- Source subject to a MACT standard
- Source requested case-by-case 112(g) or (j) determination
- Source applied for a plant-wide applicability limit (PAL)
- Source requested terms for operational flexibility
- Source requested streamlining of multiple applicable requirements
- Source requested monitoring plan to establish periodic monitoring
- Application proposes new control technology
- Certified by responsible official
- Diagrams or drawings included
- Confidential business information (CBI) included

3A - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876
DOCUMENT ID: 140,813
PHYSICAL ADDRESS:

Koppers Inc
TVRA-0960-00012
1 Koppers Drive
Tie Plant, MS 38960

MASTER-AFS:
DOCUMENT-AFS: 04300012

Air-AIRS AFS

FILE COPY

3A - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876 Koppers Inc

10/17/2003 10:08:39AM

CRITERIA

	<u>INCLUDED</u>		<u>NOT A - Actual</u>	
			<u>INCLUDED</u>	<u>P - Potential</u>
Carbon Monoxide				
630-08-0	52.1700		P	lb/hr
	228.5100		P	tons/yr
<hr/>				
Nitrogen oxides				
	16.4800		P	lb/hr
	72.1800		P	tons/yr
<hr/>				
Particulate Matter (10 microns or less)				
	41.4250		P	lb/hr
	158.0000		P	tons/yr
<hr/>				
Particulate Matter				
	41.4250		P	lb/hr
	158.0000		P	tons/yr
<hr/>				
Sulfur Dioxide				
2025884	15.0600		P	lb/hr
	65.9900		P	tons/yr
<hr/>				
VOC				
	16.2400	6.7100	P	lb/hr
	101.6300		P	tons/yr

3A - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876

Koppers Inc

10/17/2003

10:08:44AM

HAP TOTALS

	<u>INCLUDED</u>	<u>NOT INCLUDED</u>	<u>A - ACTUAL</u>	<u>P - POTENTIAL</u>
TOTAL HAPS				
	0.00	0.00	P	lb/hr
	12.25	0.00	P	tons/yr
<hr/>				
TOTAL VOC HAPS				
	11.95	0.00	P	tons/yr
<hr/>				
TOTAL NON VOC HAPS				
	0.00	0.00	P	lb/hr
	0.30	0.00	P	tons/yr
<hr/>				

3A - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876

Koppers Inc

10/17/2003 10:08:44AM

HAP

	<u>INCLUDED</u>	<u>NOT INCLUDED</u>	<u>A - Actual</u>	
		<u>P</u>	<u>Potential</u>	
HAP, Other (NON VOC)				
	0.2900	P		tons/yr
<hr/>				
HAP, Other (VOC)				
(VOC)	6.1300	P		tons/yr
<hr/>				
Lead				
	7439-92-1			
	0.0024	P		lb/hr
	0.0105	P		tons/yr
<hr/>				
Naphthalene				
(VOC)	91-20-3			
	5.8200	P		tons/yr
<hr/>				

3A - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876 Koppers Inc
DOCUMENT ID: 140,813 TVRA-0960-00012
PHYSICAL ADDRESS: 1 Koppers Drive
Tie Plant, MS 38960

FILE COPY

MASTER-AFS:
DOCUMENT-AFS: 04300012 Air-AIRS AFS

3A - EI - TOTALS BY PARAMETER BY AI

10/2/2003 4:01:47PM

MASTER AI ID: 876 Koppers Inc

CRITERIA

	<u>INCLUDED</u>	<u>NOT INCLUDED</u>	<u>A - Actual</u>	<u>P - Potential</u>
Carbon Monoxide				
630-08-0				
	52.1700		P	lb/hr
	228.5100		P	tons/yr
Nitrogen oxides				
	16.4800		P	lb/hr
	72.1800		P	tons/yr
Particulate Matter (10 microns or less)				
	41.4250		P	lb/hr
	158.0000		P	tons/yr
Particulate Matter				
	41.4250		P	lb/hr
	158.0000		P	tons/yr
Sulfur Dioxide				
2025884				
	15.0600		P	lb/hr
	65.9900		P	tons/yr
VOC				
	16.2400	6.7100	P	lb/hr
	101.6300		P	tons/yr

3A - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876

Koppers Inc

10/2/2003

4:01:54PM

HAP TOTALS

	<u>INCLUDED</u>	<u>NOT INCLUDED</u>	<u>A - ACTUAL</u>	<u>P - POTENTIAL</u>
TOTAL HAPS				
	0.00	0.00	P	lb/hr
	12.25	0.00	P	tons/yr
<hr/>				
TOTAL VOC HAPS				
	11.95	0.00	P	tons/yr
<hr/>				
TOTAL NON VOC HAPS				
	0.00	0.00	P	lb/hr
	0.30	0.00	P	tons/yr
<hr/>				

3A - EI - TOTALS BY PARAMETER BY AI

10/2/2003

4:01:54PM

MASTER AI ID: 876

Koppers Inc

HAP

<u>INCLUDED</u>	<u>NOT INCLUDED</u>	<u>A - Actual</u>	<u>P - Potential</u>
-----------------	---------------------	-------------------	----------------------

HAP, Other (NON VOC)

0.2900	P	tons/yr
--------	---	---------

**HAP, Other (VOC)
(VOC)**

6.1300	P	tons/yr
--------	---	---------

Lead

7439-92-1

0.0024	P	lb/hr
0.0105	P	tons/yr

**Naphthalene
(VOC)**

91-20-3

5.8200	P	tons/yr
--------	---	---------

3 - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876 Koppers Inc
DOCUMENT ID: 140,813 TVRA-0960-00012
PHYSICAL ADDRESS: 1 Koppers Drive
Tie Plant, MS 38960

FILE COPY

MASTER-AFS:
DOCUMENT-AFS: 04300012 Air-AIRS AFS

3 - EI - TOTALS BY PARAMETER BY AI

10/2/2003 4:14:54PM

MASTER AI ID: 876 Koppers Inc

CRITERIA

A - Actual
P - Potential

Carbon Monoxide
630-08-0

52.1700 P lb/hr
228.5100 P tons/yr

Nitrogen oxides

16.4800 P lb/hr
72.1800 P tons/yr

Particulate Matter (10 microns or less)

41.4250 P lb/hr
158.0000 P tons/yr

Particulate Matter

41.4250 P lb/hr
158.0000 P tons/yr

Sulfur Dioxide

2025884

15.0600 P lb/hr
65.9900 P tons/yr

VOC

16.2400 P lb/hr
101.6300 P tons/yr

3 - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876

Koppers Inc

10/2/2003

4:14:54PM

HAP TOTALS

A - ACTUAL
P - POTENTIAL

TOTAL HAPS

0.00

P lb/hr

12.25

P tons/yr

TOTAL VOC HAPS

11.95

P tons/yr

TOTAL NON VOC HAPS

0.00

P lb/hr

0.30

P tons/yr

3 - EI - TOTALS BY PARAMETER BY AI

10/2/2003

4:14:54PM

MASTER AI ID: 876

Koppers Inc

HAP

A - Actual
P - Potential

HAP, Other (NON VOC)

