

NOTTERS INC
MSP090300
2001—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)	Point Desc: PG- Plant Entrance (General). Data collected by Mike Hardy on 11/8/2005. Elevation 223 feet. Just inside entrance gate. Method: GPS Code (Psuedo Range) Standard Position (SA Off) Datum: NAD83 Type: MDEQ	Section: Township: Range:	SWIMS TerraServer Map It

12/20/2006 12:16:40 PM

000876 Koppers Industries, Inc.

AI NAME: Koppers Industries Inc
BRANCH: Energy and Transportation Branch
COUNTY: Grenada
REGION: NRO
SIC 1: 2491

Physical Address

Mailing Address

Line 1: 1 Koppers Drive
Line 2:
Line 3:
City: Tie Plant
State: MS
Zip: 38960

Line 1: PO Box 160
Line 2:
Line 3:
City: Tie Plant
State: MS
Zip: 38960

Locational Information

Latitude: Longitude
Section: Township: Range:

Historic Names, Active Permit Numbers, and Other Associated IDs

RELATION or PERMIT TYPE	ALT/HISTORIC ID	ALT / HISTORIC NAME	START DATE
Air-AIRS AFS	04300012	Koppers Industries, Inc.	10/12/2000
Air-Title V Operating	096000012	Koppers Industries, Inc.	03/11/1997
Hazardous Waste-EPA ID	MSD007027543	Koppers Industries, Inc.	10/12/2000
Hazardous Waste-TSD	HW8854301	Koppers Industries, Inc.	11/10/1999
Official Site Name	876	Koppers Industries, Inc.	11/09/1981
Water-Pretreatment	MSP090300	Koppers Industries, Inc.	09/18/2001

Water Information

BASIN	RECEIVING STREAMS
Yazoo River Basin	1.) 2.) 3.) 4.)

Staff to AI Assignments

MDEQ STAFF	FUNCTIONAL AREA
Rao, Maya	Permitting, Branch Manager
Rao, Maya	Permitting, Permit Writer
Lee, David	Compliance, Management
Collier, Melissa	Compliance, Staff
Collier, Melissa	Enforcement
Whittington, Darryail	Regional Office, Management

000876 Koppers Industries, Inc.

Related People Information

<u>PERSON NAME</u>	<u>REALTIONSHIP</u>
Henderson, Thomas	Is Air Permit Contact For
Henderson, Thomas	Is Water Permit Contact For
Henderson, Thomas	Is Contact For
Basilone, Timothy	Is Contact For

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/08/03**Date Sampled:** 12/02/03**Time Sampled:** 13:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/03/03**Sample Description:** Outfall 001**Sample Number:** BB60896**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	9.3	1.0	mg/L	405.1	JKS	12/03/03
Oil & Grease	ND	2.0	mg/L	1664A	CNB	12/04/03
Total Suspended Solids	20	1.0	mg/L	160.2	MWS	12/04/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/04/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/04/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/04/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/04/03
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	12/04/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	12/04/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/04/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	12/04/03
Pentachlorophenol	0.008	0.001	mg/L	625	RLT	12/04/03
Phenol	ND	0.002	mg/L	625	RLT	12/04/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/04/03

ND = Not Detected

Quality Assurance/Quality Control

B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/15/03

Date Sampled: 12/09/03

Time Sampled: 13:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/10/03

Sample Description: Outfall 001

Sample Number: BB61294

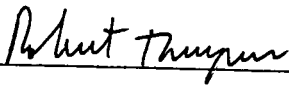
Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	21	1.0	mg/L	405.1	JKS	12/10/03
Oil & Grease	4.9	2.0	mg/L	1664A	CNB	12/11/03
Total Suspended Solids	41	1.0	mg/L	160.2	MWS	12/12/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/11/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/11/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/11/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/11/03
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	12/11/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	12/11/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/11/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	12/11/03
Pentachlorophenol	0.009	0.001	mg/L	625	RLT	12/11/03
Phenol	ND	0.002	mg/L	625	RLT	12/11/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/11/03

ND = Not Detected


Quality Assurance/Quality Control
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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/24/03

Date Sampled: 12/16/03

Time Sampled: 14:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/17/03

Sample Description: Outfall 001

Sample Number: BB61815

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	18.3	1.0	mg/L	405.1	JKS	12/18/03
Oil & Grease	ND	4.0	mg/L	1664A	CNB	12/17/03
Total Suspended Solids	66	1.0	mg/L	160.2	MWS	12/22/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/18/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/18/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/18/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/18/03
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	12/18/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	12/18/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/18/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	12/18/03
Pentachlorophenol	0.011	0.001	mg/L	625	RLT	12/18/03
Phenol	ND	0.002	mg/L	625	RLT	12/18/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/18/03

ND = Not Detected


Quality Assurance/Quality Control
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235 Highpoint Drive
Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited
LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/31/03
Date Received: ~~12/22/03~~
Date/Time Sampled: 12/22/03 11:00
Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Project Number:

Sample Description: Outfall 001

Sample Number: BB62050

Sample Matrix: WATER

Page Number: 1

Parameter	Result	Det Limit	Units	Method	Analysts	Date	Time
Biochemical Oxygen Demand	27.6	1.0	mg/L	405.1	JKS	12/24/03	09:20
Oil & Grease	ND	6.7	mg/L	1664A	CNB	12/22/03	16:00
Total Suspended Solids	188	1.0	mg/L	160.2	MWS	12/26/03	14:00
Phenolic Compounds							
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/23/03	15:43
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/23/03	15:43
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/23/03	15:43
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/23/03	15:43
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	12/23/03	15:43
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	12/23/03	15:43
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/23/03	15:43
4-Nitrophenol	ND	0.006	mg/L	625	RLT	12/23/03	15:43
Pentachlorophenol	0.010	0.001	mg/L	625	RLT	12/23/03	15:43
Phenol	ND	0.002	mg/L	625	RLT	12/23/03	15:43
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/23/03	15:43

ND = Not Detected


Quality Assurance/Quality Control


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Ridgeland, Mississippi 39157

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NELAP Accredited

NELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 01/05/04

Date Sampled: 12/29/03

Time Sampled: 10:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/29/03

Sample Description: Outfall 001

Sample Number: BB62220

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	15.3	1.0	mg/L	405.1	JKS	12/31/03
Oil & Grease	ND	2.0	mg/L	1664A	CNB	12/31/03
Total Suspended Solids	190	1.0	mg/L	160.2	MWS	12/31/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/30/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/30/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/30/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/30/03
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	12/30/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	12/30/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/30/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	12/30/03
Pentachlorophenol	0.008	0.001	mg/L	625	RLT	12/30/03
Phenol	ND	0.002	mg/L	625	RLT	12/30/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/30/03

ND = Not Detected

Quality Assurance/Quality Control

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ARGUS ANALYTICAL, INC.

235 Highpoint Drive
Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited
LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 11/11/03

Date Sampled: 11/04/03

Time Sampled: 13:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/05/03

Sample Description: Outfall 001

Sample Number: BB59521

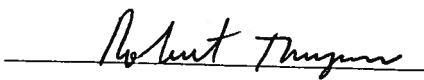
Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4	1.0	mg/L	405.1	JKS	11/05/03
Oil & Grease	ND	2.0	mg/L	1664A	JWH	11/06/03
Total Suspended Solids	23	1.0	mg/L	160.2	MWS	11/10/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	KRE	11/10/03
2-Chlorophenol	ND	0.002	mg/L	625	KRE	11/10/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	KRE	11/10/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	KRE	11/10/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	KRE	11/10/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	KRE	11/10/03
2-Nitrophenol	ND	0.002	mg/L	625	KRE	11/10/03
4-Nitrophenol	ND	0.005	mg/L	625	KRE	11/10/03
Pentachlorophenol	ND	0.005	mg/L	625	KRE	11/10/03
Phenol	ND	0.002	mg/L	625	KRE	11/10/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	KRE	11/10/03

ND = Not Detected


Quality Assurance/Quality Control


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ARGUS ANALYTICAL, INC.

235 Highpoint Drive
Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited
LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 11/20/03

Date Sampled: 11/12/03

Time Sampled: 11:30

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/13/03

Sample Description: Outfall 001

Sample Number: BB59845


Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	6	1.0	mg/L	405.1	JKS	11/13/03
Oil & Grease	ND	6.7	mg/L	1664A	CNB	11/14/03
Total Suspended Solids	15	1.0	mg/L	160.2	MWS	11/18/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	11/19/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	11/19/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	11/19/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	11/19/03
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	11/19/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	11/19/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	11/19/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	11/19/03
Pentachlorophenol	0.016	0.001	mg/L	625	RLT	11/19/03
Phenol	ND	0.002	mg/L	625	RLT	11/19/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	11/19/03

ND = Not Detected


Quality Assurance/Quality Control


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Ridgeland, Mississippi 39157

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

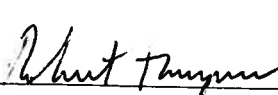
Date Reported: 11/26/03
Date Received: 11/19/03
Date/Time Sampled: 11/18/03 13:00
Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Project Number:**Sample Description:** Outfall 001**Sample Number:** BB60160**Sample Matrix:** WATER**Page Number:** 1

Parameter	Result	Det Limit	Units	Method	Analysts	Date	Time
Biochemical Oxygen Demand	13.4	1.0	mg/L	405.1	JKS	11/20/03	10:15
Oil & Grease	ND	6.7	mg/L	1664A	CNB	11/20/03	16:05
Total Suspended Solids	15	1.0	mg/L	160.2	MWS	11/20/03	17:30
Phenolic Compounds							
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	11/19/03	17:03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	11/19/03	17:03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	11/19/03	17:03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	11/19/03	17:03
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	11/19/03	17:03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	11/19/03	17:03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	11/19/03	17:03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	11/19/03	17:03
Pentachlorophenol	0.019	0.001	mg/L	625	RLT	11/19/03	17:03
Phenol	ND	0.002	mg/L	625	RLT	11/19/03	17:03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	11/19/03	17:03

ND = Not Detected


Quality Assurance/Quality Control
B. G. Giessner, Ph.D.

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235 Highpoint Drive
Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited
LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/03/03

Date Sampled: 11/25/03

Time Sampled: 14:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/26/03

Sample Description: Outfall 001

Sample Number: BB60666

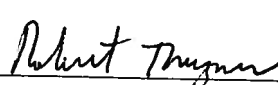
Sample Matrix: WATER


Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	21.6	1.0	mg/L	405.1	JKS	11/26/03
Oil & Grease	ND	6.7	mg/L	1664A	CNB	12/02/03
Total Suspended Solids	23	1.0	mg/L	160.2	MWS	12/01/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/02/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/02/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/02/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/02/03
4,6-Dinitro-2-methylphenol	ND	0.001	mg/L	625	RLT	12/02/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	12/02/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/02/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	12/02/03
Pentachlorophenol	0.008	0.001	mg/L	625	RLT	12/02/03
Phenol	ND	0.002	mg/L	625	RLT	12/02/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/02/03

ND = Not Detected


Quality Assurance/Quality Control


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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 10/17/03**Date Sampled:** 10/08/03**Time Sampled:** 15:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/09/03**Sample Description:** Outfall 001**Sample Number:** BB58178**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	5.6	1.0	mg/L	405.1	JKS	10/09/03
Oil & Grease	ND	2.0	mg/L	1664A	JWH	10/14/03
Total Suspended Solids	24	1.0	mg/L	160.2	MWS	10/14/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	10/16/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	10/16/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	10/16/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	10/16/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	10/16/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	10/16/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	10/16/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	10/16/03
Pentachlorophenol	ND	0.005	mg/L	625	RLT	10/16/03
Phenol	ND	0.002	mg/L	625	RLT	10/16/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	10/16/03

ND = Not Detected


Quality Assurance/Quality Control
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Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 10/22/03**Date Sampled:** 10/14/03**Time Sampled:****Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/15/03**Sample Description:** Outfall 001**Sample Number:** BB58492**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	11.1	1.0	mg/L	405.1	JKS	10/15/03
Oil & Grease	ND	2.2	mg/L	1664A	JWH	10/21/03
Total Suspended Solids	23	1.0	mg/L	160.2	MWS	10/17/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	10/20/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	10/20/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	10/20/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	10/20/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	10/20/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	10/20/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	10/20/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	10/20/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	10/20/03
Phenol	ND	0.002	mg/L	625	RLT	10/20/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	10/20/03

ND = Not Detected


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ATTN: Haley Biddy

Date Reported: 10/31/03**Date Sampled:** 10/21/03**Time Sampled:** 15:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/22/03**Sample Description:** Outfall 001**Sample Number:** BB58773**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	5.4	1.0	mg/L	405.1	JKS	10/22/03
Oil & Grease	ND	2.0	mg/L	1664A	JWH	10/29/03
Total Suspended Solids	59	1.0	mg/L	160.2	MWS	10/24/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	JAR	10/27/03
2-Chlorophenol	ND	0.002	mg/L	625	JAR	10/27/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	JAR	10/27/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	JAR	10/27/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	JAR	10/27/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	JAR	10/27/03
2-Nitrophenol	ND	0.002	mg/L	625	JAR	10/27/03
4-Nitrophenol	ND	0.005	mg/L	625	JAR	10/27/03
Pentachlorophenol	ND	0.005	mg/L	625	JAR	10/27/03
Phenol	ND	0.002	mg/L	625	JAR	10/27/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	JAR	10/27/03

ND = Not Detected


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ATTN: Haley Biddy



Date Reported: 11/04/03**Date Sampled:** 10/28/03**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/29/03**Sample Description:** Outfall 001**Sample Number:** BB59139**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	8.4	1.0	mg/L	405.1	JKS	10/30/03
Oil & Grease	ND	2.0	mg/L	1664A	SMB	11/01/03
Total Suspended Solids	78	1.0	mg/L	160.2	MWS	11/03/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	KRE	11/03/03
2-Chlorophenol	ND	0.002	mg/L	625	KRE	11/03/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	KRE	11/03/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	KRE	11/03/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	KRE	11/03/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	KRE	11/03/03
2-Nitrophenol	ND	0.002	mg/L	625	KRE	11/03/03
4-Nitrophenol	ND	0.005	mg/L	625	KRE	11/03/03
Pentachlorophenol	ND	0.005	mg/L	625	KRE	11/03/03
Phenol	ND	0.002	mg/L	625	KRE	11/03/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	KRE	11/03/03

ND = Not Detected


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1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 09/11/03

Date Sampled: 09/02/03

Time Sampled: 13:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/03/03

Sample Description: Outfall 001

Sample Number: BB56489

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	42	1.0	mg/L	405.1	JKS	09/03/03
Oil & Grease	ND	2.0	mg/L	1664A	JWH	09/09/03
Total Suspended Solids	43	1.0	mg/L	160.2	MWS	09/04/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/03/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/03/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/03/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/03/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	09/03/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	09/03/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/03/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	09/03/03
Pentachlorophenol	0.008	0.005	mg/L	625	RLT	09/03/03
Phenol	ND	0.002	mg/L	625	RLT	09/03/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/03/03

ND = Not Detected


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ATTN: Haley Biddy

Date Reported: 09/17/03**Date Sampled:** 09/09/03**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/10/03**Sample Description:** Outfall 001**Sample Number:** BB56792**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	9	1.0	mg/L	405.1	JKS	09/11/03
Oil & Grease	ND	2.2	mg/L	1664A	JWH	09/16/03
Total Suspended Solids	13	1.0	mg/L	160.2	MWS	09/12/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/12/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/12/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/12/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/12/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	09/12/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	09/12/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/12/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	09/12/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	09/12/03
Phenol	ND	0.002	mg/L	625	RLT	09/12/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/12/03

ND = Not Detected


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Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 09/23/03