0.2900 P tons/yr

**HAP, Other (VOC)
(VOC)**

6.1300 P tons/yr

Lead

7439-92-1

0.0024 P lb/hr
0.0105 P tons/yr

**Naphthalene
(VOC)**

91-20-3

5.8200 P tons/yr

3 - EI - TOTALS BY PARAMETER BY AI

10/2/2003

4:14:54PM

MASTER AI ID: 876

Koppers Inc

CRITERIA**SUBJECT ITEM DESIGNATION****A - ACTUAL
P - POTENTIAL****Carbon Monoxide****630-08-0**

EQPT00000001	AA-001	51.1500	P	lb/hr
EQPT00000007	AA-002	1.0200	P	lb/hr
IA00000001	IA-001		P	lb/hr
		52.1700	P	lb/hr
EQPT00000001	AA-001	224.0400	P	tons/yr
EQPT00000007	AA-002	4.4700	P	tons/yr
IA00000001	IA-001		P	tons/yr
		228.5100	P	tons/yr

Nitrogen oxides

EQPT00000001	AA-001	12.4000	P	lb/hr
EQPT00000007	AA-002	4.0800	P	lb/hr
IA00000001	IA-001		P	lb/hr
		16.4800	P	lb/hr
EQPT00000001	AA-001	54.3100	P	tons/yr
EQPT00000007	AA-002	17.8700	P	tons/yr
IA00000001	IA-001		P	tons/yr
		72.1800	P	tons/yr

Particulate Matter (10 microns or less)

EQPT00000001	AA-001	32.5500	P	lb/hr
EQPT00000007	AA-002	0.4100	P	lb/hr
EQPT00000004	AA-004	2.0000	P	lb/hr
EQPT00000009	AA-010	3.4650	P	lb/hr
EQPT00000010	AA-011	3.0000	P	lb/hr
IA00000001	IA-001		P	lb/hr
		41.4250	P	lb/hr
EQPT00000001	AA-001	142.5700	P	tons/yr
EQPT00000007	AA-002	1.7900	P	tons/yr
EQPT00000004	AA-004	2.4000	P	tons/yr
EQPT00000009	AA-010	3.9400	P	tons/yr
EQPT00000010	AA-011	7.3000	P	tons/yr
IA00000001	IA-001		P	tons/yr
		158.0000	P	tons/yr

Particulate Matter

3 - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876

Koppers Inc

10/2/2003

4:14:54PM

CRITERIA

<u>SUBJECT ITEM</u>	<u>DESIGNATION</u>		<u>A - ACTUAL</u>	<u>P - POTENTIAL</u>
Particulate Matter				
EQPT00000001	AA-001	32.5500	P	lb/hr
EQPT00000007	AA-002	0.4100	P	lb/hr
EQPT00000004	AA-004	2.0000	P	lb/hr
EQPT00000009	AA-010	3.4650	P	lb/hr
EQPT00000010	AA-011	3.0000	P	lb/hr
IA00000001	IA-001		P	lb/hr
		41.4250	P	lb/hr
EQPT00000001	AA-001	142.5700	P	tons/yr
EQPT00000007	AA-002	1.7900	P	tons/yr
EQPT00000004	AA-004	2.4000	P	tons/yr
EQPT00000009	AA-010	3.9400	P	tons/yr
EQPT00000010	AA-011	7.3000	P	tons/yr
IA00000001	IA-001		P	tons/yr
		158.0000	P	tons/yr
<hr/>				
Sulfur Dioxide				
2025884				
EQPT00000001	AA-001	0.5800	P	lb/hr
EQPT00000007	AA-002	14.4800	P	lb/hr
IA00000001	IA-001		P	lb/hr
		15.0600	P	lb/hr
EQPT00000001	AA-001	2.5500	P	tons/yr
EQPT00000007	AA-002	63.4400	P	tons/yr
IA00000001	IA-001		P	tons/yr
		65.9900	P	tons/yr
<hr/>				
VOC				
EQPT00000001	AA-001	1.4000	P	lb/hr
EQPT00000007	AA-002	0.0400	P	lb/hr
EQPT00000003	AA-003		P	lb/hr
AREA00000001	AA-008	5.7700	P	lb/hr
EQPT00000008	AA-009	9.0300	P	lb/hr
EQPT00000011	AA-012		P	lb/hr
IA00000001	IA-001		P	lb/hr
		16.2400	P	lb/hr

3 - EI - TOTALS BY PARAMETER BY AI

MASTER AI ID: 876

Koppers Inc

10/2/2003

4:14:54PM

CRITERIA

<u>SUBJECT ITEM</u>	<u>DESIGNATION</u>		<u>A - ACTUAL</u>	
			<u>P - POTENTIAL</u>	
VOC				
EQPT00000001	AA-001	6.1100	P	tons/yr
EQPT00000007	AA-002	0.1800	P	tons/yr
EQPT00000003	AA-003	29.3700	P	tons/yr
AREA00000001	AA-008	25.3100	P	tons/yr
EQPT00000008	AA-009	40.0000	P	tons/yr
EQPT00000011	AA-012	0.6600	P	tons/yr
IA00000001	IA-001		P	tons/yr
		101.6300	P	tons/yr

3 - EI - TOTALS BY PARAMETER BY AI

10/2/2003

4:14:49PM

MASTER AI ID: 876

Koppers Inc

HAP

A - ACTUAL
P - POTENTIAL

SUBJECT ITEM DESIGNATION

HAP, Other (NON VOC)

AI00000876 0.2900 P tons/yr

**HAP, Other (VOC)
(VOC)**

AI00000876 6.1300 P tons/yr

Lead

7439-92-1

EQPT00000001 AA-001 0.0024 P lb/hr

EQPT00000001 AA-001 0.0105 P tons/yr

**Naphthalene
(VOC)**

91-20-3

AI00000876 5.8200 P tons/yr

July 24, 2002

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

CERTIFIED MAIL # 7000 0520 0021 7551 8692

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

Re: Request for a 502 (b)(10) Change
Koppers Industries Inc.,
Tie Plant, Mississippi
Title V Operating Permit #0960-00012

Dear Mr. Lee:

The Koppers Industries, Inc (Koppers) facility located in Tie Plant, Mississippi made the following modification in July, 2002 pursuant to the Operational Flexibility Regulations 502(b)10 and APC-S-6, Section IV.F:

Replace, in kind, the wood hog (grinder) as part of the Wood Fuel Preparation and Handling operation at emission point AA-011 under the Title V permit referenced above.


The former equipment will be replaced with a Precision Husky Chipper with an in-feed conveyor that is located in the same area of the property. This equipment is used for processing untreated wood fuel for use in our wood fired boiler. As you were notified by past correspondence, only untreated wood has been used as fuel in the boiler since October 8, 2002. At this time, our plans are to continue using only untreated wood as fuel in the boiler. There is no change to the amount of fuel consumed by the boiler.

This change, since it is a replacement in kind, will not cause emissions that are currently allowable under the Title V permit to be exceeded. No new pollutants will be emitted as a result of this change. Koppers believes that no change is necessary in permit terms and conditions as a result of this modification.

This modification does not constitute a Title I modification and does not exceed the allowable emission rate for particulate emissions regulated under the existing Title V permit for the facility. This modification does not violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring, recordkeeping, reporting, or compliance certification requirements. Further, we understand that a permit shield will not be extended to this modification.