Date Sampled: 09/16/03

Time Sampled: 15:50

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/17/03

Sample Description: Outfall 001

Sample Number: BB57129


Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	7.2	1.0	mg/L	405.1	JKS	09/18/03
Oil & Grease	ND	2.1	mg/L	1664A	JWH	09/17/03
Total Suspended Solids	17	1.0	mg/L	160.2	AMB	09/18/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/17/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/17/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/17/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/17/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	09/17/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	09/17/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/17/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	09/17/03
Pentachlorophenol	ND	0.005	mg/L	625	RLT	09/17/03
Phenol	ND	0.002	mg/L	625	RLT	09/17/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/17/03

ND = Not Detected


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ATTN: Haley Biddy



Date Reported: 10/01/03**Date Sampled:** 09/23/03**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/24/03**Sample Description:** Outfall 001**Sample Number:** BB57430**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	10.2	1.0	mg/L	405.1	JKS	09/25/03
Oil & Grease	ND	2.2	mg/L	1664A	JWH	09/29/03
Total Suspended Solids	14	1.0	mg/L	160.2	AMB	09/25/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/29/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/29/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/29/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/29/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	09/29/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	09/29/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/29/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	09/29/03
Pentachlorophenol	ND	0.005	mg/L	625	RLT	09/29/03
Phenol	ND	0.002	mg/L	625	RLT	09/29/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/29/03

ND = Not Detected


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ATTN: Haley Biddy

Date Reported: 10/09/03
Date Received: 10/01/03
Date/Time Sampled: 09/30/03 14:00
Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Project Number:

Sample Description: Outfall 001

Sample Number: BB57794

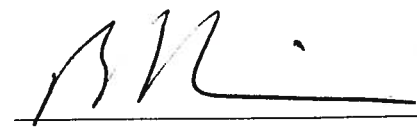
Sample Matrix: WATER

Page Number: 1

Parameter	Result	Det Limit	Units	Method	Analysts	Date	Time
Biochemical Oxygen Demand	9.6	1.0	mg/L	405.1	JKS	10/01/03	06:15
Oil & Grease	ND	6.7	mg/L	1664A	JWH	10/08/03	10:00
Total Suspended Solids	13	1.0	mg/L	160.2	MWS	10/02/03	14:30
Phenolic Compounds							
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	10/01/03	17:11
2-Chlorophenol	ND	0.002	mg/L	625	RLT	10/01/03	17:11
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	10/01/03	17:11
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	10/01/03	17:11
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	10/01/03	17:11
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	10/01/03	17:11
2-Nitrophenol	ND	0.002	mg/L	625	RLT	10/01/03	17:11
4-Nitrophenol	ND	0.006	mg/L	625	RLT	10/01/03	17:11
Pentachlorophenol	ND	0.006	mg/L	625	RLT	10/01/03	17:11
Phenol	ND	0.002	mg/L	625	RLT	10/01/03	17:11
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	10/01/03	17:11

ND = Not Detected


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ATTN: Haley Biddy

Date Reported: 03/12/03**Date Sampled:** 03/04/03**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

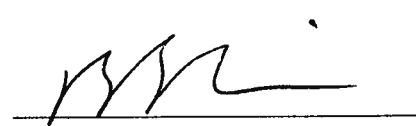
Date Received: 03/05/03**Sample Description:** Outfall 001**Sample Number:** BB46466**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4.2	1.0	mg/L	405.1	JKS	03/05/03
Oil & Grease	ND	2.1	mg/L	1664A	SMB	03/11/03
Total Suspended Solids	40	1.0	mg/L	160.2	BB	03/05/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	03/07/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	03/07/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	03/07/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	03/07/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	03/07/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	03/07/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	03/07/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	03/07/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	03/07/03
Phenol	ND	0.002	mg/L	625	RLT	03/07/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	03/07/03

ND = Not Detected



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ATTN: Haley Biddy

Date Reported: 03/18/03**Date Sampled:** 03/11/03**Time Sampled:** 13:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 03/12/03**Sample Description:** Outfall 001**Sample Number:** BB46879**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	3.6	1.0	mg/L	405.1	JKS	03/12/03
Oil & Grease	ND	6.7	mg/L	1664A	SMB	03/17/03
Total Suspended Solids	13	1.0	mg/L	160.2	BB	03/14/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	03/12/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	03/12/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	03/12/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	03/12/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	03/12/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	03/12/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	03/12/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	03/12/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	03/12/03
Phenol	ND	0.002	mg/L	625	RLT	03/12/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	03/12/03

ND = Not Detected


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ATTN: Haley Biddy

Date Reported: 03/25/03**Date Sampled:** 03/18/03**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

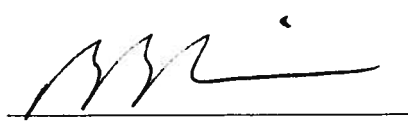
Date Received: 03/19/03**Sample Description:** Outfall 001**Sample Number:** BB47261**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	3.6	1.0	mg/L	405.1	JKS	03/19/03
Oil & Grease	ND	6.7	mg/L	1664A	SMB	03/20/03
Total Suspended Solids	16	1.0	mg/L	160.2	BB	03/19/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	03/21/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	03/21/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	03/21/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	03/21/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	03/21/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	03/21/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	03/21/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	03/21/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	03/21/03
Phenol	ND	0.002	mg/L	625	RLT	03/21/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	03/21/03

ND = Not Detected



Quality Assurance/Quality Control



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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 04/02/03**Date Sampled:** 03/25/03**Time Sampled:** 13:30**Sampled by:** MH


Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 03/26/03**Sample Description:** Outfall 001**Sample Number:** BB47675**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4.8	1.0	mg/L	405.1	JKS	03/27/03
Oil & Grease	ND	6.7	mg/L	1664A	SMB	04/01/03
Total Suspended Solids	17	1.0	mg/L	160.2	BB	03/26/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	03/31/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	03/31/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	03/31/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	03/31/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	03/31/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	03/31/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	03/31/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	03/31/03
Pentachlorophenol	ND	0.005	mg/L	625	RLT	03/31/03
Phenol	ND	0.002	mg/L	625	RLT	03/31/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	03/31/03

ND = Not Detected


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To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 02/11/03

Date Sampled: 02/04/03

Time Sampled: 13:00

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 02/05/03

Sample Description: Outfall 001

Sample Number: BB45028


Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	8	1.0	mg/L	405.1	JKS	02/06/03
Oil & Grease	ND	2.1	mg/L	1664A	SMB	02/10/03
Total Suspended Solids	36	1.0	mg/L	160.2	BB	02/05/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	02/07/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	02/07/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	02/07/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	02/07/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	02/07/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	02/07/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	02/07/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	02/07/03
Pentachlorophenol	ND	0.005	mg/L	625	RLT	02/07/03
Phenol	ND	0.002	mg/L	625	RLT	02/07/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	02/07/03

ND = Not Detected


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1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 02/21/03**Date Sampled:** 02/12/03**Time Sampled:** 13:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 02/13/03**Sample Description:** Outfall 001**Sample Number:** BB45500**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	9	1.0	mg/L	405.1	JKS	02/13/03
Oil & Grease	ND	2.1	mg/L	1664A	SMB	02/19/03
Total Suspended Solids	107	1.0	mg/L	160.2	BB	02/14/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	02/17/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	02/17/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	02/17/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	02/17/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	02/17/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	02/17/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	02/17/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	02/17/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	02/17/03
Phenol	ND	0.002	mg/L	625	RLT	02/17/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	02/17/03

ND = Not Detected


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Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 02/26/03**Date Sampled:** 02/18/03**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 02/19/03**Sample Description:** Outfall 001**Sample Number:** BB45797**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	9.6	1.0	mg/L	405.1	JKS	02/20/03
Total Suspended Solids	51	1.0	mg/L	160.2	BB	02/19/03
Oil & Grease	ND	2.0	mg/L	1664A	SMB	02/21/03

ND = Not Detected


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ATTN: Haley Biddy

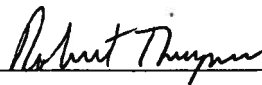
Date Reported: 02/26/03**Date Sampled:** 02/21/03**Time Sampled:** 11:00**Sampled by:** MH

Project ID/Location: Resample
Weekly Requirements

Date Received: 02/25/03**Sample Description:** Outfall 001**Sample Number:** BB46085**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	02/25/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	02/25/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	02/25/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	02/25/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	02/25/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	02/25/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	02/25/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	02/25/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	02/25/03
Phenol	ND	0.002	mg/L	625	RLT	02/25/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	02/25/03

ND = Not Detected


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Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 03/04/03**Date Sampled:** 02/25/03**Time Sampled:** 15:00**Sampled by:** MH

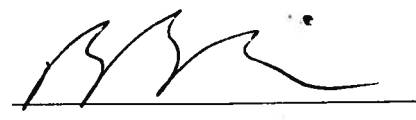
Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 02/26/03**Sample Description:** Outfall 001**Sample Number:** BB46173**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	9	1.0	mg/L	405.1	JKS	02/27/03
Oil & Grease	ND	2.2	mg/L	1664A	SMB	02/28/03
Total Suspended Solids	31	1.0	mg/L	160.2	BB	02/26/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	02/28/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	02/28/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	02/28/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	02/28/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	02/28/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	02/28/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	02/28/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	02/28/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	02/28/03
Phenol	ND	0.002	mg/L	625	RLT	02/28/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	02/28/03

ND = Not Detected


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Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 01/14/03**Date Sampled:** 01/07/03**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 01/08/03**Sample Description:** Outfall 001**Sample Number:** BB43636**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	12.8	1.0	mg/L	405.1	JKS	01/09/03
Oil & Grease	ND	2.1	mg/L	1664A	SMB	01/09/03
Total Suspended Solids	67	1.0	mg/L	160.2	PAW	01/09/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.011	mg/L	625	RLT	01/08/03
2-Chlorophenol	ND	0.011	mg/L	625	RLT	01/08/03
2,4-Dichlorophenol	ND	0.011	mg/L	625	RLT	01/08/03
2,4-Dimethylphenol	ND	0.011	mg/L	625	RLT	01/08/03
4,6-Dinitro-2-methylphenol	ND	0.027	mg/L	625	RLT	01/08/03
2,4-Dinitrophenol	ND	0.027	mg/L	625	RLT	01/08/03
2-Nitrophenol	ND	0.011	mg/L	625	RLT	01/08/03
4-Nitrophenol	ND	0.027	mg/L	625	RLT	01/08/03
Pentachlorophenol	0.565	0.027	mg/L	625	RLT	01/08/03
Phenol	ND	0.011	mg/L	625	RLT	01/08/03
2,4,6-Trichlorophenol	ND	0.011	mg/L	625	RLT	01/08/03

ND = Not Detected


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To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 01/24/03**Date Sampled:** 01/16/03**Time Sampled:** 14:00**Sampled by:** M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 01/17/03**Sample Description:** Outfall 001**Sample Number:** BB44073**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	7.8	1.0	mg/L	405.1	JKS	01/17/03
Oil & Grease	ND	6.7	mg/L	1664A	SMB	01/22/03
Total Suspended Solids	50	1.0	mg/L	160.2	BB	01/20/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	01/20/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	01/20/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	01/20/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	01/20/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	01/20/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	01/20/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	01/20/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	01/20/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	01/20/03
Phenol	ND	0.002	mg/L	625	RLT	01/20/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	01/20/03

ND = Not Detected


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1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 02/03/03

Date Sampled: 01/24/03

Time Sampled: 15:50

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 01/27/03

Sample Description: Outfall 001

Sample Number: BB44502

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Oil & Grease	ND	2.2	mg/L	1664A	SMB	01/31/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	01/28/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	01/28/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	01/28/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	01/28/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	01/28/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	01/28/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	01/28/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	01/28/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	01/28/03
Phenol	ND	0.002	mg/L	625	RLT	01/28/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	01/28/03

ND = Not Detected


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Tie Plant, MS 38960

ATTN: Haley Bidy

Date Reported: 02/17/03**Date Sampled:** 01/30/03**Time Sampled:** 14:50**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 01/30/03**Sample Description:** Outfall 001**Sample Number:** BB44769**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	8.4	1.0	mg/L	405.1	JKS	01/31/03
Oil & Grease	ND	2.1	mg/L	1664A	SMB	02/04/03
Total Suspended Solids	47	1.0	mg/L	160.2	BB	02/10/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	02/06/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	02/06/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	02/06/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	02/06/03
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	02/06/03
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	02/06/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	02/06/03
4-Nitrophenol	ND	0.006	mg/L	625	RLT	02/06/03
Pentachlorophenol	ND	0.006	mg/L	625	RLT	02/06/03
Phenol	ND	0.002	mg/L	625	RLT	02/06/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	02/06/03

ND = Not Detected


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Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/10/02**Date Sampled:** 12/03/02**Time Sampled:** 11:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/04/02**Sample Description:** Outfall 001**Sample Number:** BB41967**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4.6	1.0	mg/L	405.1	JKS	12/05/02
Oil & Grease	ND	2.0	mg/L	1664A	SMB	12/05/02
Total Suspended Solids	30	1.0	mg/L	160.2	BB	12/05/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/06/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/06/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/06/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/06/02
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	12/06/02
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	12/06/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/06/02
4-Nitrophenol	ND	0.005	mg/L	625	RLT	12/06/02
Pentachlorophenol	ND	0.005	mg/L	625	RLT	12/06/02
Phenol	ND	0.002	mg/L	625	RLT	12/06/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/06/02

ND = Not Detected


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1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/17/02**Date Sampled:** 12/10/02**Time Sampled:** 13:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/11/02**Sample Description:** Outfall 001**Sample Number:** BB42464**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	5.1	1.0	mg/L	405.1	JKS	12/12/02
Oil & Grease	ND	6.7	mg/L	1664A	SMB	12/16/02
Total Suspended Solids	35	1.0	mg/L	160.2	BB	12/11/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	JAR	12/13/02
2-Chlorophenol	ND	0.002	mg/L	625	JAR	12/13/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	JAR	12/13/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	JAR	12/13/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	JAR	12/13/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	JAR	12/13/02
2-Nitrophenol	ND	0.002	mg/L	625	JAR	12/13/02
4-Nitrophenol	ND	0.006	mg/L	625	JAR	12/13/02
Pentachlorophenol	ND	0.006	mg/L	625	JAR	12/13/02
Phenol	ND	0.002	mg/L	625	JAR	12/13/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	JAR	12/13/02

ND = Not Detected


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Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/24/02**Date Sampled:** 12/17/02**Time Sampled:** 13:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/18/02**Sample Description:** Outfall 001**Sample Number:** BB42840**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4	1.0	mg/L	405.1	JKS	12/19/02
Oil & Grease	ND	2.3	mg/L	1664A	SMB	12/23/02
Total Suspended Solids	29	1.0	mg/L	160.2	BB	12/19/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/23/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/23/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/23/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/23/02
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	12/23/02
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	12/23/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/23/02
4-Nitrophenol	ND	0.005	mg/L	625	RLT	12/23/02
Pentachlorophenol	ND	0.005	mg/L	625	RLT	12/23/02
Phenol	ND	0.002	mg/L	625	RLT	12/23/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/23/02

ND = Not Detected


Quality Assurance/Quality Control
B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 01/03/03**Date Sampled:** 12/24/02**Time Sampled:** 10:30**Sampled by:** M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/27/02**Sample Description:** Outfall 001**Sample Number:** BB43219**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Total Suspended Solids	24	1.0	mg/L	160.2	BB	12/30/02
Oil & Grease	ND	6.7	mg/L	1664A	SMB	01/02/03
<i>*BDD Expired</i>						
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	12/31/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	12/31/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	12/31/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	12/31/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	12/31/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	12/31/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	12/31/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	12/31/02
Pentachlorophenol	ND	0.006	mg/L	625	RLT	12/31/02
Phenol	ND	0.002	mg/L	625	RLT	12/31/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	12/31/02

ND = Not Detected


Quality Assurance/Quality Control
B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

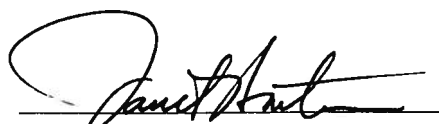
Date Reported: 01/13/03**Date Sampled:** 12/31/02**Time Sampled:** 12:00**Sampled by:** M. Harper

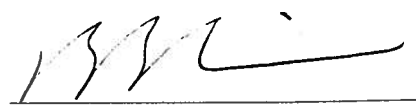
Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/31/02**Sample Description:** Outfall 001**Sample Number:** BB43317**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	5.7	1.0	mg/L	405.1	JKS	01/02/03
Oil & Grease	ND	2.1	mg/L	1664A	SMB	01/02/03
Total Suspended Solids	41	1.0	mg/L	160.2	MWS	01/02/03
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	01/03/03
2-Chlorophenol	ND	0.002	mg/L	625	RLT	01/03/03
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	01/03/03
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	01/03/03
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	01/03/03
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	01/03/03
2-Nitrophenol	ND	0.002	mg/L	625	RLT	01/03/03
4-Nitrophenol	ND	0.005	mg/L	625	RLT	01/03/03
Pentachlorophenol	ND	0.005	mg/L	625	RLT	01/03/03
Phenol	ND	0.002	mg/L	625	RLT	01/03/03
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	01/03/03

ND = Not Detected


Quality Assurance/Quality Control


B. G. Giessner, Ph.D.

KOPPERS INDUSTRIES

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

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

December 30, 2002

Mr. David Lee

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

Certified Mail 7099 3400 0002 5201 1083

Subject: Koppers Industries, Inc.
Grenada Plant-POTW Permit # MSP090300
Notification of permit exceedence

Dear Mr. Lee

This letter is to notify you of an exceedence of Koppers Industries Inc. POTW permit # MSP090300. On December 24, 2002 we discharged to the City of Grenada 37,500 gallons. This amount exceeded our permit limit by 2,500 gallons. Due to our pump losing prime from the discharge tank we had approximately 10,000 gallons carry over from the previous day. The operator reduced the system, however the permitted limit was still exceeded. We are now in the process of installing an automatic shut off so that a desired volume can be pre-set and the system will shut down when that volume has been reached. I left a voice mail message to your office on December 25, 2002 around 10:45 a.m. concerning this matter. If you have any questions please call (662) 226-4585 ext. 40

Sincerely,



Haley P. Bidy
Environmental Supervisor

CC. Clovis Tilghman, City of Grenada-WWTP
Tim Basilone, Koppers Pittsburgh

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

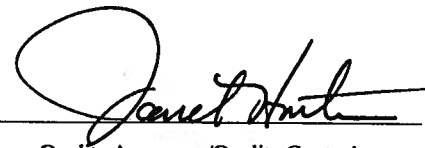
Date Reported: 11/14/02**Date Sampled:** 11/06/02**Time Sampled:** 14:00**Sampled by:** M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/07/02**Sample Description:** Outfall 001**Sample Number:** BB40482**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4.44	1.0	mg/L	405.1	JKS	11/07/02
Oil & Grease	ND	2.1	mg/L	1664A	SMB	11/13/02
Total Suspended Solids	37	1.0	mg/L	160.2	BB	11/08/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	11/07/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	11/07/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	11/07/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	11/07/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	11/07/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	11/07/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	11/07/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	11/07/02
Pentachlorophenol	0.018	0.006	mg/L	625	RLT	11/07/02
Phenol	ND	0.002	mg/L	625	RLT	11/07/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	11/07/02

ND = Not Detected


Quality Assurance/Quality Control
B. G. Giessner, Ph.D.

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 11/19/02

Date Sampled: 11/12/02

Time Sampled: 10:00

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/13/02

Sample Description: Outfall 001

Sample Number: BB40781

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	6.2	1.0	mg/L	405.1	JKS	11/14/02
Oil & Grease	ND	2.1	mg/L	1664A	SMB	11/18/02
Total Suspended Solids	39	1.0	mg/L	160.2	BB	11/14/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	11/14/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	11/14/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	11/14/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	11/14/02
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	11/14/02
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	11/14/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	11/14/02
4-Nitrophenol	ND	0.005	mg/L	625	RLT	11/14/02
Pentachlorophenol	0.011	0.005	mg/L	625	RLT	11/14/02
Phenol	ND	0.002	mg/L	625	RLT	11/14/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	11/14/02

ND = Not Detected


Quality Assurance/Quality Control
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Ridgeland, Mississippi 39157

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 11/26/02

Date Sampled: 11/19/02

Time Sampled: 11:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/20/02

Sample Description: Outfall 001**Sample Number:** BB41286**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	2.7	1.0	mg/L	405.1	JKS	11/21/02
Oil & Grease	ND	2.0	mg/L	1664A	SMB	11/25/02
Total Suspended Solids	31	1.0	mg/L	160.2	BB	11/21/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	11/21/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	11/21/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	11/21/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	11/21/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	11/21/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	11/21/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	11/21/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	11/21/02
Pentachlorophenol	ND	0.006	mg/L	625	RLT	11/21/02
Phenol	ND	0.002	mg/L	625	RLT	11/21/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	11/21/02

ND = Not Detected


Quality Assurance/Quality Control
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ARGUS ANALYTICAL, INC.

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 12/04/02

Date Sampled: 11/26/02

Time Sampled: 12:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/27/02

Sample Description: Outfall 001

Sample Number: BB41724

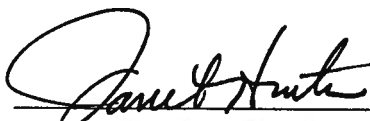
Sample Matrix: WATER

Page Number: 1

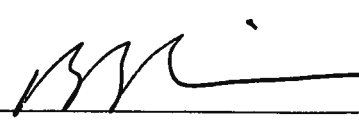
Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4	1.0	mg/L	405.1	JKS	11/27/02
Oil & Grease	ND	2.0	mg/L	1664A	SMB	12/03/02
Total Suspended Solids	41	1.0	mg/L	160.2	BB	12/02/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	11/27/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	11/27/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	11/27/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	11/27/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	11/27/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	11/27/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	11/27/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	11/27/02
Pentachlorophenol	ND	0.006	mg/L	625	RLT	11/27/02
Phenol	ND	0.002	mg/L	625	RLT	11/27/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	11/27/02

ND = Not Detected



Quality Assurance/Quality Control



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Ridgeland, Mississippi 39157

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To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

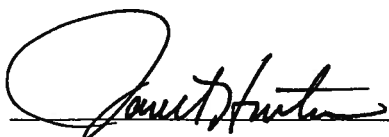
Date Reported: 10/10/02**Date Sampled:** 10/01/02**Time Sampled:** 11:00**Sampled by:** MH


Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/02/02**Sample Description:** Outfall 001**Sample Number:** BB38685**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	3.4	1.0	mg/L	405.1	JKS	10/03/02
Oil & Grease	ND	2.1	mg/L	1664A	SMB	10/09/02
Total Suspended Solids	52	1.0	mg/L	160.2	AMB	10/09/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	10/03/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	10/03/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	10/03/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	10/03/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	10/03/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	10/03/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	10/03/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	10/03/02
Pentachlorophenol	ND	0.006	mg/L	625	RLT	10/03/02
Phenol	ND	0.002	mg/L	625	RLT	10/03/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	10/03/02

ND = Not Detected


Quality Assurance/Quality Control


B. G. Giessner, Ph.D.

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LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 10/14/02**Date Sampled:** 10/07/02**Time Sampled:** 14:30**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/08/02**Sample Description:** Outfall 001**Sample Number:** BB38973**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	2.2	1.0	mg/L	405.1	MWS	10/09/02
Oil & Grease	ND	2.1	mg/L	1664A	SMB	10/11/02
Total Suspended Solids	37	1.0	mg/L	160.2	BB	10/11/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	10/09/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	10/09/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	10/09/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	10/09/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	10/09/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	10/09/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	10/09/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	10/09/02
Pentachlorophenol	ND	0.006	mg/L	625	RLT	10/09/02
Phenol	ND	0.002	mg/L	625	RLT	10/09/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	10/09/02

ND = Not Detected


Quality Assurance/Quality Control
B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy


Date Reported: 10/22/02**Date Sampled:** 10/15/02**Time Sampled:** 13:30**Sampled by:** MH

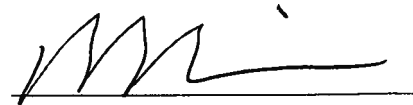
Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/16/02**Sample Description:** Outfall 001**Sample Number:** BB39386**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4.2	1.0	mg/L	405.1	JKS	10/16/02
Oil & Grease	ND	2.1	mg/L	1664A	SMB	10/21/02
Total Suspended Solids	40	1.0	mg/L	160.2	LRD	10/17/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	10/16/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	10/16/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	10/16/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	10/16/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	10/16/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	10/16/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	10/16/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	10/16/02
Pentachlorophenol	0.006	0.006	mg/L	625	RLT	10/16/02
Phenol	ND	0.002	mg/L	625	RLT	10/16/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	10/16/02

ND = Not Detected


Quality Assurance/Quality Control


B. G. Giessner, Ph.D.

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 10/29/02

Date Sampled: 10/22/02

Time Sampled: 14:00

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 10/23/02

Sample Description: Outfall 001

Sample Number: BB39771

Sample Matrix: WATER

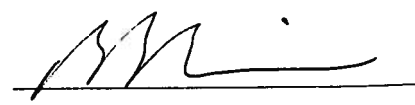
Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	6.6	1.0	mg/L	405.1	JKS	10/24/02
Oil & Grease	ND	2.2	mg/L	1664A	SMB	10/29/02
Total Suspended Solids	26	1.0	mg/L	160.2	BB	10/24/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	10/24/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	10/24/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	10/24/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	10/24/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	10/24/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	10/24/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	10/24/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	10/24/02
Pentachlorophenol	0.009	0.006	mg/L	625	RLT	10/24/02
Phenol	ND	0.002	mg/L	625	RLT	10/24/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	10/24/02

ND = Not Detected


Quality Assurance/Quality Control


B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 11/07/02

Date Sampled: 10/31/02

Time Sampled: 10:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 11/01/02

Sample Description: Outfall 001

Sample Number: BB40219

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	5.16	1.0	mg/L	405.1	JKS	11/01/02
Oil & Grease	ND	2.2	mg/L	1664A	SMB	11/07/02
Total Suspended Solids	44	1.0	mg/L	160.2	BB	11/04/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	11/01/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	11/01/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	11/01/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	11/01/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	11/01/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	11/01/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	11/01/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	11/01/02
Pentachlorophenol	0.015	0.006	mg/L	625	RLT	11/01/02
Phenol	ND	0.002	mg/L	625	RLT	11/01/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	11/01/02

ND = Not Detected


Quality Assurance/Quality Control
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235 Highpoint Drive

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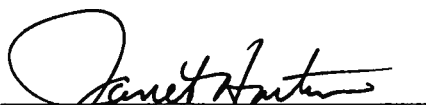

NELAP Accredited
LELAP 04023**To:** Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 09/23/02**Date Sampled:** 09/17/02**Time Sampled:** 13:30**Sampled by:** M. Harper**Project ID/Location:** Facility Discharge
Bi-Annual Requirements**Date Received:** 09/18/02**Sample Description:** Outfall 001**Sample Number:** BB37966**Project Number:****Sample Matrix:** WATER

Parameter	Result	Det Limit	Units	Method	Analysts	Date	Time
Copper	ND	0.010	mg/L	200.7	BTH	09/20/02	19:46
Chromium	ND	0.05	mg/L	200.7	BTH	09/20/02	19:47
Arsenic	ND	0.05	mg/L	200.7	BTH	09/20/02	19:47
Nickel	0.06	0.02	mg/L	200.7	BTH	09/20/02	19:44
Zinc	0.217	0.025	mg/L	200.7	BTH	09/20/02	19:44

ND = Not Detected


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Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Anthony Mayhan

Date Reported: 01/17/01

Date Sampled: 01/09/01

Time Sampled: 13:00

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 01/10/01

Sample Description: Outfall 001

Sample Number: BB00710

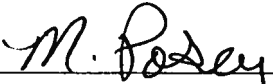
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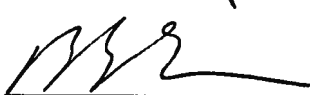
Sample Matrix: WATER

Parameter	Result	Det Limit	Units	Method	Analysts	Date	Time
Biochemical Oxygen Demand	40.5	1.0	mg/L	405.1	KWC	01/11/01	07:47
Total Suspended Solids	225	5.0	mg/L	160.2	KWC	01/15/01	10:25
Phenolics, Total	0.07	0.05	mg/L	420.1	AMB	01/15/01	09:30
Oil & Grease	ND	8.0	mg/L	1664	SMB	01/12/01	12:00
Pentachlorophenol	7.11	0.500	mg/L	625	RLT	01/11/01	10:06

*Disregard this #, the current
penta level is on the other page*

ND = Not Detected


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Ridgeland, Mississippi 39157

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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 09/11/02**Date Sampled:** 09/03/02**Time Sampled:** 12:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/04/02**Sample Description:** Outfall 001**Sample Number:** BB37136**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4	1.0	mg/L	405.1	JKS	09/05/02
Oil & Grease	ND	2.0	mg/L	1664A	SMB	09/06/02
Total Suspended Solids	8	1.0	mg/L	160.2	BB	09/04/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/05/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/05/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/05/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/05/02
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	09/05/02
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	09/05/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/05/02
4-Nitrophenol	ND	0.005	mg/L	625	RLT	09/05/02
Pentachlorophenol	ND	0.005	mg/L	625	RLT	09/05/02
Phenol	ND	0.002	mg/L	625	RLT	09/05/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/05/02

ND = Not Detected


Quality Assurance/Quality Control
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LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 09/18/02**Date Sampled:** 09/10/02**Time Sampled:** 13:30**Sampled by:** MH

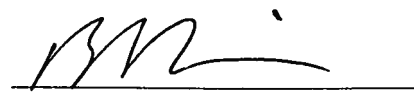
Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/11/02**Sample Description:** Outfall 001**Sample Number:** BB37483**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	4.2	1.0	mg/L	405.1	JKS	09/12/02
Oil & Grease	ND	2.1	mg/L	1664A	SMB	09/17/02
Total Suspended Solids	36	1.0	mg/L	160.2	BB	09/13/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/12/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/12/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/12/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/12/02
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	09/12/02
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	09/12/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/12/02
4-Nitrophenol	ND	0.005	mg/L	625	RLT	09/12/02
Pentachlorophenol	ND	0.005	mg/L	625	RLT	09/12/02
Phenol	ND	0.002	mg/L	625	RLT	09/12/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/12/02

ND = Not Detected


Quality Assurance/Quality Control


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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 09/23/02**Date Sampled:** 09/17/02**Time Sampled:** 13:30**Sampled by:** M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/18/02**Sample Description:** Outfall 001**Sample Number:** BB37965**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	1.5	1.0	mg/L	405.1	JKS	09/18/02
Oil & Grease	ND	2.1	mg/L	1664A	SMB	09/18/02
Total Suspended Solids	14	1.0	mg/L	160.2	BB	09/19/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/20/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/20/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/20/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/20/02
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	09/20/02
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	09/20/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/20/02
4-Nitrophenol	ND	0.005	mg/L	625	RLT	09/20/02
Pentachlorophenol	ND	0.005	mg/L	625	RLT	09/20/02
Phenol	ND	0.002	mg/L	625	RLT	09/20/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/20/02

ND = Not Detected



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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Haley Biddy

Date Reported: 10/01/02**Date Sampled:** 09/24/02**Time Sampled:** 14:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 09/25/02**Sample Description:** Outfall 001**Sample Number:** BB38304**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	1.4	1.0	mg/L	405.1	JKS	09/25/02
Oil & Grease	ND	2.0	mg/L	1664A	SMB	09/30/02
Total Suspended Solids	16	1.0	mg/L	160.2	AMB	09/26/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	09/25/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	09/25/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	09/25/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	09/25/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	09/25/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	09/25/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	09/25/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	09/25/02
Pentachlorophenol	0.007	0.006	mg/L	625	RLT	09/25/02
Phenol	ND	0.002	mg/L	625	RLT	09/25/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	09/25/02