Based on information and belief formed after reasonable inquiry, the statements contained herein are true, accurate, and complete.

Sincerely,


Thomas L. Henderson
Plant Manager

cc: Chief of the Operating Source Section
Air & Radiation Technology Branch
U.S. EPA Region IV
61 Forsythe Street
Atlanta, GA 30303

Tim Basilone - Koppers Pittsburgh

KOPPERS INDUSTRIES

Koppers Industries, Inc.

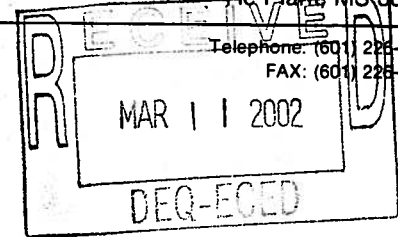
P.O. Box 160

Tie Plant, MS 38960

Telephone: (601) 228-4584

FAX: (601) 228-4588

March 8, 2002



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

RE: Facility Change Notification
Koppers Industries, Inc., Grenada, Mississippi
Title V Operating Permit #0960-00012

Dear Mr. Lee,

Koppers Industries, Inc. (Koppers) is providing this notification to the Mississippi Department of Environmental Quality (MDEQ) in accordance with Section 1.17 of our Title V Operating Permit referenced above. Plans to replace, in kind, the existing oil/water separator located at the Koppers facility in Grenada, Mississippi are currently being developed. This project is necessary in order to replace the existing oil/water separator with equipment that is located within secondary containment. The existing separator will be taken out of service, and its use will be discontinued.

The existing oil/water separator consists of an above ground concrete structure with a capacity to hold ~ 66,000 gallons of wastewater. Emissions from this separator were included within the Title V Permit for the facility.

The new oil/water separator, which will replace the existing separator in kind, will consist of an above ground tank with the capacity to hold ~ 40,000 gallons of wastewater. The tank will be constructed of steel, with an open top, and located in the general wood treating operating area near the existing separator.

This change, since it is a replacement in kind, will not cause emissions that are allowable under the Title V permit to be exceeded. In fact, emissions from the new separator will be less than those of the existing separator, due to a reduction in volume and liquid surface area that is exposed to the atmosphere. In addition, permit terms and conditions will remain applicable as written in the permit, without change.

Koppers will commence activities for the construction of the new separator in April 2002.

The existing separator will be emptied, cleaned, and taken out of service.

If you have any questions or wish to discuss this matter, please call me at (662)226-4584, extension 11.

Based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate and complete.

Yours truly,


Thomas L. Henderson
Plant Manager

cc. T. Basilone, KII – Pittsburgh

KOPPERS INDUSTRIES

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

March 7, 1994

via UPS Next Day

Telephone: (412) 227-2001

Mr. Don Watts
Air Permitting Branch
Office of Pollution Control
Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

DEPT OF ENVIRONMENTAL QUALITY
REC'D

MAR 11 1994

Re: Application for Modification and Renewal of Air Pollution
Control Operating Permit No. 0960-00012

Dear Mr. Watts:

As we discussed on January 24, enclosed are two copies of an application for Koppers Industries, Inc. (Koppers) wood preserving plant in Tie Plant, MS for the modification and renewal of our existing air pollution control permit. We are seeking to modify the permit to; 1) eliminate the provision allowing burning of wood preserving process waste as fuel additive and 2) allow use as a primary fuel used treated wood containing creosote or pentachlorophenol. In addition, the existing permit, which initially expired on December 1, 1988, was reissued to expire on May 1, 1990, and which, by letter dated September 26, 1990, was further extended indefinitely pending agency action, should be renewed to reflect our current operation.

History and Background

The Grenada Tie Plant was built in 1904 to treat railroad cross ties for the Illinois Central Railroad. The Wellons wood fired boiler was installed in 1978 to provide process heat and utilize wood waste fuel instead of fuel oil or natural gas. A small turbine and generator were installed to reduce electricity cost by utilizing excess steam.

Koppers, employing 60 people locally, produces utility poles, piling, and railroad ties for various customers in Mississippi, the eastern USA, and for export. About 80 percent of the wood we treat is purchased from within Mississippi. These products are wood which is pressure treated with creosote or pentachlorophenol wood preservative solutions.

The boiler burns wood waste derived from untreated wood. Steam is produced to provide process heat for wood preserving processes and for kilns to dry wood prior to treatment. Additionally, a turbine and electric generator utilize excess steam to provide electricity

Mr. Don Watts, Air Permitting Branch, MS DEQ

March 9, 1994

for Koppers plant and the sale of any excess electricity. Most wood waste fuel is purchased from local industries.

Koppers boiler was permitted to burn wood preserving process waste, containing pentachlorophenol and/or creosote, as fuel additive to the wood waste fuel about 1985. Burning of process waste as fuel additive continued until such wastes became listed hazardous wastes in June 1991. At that time, Koppers stopped such activity until a RCRA hazardous waste permit could be obtained. Koppers attempted to obtain a RCRA permit under the Boiler and Industrial Furnace (BIF) regulations beginning in late 1991. Due to lack of permitting progress and a negative regulatory climate for any hazardous waste combustion systems, the decision was made recently to withdraw our BIF application. A copy of the withdrawal letter, dated October 4, 1993 is included in this application package.

All such hazardous process wastes which are generated by Koppers are now, and will continue to be, disposed off-site. Koppers is no longer seeking any permit to burn hazardous wood preserving process wastes.

Disposal of the treated wood products at the end of their useful lives has become a costly issue for Koppers' customers. Although such materials are clearly not listed or characteristic hazardous waste, disposal options have become limited and costs are rapidly increasing, especially with landfill space becoming more limited. For the last several years, Koppers has been responding to our customers' needs with a program of receiving such used treated wood and recycling it for energy recovery in our industrial boilers. Koppers now operates three boilers which are permitted to burn treated wood and a fourth has obtained a permit, although facility modifications have not yet begun.

The Illinois Central Rail Road (ICRR) has met with Koppers and expressed serious interest in having Koppers provide a used tie disposal/recycling service. They are presently sending their used ties out of state for disposal. As planned, the ICRR would be the major source of used treated wood fuel. We expect to also receive used treated wood from other railroads and utility companies.

Permit Modification Requested

With this application, Koppers is requesting approval to utilize waste treated wood containing creosote and pentachlorophenol preservatives, as a primary boiler fuel. The ability to burn used treated wood as boiler fuel will help Koppers achieve two important goals; helping to reduce plant operating costs and providing

Mr. Don Watts, Air Permitting Branch, MS DEQ

March 9, 1994

improved service to our customers. Koppers is now paying a significant price for wood fuel for our boiler. We believe that use of creosote treated wood fuel will significantly lower that cost. Most railroads and utilities now dispose of used wood by landfilling at a substantial cost. The reduced disposal cost and elimination of long term liability resulting from burning the used wood as fuel at Koppers' boiler would be a substantial benefit to those customers.

Plant Modifications Required

The only plant modifications required to allow use of treated wood fuel will be for the handling and size reduction of that fuel. No modifications will be required to any part of the combustion system. As now envisioned, Koppers would purchase and install the following additional equipment:

Unloading and In-Feed System Most ties are expected to be delivered by rail car. Ties will be unloaded from rail cars by an hydraulic loader, such as a Prentice. Poles will be delivered both by rail cars and by trucks. Poles will be sheared to length, as required for processing.