ND = Not Detected


Quality Assurance/Quality Control
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 Ridgeland, Mississippi 39157
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NEIAP Accredited
 LELAP 04023

To: Koppers Company
 1 Koppers Drive
 Tie Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/28/02

Date Sampled: 01/22/02

Time Sampled: 10:00

Sampled by: M11

Project ID/Location: Special Analysis

Date Received: 01/23/02

Sample Description: Outfall 001

Sample Number: BB23843

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	PENDING		mg/l.	405.1		
Oil & Grease	ND	6.7	mg/L	1664A	JRW	01/24/02
Total Suspended Solids	PENDING		mg/L	160.2		
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/l.	625	RLT	01/23/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	01/23/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	01/23/02
2,4-Dimethylphenol	ND	0.002	mg/l.	625	RLT	01/23/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	01/23/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	01/23/02
2-Nitrophenol	ND	0.002	mg/l.	625	RLT	01/23/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	01/23/02
Pentachlorophenol	0.163	0.006	mg/L	625	RLT	01/23/02
Phenol	ND	0.002	mg/L	625	RLT	01/23/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	01/23/02

ND = Not Detected

Quality Assurance/Quality Control

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Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited
LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/03/02

Date Sampled: 12/19/01

Time Sampled: 10:00

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/20/01

Sample Description: Outfall 001

Sample Number: BB21847

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	102	1.0	mg/L	405.1	MWS	12/21/01
Oil & Grease	10.3	6.7	mg/L	1664A	SMB	12/28/01
Total Suspended Solids	2	1.0	mg/L	160.2	BB	12/26/01
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.210	mg/L	625	RLT	12/31/01
2-Chlorophenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4-Dichlorophenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4-Dimethylphenol	ND	0.210	mg/L	625	RLT	12/31/01
4,6-Dinitro-2-methylphenol	ND	0.525	mg/L	625	RLT	12/31/01
2,4-Dinitrophenol	ND	0.525	mg/L	625	RLT	12/31/01
2-Nitrophenol	ND	0.210	mg/L	625	RLT	12/31/01
4-Nitrophenol	ND	0.525	mg/L	625	RLT	12/31/01
Pentachlorophenol	0.919	0.525	mg/L	625	RLT	12/31/01
Phenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4,6-Trichlorophenol	ND	0.210	mg/L	625	RLT	12/31/01

ND = Not Detected



Quality Assurance/Quality Control



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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/07/02

Date Sampled: 12/26/01

Time Sampled: 10:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/27/01

Sample Description: Outfall 001

Sample Number: BB22111

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	37.5	1.0	mg/L	405.1	MWS	12/28/01
Total Suspended Solids	36	1.0	mg/L	160.2	MLO	12/31/01
Oil & Grease	PENDING		mg/L	1664A		
4-Chloro-3-methylphenol	ND	0.042	mg/L	625	RLT	12/31/01
2-Chlorophenol	ND	0.042	mg/L	625	RLT	12/31/01
2,4-Dichlorophenol	ND	0.042	mg/L	625	RLT	12/31/01
2,4-Dimethylphenol	ND	0.042	mg/L	625	RLT	12/31/01
4,6-Dinitro-2-methylphenol	ND	0.105	mg/L	625	RLT	12/31/01
2,4-Dinitrophenol	ND	0.105	mg/L	625	RLT	12/31/01
2-Nitrophenol	ND	0.042	mg/L	625	RLT	12/31/01
4-Nitrophenol	ND	0.105	mg/L	625	RLT	12/31/01
Pentachlorophenol	2.54	0.105	mg/L	625	RLT	12/31/01
Phenol	ND	0.042	mg/L	625	RLT	12/31/01
2,4,6-Trichlorophenol	ND	0.042	mg/L	625	RLT	12/31/01

ND = Not Detected

Quality Assurance/Quality Control

B. G. Giessner, Ph.D.

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Ridgeland, Mississippi 39157
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NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/31/02

Date Sampled: 01/22/02

Time Sampled: 10:00

Sampled by: MH

Project ID/Location: Special Analysis

Date Received: 01/23/02

Sample Description: Outfall 001

Sample Number: BB23843

Sample Matrix: WATER


Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	9.3	1.0	mg/L	405.1	MWS	01/24/02
Oil & Grease	ND	6.7	mg/L	1664A	JRW	01/24/02
Total Suspended Solids	460	10.	mg/L	160.2	LRD	01/25/02
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	01/23/02
2-Chlorophenol	ND	0.002	mg/L	625	RLT	01/23/02
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	01/23/02
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	01/23/02
4,6-Dinitro-2-methylphenol	ND	0.006	mg/L	625	RLT	01/23/02
2,4-Dinitrophenol	ND	0.006	mg/L	625	RLT	01/23/02
2-Nitrophenol	ND	0.002	mg/L	625	RLT	01/23/02
4-Nitrophenol	ND	0.006	mg/L	625	RLT	01/23/02
Pentachlorophenol	0.163	0.006	mg/L	625	RLT	01/23/02
Phenol	ND	0.002	mg/L	625	RLT	01/23/02
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	01/23/02

ND = Not Detected


Quality Assurance/Quality Control


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Ridgeland, Mississippi 39157
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NEIAP Accredited
LEIAP 04023

To: Koppers Company
1 Koppers Drive
Tic Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/03/02

Date Sampled: 12/19/01

Time Sampled: 10:00

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/20/01

Sample Description: Outfall 001

Sample Number: BB21847

Sample Matrix: WATER

Page Number: 1

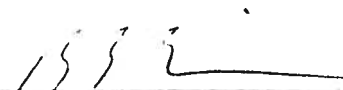
Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	102	1.0	mg/L	405.1	MWS	12/21/01
Oil & Grease	10.3	6.7	mg/L	1664A	SMB	12/28/01
Total Suspended Solids	2	1.0	mg/L	160.2	BB	12/26/01
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.210	mg/L	625	RLT	12/31/01
2-Chlorophenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4-Dichlorophenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4-Dimethylphenol	ND	0.210	mg/L	625	RLT	12/31/01
4,6-Dinitro-2-methylphenol	ND	0.525	mg/L	625	RLT	12/31/01
2,4-Dinitrophenol	ND	0.525	mg/L	625	RLT	12/31/01
2-Nitrophenol	ND	0.210	mg/L	625	RLT	12/31/01
4-Nitrophenol	ND	0.525	mg/L	625	RLT	12/31/01
Pentachlorophenol	0.919	0.525	mg/L	625	RLT	12/31/01
Phenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4,6-Trichlorophenol	ND	0.210	mg/L	625	RLT	12/31/01

ND = Not Detected



Quality Assurance/Quality Control



B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/07/02

Date Sampled: 12/26/01

Time Sampled: 10:00

Sampled by: MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/27/01

Sample Description: Outfall 001

Sample Number: BB22111

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	37.5	1.0	mg/L	405.1	MWS	12/28/01
Total Suspended Solids	36	1.0	mg/L	160.2	MLO	12/31/01
Oil & Grease	PENDING		mg/L	1664A		
4-Chloro-3-methylphenol	ND	0.042	mg/L	625	RLT	12/31/01
2-Chlorophenol	ND	0.042	mg/L	625	RLT	12/31/01
2,4-Dichlorophenol	ND	0.042	mg/L	625	RLT	12/31/01
2,4-Dimethylphenol	ND	0.042	mg/L	625	RLT	12/31/01
4,6-Dinitro-2-methylphenol	ND	0.105	mg/L	625	RLT	12/31/01
2,4-Dinitrophenol	ND	0.105	mg/L	625	RLT	12/31/01
2-Nitrophenol	ND	0.042	mg/L	625	RLT	12/31/01
4-Nitrophenol	ND	0.105	mg/L	625	RLT	12/31/01
Pentachlorophenol	2.54	0.105	mg/L	625	RLT	12/31/01
Phenol	ND	0.042	mg/L	625	RLT	12/31/01
2,4,6-Trichlorophenol	ND	0.042	mg/L	625	RLT	12/31/01

ND - Not Detected

Quality Assurance/Quality Control

B. G. Giessner, Ph.D

**ARGUS ANALYTICAL, INC.**

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 39060

ATTN: Blair Simpson

Date Reported: 05/15/01

Date Sampled: 05/03/01

Time Sampled: 10:00

Sampled by: M. Harper

Project ID/Location: Pretreatment Form 2-P
Grenada

Date Received: 05/04/01

Sample Description: Wastewater

Sample Number: BB07284

Sample Matrix: WATER

Project Number:

Page Number: 1

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Cyanide, Total	ND	0.01	mg/L	335.4	FRM	05/10/01
Phenolics	ND	0.05	mg/L	420.1	AMB	05/10/01
Investigative Study	-				JSM	05/15/01
Metals						
Antimony	ND	0.05	mg/L	200.7	BTH	05/07/01
Arsenic	ND	0.05	mg/L	200.7	BTH	05/07/01
Beryllium	ND	0.01	mg/L	200.7	BTH	05/07/01
Cadmium	ND	0.02	mg/L	200.7	BTII	05/07/01
Chromium	ND	0.05	mg/L	200.7	BTH	05/07/01
Copper	ND	0.010	mg/L	200.7	BTH	05/07/01
Lead	ND	0.050	mg/L	200.7	BTH	05/07/01
Mercury	ND	0.0002	mg/L	200.7	BTH	05/07/01
Nickel	0.04	0.02	mg/L	245.1	JWH	05/10/01
Selenium	ND	0.05	mg/L	200.7	BTH	05/07/01
Silver	ND	0.005	mg/L	200.7	BTH	05/07/01
Thallium	ND	0.02	mg/L	200.7	BTH	05/07/01
Zinc	1.36	0.025	mg/L	200.7	BTII	05/07/01
Priority Pollutant Volatile Organics						
Acrolein	ND	0.010	mg/L	624	MMP	05/10/01
Acrylonitrile	ND	0.010	mg/L	624	MMP	05/10/01
Benzene	ND	0.005	mg/L	624	MMP	05/10/01
Bromodichloromethane	ND	0.005	mg/L	624	MMP	05/10/01
Bromoform	ND	0.005	mg/L	624	MMP	05/10/01
Bromomethane	ND	0.010	mg/L	624	MMP	05/10/01
Carbon tetrachloride	ND	0.005	mg/L	624	MMP	05/10/01
Chlorobenzene	ND	0.005	mg/L	624	MMP	05/10/01
Chloroethane	ND	0.005	mg/L	624	MMP	05/10/01
2-Chloroethylvinyl ether	ND	0.010	mg/L	624	MMP	05/10/01
Chloroform	ND	0.005	mg/L	624	MMP	05/10/01
Chloromethane	ND	0.010	mg/L	624	MMP	05/10/01
Dibromochloromethane	ND	0.005	mg/L	624	MMP	05/10/01

Sample Description: Wastewater

Sample Number: HB07284

Page Number: 2

Parameter	Result	Det Limit	Units	Method	Analysts	Date
1,1-Dichloroethane	ND	0.005	mg/L	624	MMP	05/10/01
1,2-Dichloroethane	ND	0.005	mg/L	624	MMP	05/10/01
1,1-Dichloroethene	ND	0.005	mg/L	624	MMP	05/10/01
1,2-Dichloroethene	ND	0.010	mg/L	624	MMP	05/10/01
1,2-Dichloropropane	ND	0.005	mg/L	624	MMP	05/10/01
cis-1,3-Dichloropropene	ND	0.005	mg/L	624	MMP	05/10/01
trans-1,3-Dichloropropene	ND	0.005	mg/L	624	MMP	05/10/01
Ethylbenzene	ND	0.005	mg/L	624	MMP	05/10/01
Methylene chloride	ND	0.005	mg/L	624	MMP	05/10/01
1,1,2,2-Tetrachloroethane	ND	0.005	mg/L	624	MMP	05/10/01
Tetrachloroethene (PCE)	ND	0.005	mg/L	624	MMP	05/10/01
Toluene	ND	0.005	mg/L	624	MMP	05/10/01
1,1,1-Trichloroethane	ND	0.005	mg/L	624	MMP	05/10/01
1,1,2-Trichloroethane	ND	0.005	mg/L	624	MMP	05/10/01
Trichloroethene (TCE)	ND	0.005	mg/L	624	MMP	05/10/01
Vinyl chloride	ND	0.001	mg/L	624	MMP	05/10/01
Priority Pollutant Semivolatile Organics						
Acenaphthene	ND	0.002	mg/L	625	RLT	05/07/01
Acenaphthylene	ND	0.002	mg/L	625	RLT	05/07/01
Anthracene	ND	0.002	mg/L	625	RLT	05/07/01
Benzidine	ND	0.005	mg/L	625	RLT	05/07/01
Benzo(a)anthracene	ND	0.002	mg/L	625	RLT	05/07/01
Benzo(a)pyrene	ND	0.002	mg/L	625	RLT	05/07/01
Benzo(b)fluoranthene	ND	0.005	mg/L	625	RLT	05/07/01
Benzo(g,h,i)perylene	ND	0.005	mg/L	625	RLT	05/07/01
Benzo(k)fluoranthene	ND	0.005	mg/L	625	RLT	05/07/01
bis(2-Chloroethoxy)methane	ND	0.002	mg/L	625	RLT	05/07/01
bis(2-Chloroethyl)ether	ND	0.005	mg/L	625	RLT	05/07/01
bis(2-Chloroisopropyl)ether	ND	0.002	mg/L	625	RLT	05/07/01
bis(2-Ethylhexyl) phthalate	ND	0.005	mg/L	625	RLT	05/07/01
4-Bromophenyl phenyl ether	ND	0.002	mg/L	625	RLT	05/07/01
Butyl benzyl phthalate	ND	0.005	mg/L	625	RLT	05/07/01
4-Chloro-3-methylphenol	ND	0.002	mg/L	625	RLT	05/07/01
2-Chloronaphthalene	ND	0.002	mg/L	625	RLT	05/07/01
2-Chlorophenol	ND	0.002	mg/L	625	RLT	05/07/01
4-Chlorophenyl phenyl ether	ND	0.002	mg/L	625	RLT	05/07/01
Chrysene	ND	0.002	mg/L	625	RLT	05/07/01
Dibenzo(a,h)anthracene	ND	0.005	mg/L	625	RLT	05/07/01
Di-n-butyl phthalate	ND	0.005	mg/L	625	RLT	05/07/01
1,2-Dichlorobenzene	ND	0.002	mg/L	625	RLT	05/07/01
1,3-Dichlorobenzene	ND	0.002	mg/L	625	RLT	05/07/01
1,4-Dichlorobenzene	ND	0.002	mg/L	625	RLT	05/07/01
3,3'-Dichlorobenzidine	ND	0.002	mg/L	625	RLT	05/07/01
2,4-Dichlorophenol	ND	0.002	mg/L	625	RLT	05/07/01
Diethyl phthalate	ND	0.005	mg/L	625	RLT	05/07/01
Dimethyl phthalate	ND	0.002	mg/L	625	RLT	05/07/01

Sample Description: Wastewater

Sample Number: BH07284

Page Number: 3

Parameter	Result	Det Limit	Units	Method	Analysts	Date
2,4-Dimethylphenol	ND	0.002	mg/L	625	RLT	05/07/01
4,6-Dinitro-2-methylphenol	ND	0.005	mg/L	625	RLT	05/07/01
2,4-Dinitrophenol	ND	0.005	mg/L	625	RLT	05/07/01
2,4-Dinitrotoluene	ND	0.005	mg/L	625	RLT	05/07/01
2,6-Dinitrotoluene	ND	0.002	mg/L	625	RLT	05/07/01
Di-n-octyl phthalate	ND	0.002	mg/L	625	RLT	05/07/01
1,2-Diphenylhydrazine	ND	0.005	mg/L	625	RLT	05/07/01
Fluoranthene	ND	0.002	mg/L	625	RLT	05/07/01
Fluorene	ND	0.002	mg/L	625	RLT	05/07/01
Hexachlorobenzene	ND	0.001	mg/L	625	RLT	05/07/01
Hexachlorobutadiene	ND	0.002	mg/L	625	RLT	05/07/01
Hexachlorocyclopentadiene	ND	0.005	mg/L	625	RLT	05/07/01
Hexachloroethane	ND	0.002	mg/L	625	RLT	05/07/01
Indeno(1,2,3-cd)pyrene	ND	0.005	mg/L	625	RLT	05/07/01
Isophorone	ND	0.002	mg/L	625	RLT	05/07/01
Naphthalene	ND	0.002	mg/L	625	RLT	05/07/01
Nitrobenzene	ND	0.005	mg/L	625	RLT	05/07/01
2-Nitrophenol	ND	0.002	mg/L	625	RLT	05/07/01
4-Nitrophenol	ND	0.005	mg/L	625	RLT	05/07/01
n-Nitrosodi-n-propylamine	ND	0.002	mg/L	625	RLT	05/07/01
n-Nitrosodimethylamine	ND	0.002	mg/L	625	RLT	05/07/01
n-Nitrosodiphenylamine	ND	0.002	mg/L	625	RLT	05/07/01
Pentachlorophenol	ND	0.005	mg/L	625	RLT	05/07/01
Phenanthrene	ND	0.002	mg/L	625	RLT	05/07/01
Phenol	ND	0.002	mg/L	625	RLT	05/07/01
Pyrene	ND	0.002	mg/L	625	RLT	05/07/01
1,2,4-Trichlorobenzene	ND	0.002	mg/L	625	RLT	05/07/01
2,4,6-Trichlorophenol	ND	0.002	mg/L	625	RLT	05/07/01
Priority Pollutant Pesticides/PCBs						
Aldrin	ND	0.00005	mg/L	608	MMP	05/07/01
alpha-BHC	ND	0.00005	mg/L	608	MMP	05/07/01
beta-BHC	ND	0.00005	mg/L	608	MMP	05/07/01
gamma-BHC (lindane)	ND	0.00005	mg/L	608	MMP	05/07/01
delta-BHC	ND	0.00005	mg/L	608	MMP	05/07/01
Chlordane	ND	0.00005	mg/L	608	MMP	05/07/01
4,4'-DDT	ND	0.00010	mg/L	608	MMP	05/07/01
4,4'-DDE	ND	0.00010	mg/L	608	MMP	05/07/01
4,4'-DDD	ND	0.00010	mg/L	608	MMP	05/07/01
Dieldrin	ND	0.00010	mg/L	608	MMP	05/07/01
Endosulfan I	ND	0.00005	mg/L	608	MMP	05/07/01
Endosulfan II	ND	0.00010	mg/L	608	MMP	05/07/01
Endosulfan sulfate	ND	0.00010	mg/L	608	MMP	05/07/01
Endrin	ND	0.00010	mg/L	608	MMP	05/07/01
Endrin aldehyde	ND	0.00010	mg/L	608	MMP	05/07/01
Heptachlor	ND	0.00005	mg/L	608	MMP	05/07/01
Heptachlor epoxide	ND	0.00005	mg/L	608	MMP	05/07/01

Sample Description: Wastewater

Sample Number: BB07284


Page Number: 4

Parameter	Result	Det Limit	Units	Method	Analyst	Date
PCB-1016	ND	0.00100	mg/L	608	MMP	05/07/01
PCB-1221	ND	0.00200	mg/L	608	MMP	05/07/01
PCB-1232	ND	0.00100	mg/L	608	MMP	05/07/01
PCB-1242	ND	0.00100	mg/L	608	MMP	05/07/01
PCB-1248	ND	0.00100	mg/L	608	MMP	05/07/01
PCB-1254	ND	0.00100	mg/L	608	MMP	05/07/01
PCB-1260	ND	0.00100	mg/L	608	MMP	05/07/01
Toxaphene	ND	0.00100	mg/L	608	MMP	05/07/01

* Dioxins will be reported at a later date
when results are received from subcontract lab.

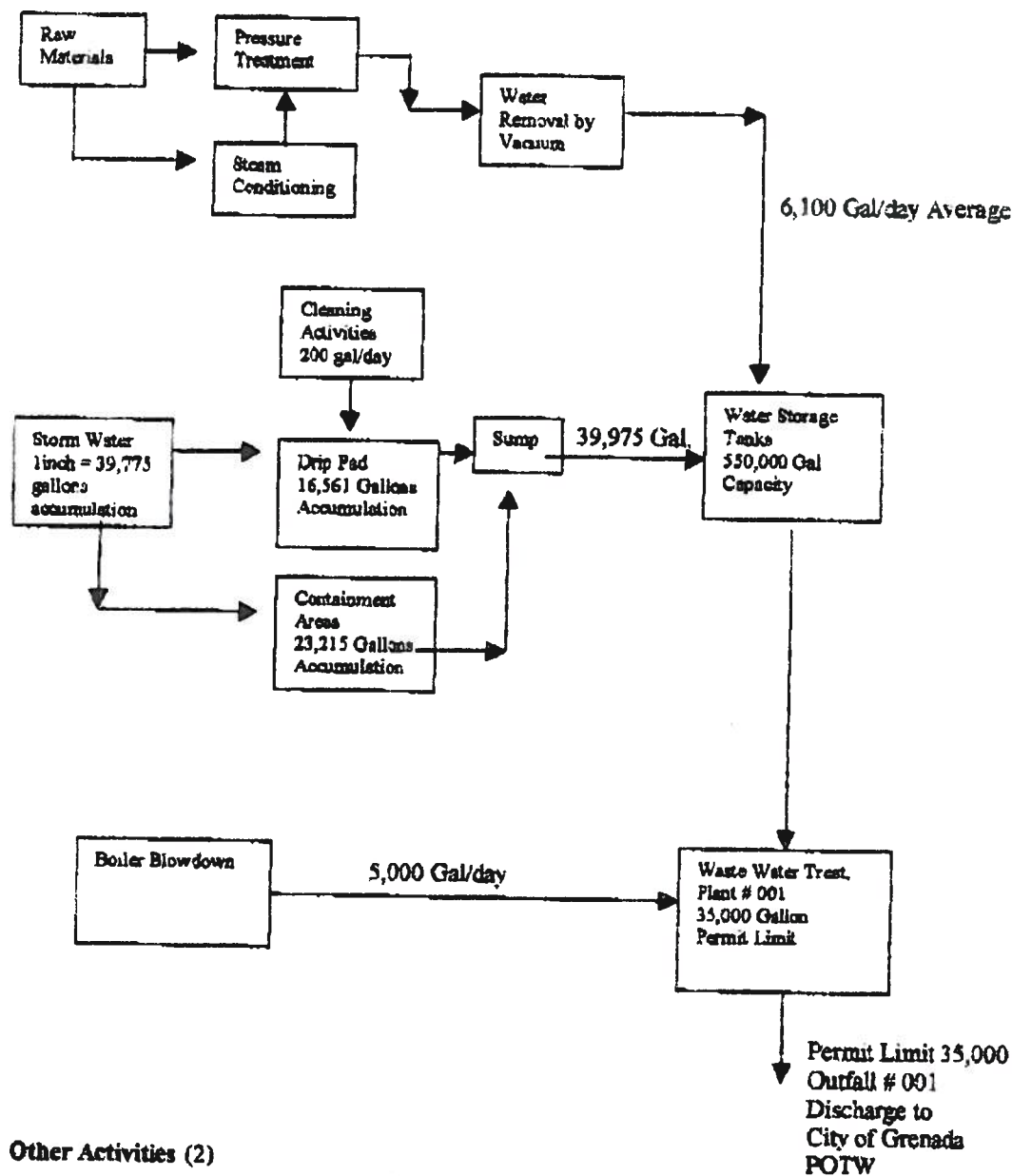
ND = Not Detected


Quality Assurance/Quality Control


R. G. Giesselet, PhD

KOPPERS INDUSTRIES INC.
GRENADA, MISSISSIPPI
WASTE WATER PROCESS FLOW DIAGRAM 5-15-2001

PROCESS FLOW DIAGRAM with a ONE INCH RAINFALL EVENT



Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Summation of all waters entering & exiting WWTP # 001 Per Year

Process	Rain Water	Boiler Blow	Cleaning Activities	Steam leaks,	Sum Total
Water/yr.	50in/yr.	Down/yr.	per year	cooling tower disch- arge etc. (300gpd)	
Gal 1608381	1986648	1320000	52800	79200	5048029

Rainfall Data Acquired from
Army Corp of Engineers
Grenada Lake Office

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

6 Year Composite

Discharge	(Gpd)	# of days	Average/day	Month	1. % of months exc- eeding 30000 gpd	2. % of months exc- eeding 25000 gpd	3. % of months exc- eeding 20000 gpd	Rainfall/month
Avg./month Gyps		Avg./month	Avg./day Gyps	Month/yr.				Avg./month Gyps
423780.08	gal	29.5	14446.8	38300	33.33	70.83	90.28	4.18
Discharge								
Avg./yr. Gyps								
5085367								

1. Twenty-four (24) months out of a total of seventy-two (72) months had a discharge at or over 30,000 gallons. This translates to Thirty-three (33) percent % of seventy-two (72) months having discharges at or above 30,000 gallons.
2. Fifty-one (51) months out of a total of seventy-two (72) months had a discharge at or over 25,000 gallons. This translates to Seventy-one (71) percent % of seventy-two (72) months having discharges at or above 25,000 gallons.
3. Sixty-five (65) months out of a total of seventy-two (72) months had a discharge at or over 20,000 gallons. This translates to Ninety-one (91) percent % of seventy-two (72) months having discharges at or above 20,000 gallons.

Rainfall Data Acquired from
Army Corp of Engineers
Grenada Lake Office

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Rain Water Accumulation Possibilities

KOPPERS INDUSTRIES

Grenada Plant

4/24/2001

	Drip Pad		Tank Farm		WWTP		Cylinder Basement		Other Con-		
	Units used		Units used		Units used		Units used		tainment	Total	Units used
Sq. Ft. (ft ²)	28568	ft ²	21000	ft ²	5685	ft ²	9408	ft ²	1173	63934	ft ²
Curb Height (ft)	0.6666	ft	3	ft	4.66	ft	3	ft	0.666		ft
Cubic ft. (ft ³)	17710	ft ³	63000	ft ³	26492	ft ³	28224	ft ³	781	136208	ft ³
Gallon Capacity	132473	gal	471240	gal	198161	gal	211116	gal	5844	1018832	gal
One-inch rain	2214	ft ³	1750	ft ³	472	ft ³	784	ft ³	98	4748	ft ³
	16561	gal	13090	gal	3529	gal	5864	gal	731	39775	gal
Average one-month rain	9255	ft ³	7315	ft ³	1980	ft ³	3277	ft ³	409	19847	ft ³
4.18 inches	69224	gal	54716	gal	14812	gal	24513	gal	3056	166322	gal
1895-2000											
Grenada Average											
24hr/ 25 year flood event - 7 inch rain	15498	ft ³	12250	ft ³	3316	ft ³	5488	ft ³	684	33236	ft ³
	115925	gal	91630	gal	24805	gal	41050	gal	5118	278529	gal
Rainfall Accumulation using 50inch/yr 4.16ft	110523	ft ³	87360	ft ³	23687	ft ³	39137	ft ³	4887	265595	ft ³
	826711	gal	653453	gal	177180	gal	292747	gal	36558	1986648	gal

Discharge time needed to treat one year (50in) worth of rain using our 35,000 gal/day filter: If only stormwater was processed and discharged, 354 days production.

56.76 days

Process Water Possibilities
Grenada Plant
KOPPERS INDUSTRIES

Process Water Data

Date	Process Water (gal)	# of dry charges	# of green charges	Total # of charges	Total ft ³ treated	Gallons/ft ³	Avg # of treating days/month
4/23/2001	2770	6	1	7	12032	0.2	22
4/24/2001	7200	8	2	10	13731	0.5	22
4/25/2001	6000	7	1	8	11666	0.5	22
4/26/2001	4200	2	2	4	6197	0.7	22
4/27/2001	4600	2	4	6	9792	0.5	22

Average for this week	4954	5	2	7	10684	0.5	22
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Averages based on production records

Total Ft ³ treated based on year 2000 production records	3330224	Average Ft ³ /day treated based on year 2000 production records(284days)	12614.48
		Average process gallons/day	6096.1
		(Avg. Ft ³ /day) x (Avg. Gal./Ft ³) x (1)	

Average process gallons/month(22days)	134115.1
---------------------------------------	----------

(Avg. Ft³/day) x (Avg. Gal./Ft³) x (Avg. #days/month)

Average process gallons/year(264days)	1609361.257
---------------------------------------	-------------

(Avg. Ft³/day) x (Avg. Gal./Ft³) x (Avg. #days/year)

Process Water Possibilities
Grenada Plant
KOPPERS INDUSTRIES

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Historical Waste Water Discharge Amounts from 1995 - 2000
KOPPERS INDUSTRIES INC.
Tie Plant, Mississippi
4/10/2001
Supporting Data for 6 Year Composite

Year	Month	Discharge (Gal)	# of days	Average/day	Maximum	% of months exc- eeding 30000 gal	% of months exc- eeding 25000 gal	% of months exc- eeding 20000 gal	Rainfall/month (inches)
1995	January	431400	31	13916.1	25300	0	Y	Z	3.74
1995	February	522000	26	20076.9	33500	X	Y	Z	8.18
1995	March	634200	31	20458.1	34800	X	Y	Z	5.94
1995	April	467200	30	15573.3	32500	X	Y	Z	7.5
1995	May	294600	31	9503.2	20300	0	0	Z	5.3
1995	June	524000	30	17466.7	27600	0	Y	Z	7.7
1995	July	467100	31	15067.7	34800	0	Y	Z	5.6
1995	August	509700	26	18203.6	33100	X	Y	Z	3.1
1995	September	338200	28	12078.6	22400	0	0	Z	0.52
1995	October	376400	31	12141.9	26300	0	Y	Z	2.47
1995	November	410000	28	14642.9	34000	X	Y	Z	3.69
1995	December	526300	31	16977.4	38300	X	Y	Z	5.26
Average		458425	Average	15509	38300	58.33	83.33	100.00	Total 59.00
			Max Avg.	20458					Avg. 4.91

x=month with discharge > than 30,000 gal
y=month with discharge > than 25,000 gal
z=month with discharge > than 20,000 gal

Note: On December 14, 1995 our permit was exceeded due to a broken well water line. It was caused by the cold weather which burst the line and was dumped into the tank tank.