Grinder A wood grinder, such as a tub grinder, will be installed to provide gross size reduction and metal removal forthe used treated wood.

Hog A new hog will be installed to replace the existing one. All fuel processed by the grinder will pass through the hog for further size reduction prior to being conveyed to the silos.

Boiler Emissions

We expect that you will have concerns about potential emissions resulting from burning of treated wood. Koppers shares this concern, but believes that creosote and pentachlorophenol treated wood waste can be burned in a boiler without causing any adverse human health or environmental impacts or any significant increase in emissions. To justify this position, considerable data is included in this application package concerning emission tests and their relevance to this project.

At Tab 2, the Emissions Inventory Calculation is provided which summarizes estimated emissions for all processes at the Koppers plant. An analysis of various emission tests for similar boilers is provided titled Grenada Boiler Emissions - Estimate Worksheet

March 9, 1994

which follows the Inventory sheets. This summarizes results of the May 1988 stack tests for burning untreated wood only, untreated wood fuel with creosote process waste, and untreated wood fuel with pentachlorophenol process waste at the Grenada boiler. It also summarizes test results for burning untreated and treated wood at Koppers Montgomery, AL boiler, and industry pooled testing done in California on wood fired boilers for submission to the CA Air Resources Board (ARB). These reference documents are included at Tab 7.

At the bottom of the worksheet, these results are then used to calculate standardized emission factors, expressed as pounds of pollutant per ton of fuel burned. For comparison, these factors are then each used to predict annual emissions from the Grenada boiler operated at it's rated capacity. Additionally, the ARB results are used to predict metals emissions from the boiler. As you can see, projected annual emissions of constituents of greatest health concern, carcinogenic PAH and pentachlorophenol, are consistent in every test and are very low.

The data indicates that the impact on emissions of burning treated wood versus untreated wood will be negligible. Polycyclic aromatic hydrocarbons (PAH) are considered within the categories of non-carcinogenic and potentially carcinogenic. Although creosote is primarily composed of PAH, PAH emissions are not statistically different for burning treated wood than for burning untreated wood. The tests document overall PAH DRE levels exceeding 99.99%. Emissions of pentachlorophenol, though clearly not associated with burning untreated wood, have been shown in tests to be effectively destroyed by combustion with DRE's greater than 99.99%. Projected emissions, based on the Montgomery tests, are only about 5 pounds per year. Thus, Koppers is confident that burning used treated wood for boiler fuel will not result in any increase in emissions over those now permitted and it will not adversely impact the surrounding population or environment.

As part of our attempt to obtain the RCRA BIF permit, Koppers made some improvements to the boiler system which we expect to benefit this permitting effort. A continuous emission monitoring system, recording CO and O₂ was installed. Information about this unit is included at Tab 4. Boiler refractory was substantially rebuilt and repair and maintenance work performed. The turbine was rebuilt. All of this work will help provide reliable combustion and emissions control and monitoring.

Mr. Don Watts, Air Permitting Branch, MS DEQ

March 9, 1994

Wood Preserving Process Emissions

Although the main reason for our submittal of this application is for the boiler fuel change, the application is intended to cover the entire plant. Thus, the Emissions Inventory Calculation at Tab 2 also covers the wood preserving processes. Emissions of creosote and pentachlorophenol are reported. Supporting calculation sheets are included at Tab 5, which are the calculations used to prepare the 1992 Toxic Release Inventory Form R report for this plant. At this tab, supporting worksheets are also included.

Permitting Process

Burning of used treated wood is a very important part of Koppers long term strategy for this plant. Koppers will actively pursue permitting and is dedicated to the safe and compliant combustion of waste treated wood fuel in our boiler.

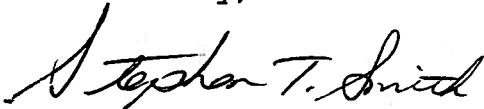
There will be substantial benefits to the public, as well as to Koppers. Additional employment of two to four full time people will result. Landfill space in the state will be conserved by eliminating disposal of this wood. Energy resources will be conserved by utilizing the energy value of this waste wood.

Proceeding with this project is important to Koppers management and the continuing viability of the plant. We will do all we can to meet your requirements and to work cooperatively with your agency. Your assistance in working through the air permit process is requested and will be greatly appreciated.

I expect that before you take any action on this application, you will want to see our plant. Thus, although we are quite willing to meet you in Jackson, I suggest that after your have had time to review the application, we meet in Tie Plant to discuss the application and tour the plant. At that time, we can decide what next steps will need to be taken.

Please call me at (412)227-2677 if you have questions or would like to arrange a time to meet. If I do not hear from you in the next couple weeks, I will call.

Sincerely,



Stephen T. Smith
Environmental Program Manager

Mr. Don Watts, Air Permitting Branch, MS DEQ

March 9, 1994

cc: Ron Murphey, Grenada, MS
Dan McLeod, MS DEQ, Jackson, MS

cc w/o attachments:

W. R. Donley, K-1750

J. R. Batchelder, K-1701

via Express Mail

May 6, 1996

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

RECEIVED
MAY - 8 1996
Dept. of Environmental Quality
Office of Pollution Control

RE: **Stack Test Report and Request for Minor Permit Modification**
Facility No. 0960-00012
Koppers Industries, Inc.
Tie Plant, Grenada County, MS

Dear Mr. Watts:

Enclosed are two copies of the Stack Test Report for the test conducted at the Koppers Industries, Inc. (KII) boiler on February 20-21, 1996. As documented by the report, most parameters are well within the requirements of the permit. Issues related to some other parameters need to be addressed.

Based on the test results and as I have discussed previously with Mr. Burchfield, KII recognizes that emission levels indicated by the test for some constituents exceed levels allowed by the permit. KII hereby requests that a minor permit modification be made to adjust some parameters to allow continued operation of the boiler in compliance with the Permit to Operate. The permit changes KII requests are listed and discussed below.

1. **Revise the Nitrogen Oxides emission limitation to 15.63 pounds per hour and 68.47 tons per year.**

This level is based on the high fire average NOX emission rate of 10.05 lb/hr, fuel feed rate of 7318 lb/hr, and an allowance for variability of 20% which results in a NOX factor of 3.30 lb-NOX per ton of fuel. This factor is then multiplied by the maximum permitted fuel feed rate of 9375 lb/hr to obtain the maximum hourly emission rate. The NOX emission level included in the application by KII and subsequently put into the permit was based on KII's expectation of NOX emissions from this boiler based on results at other boilers.

This level of NOX emission is still low by standards of most boilers. In a rule proposed by EPA in 61 Federal Register, January 19, 1996 on Nitrogen Oxides Emission Reduction Program, EPA cited emission rate factors for known low NOX boilers (LNBs). Emission factors for these LNBs

ranged from 0.262 to .484 lb-NOX/mmBTU. The factor for the KII boiler in this test was 0.232 lb-NOX/mmBTU, significantly lower than the low NOX boilers cited by EPA. Thus, the emission level requested by KII is at a "low" level and does not exceed major source levels.