Rainfall Data Acquired from
Army Corp of Engineers
Grenada Lake Office

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Historical Discharge Data Grenada Plant

KOPPERS INDUSTRIES

Year	Month	Discharge (Gal)	# of days	Average/day	Max/month	% of months exc-	% of months exc-	% of months exc-	Rainfall/month (inches)
1996	January	531900	31	17158.1	26400	0	Y	Z	4.56
1996	February	399900	29	13789.7	27900	0	Y	Z	3.28
1996	March	528000	31	17032.3	30500	X	Y	Z	4.63
1996	April	398700	30	13280.0	28400	0	Y	Z	5.29
1996	May	323500	31	10435.5	27200	0	Y	Z	1.17
1996	June	295806	30	9860.2	18900	0	Y	0	4.65
1996	July	224100	31	7229.0	16800	0	0	0	1.78
1996	August	300700	31	9700.0	26100	0	Y	Z	5.16
1996	September	474500	30	15816.7	25800	0	Y	Z	6.63
1996	October	316160	31	10198.7	20500	0	0	Z	1.84
1996	November	375800	30	12526.7	23700	0	0	Z	4.96
1996	December	301200	31	9716.1	18900	0	0	0	5.87
Average		372522		12229	30500	8.33	58.33	75.00	Total 49.82
Max Avg.				17158					Avg. 4.15

Year	Month	Discharge (Gal)	# of days	Average/day	Max/month	% of months exc-	% of months exc-	% of months exc-	Rainfall/month (inches)
1997	January	527000	31	17000.0	27000	0	Y	Z	6.65
1997	February	305600	28	10914.3	21700	0	0	Z	3.96
1997	March	518800	31	16671.0	32800	X	Y	Z	5.45
1997	April	201900	30	6730.0	15800	0	0	0	3.05
1997	May	484300	31	15622.6	28500	0	Y	Z	11
1997	June	394500	30	13150.0	30000	X	Y	Z	7.52
1997	July	245500	31	7919.4	17900	0	0	0	5
1997	August	432100	31	13938.7	31600	X	Y	Z	4.52
1997	September	304200	30	10140.0	20000	0	0	Z	2.54
1997	October	330400	31	10658.1	22800	0	0	Z	2.71
1997	November	309800	30	10320.0	19600	0	0	0	1.87
1997	December	377100	31	12164.5	22800	0	0	Z	4.68
Average		369063.3		12102.4	32600	25	41.67	75	Total 58.95
Max Avg.				17000					Avg. 4.9

Rainfall Data Acquired from
Army Corp of Engineers
Grenada Lake Office

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Year	Month	Discharge (Gal)	# of days	Average/day	Max/month	% of months exc- eeding 30000 gal	% of months exc- eeding 25000 gal	% of months exc- eeding 20000 gal	Rainfall/month (inches)
1998	January	387000	31	12483.9	27000	0	Y	Z	5.88
1998	February	398900	28	14246.4	25000	0	Y	Z	5.14
1998	March	444400	31	14335.5	28800	0	Y	Z	4.82
1998	April	411400	30	13713.3	26200	0	Y	Z	6.27
1998	May	321200	31	10361.3	33000	X	Y	Z	4.38
1998	June	337400	30	11246.7	28800	0	Y	Z	2.27
1998	July	237000	23	10304.3	27200	0	Y	Z	3.44
1998	August	333600	21	15885.7	25400	0	Y	Z	2.34
1998	September	311200	30	10373.3	21400	0	0	Z	0.44
1998	October	280300	31	9041.9	21400	0	0	Z	0.91
1998	November	392000	30	13066.7	23700	0	0	Z	3.59
1998	December	538400	28	19228.6	30300	X	Y	Z	6.18
Average		368066.7	Average	12857.3	33000	16.87	75.00	100.00	Total 45.64
			Max Avg.	19228.6					Avg. 3.8

Year	Month	Discharge (Gal)	# of days	Average/day	Max/month	% of months exc- eeding 30000 gal	% of months exc- eeding 25000 gal	% of months exc- eeding 20000 gal	Rainfall/month (inches)
1999	January	623100	29	21486.2	30900	X	Y	Z	8.17
1999	February	432300	28	15439.3	28100	0	Y	Z	1.3
1999	March	550500	31	17758.1	30000	X	Y	Z	3.26
1999	April	542100	30	18070.0	29400	0	Y	Z	5.44
1999	May	414000	31	13354.8	23700	0	0	Z	2.07
1999	June	485600	30	16186.7	33200	X	Y	Z	2.66
1999	July	605100	31	19519.4	30500	X	Y	Z	3.27
1999	August	611100	31	19712.9	29300	0	Y	Z	0.58
1999	September	584500	30	19483.3	33300	X	Y	Z	1.32
1999	October	501900	31	16190.3	27000	0	Y	Z	0.6
1999	November	422600	30	14086.7	25000	0	Y	Z	1.76
1999	December	639400	31	20825.8	34300	X	Y	Z	2.85
Average		534350	Average	17659.5	34300	50	91.67	100	Total 33.28
			Max Avg.	21486.2					Avg. 2.78

Rainfall Data Acquired from
Army Corp of Engineers
Grenada Lake Office

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

Year	Month	Discharge (Gal)	# of days	Average/day	Max/month	% of months exc- eeding 30000 gal	% of months exc- eeding 25000 gal	% of months exc- eeding 20000 gal	Rainfall/month (inches)
2000	January	605000	31	19516.1	34800	x	y	2	1.8
2000	February	386700	29	13334.5	31400	x	y	2	no data
2000	March	466800	31	15058.1	29800	0	y	2	5.87
2000	April	570400	28	20371.4	34000	x	y	2	10.3
2000	May	310900	28	11103.6	22500	0	0	2	1.1
2000	June	404800	30	13483.3	29600	0	y	2	4.6
2000	July	230800	31	7448.4	18800	0	0	0	1.5
2000	August	370800	22	16854.5	27500	0	y	2	0.7
2000	September	348900	22	15859.1	23800	0	0	2	1.8
2000	October	566900	31	18287.1	28900	0	y	2	0.2
2000	November	662900	30	22096.7	34100	x	y	2	14.7
2000	December	381800	17	22458.8	32900	x	y	2	7.7
Average		442233.3	Average	16323.5	34800	41.67	75.00	91.67	Total 50.27
			Max Avg.	22458.8					Avg. 4.57

Rainfall Data Acquired from
Army Corp of Engineers
Grenada Lake Office

Historical Discharge Data
Grenada Plant
KOPPERS INDUSTRIES

**KOPPERS
INDUSTRIES**

FACSIMILE TRANSMITTAL SHEET

TO:

Ms. Mary Coleman

FAX NUMBER:

1-601-961-5703

FROM:

Blair Simpson

DATE:

NO. OF PAGES (INCLUDING THIS ONE)

17

NOTES/COMMENTS:

☐ URGENT ☒ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY

Ms. Coleman,

Enclosed is your May 4th, 2001 letter, my
response letter, laboratory bench sheets, process
flow diagram, and supporting information. If
you have any questions please call me a
extension 40.

Thanks,

Blair Simpson

PO BOX 160
TIE PLANT, MS. 38960
(662)-226-4584 - PHONE
(662)-226-4588 - FAX

ARGUS ANALYTICAL, INC.

235 Highpoint Drive
Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/18/01

Date Sampled: 1-17-01

Time Sampled:

Sampled by: M.Harper

Project ID/Location: 0013

Date Received: 01/18/01

Sample Description: Wastewater

Sample Number: BB01227

Project Number:

Sample Matrix: WATER

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Pentachlorophenol	0.349	0.005	mg/L	625	RLT	01/18/01

ND = Not Detected

Unless otherwise noted, all results are
reported on the as received basis.

argusnd


Quality Assurance/Quality Control


B. G. Giessner, Ph.D.



Mississippi Department of Environmental Quality
Office of Pollution Control
Water Compliance Inspection Report

Site Name: Koppers Industries Inc

Permit Number: Water-Pretreatment MSP090300

Physical Address

1 Koppers Drive
Tie Plant, MS 38960
Grenada County

Mailing Address

PO Box 160
Tie Plant, Mississippi 38960

Transaction code: -----N - new
Completed date: -----1/16/02
Compliance activity & pcs codes:----CEI-NPDES - C
Facility type: -----Industrial - 2
Investigator: -----Azzam Abumirshid

Areas Evaluated

S PERMIT	S FACILITY SITE REVIEW
N LABORATORY	N PRETREATMENT
S SELF-MONITORING PROGRAM	N EFFLUENT/RECEIVING WATERS
S RECORDS/REPORTS	S FLOW MEASUREMENT
N SLUDGE DISPOSAL	S OPERATIONS & MAINTENANCE
N COMPLIANCE SCHEDULES	

S-Satisfactory M-Marginal U-Unsatisfactory N-Not Evaluated

COMMENTS: Facility treats wastewater generated from the preserving process on site. Wastewater goes through an oil/water separator, biological treatment, clarifier and then discharged to city of Grenada POTW. On January 3, 2002, facility was notified by Argus Analytical Laboratory that samples collected on December 19 and 26, 2001 exceeded pentachlorophenol allowable discharge limits.

Facility ceased discharging wastewater to the city POTW. Facility believes that low temperature caused the treatment deficiency in the biological treatment system. Facility is planning on providing a source of heat to the biological treatment system and or adding a polishing tank. In the mean time wastewater is collected in tanks.

Azzam Abumirshid

1-02
Inspection Division

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YEAR	MO	DAY
19	01	01

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
 NAME: KOPPELAND INDUSTRIES, INC.
 ADDRESS: P.O. BOX 100
 CITY: PLANT
 STATE: MS 38500

PERMIT NUMBER: 00000300
 DISCHARGE NUMBER: 0017

FACILITY: CHANDLER COUNTY
 LOCATION: MILL PLANT

MONITORING PERIOD
 FROM: YEAR 03 MO 06 DAY 01 TO YEAR 03 MO 05 DAY 31

RECEIVED (500000)
 F - FINAL
 TOTAL PAGES: 2
 SEP 24 2003
 NO DISCHARGE
 NOTE: Read instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
0000, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	1.405	2.807	(26)		10.8	20.4	0	1/7	long
00010, 1 0 0	PERMIT REQUIREMENT	1.0	1.40	LB/DAY		240	480		WEEKLY	COMP24
00020, 1 0 0	SAMPLE MEASUREMENT				8.09		8.43	0	2/7	Grab
00030, 1 0 0	PERMIT REQUIREMENT				5.5 MINIMUM		9.5 MAXIMUM		WEEKLY	GRAB
00040, 1 0 0	SAMPLE MEASUREMENT	2.503	4.537	(20)		22.5	35	0	1/7	long
00050, 1 0 0	PERMIT REQUIREMENT	88	175	LB/DAY		300	600		WEEKLY	COMP24
00060, 1 0 0	SAMPLE MEASUREMENT							0	1/7	Grab
00070, 1 0 0	PERMIT REQUIREMENT								WEEKLY	GRAB
00080, 1 0 0	SAMPLE MEASUREMENT	0.00045	0.00179	(26)		0.00325	0.013	0	1/7	Grab
00090, 1 0 0	PERMIT REQUIREMENT	0.053	0.105	LB/DAY		0.18	0.36		WEEKLY	GRAB
00100, 1 0 0	SAMPLE MEASUREMENT							0	1/7	Grab
00110, 1 0 0	PERMIT REQUIREMENT								WEEKLY	GRAB
00120, 1 0 0	SAMPLE MEASUREMENT	0.0150	0.0284	(03)				0	Daily	Cont.
00130, 1 0 0	PERMIT REQUIREMENT	0.88	1.75	LB/DAY		3	6		DAILY	CONTIN

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER: *Thomas L. Henderson*
 TYPED OR PRINTED: *Pls*
 COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):
 I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: *Thomas L. Henderson*
 AREA CODE: 662 NUMBER: 264-584
 YEAR: 03 MO: 09 DAY: 22

TELEPHONE: DATE:

9320-1 (Rev. 3/99) Previous editions may be used. This is a 4-part form. PAGE 1 OF 1

TELEPHONE		DATE		
662	726-4589	03	08	25
AREA CODE	NUMBER	YEAR	MO	DAY

NAME: AOPRUS INDUSTRIES INC
ADDRESS: P O BOX 100
CITY: EL PASO
STATE: TEXAS 79901

FACILITY: AOPRUS INDUSTRIES
LOCATION: EL PASO, TEXAS

PERMIT NUMBER: 0000000000
DISCHARGE NUMBER: 0000000000
MONITORING PERIOD: FROM 03/01/03 TO 03/31/03

NOTE: Read instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				UNITS
5-DAY (20 DFG. C)		0.239	1.324	(20)		5.1	6.3	(19)	0	1/7	Comp
PERMIT REQUIREMENT		10	140	MG/DAY	240	480	480	MG/L		WEEKLY	COMP24
MEASUREMENT					8.05		8.27	(12)	0	1/7	Grab
PERMIT REQUIREMENT					5.5		9.5	MINIMUM		WEEK	
MEASUREMENT		8.953	14.398	(20)		58.25	83	(15)	0	1/7	Comp24
PERMIT REQUIREMENT		8	115	MG/DAY	300	600	600	MG/L		WEEKLY	COMP24
MEASUREMENT								(19)	0	1/7	Grab
PERMIT REQUIREMENT										WEEKLY	GRAB
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MEASUREMENT								(19)	0	1/7	Grab
PERMIT REQUIREMENT										WEEKLY	GRAB

NAME: THOMAS L. HENDERSON

ADDRESS: PO BOX 160

CITY: THE PLANT

FACILITY: GRENADA COUNTY

LOCATION: THE PLANT

DATE: 03/07/04

PERMIT NUMBER: 05 090300

DISCHARGE NUMBER: 0017

MONITORING PERIOD
FROM: 03/01/04 TO: 03/05/04

NOTE: Read instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				UNITS
ASBESTOS, TOTAL RECOVERABLE	SAMPLE MEASUREMENT	NO DET = B	NO DET = B	(26)		NO DET = B	NO DET = B	(19)	0	3/12	lamp
	PERMIT REQUIREMENT	REPORT ANNL AVG	0.131	ANNL MAX		REPORT ANNL AVG	0.45	ANNL MAX		SEMI-ANNUAL	COMP24
CHLORIDE, GROSS VALUE	SAMPLE MEASUREMENT	0.017	0.017	(26)		0.07	0.07	(19)	0	3/12	lamp
	PERMIT REQUIREMENT	REPORT ANNL AVG		ANNL MAX		REPORT ANNL AVG		ANNL MAX		SEMI-ANNUAL	COMP24
COPPER, GROSS VALUE	SAMPLE MEASUREMENT	0.076	0.076	(26)		0.322	0.322	(19)	0	3/12	lamp
	PERMIT REQUIREMENT	REPORT ANNL AVG		ANNL MAX		REPORT ANNL AVG		ANNL MAX		SEMI-ANNUAL	COMP24
CHLORIDE, GROSS VALUE	SAMPLE MEASUREMENT	NO DET = B	NO DET = B	(26)		NO DET = B	NO DET = B	(19)	0	3/12	lamp
	PERMIT REQUIREMENT	REPORT ANNL AVG	1.168	ANNL MAX		REPORT ANNL AVG	4.0	ANNL MAX		SEMI-ANNUAL	COMP24
COPPER, GROSS VALUE	SAMPLE MEASUREMENT	NO DET = B	NO DET = B	(26)		NO DET = B	NO DET = B	(19)	0	3/12	lamp
	PERMIT REQUIREMENT	REPORT ANNL AVG	0.642	ANNL MAX		REPORT ANNL AVG	2.2	ANNL MAX		SEMI-ANNUAL	COMP24
CHLORIDE, GROSS VALUE	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE: PRINCIPAL EXECUTIVE OFFICER

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

Thomas L. Henderson

Thomas L. Henderson

662 228-4534 03 07 14

DISCHARGE MONITORING REPORT (DMR)

DISCHARGE NUMBER

MONITORING PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY
03	05	04		03	05	31

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466
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NOTE: Read instructions before completing this form

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
0001 5-DAY (20 DECS. C) PERMIT GROSS VALUE	SAMPLE MEASUREMENT	2.194	3.528	(20)		8.85	14.1	(15)	0	1/3	Comp
0002 1 0 0 PERMIT GROSS VALUE	PERMIT REQUIREMENT	MO AVG	DAILY MX	LESS/DY		240 MO AVG	480 DAILY MX	55/1			
0003 1 0 0 SAMPLE MEASUREMENT	SAMPLE MEASUREMENT				6.2		8.1	(12)	0	3/3	Comp
0004 1 0 0 PERMIT GROSS VALUE	PERMIT REQUIREMENT				5.5 MINIMUM		9.5 MAXIMUM	50			
0005 1 0 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT	21.225	32.201	(20)		85.25	130	(10)	0	1/3	Comp
0006 1 0 0 PERMIT GROSS VALUE	PERMIT REQUIREMENT	MO AVG	DAILY MX	LESS/DY		300 MO AVG	600 DAILY MX	55/1			
0007 1 0 0 SAMPLE MEASUREMENT	SAMPLE MEASUREMENT	NO DI = B	NO DI = B	(20)		NO DI = B	NO DI = B	(15)	0	1/3	Comp
0008 1 0 0 PERMIT GROSS VALUE	PERMIT REQUIREMENT	REPORT MO AVG	DAILY MX	LESS/DY		REPORT MO AVG	100 DAILY MX	55/1			
0009 1 0 0 SAMPLE MEASUREMENT	SAMPLE MEASUREMENT	NO DI = B	NO DI = B	(20)		NO DI = B	NO DI = B	(15)	0	1/3	Comp
0010 1 0 0 PERMIT GROSS VALUE	PERMIT REQUIREMENT	MO AVG	DAILY MX	LESS/DY		0.18 MO AVG	0.36 DAILY MX	55/1			
0011 1 0 0 SAMPLE MEASUREMENT	SAMPLE MEASUREMENT	NO DI = B	NO DI = B	(20)		NO DI = B	NO DI = B	(15)	0	1/3	Comp
0012 1 0 0 PERMIT GROSS VALUE	PERMIT REQUIREMENT	MO AVG	DAILY MX	LESS/DY		3 MO AVG	6 DAILY MX	55/1			
0013 1 0 0 SAMPLE MEASUREMENT	SAMPLE MEASUREMENT	0.0219	0.0300	(03)					0	1/3	Comp
0014 1 0 0 PERMIT GROSS VALUE	PERMIT REQUIREMENT	REPORT MO AVG	DAILY MX	LESS/DY							

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Thomas L. Henderson

TYPED OR PRINTED

DATE

03 06 20

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

Thomas L. Henderson

TELEPHONE

663 226 4588

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**FREQUENCY
OF
SAMPLE**

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YEAR	MO	DAY
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NOTE: Read instructions before completing this form.

TYPED OR PRINTED THOMAS L. HEADCASEO Plaintiff vs. Defendant		to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT Thomas L. Headcaseo		662-226-4584 03 04 22	
AREA CODE	NUMBER	YEAR	MO DAY

DISCHARGE NUMBER

MONTHLY CHARGES PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY
01	02	01		03	02	28

NOTE: Read instructions before completing this form.

FOR LOADING	QUALITY OR CON
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MAXIMUM	UNITS	MINIMUM	AVERAGE
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1. The first part of the paper is devoted to the study of the asymptotic behavior of the solutions of the system (1) as $t \rightarrow \infty$. It is shown that the solutions of the system (1) tend to zero as $t \rightarrow \infty$ if and only if the matrix A is Hurwitz.

ent and all attachments were

11. Who are the persons who manage the system, and evaluate the information?

SIGNATURE OF PRISONER

OFFICE ON ADOPTION

10

DISCHARGE NUMBER

NOTE: Read instructions before completing this

PARAMETER	QUANTITY OR LOADING	QUALITY OR CONCENTRATION	NO. OF SAMPLES
			5

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
 ADDRESS 60 BOX 600
 LE PLANT

 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 MS090300
 PERMIT NUMBER
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 DISCHARGE NUMBER

 FACILITY NAME/ADDRESS
 LE PLANT

 FACILITY LOCATION
 CANADA

 FACILITY NAME/ADDRESS
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 MONITORING PERIOD
 FROM YEAR MO DAY TO YEAR MO DAY
 02 12 01 02 12 31

NOTE: Read instructions before completing this form.

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 JAN 22 2003

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				UNITS
00000 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.632	0.879	(26)		4.85	5.7	(19)	1	4/5	Comp
00000 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	1.0	1.40	1.00/DY		240	180	MG/L			
00000 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT			(26)	7.1		8.1	(19)	0	3/4	Grab
00000 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT			(26)	5.5		9.5	MG/L			
00000 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	4.074	5.730	(26)		31.8	41	(19)	0	1/4	Comp
00000 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	8.8	11.5	LBS/DY		300	600	MG/L			
00000 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	NO DI = B	NO DI = B	(26)		NO DI = B	NO DI = B	(19)	0	1/4	Grab
00000 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	REPORT	29.2	LBS/DY		REPORT	100	MG/L			
00000 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	NO DI = B	NO DI = B	(26)		NO DI = B	NO DI = B	(19)	0	1/4	Grab
00000 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	0.053	0.105	LBS/DY		0.19	0.36	MG/L			
00000 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	NO DI = B	NO DI = B	(26)		NO DI = B	NO DI = B	(19)	0	1/4	Grab
00000 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	0.08	1.15	LBS/DY		3	9	MG/L			
00000 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	20169	0.0375	(03)					1	Daily	Cont
00000 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	REPORT	0.035	DAILY MX							

 NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
 Thomas L. Henderson
 Plant Manager

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
 Thomas L. Henderson

 TELEPHONE
 662-286-4584
 DATE
 03 01 17

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Attachments: 1) Analytical results showing BOD expiring on 2) December 30th letter concerning Discharge.



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

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

RECEIVED
DEC 19 2002
U.S. Environmental Quality
Office of Pollution Control

December 17, 2002

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 9118

**Subject: Koppers Industries, Inc.
Grenada Plant – November, 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the November, 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
 NAME: ROBERTS INDUSTRIES INC
 ADDRESS: P O BOX 160
 ELIZABETH, NJ 07208

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 PERMIT NUMBER: NJ0090300
 DISCHARGE NUMBER: 001A

FACILITY: KENNEDY COUNTY
 LOCATION: NEW JERSEY

MS 30960

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
02	10	01	02	10	31

STATION NO: (3096) NO: 001A
 F - FIRM
 TOTAL: 100.00
 DISCHARGE: 100.00
 NOTE: Read instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
500, 3-DAY (20 DGS. C)	SAMPLE MEASUREMENT	0.915	1.365	(20)		4.312	6.6	0	1/1	Loop
00310 1 0 0	PERMIT REQUIREMENT	70	140	DAILY MX		240	480	0	1/1	Loop
00310 1 0 0	MEASUREMENT			105/DY				0	1/1	Loop
00400 1 0 0	SAMPLE MEASUREMENT				6.8		2.65	0	1/1	Loop
00400 1 0 0	PERMIT REQUIREMENT				5.5		9.5	0	1/1	Loop
00530 1 0 0	SAMPLE MEASUREMENT	8.257	10.862	(20)		39.8	52	0	1/1	Loop
00530 1 0 0	PERMIT REQUIREMENT	88	175	DAILY MX		300	600	0	1/1	Loop
00530 1 0 0	MEASUREMENT			105/DY				0	1/1	Loop
00530 1 0 0	SAMPLE MEASUREMENT	NODI=B	NODI=B	(25)		No DI=B	NODI=B	0	1/1	Grab
00530 1 0 0	PERMIT REQUIREMENT	REPORT	29.2	DAILY MX		REPORT	100	0	1/1	Grab
00530 1 0 0	MEASUREMENT			105/DY				0	1/1	Grab
00530 1 0 0	SAMPLE MEASUREMENT	0.00138	0.00370	(25)		0.006	0.015	0	1/1	Grab
00530 1 0 0	PERMIT REQUIREMENT	0.053	0.105	DAILY MX		0.10	0.35	0	1/1	Grab
00530 1 0 0	MEASUREMENT			105/DY				0	1/1	Grab
00530 1 0 0	SAMPLE MEASUREMENT	NODI=B	NODI=B	(20)		No DI=B	NODI=B	0	1/1	Grab
00530 1 0 0	PERMIT REQUIREMENT	0.88	1.75	DAILY MX		3	6	0	1/1	Grab
00530 1 0 0	MEASUREMENT			105/DY				0	1/1	Grab
00530 1 0 0	SAMPLE MEASUREMENT	0.0222	0.0337	(03)				0	Daily	Grab
00530 1 0 0	PERMIT REQUIREMENT	REPORT	0.035	DAILY MX				0	Daily	Grab
00530 1 0 0	MEASUREMENT			105/DY				0	Daily	Grab

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER: Thomas L. Henderson
 TYPED OR PRINTED: Thomas L. Henderson
 COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):
 I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: Thomas L. Henderson
 TELEPHONE: 662-226-4587
 DATE: 02-11-13

EPA Form 3320-1 (Rev. 3/99) Previous editions may be used. PAGE 1 OF 1

NAME: KODAK INDUSTRIALS INC

ADDRESS: 1000 E. 1000

CITY: CHATTANOOGA

STATE: TENNESSEE

COUNTY: HAMPSHIRE

LOCATION: CHATTANOOGA

PERMIT NUMBER: 30093

DATE: 09/10/02

PERMIT NUMBER		DISCHARGE NUMBER	
30093		201	
MONITORING PERIOD			
FROM	YEAR	MO	DAY
09/01/02	02	01	01
TO	YEAR	MO	DAY
09/30/02	02	01	30

NOTE: Read instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
1. 3-DAY (24 HRS. C) PERMIT REQUIREMENT		0.262	0.511	(26)		2.775	4.2	0	1/7	Comp
2. PERMIT GROSS VALUE				LBS/DY						
3. PERMIT GROSS VALUE				LBS/DY						
4. PERMIT GROSS VALUE				LBS/DY						
5. PERMIT GROSS VALUE				LBS/DY						
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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	THOMAS L. HEADERSON	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	THOMAS L. HEADERSON	TELEPHONE	DATE
TYPED OR PRINTED	THOMAS L. HEADERSON				

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME: THOMAS L. HENDERSON
ADDRESS: 100 BOX 160
TULSA, OK 74101

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
PERMIT NUMBER: NP0000300
DISCHARGE NUMBER: 001A

OMB NO. 2040-0004

FACILITY: THOMAS L. HENDERSON
LOCATION: TULSA, OK 74101
MS 30960

MONITORING PERIOD
FROM: YEAR 02 MO 06 DAY 01
TO: YEAR 02 MO 09 DAY 31

DISCHARGE
TOTAL FACILITY DISCHARGE
P - FINAL
NO DISCHARGE

SEP 17 2002
DEF-0000

NOTE: Read instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				UNITS
5-DAY BOD (20 DEG. C)		0.460	0.658	(25)		2.175	3.2	(19)	0	1/7	Grab
PERMIT REQUIREMENT		NO AVG	DAILY MX	LBS/DY		240	480	MG/L			
SAMPLE MEASUREMENT					7.9		8.2	(12)	0	3/7	Grab
PERMIT REQUIREMENT											
SOLIDS, TOTAL SUSPENDED		2.637	3.670	(26)		13.25	20	(19)	0	1/7	Grab
PERMIT REQUIREMENT		NO AVG	DAILY MX	LBS/DY		300	600	MG/L			
SAMPLE MEASUREMENT											
PERMIT REQUIREMENT											
5-DAY BOD (20 DEG. C)		0.00137	0.00209	(26)		0.00225	0.01	(12)	0	1/7	Grab
PERMIT REQUIREMENT		NO AVG	DAILY MX	LBS/DY		0.18	0.36	MG/L			
SAMPLE MEASUREMENT											
PERMIT REQUIREMENT											
5-DAY BOD (20 DEG. C)		0.0213	0.0294	(23)					0	Daily	Cont
PERMIT REQUIREMENT		NO AVG	DAILY MX	MGD							
SAMPLE MEASUREMENT											
PERMIT REQUIREMENT											

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE: THOMAS L. HENDERSON
SIGNATURE: [Signature]
OFFICER OR AUTHORIZED AGENT

TELEPHONE: 462-226-4587
DATE: 09/17/02

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Thomas L. Henderson
Typed or Printed

Signature of Principal Executive Officer or Authorized Agent

Area Code: 462
Number: 226-4587

Year: 02
Month: 09
Day: 31

001 A

RECEIVED
AUG 21 2002

AREA CODE	NUMBER	YEAR	MO	DAY
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NOTE: Read instructions before completing this form

NOTE: Read instructions before completing this form.

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NOTE: Read instructions before completing this form.

ing this form.

SECRET
APR 15 2002

Form Approved
OMB No. 2070-0047

NAME KOREAN INDUSTRIES INC

ADDRESS P O BOX 150

MS 38960

FACILITY KOREAN INDUSTRIES

LOCATION BRIDGEMAN

MS 38960

FROM

YEAR	MO	DAY
02	02	01

MONITORING PERIOD

YEAR	MO	DAY
02	02	28

PERMIT NUMBER MS090300

DISCHARGE NUMBER 001 A

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)

ONE No. 2040-0004

MINOR (SBR NO) F - FINAL

FINAL FACILITY DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				UNITS
BOB, 5-DAY (20 DEG. C)		0.258	0.383	(26)		2.33	3.3	(19)	0	1/7	Comp
PERMIT REQUIREMENT		7.0	140	LBS/DAY		240	460	MG/L			
PERMIT MEASUREMENT					7.0		7.6	(12)	0	2/7	Grab
PERMIT REQUIREMENT					5.5		9.5	MG/L			
PERMIT MEASUREMENT		1.057	2.434	(26)		9.75	21.0	(19)	0	1/7	Comp
PERMIT REQUIREMENT						300	600	MG/L			
PERMIT MEASUREMENT		0.425	1.171	(26)		3.48	10.1	(19)	0	1/7	Grab
PERMIT REQUIREMENT						REPORT	100	MG/L			
PERMIT MEASUREMENT		0.0098	0.0013	(26)		0.009	0.011	(19)	0	1/7	Grab
PERMIT REQUIREMENT						0.18	0.35	MG/L			
PERMIT MEASUREMENT		NODI=B	NODI=B	(26)		NODI=B	NODI=B	(19)	0	1/7	Grab
PERMIT REQUIREMENT						3	6	MG/L			
PERMIT MEASUREMENT		0.018	0.0306	(03)					0	Daily	Cont
PERMIT REQUIREMENT											

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Thomas L. Henderson Mgr.

Plant

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Principal Executive Officer or Authorized Agent

TELEPHONE DATE

WARRANTED AND PROVEN

2004

LOCATION 10000 A.M.E.

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FROM

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NOTE: Read instructions before completing this form.

to completing this form.

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

See attached letter.