- 2. Revise the emission limitation for Carbon Monoxide to 5.63 pounds per hour and 24.64 tons per year when burning any amount of treated wood fuel and 19.62 pounds per hour and 85.94 tons per year when burning only untreated wood fuel.**

With CO emissions during the stack test under 2 lb/hr, no problem is expected in meeting the existing permit limit for CO when treated wood fuel is being used. Additionally, KII has found that burning a mixture of approximately 50% untreated and 50% treated wood fuel also results in low CO emissions. However, when only untreated wood fuel is burned, the fuel quality is such that the boiler cannot be adjusted to maintain CO levels within the permit limits. KII, therefore, proposes a dual permit standard with a low limit applying whenever any amount of treated wood fuel is being burned and a higher level applying when only untreated wood fuel is in use. As discussed in the test report, the small particle size of the locally available untreated wood fuel which restricts air flow through the fuel pile is believed to be mostly responsible for the higher CO levels. The higher proposed levels equate approximately to 300 ppm.

It remains KII's intention and expectation that most of the time the boiler will be run primarily on treated wood fuel. However, KII also expects that at times it will be necessary to run on untreated wood fuel due to low availability of the treated material.

The proposed dual standard is proposed in recognition of concerns that poorer combustion, which may be indicated by higher CO levels, could cause increased emissions of products of incomplete combustion and/or wood preservative constituents. The revised limitation will assure that treated wood fuel will only be used when the lowest emission levels can be maintained.

- 3. Revise the temperature limitation to read; "The temperature in the Woodwaste Boiler must be maintained at 1140 °F or greater when firing treated wood.**

This revision is justified by the stack test results and corresponds to conditions of the low fire test scenario. The stack test was designed to show 1) the relationship between temperature probes just above the combustion cells and the probes located near the top of the secondary combustion chamber near the superheat tubes and 2) that the required DRE could be maintained during low fire conditions. Temperatures in the secondary chamber were found to be about 100 and 400°F lower under low fire and high fire conditions, respectively, than measured just above the cells. Both low and high fire condition DREs significantly exceeded the required DRE of 99.9%.

Mr. Watts, Ms DEQ

May 6, 1996

4. **Revise the description of the boiler in Part II to read; "... the 60 MMBTU/hr Wellons/Nebraska Woodwaste Boiler ..."**

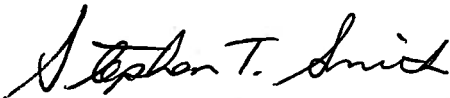
The actual heat input during the high fire test was 52 mmBTU. In order to allow for fuel variability in which wetter fuel will require more heat input, the test input level is increased by 15%.

These revisions should be processed as a minor permit modification because the changes do not relate to any practical change in operations, the change of fuel to allow treated wood fuel has recently gone through public comment, and the increased emissions will not change the plant's Title 5 permitting status. Additionally, it is likely that re-permitting will occur in the near future due to the expected issuance of a Synthetic Minor permit.

KII is unwilling to risk the further capital expense of installing the new silo, fuel grinder, and handling equipment until we can reach agreement with MS DEQ on the revised permit conditions. Therefore, your prompt review and consideration of the test report and this permit modification request will be greatly appreciated. Additionally, I will welcome the opportunity to meet with you and/or other DEQ staff concerning this permit.

Please call me at (412)227-2677 if you have questions or would like to arrange a meeting.

Sincerely,



Stephen T. Smith
Environmental Program Manager

cc: T. L. Henderson, Grenada, MS
M. Sylvester, Grenada, MS
W. A. Meisinger, Harmarville Tech. Center
Bob Daniel, Columbus, MS

cc w/o attachment:

Danny Russell, EML, P. O. Box 655, Ridgeland, Ms 39158
G. W. Caric, K-1726
W. R. Donley, K-2000
John Heller, K-2050
T. D. Loadman, K-2000
R. D. Collins, K-1701

via Express Mail

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

June 21, 1996

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

RECEIVED
JUN 24 1996
Dept. of Environmental Quality
Office of Pollution Control

RE: Title 5 Permit Application
Facility No. 0960-00012
Tie Plant, Grenada County, MS

Dear Mr. Burchfield:

Koppers Industries, Inc. (KII) has determined that the Grenada plant at Tie Plant, MS has the potential to emit major levels of pollutants and is, therefore, submitting a revision to our previously submitted Synthetic Minor Application to make it a Title 5 Application. KII conducted stack tests of our boiler on February 20-21, 1996 as required by the permit to construct. Results indicated that the major source threshold for hydrochloric acid was exceeded when pentachlorophenol treated wood fuel was used. Additionally, use of the continuous emission monitor (CEM) in conjunction with stack test results indicates that major levels of carbon monoxide (CO) may be emitted when untreated wood fuel is used.

Based on the new information resulting from the February 1996 stack test it is now clear that KII will need a Title 5 Air Permit. The operating restrictions needed to maintain the non-major status as listed in the Synthetic Minor Application are no longer necessary since the plant has the potential to be a major source. KII has reviewed and revised our operating conditions and emissions inventory calculation to reflect new data from the stack test, incorporate more conservative (higher) assumptions in emission factors, and maximum reasonable business or process volumes. The additional small emission sources identified during your plant visit have been included.

Since the application package for a Title 5 permit is basically the same as for a synthetic minor permit, I am making this application as a revision to the application submitted on March 31, 1995 and revised October 2, 1995. However, in order to avoid confusion with new and revised forms, this submittal is being made as a complete package to replace the previous submittals. To assist in your review, a list of new and revised forms in this application compared to the most recent submittal is included in the attached table. An updated Summary of Emission Points is attached. Where few changes to previously submitted forms are made, I have simply lined out the old information and written the new information next to the old. The supplemental information provided to you, dated December 18, 1995, in response to your questions remains valid.

Note that while this data indicates that KII has the potential to be a major source, actual emissions are not expected to exceed major levels due to lower actual business levels and process rates.

KII has concluded that the New Source Performance Standards(NSPS) of 40 CFR 60, Subpart Dc, Small Industrial, Commercial, Institutional, Steam Generating Units, do not apply to Source 01, Wood Fired Boiler. The recent change of fuel to used treated wood should not be considered to be a modification per the NSPS regulations because that change does not cause an increase in any air pollutant. The previous permit, issued November, 1985, allowed use of wood preserving sludge to be co-fired with wood fuel. Up to 400 pounds per hour of pentachlorophenol-in-oil and/or creosote sludge or 800 pounds per hour of creosote only sludge could be burned mixed with wood fuel. Creosote sludge would often contain 50% or more creosote. Pentachlorophenol-in-oil sludge would contain 5% or more pentachlorophenol. These constituent levels and resulting feed rates exceed the constituent feed rates measured in the 2/96 treated wood fuel stack test by over 10 times. The BTU value of the wood mixed with sludge would have exceeded the value of treated wood fuel, resulting in NOX emission rates at least as high as measured in the stack test. Although SO2 and HCl emissions were not tested under the previous permit conditions, fuel sulfur and chlorine levels would have caused emissions of these constituents to have exceeded the emission rates measured in the test burn. Thus, KII concludes that use of treated wood fuel will not cause any increase in emissions compared to emissions under the allowed operations of the November, 1985 permit. Therefore, the change to treated wood fuel does not constitute a modification. The wood fired boiler is an existing source which has not been modified or reconstructed after June 9, 1989 and is not subject to NSPS.

Similarly, the NSPS Subpart AAA, Residential Wood Heaters, does not apply to the wood stove in the shop because it was installed in 1985 and the applicability date for that Subpart is July 1, 1988.

Concerning the revised Permit to Construct which will result from this application, attached are suggested permit conditions. For the wood fired boiler, these conditions are intended to provide assurance of good combustion conditions, especially when treated wood fuel is being used, and are based on the results of the 2/96 stack test.

As you understand from our previous discussions, obtaining a permit to allow use of treated wood fuel in the cogeneration boiler is critical to our business. Our customer, the Illinois Central Railroad has a large inventory of used ties on hand which we have committed to recycle to energy. They are very anxious for us to proceed. Your efforts to speed the permitting process will be appreciated.

Mr. David Burchfield, Ms DEQ

June 21, 1996

I also apologize for putting you to the trouble of these permit changes and thank you for your patience in working with me. Please call me at (412)227-2677 if you have questions.

Sincerely,



Stephen T. Smith
Environmental Program Manager

cc: T. L. Henderson, Grenada, MS
cc w/o attachments:
G. W. Caric, K-1726
John Heller, K-2050
W. R. Donley, K-2000
R. D. Collins, K-1701

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

Srenada Co.

** INVOICE **

* * TITLE V AIR OPERATING PERMIT FEE * *

BILL TO:
 KOPPERS INDUSTRIES INC

 436 SEVENTH AVENUE
 PITTSBURG, PA 15219

INVOICE # 3510
 INVOICE DATE: 7/31/02

MDEQ CONTACTS:
 FINANCIAL: MONA VARNER 601-961-5572
 TITLE V: WAYNE ANDERSON 601-961-5153

FACILITY I.D.# 0960-00012

TERMS: DUE 9/1/2002

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	BILLED	FEE PER TON OF BILLED	TOTAL FEE
PARTICULATE MATTER	22.680		25.00	567.00
SO2	4.780		25.00	119.50
NOX	26.680		25.00	667.00
CO	66.940		0.00	0.00
VOC	39.030		25.00	975.75
LEAD	0.000		0.00	0.00
TRS	0.000		25.00	0.00
TOTAL HAP's (VOC)	1.730		0.00	0.00
TOTAL HAPs (Non-Voc)	0.400		25.00	10.00
CFC's / HCFC's	0.000		0.00	0.00
Other	0.000		25.00	0.00

TOTAL ANNUAL FEE DUE

 2,339.25
 =====

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 timely and correct submission of your AERF.

KOPPERS INDUSTRIES

Grenada
471044 ⁶⁰⁻¹⁶⁰₄₃₃

Date: AUGUST 22 2002

Pay To The Order Of: MISSISSIPPI ST DEPT ENVIRONMEN

Amount
\$2,339.25

TWO THOUSAND THREE HUNDRED THIRTY NINE AND 25/100 ONLY

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

DEA *McClain*
KOPPERS INDUSTRIES, INC.
V.P. AND C.F.O. TREASURER

Fellon Bank, N.A., Pittsburgh, PA 15259

⑈471044⑈ ⑆043301601⑆ 069⑈1665⑈

KOPPERS INDUSTRIES, INC. PITTSBURGH PA

471044

3P	CD	VENDOR	DIV	OUR AUDIT	YOUR INVOICE NBR	MO/DA	INV AMOUNT	INV DISC	NET AMT PAYABLE
	7	940505031	477	47720800026	TITLE V AIR 2002	0812	2339.25	0.00	***2339.25

0960-00012



471044

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:)
Koppers Industries, Inc.) Docket No. CAA-04-2000-0029
Grenada, Mississippi)
RESPONDENT) Proceeding Under Clean Air Act,
) Section 113 (a)(3)(B)
)
_____)

COMPLIANCE ORDER

I. STATUTORY AUTHORITY

This Compliance Order (Order) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) by Sections 113(a) of the Clean Air Act (the Act), 42 U.S.C. § 7413(a). The Administrator has delegated this authority to the Regional Administrator of EPA Region 4, who in turn delegated it to the Director, Air, Pesticides and Toxics Management Division of EPA Region 4 (Complainant).

II. FINDINGS

1. Koppers Industries, Inc. (Respondent), is the owner and operator of a Part 70 source, located in Grenada (Grenada County), which is subject to the requirements of 40 C.F.R. Part 70, as approved by EPA for the State of Mississippi on January 27, 1995 in 59 Fed. Reg. 66737-66740 (Dec. 28, 1994), and Mississippi regulations at APC-S-6.

2. Pursuant to 40 C.F.R. § 70.1(b), all sources subject to 40 C.F.R. Part 70 shall have a permit to operate that assures compliance by the source with all applicable requirements, as defined by 40 C.F.R. § 70.2.

3. In accordance with the requirements of 40 C.F.R. Part 70 and Mississippi regulations at APC-S-6, Respondent was issued a Title V operating permit by the State of Mississippi on

March 11, 1997.

4. Pursuant to Section 114(b)(3) of the Act, 42 U.S.C. § 7414(a)(3), and 40 C.F.R. § 70.6(c)(5), the permittee is required to periodically (but no less frequently than annually) certify that the facility is in compliance with all applicable requirements of the permit.

5. Pursuant to 40 C.F.R. § 70.6(c)(5), the permittee is required to submit all compliance certifications to the Administrator as well as to the permitting authority.

6. Pursuant to Section 4.2 of the Title V operating permit issued to Respondent, “[e]xcept as otherwise specified herein, the permittee shall submit to the Permit Board and to the Regional Administrator of EPA, Region 4 a certification of compliance with permit terms and conditions, including emission limitations, standards or work practices, by January 31 for the preceding calendar year.”

7. Pursuant to Section 4.2 of Respondent’s permit, Respondent was required to submit a compliance certification for calendar year 1999 to the Regional Administrator of EPA, Region 4 by January 31, 2000.

8. According to a April 26, 2000, affidavit by the keeper of the records for compliance certifications for the Regional Administrator of EPA, Region 4, as of April 26, 2000, Respondent has not submitted a compliance certification to the Regional Administrator of EPA, Region 4.

III. ORDER

Based upon the findings set forth above, IT IS HEREBY ORDERED, pursuant to Section 113(a)(3)(B) of the Act, 42 U.S.C. § 7413(a)(3)(B):

9. The provisions of this Order shall apply to Respondent and its officers, agents, servants, employees, successors, and to all persons, firms, and corporations acting under, through,

or for Respondent.

10. Respondent shall submit to the Regional Administrator of EPA, Region 4, a certification of compliance with permit terms and conditions, including emission limitations, standards or work practices for Calendar year 1999, in accordance with Section 114(a)(3) of the Act, 42 U.S.C. §7413 (a)(3) and 40 C.F.R. § 70.6(c)(5), within fourteen (14) calendar days of receipt of this Order.

11. This Order only addresses the Respondent's responsibilities under 40 C.F.R. Part 70 and in no way affects Respondent's obligations to comply with other local, state, or federal laws and regulations.

12. If Respondent fails to comply with the above, EPA has the right to take enforcement action for failure to comply with this Order.

13. This Order is effective upon receipt by Respondent.

IV. ENFORCEMENT

Section 113(a) of the Act provides that EPA may take any of the following enforcement actions based upon the findings of this Order and/or failure to comply with the above Order:

- issue an administrative penalty order pursuant to Section 113(d) of the Act for civil administrative penalties of up to \$27,500 per day of violation; or
- bring a civil action pursuant to Section 113(b) of the Act for injunctive relief or civil penalties of not more than \$27,500 per day for each violation.

Furthermore, for any person who knowingly violates the provisions of the Act as set forth in Section 113(c), criminal penalties, imprisonment, or both are possible. Under Section 306 of the Act, the regulations promulgated thereunder (40 C.F.R. Part 15), and Executive Order 11738,

facilities to be utilized in federal contracts, grants, and loans, must be in full compliance with the Act and all regulations promulgated thereto. Violation of the Act may result in the subject facility or other facilities owned or operated by the Respondent being declared ineligible for participation in any Federal contract, grant or loan program.

V. PENALTY ASSESSMENT CRITERIA

If a penalty is assessed under Sections 113(b) or (d), Section 113(e)(1) of the Act states that the Administrator or the court, as appropriate, shall, in determining the amount of penalty to be assessed, take into consideration (in addition to such other factors as justice may require) the size of the business, the economic impact of the penalty on the business, the violator's full compliance history and good faith efforts to comply, the duration of the violation as established by any credible evidence (including evidence other than the applicable test method), payment by the violator of penalties previously assessed for the same violation, the economic benefit of non-compliance, and the seriousness of the violation.

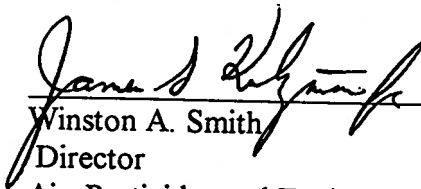
Section 113(e)(2) of the Act allows the Administrator or the court to assess a penalty for each day of the violation. For purposes of determining the number of days of the violation, where EPA makes a prima facie showing that the conduct or events giving rise to this violation are likely to have continued or recurred past the date of this notice or any prior notice of the same violation, the days of violation shall be presumed to include the date of the notice and each and every day thereafter until Respondent establishes that continuous compliance has been achieved, except to the extent that Respondent can prove by the preponderance of the evidence that there were intervening days during which no violation occurred or that violation was not continuing in nature.

This Order does not prevent the State or EPA from assessing any penalties nor otherwise affect or limit the State's or the United States' authority to enforce under other provisions of the Act, nor affect any person's obligations to comply with a term or condition of any permit or applicable implementation plan.

VI. EFFECTIVE DATE

In accordance with Section 113(a)(4) of the Act, EPA is providing Respondent with an opportunity for a conference to discuss the violation which is the subject of this Order. If Respondent does not request a conference within seven (7) calendar days of receipt of this Order, or cannot meet with EPA within 14 calendar days of receipt of this Order, this Order shall be effective immediately upon receipt by Respondent. If a conference is held between Respondent and EPA Region 4, this order shall become effective upon the day of the conference unless otherwise agreed upon at the conference. The conference, if requested, will afford Respondent an opportunity to present information bearing on the findings of this Order, on any efforts Respondent has taken to achieve compliance, and on the steps Respondent proposes to take to achieve compliance.

5/5/00
Date of Issuance



Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

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: 436 Seventh Avenue Pittsburgh 15219
(Street Location) (City) (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1999. 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 1998	Actual Annual (1999) Emission Rate (TPY)
Particulate Matter (PM)	200.13	19.37	11.31
SO2	109.94	11.2	4.92
NOX	63.37	27.45	16.52
CO	13.29	70.21	41.55
VOC*	85.22	37.64	26.91
TRS	0.00	0	0
LEAD	0.01	0.0026	0.001
CFCs/HCFCs	0.00	0	0
Other	0.00	0	0
Total HAPs (Voc)	0.00	2.21	2.77
Total HAPs (Non-Voc)	16.73	0.08	7.75

* 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. Kessler

Signature

6-21-00

Date

RECEIVED
JUN 30 2000
DEQ-UPC

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

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SO2	109.94	11.2	4.92
NOX	63.37	27.45	16.52
CO	13.29	70.21	41.55
VOC*	85.22	37.64	26.91
TRS	0.00	0	0
LEAD	0.01	0.0026	0.001
CFCs/HCFCs	0.00	0	0
Other	0.00	0	0
Total HAPs (Voc)	0.00	2.21	2.77
Total HAPs (Non-Voc)	16.73	0.08	7.75

OK
was
715/100

* 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.

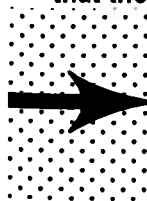
I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Thomas L. Kuebler

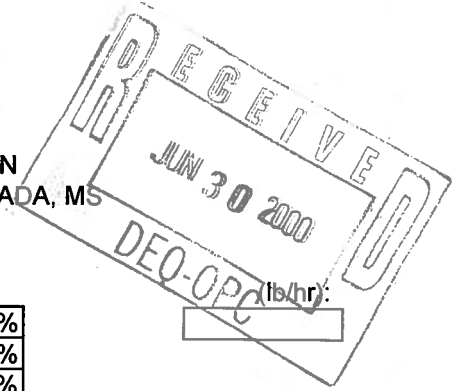
Signature

6-21-00

Date



EMISSION INVENTORY CALCULATION
 KOPPERS INDUSTRIES, INC. - GRENADA, MS
 ANNUAL EMISSIONS - 1999



01-BOILER, WOOD FIRED

	tn/yr	Sulfur	Chlorine
Total Wood Burned:	10,011	0.08%	0.12%
Creo Wood Burned:	4,337	0.10%	0.04%
Penta Wood Burned:	3,660	0.10%	0.25%
Untreated Wood Burned:	2,014	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	10.36	0.00
SO2	0.98	lb/tn	Mass Calc	4.92	0.00
NOX (3)	3.3	lb/tn	2/96 test	16.52	0.00
CO (2)	8.3	lb/tn	CEM	41.55	0.00
VOC	0.18	lb/tn	AP-42	0.90	0.00
HCl	1.538	lb/tn PCP fuel	2/96 Test	7.70	0.00
Arsenic	8.8E-05	lb/tn	AP-42	0.0004	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	0.000
Manganese	8.9E-03	lb/tn	AP-42	0.0445	0.000
Nickel	5.6E-04	lb/tn	AP-42	0.0028	0.000
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	0.000

- (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.

26-BOILER, FUEL OIL

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

**EMISSION INVENTORY CALCULATION
KOPPERS INDUSTRIES, INC. - GRENADA, MS
ANNUAL EMISSIONS - 1999**

05-WOOD PRESERVING PROCESSES

Creosote Ties	1,863,701	C. F.
Creosote Poles	82,002	C. F.
Total Creosote Wood	1,945,703	C. F.
Oil/Penta Poles	969,683	C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Creosote (VOC)	1.99E-03	lb/cf	Form R	1.94	
HAPs contained in creosote:					
Biphenyl	1.94	% in vapor	Calculation	0.04	
Dibenzofurans	5	% in vapor	Calculation	0.10	
Naphthalene	58.3	% in vapor	Calculation	1.13	
Quinoline	2.62	% in vapor	Calculation	0.05	
TOTAL CREO. HAP	67.86	% in vapor		1.31	
Pentachlorophenol (VOC)	2.06E-06	lb/cf	Form R	0.00	
#6 Oil (VOC)	1.0E-02	lb/cf	Engr. Est.	4.85	
TOTAL VOC				6.79	

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	3.96	0.90
Naphthalene	1.37E-03	lb/cf	FR Test	1.28	0.29
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	0.47	0.11
Naphthalene	3.34E-03	lb/cf	FR Test	0.137	0.031
Benzene	4.23E-06	lb/cf	FR Test	0.000	0.000
Toluene	1.52E-04	lb/cf	FR Test	0.006	0.001
Penta Poles					
Oil (VOC, est. as creo)	1.15E-02	lb/cf	FR Test	5.58	1.27
Pentachlorophenol	1.9E-06	lb/cf	Engr. Est.	0.001	0.000
Totals					
VOC				10.01	2.28
Naphthalene				1.41	0.32
Benzene				0.002	0.000
Toluene				0.039	0.009
Pentachlorophenol				0.001	0.000
HAP Organics (Total)				1.46	0.33

**EMISSION INVENTORY CALCULATION
KOPPERS INDUSTRIES, INC. - GRENADA, MS
ANNUAL EMISSIONS - 1999**

31-DRY KILNS

Poles Dried

768,754 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	19.22	9.03

27-CYCLONES FOR WOOD MILLING

Number of Cyclones:

1

Ave. Hours/Day:

0

Ave Days/Yr Each:

0

Total Hours:

0

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	0.00	0

32-POLE PEELER

Poles Peeled= 241,025 CF/yr

440 CF/hr

Pole Density= 45 lb/CF

Pole Amount Peeled= 5,423 tn/yr

9.9 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.350	lb/ton	AP-42	0.95	3.465

33-SPACE HEATERS, NATURAL GAS

Location	BTU/Hr	BTU/CF	CF/Hr	Hr/Yr	MMCF/Yr
Boiler House	200000	1000	200	0.00	0
Standby Boiler Room	100000	1000	100	0.00	0

**EMISSION INVENTORY CALCULATION
KOPPERS INDUSTRIES, INC. - GRENADA, MS
ANNUAL EMISSIONS - 1999**

E C E I V
JUN 30 2000
DE-0-0pg

Fire Pump Building
TOTAL

20000	1000	20	0.00	0
320000		320		

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.18	lb/MMCF	AP-42	0.00	0.00
SO2	0.6	lb/MMCF	AP-42	0.00	0.00
NOX	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 (Fugitive)

Wood Fuel Processed Tn/Yr tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	0.25	lb/tn	Engr. Est.	1.25	3.00

35-STEAM CLEANER, NATURAL GAS FIRED

Annual Usage hours/yr Fuel Use Rate CF/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	12	lb/MMCF	AP-42	0.00	0.01
SO2	0.6	lb/MMCF	AP-42	0.00	0.00
NOX	100	lb/MMCF	AP-42	0.00	0.04
CO	21	lb/MMCF	AP-42	0.00	0.01
VOC	5.8	lb/MMCF	AP-42	0.00	0.00

36-WOOD STOVE HEATER, SHOP

Annual Usage tn/yr Fuel Use Rate tn/hr

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

37-PARTS CLEANERS, DEGREASERS

Number of units operating:

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

**EMISSION INVENTORY CALCULATION
KOPPERS INDUSTRIES, INC. - GRENADA, MS
ANNUAL EMISSIONS - 1999**

TOTAL PLANT EMISSIONS

Pollutant	Estimated (tn/yr)	Emissions (lb/hr)
Particulate (less fugitive)	11.31	
SO2 (2)	4.92	
NOX	16.52	
CO	41.55	
VOC(less fugitive)	26.91	
HAPs(Organics/VOC)	2.77	
Naphthalene	2.54	
HAP Metals	0.05	
HCl	7.70	
Total HAPs	10.52	

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

$$\begin{aligned}
 \text{Total HAP's (non-VOC)} &= 10.52 \text{ tpy} - 2.77 \text{ tpy} \\
 &= 7.75 \text{ tpy}
 \end{aligned}$$

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

Grenada

** INVOICE **

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

BILL TO:
 KOPPERS INDUSTRIES INC

 436 SEVENTH AVENUE
 PITTSBURG, PA 15219

INVOICE # 3039
 INVOICE DATE: 7/31/01

 MDEQ CONTACTS:
 FINANCIAL: M. VARNER 601-961-5572
 ENGINEERING: W.ANDERSON 601-961-5153

FACILITY I.D. # 0960-00012

TERMS: DUE 9/1/01

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	26.68	26.68	21.00	560.28
SO2	7.18	7.18	21.00	150.78
NOX	31.93	31.93	21.00	670.53
CO	80.31	80.31	0.00	0.00
VOC	34.68	34.68	21.00	728.28
LEAD	0.00	0.00	0.00	0.00
TRS	0.00	0.00	21.00	0.00
TOTAL HAP's (VOC)	5.20	5.20	0.00	0.00
TOTAL HAPs (Non-Voc)	2.13	2.13	21.00	44.73
CFC's / HCFC's	0.00	0.00	0.00	0.00
Other	0.00	0.00	21.00	0.00

TOTAL ANNUAL FEE DUE

 2,154.60
 =====

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 * * * * *

**KOPPERS
INDUSTRIES**

Grenada 62-4
398391 311

Date: AUGUST 2000

Pay To The Order Of: MISSISSIPPI ST DEPT ENVIRONMEN

Amount
\$1,348.20

ONE THOUSAND THREE HUNDRED FORTY EIGHT AND 20/100 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. *McAhenning*
TREASURER

⑈ 398391 ⑈ ⑆031100047⑆ 200943 678⑈

KOPPERS INDUSTRIES, INC. PITTSBURGH PA

398391

SP	CD	VENDOR	DIV	OUR	AUDIT	YOUR	INVOICE	NBR	MO/DA	INV	INV	AMOUNT	DISC	NET AMT	PAYABLE
*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
940505031	477	02400081148	2619						0711			1348.20	0.00	***1348.20	



0960 - 00012

398391

Glenman

DEPARTMENT 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

 436 SEVENTH AVENUE
 PITTSBURG, PA 15219

INVOICE # 2619
 INVOICE DATE: 7/31/00

 MDEQ CONTACTS:
 FINANCIAL: M. VARNER 601-961-5572
 ENGINEERING: W. ANDERSON 601-961-5153

FACILITY I.D. # 0960-00012

TERMS: DUE 9/1/00

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	11.31	11.31	20.00	226.20
SO2	4.92	4.92	20.00	98.40
NOX	16.52	16.52	20.00	330.40
CO	0.00	0.00	0.00	0.00
VOC	26.91	26.91	20.00	538.20
LEAD	0.00	0.00	0.00	0.00
TRS	0.00	0.00	20.00	0.00
TOTAL HAP's (VOC)	0.00	0.00	0.00	0.00
TOTAL HAPs (Non-Voc)	7.75	7.75	20.00	155.00
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

 1,348.20
 =====

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 * * * * *