NAME KOPERS INDUSTRIES INC

ADDRESS P O BOX 160

TIE PLANT

FACILITY **GREENADA COUNTY**
LOCATION **GREENADA**
ATTN: **THOMAS L HENDERSON**

MS 38960

MS 38960

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

MSP090300
PERMIT NUMBER

001 Y
DISCHARGE NUMBER

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
01	10	01	01	12	31

MINOR (SUBR NO) **F-154**
TOTAL FACILITY DISCHARGE

*** NO DISCHARGE 1 1 ***
NOTE: Read instructions before completing this form.

ENERG

PARAMETER	SAMPLE MEASUREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
ARSENIC, TOTAL RECOVERABLE	NO DI = B	NO DI = B	NO DI = B	(26)	*****	NO DI = B	NO DI = B	0	2/yr	Comp
EFFLUENT GROSS VALUE REQUIREMENT	PERMIT REPORT ANNL AVG	0.131	ANNL MAX	LBS/DY	*****	REPORT ANNL AVG	0.45	ANNL MAX	SEMI-COMP 24	
CHROMIUM	NO DI = B	NO DI = B	NO DI = B	(26)	*****	NO DI = B	NO DI = B	0	2/yr	Comp
EFFLUENT GROSS VALUE REQUIREMENT	PERMIT REPORT ANNL AVG	0.003	ANNL MAX	LBS/DY	*****	REPORT ANNL AVG	0.02	ANNL MAX	SEMI-COMP 24	
ZINC	NO DI = B	NO DI = B	NO DI = B	(26)	*****	NO DI = B	NO DI = B	0	2/yr	Comp
EFFLUENT GROSS VALUE REQUIREMENT	PERMIT REPORT ANNL AVG	0.011	ANNL MAX	LBS/DY	*****	REPORT ANNL AVG	0.089	ANNL MAX	SEMI-COMP 24	
TOTAL RECOVERABLE	NO DI = B	NO DI = B	NO DI = B	(26)	*****	NO DI = B	NO DI = B	0	2/yr	Comp
EFFLUENT GROSS VALUE REQUIREMENT	PERMIT REPORT ANNL AVG	1.168	ANNL MAX	LBS/DY	*****	REPORT ANNL AVG	4.0	ANNL MAX	SEMI-COMP 24	
COPPER	NO DI = B	NO DI = B	NO DI = B	(26)	*****	NO DI = B	NO DI = B	0	2/yr	Comp
EFFLUENT GROSS VALUE REQUIREMENT	PERMIT REPORT ANNL AVG	0.642	ANNL MAX	LBS/DY	*****	REPORT ANNL AVG	2.2	ANNL MAX	SEMI-COMP 24	
TOTAL RECOVERABLE	NO DI = B	NO DI = B	NO DI = B	(26)	*****	NO DI = B	NO DI = B	0	2/yr	Comp
EFFLUENT GROSS VALUE REQUIREMENT	PERMIT REPORT ANNL AVG	0.642	ANNL MAX	LBS/DY	*****	REPORT ANNL AVG	2.2	ANNL MAX	SEMI-COMP 24	
MEASUREMENT	SAMPLE									
PERMIT REQUIREMENT										
MEASUREMENT	SAMPLE									
PERMIT REQUIREMENT										
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.									
Thomas L. Henderson / Plant Manager	Thomas L. Henderson									
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)	No Excursions.									
TELEPHONE	662 226-4584									
DATE	02 01 18									

NAME KOPPER'S INDUSTRIES INC

ADDRESS P O BOX 160

TIE PLANT

FACILITY GRENADA COUNTY

LOCATION GRENADA

ATTN: THOMAS L HENDERSON

MS 38960

MS 38960

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

MSPO90300
PERMIT NUMBER

001 A
DISCHARGE NUMBER

MINOR

(SUBR NO)
F - FINAL

TOTAL FACILITY DISCHARGE

ENERG

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
01	12	01	01	12	31

*** NO DISCHARGE 1 1 ***
NOTE: Read instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	2.708	6.255	(25)	*****	37.575	102	0	1/4	Comp
00310 1 0 0	PERMIT REQUIREMENT	70	140	DAILY MX	*****	240	480		WEEKLY COMB	
EFFLUENT GROSS VALU	MEASUREMENT	*****	*****	LBS/DY	*****	*****	*****			
00400 1 0 0	SAMPLE MEASUREMENT	*****	*****		8.10	*****	8.50	0	2/4	Grab
EFFLUENT GROSS VALU	PERMIT REQUIREMENT	*****	*****	*****	5.5 MINIMUM	*****	9.5 MAXIMUM		WEEKLY	
SOLIDS, TOTAL	SAMPLE MEASUREMENT	3.264	6.005	(26)	*****	21.25	36	0	1/4	Comp
00530 1 0 0	PERMIT REQUIREMENT	88	175	DAILY MX	*****	300	600		WEEKLY COMB	
EFFLUENT GROSS VALU	MEASUREMENT	*****	*****	LBS/DY	*****	*****	*****			
DIL & GREASE (FRED)	SAMPLE MEASUREMENT	0.264	0.754	(26)	*****	3.705	10.3	0	1/4	Grab
EXTR. - IR METH/TOT, ROMEASUREMENT	PERMIT REQUIREMENT	REPORT	29.2	DAILY MX	*****	REPORT	100		WEEKLY GRAB	
00560 1 0 0	MEASUREMENT	MD AVG	DAILY MX	LBS/DY	*****	MD AVG	DAILY MX			
EFFLUENT GROSS VALU	SAMPLE MEASUREMENT	0.113	0.424	(26)	*****	0.865	2.54	4	1/4	Grab
PENTACHLOROPHENOL	PERMIT REQUIREMENT	0.053	0.105	DAILY MX	*****	0.18	0.36		WEEKLY GRAB	
39032 1 0 0	SAMPLE MEASUREMENT	MD AVG	DAILY MX	LBS/DY	*****	MD AVG	DAILY MX			
EFFLUENT GROSS VALU	MEASUREMENT	*****	*****	(26)	*****	*****	*****			
PHENOLS	PERMIT REQUIREMENT	MDI=B	MDI=B		*****	MDI=B	MDI=B	0	1/4	Grab
00000 1 0 0	SAMPLE MEASUREMENT	0.88	1.75	DAILY MX	*****	MDI=B	MDI=B		WEEKLY GRAB	
EFFLUENT GROSS VALU	PERMIT REQUIREMENT	MDI=B	MDI=B	LBS/DY	*****	MDI=B	MDI=B			
FLOW, IN CONDUIT OR	SAMPLE MEASUREMENT	0.0209	0.0346	(03)	*****	MDI=B	MDI=B	0	Daily	Cont
THRU TREATMENT PLANT	PERMIT REQUIREMENT	REPORT	0.035	DAILY MX	*****	MDI=B	MDI=B		DAILY CONTIN	
50050 1 0 0	MEASUREMENT	MDI=B	MDI=B	MGD	*****	MDI=B	MDI=B			
EFFLUENT GROSS VALU	PERMIT REQUIREMENT	MDI=B	MDI=B		*****	MDI=B	MDI=B			
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.									
Thomas L. Henderson	Signature of Principal Executive Officer or Authorized Agent									
TELEPHONE	DATE									
662-226-4584	02 01 18									

NAME: KOPERS INDUSTRIES INC

ADDRESS: P O BOX 160

TIE PLANT

FACILITY: **GREENADA COUNTY**

LOCATION: **GREENADA**

ATTN: THOMAS L HENDERSON

MS 38960

MS 38960

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

MSP090300
PERMIT NUMBER

001 A
DISCHARGE NUMBER

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
01	11	01	01	11	30

MINOR (SUBR NO)
F - FINAL
TOTAL FACILITY DISCHARGE
*** NO DISCHARGE ***
NOTE: Read Instructions before completing this form.



PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	0.516	1.034	(26)	*****	5.55	8.1	0	1/7	comp
00310 1 0 0	PERMIT REQUIREMENT	70	140	DAILY MX	*****	240	480		WEEKLY	COMP 24
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	LBS/DY	8.1	*****	8.5	0	2/7	grab
00400 1 0 0	PERMIT REQUIREMENT	*****	*****	*****	5.5	*****	9.5		WEEKLY	GRAB
SOLIDS, TOTAL SUSPENDED	SAMPLE MEASUREMENT	5.223	8.422	(26)	*****	60	70	0	1/7	comp
00530 1 0 0	PERMIT REQUIREMENT	88	175	DAILY MX	*****	300	600		WEEKLY	COMP 24
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	NODI=B	NODI=B	LBS/DY	*****	NODI=B	NODI=B	0	1/7	grab
00560 1 0 0	PERMIT REQUIREMENT	REPORT	29.2	DAILY MX	*****	REPORT	100		WEEKLY	GRAB
PENTACHLOROPHENOL	SAMPLE MEASUREMENT	NODI=B	NODI=B	(26)	*****	NODI=B	NODI=B	0	1/7	grab
39032 1 0 0	PERMIT REQUIREMENT	0.053	0.105	DAILY MX	*****	0.18	0.36		WEEKLY	GRAB
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	NODI=B	NODI=B	LBS/DY	*****	NODI=B	NODI=B	0	1/7	grab
PHENOLS	PERMIT REQUIREMENT	0.88	1.75	DAILY MX	*****	3	6		WEEKLY	GRAB
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.0109	0.0229	(03)	*****	*****	*****	0	Daily	CONT
50050 1 0 0	PERMIT REQUIREMENT	MD AVG	MD AVG	MG/L	*****	*****	*****		DAILY	CONTIN
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	MD AVG	MD AVG	MG/L	*****	*****	*****		DAILY	CONTIN

NAME/TITLE: PRINCIPAL EXECUTIVE OFFICER

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

THOMAS L. HENDERSON

Plant Manager

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Thomas L. Henderson

642 226-4584

01 12 14

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Typed or Printed

No Excursions.

00027 / 0110 074-0000

PAGE 9F

NAME KOPPEERS INDUSTRIES INC

ADDRESS P O BOX 160

TIE PLANT

FACILITY GRENADA COUNTY

LOCATION GRENADA

ATTN: THOMAS L HENDERSON

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

MSPO90300
PERMIT NUMBER

001 A
DISCHARGE NUMBER

MONITORING PERIOD

YEAR	MO	DAY	YEAR	MO	DAY
01	10	01	01	10	31

MINDR (SUBR NO)
F - FINAL
TOTAL FACILITY DISCHARGE
NOV 15 2001
NOTE: Read instructions before completing this form.



PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			EX	NO. OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	1.99	4.13	(26)	*****	11.66	18.6	0	1/7	Comp
00310 1 0 0	PERMIT	70	140		*****	240	480			
EFFLUENT GROSS VALUE REQUIREMENT	MEASUREMENT	*****	*****	LBS/DY	*****	*****	*****			
00400 1 0 0	PERMIT	*****	*****		5.5	*****	*****	0	2/7	grab
EFFLUENT GROSS VALUE REQUIREMENT	MEASUREMENT	*****	*****		MINIMUM	*****	*****			
SOLIDS, TOTAL	SAMPLE	8.38	30.64	(26)	*****	58.4	220.0	0	1/7	Comp
SUSPENDED	MEASUREMENT	8.38	30.64		*****	300	600			
00530 1 0 0	PERMIT	8.38	30.64		*****	300	600			
EFFLUENT GROSS VALUE REQUIREMENT	MEASUREMENT	8.38	30.64	LBS/DY	*****	300	600			
DIL & GREASE (FRED)	SAMPLE	NO DI=B	NO DI=B	(26)	*****	NO DI=B	NO DI=B	0	1/7	grab
EXTR. -IR METH>TOT, R	MEASUREMENT	NO DI=B	NO DI=B		*****	NO DI=B	NO DI=B			
00560 1 0 0	PERMIT	NO DI=B	NO DI=B		*****	NO DI=B	NO DI=B			
EFFLUENT GROSS VALUE REQUIREMENT	MEASUREMENT	NO DI=B	NO DI=B	LBS/DY	*****	NO DI=B	NO DI=B			
PENTACHLOROPHENOL	SAMPLE	0.0023	0.0047	(26)	*****	0.013	0.021	0	1/7	grab
39032 1 0 0	PERMIT	0.0023	0.0047		*****	0.013	0.021			
EFFLUENT GROSS VALUE REQUIREMENT	MEASUREMENT	0.0023	0.0047	LBS/DY	*****	0.013	0.021			
PHENOLS	SAMPLE	NO DI=B	NO DI=B	(26)	*****	NO DI=B	NO DI=B	0	1/7	grab
40000 1 0 0	PERMIT	NO DI=B	NO DI=B		*****	NO DI=B	NO DI=B			
EFFLUENT GROSS VALUE REQUIREMENT	MEASUREMENT	NO DI=B	NO DI=B	LBS/DY	*****	NO DI=B	NO DI=B			
FLOW, IN CONDUIT OR	SAMPLE	0.0187	0.0317	(03)	*****	0.0187	0.0317	0	Daily	Cont
THRU TREATMENT PLANT	MEASUREMENT	0.0187	0.0317		*****	0.0187	0.0317			
50050 1 0 0	PERMIT	0.0187	0.0317		*****	0.0187	0.0317			
EFFLUENT GROSS VALUE REQUIREMENT	MEASUREMENT	0.0187	0.0317	MGD	*****	0.0187	0.0317			
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		THOMAS L. HENDERSON			THOMAS L. HENDERSON			TELEPHONE		DATE
THOMAS L. HENDERSON		Plant Mgr.			Plant Mgr.			662-236-4584		01/11/02
TYPED OR PRINTED		THOMAS L. HENDERSON			THOMAS L. HENDERSON			AREA CODE		YEAR MO DAY
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)		No excursions.			No excursions.			NUMBER		YEAR MO DAY
										YEAR MO DAY

RECEIVED
 1/1/2001
 TIME

PARAMETER	X	QUANTITY OR LOADING			Quality or Concentration					NO. OF ANALYSIS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS				
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	0.531	1.06	(26)	*****	4.55	9.2	(19)	0	1/4	Comp	
00310 1 0 0	PERMIT REQUIREMENT	7.0	140	LBS/DAY	*****	240	480	DAILY MG/L	0	1/4	Comp	
EFFLUENT GROSS VOLUME	SAMPLE MEASUREMENT											
00400 1 0 0	PERMIT REQUIREMENT				7.15		8.10	(12)	0	2/4	grab	
EFFLUENT GROSS VOLUME	PERMIT REQUIREMENT	*****	*****	*****	5.5 MINIMUM	*****	9.5 MAXIMUM	SU		Twice/Week		
SOLIDS, TOTAL SUSPENDED	SAMPLE MEASUREMENT	7.78	27.16	(26)	*****	67.5	236	(19)	0	1/4	Comp	
00530 1 0 0	PERMIT REQUIREMENT	82	175	LBS/DAY	*****	300	600	DAILY MG/L		WEEKLY COMPA		
EFFLUENT GROSS VOLUME	PERMIT REQUIREMENT	NO DI=B	NO DI=B	(01)	*****	NO DI=B	NO DI=B	(19)	0	1/4	grab	
OIL & GREASE (FRESH EXTR. - IR METH) TOTAL	SAMPLE MEASUREMENT	REPORT	29.2	LBS/DAY	*****	REPORT	100	DAILY MG/L		WEEKLY GRAB		
00560 1 0 0	PERMIT REQUIREMENT	NO AVG	29.2	DAILY MG/L	*****	NO AVG	100	DAILY MG/L		1/4	grab	
EFFLUENT GROSS VOLUME	SAMPLE MEASUREMENT	0.0026	0.0037	(01)	*****	0.021	0.03	(19)	0	1/4	grab	
PENTACHLOROPHENOL	SAMPLE MEASUREMENT	0.0026	0.0037	LBS/DAY	*****	0.021	0.03	DAILY MG/L		WEEKLY GRAB		
39032 1 0 0	PERMIT REQUIREMENT	0.0026	0.0037	LBS/DAY	*****	0.021	0.03	DAILY MG/L		1/4	grab	
EFFLUENT GROSS VOLUME	SAMPLE MEASUREMENT	NO DI=B	NO DI=B	(01)	*****	NO DI=B	NO DI=B	(19)	0	1/4	grab	
PHENOLS	SAMPLE MEASUREMENT	NO DI=B	NO DI=B	(01)	*****	NO DI=B	NO DI=B	(19)	0	1/4	grab	
00000 1 0 0	PERMIT REQUIREMENT	28	175	LBS/DAY	*****	3	6	DAILY MG/L		WEEKLY GRAB		
EFFLUENT GROSS VOLUME	SAMPLE MEASUREMENT	0.0176	0.0291	(03)	*****				0	Daily Cont		
FLOW, IN CONDUIT OF TREATMENT PLANT	PERMIT REQUIREMENT	REPORT	0.035	DAILY MG/L	*****					DAILY CONTIN		
50050 1 0 0	PERMIT REQUIREMENT	NO AVG	0.035	DAILY MG/L	*****							
EFFLUENT GROSS VOLUME	PERMIT REQUIREMENT	NO AVG	0.035	DAILY MG/L	*****							
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER												
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.												
Thomas L. Henderson Plant Manager												
TYPED OR PRINTED												
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)												
Thomas L. Henderson SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT												
462 226-4584 AREA CODE NUMBER												
01 10 11 YEAR MO DAY												
DATE												

FROM YEAR MO DAY TO YEAR MO DAY
 01 08 01 01 08 03
 MONITORING PERIOD
 *** NO DISCHARGE ***
 NOTE: Read Instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			Quality or Concentration			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
BOD, 5-DAY (20 DEG C)	SAMPLE MEASUREMENT	0.449	0.698	(26)	*****	3.73	5.20	0	1/7	comp
00310 1 0 0	PERMIT REQUIREMENT	70	140	MG AVG	*****	240	480	0	WEEKLY	COMP24
EFFLUENT GROSS VOLUME	SAMPLE MEASUREMENT			MG AVG	*****			0	2/4	grab
00400 1 0 0	PERMIT REQUIREMENT			MG AVG	*****			0	WEEKLY	GRAB
SOLIDS, TOTAL	SAMPLE MEASUREMENT	2.80	6.57	(26)	*****	22.5	45	0	1/4	comp
SUSPENDED	PERMIT REQUIREMENT	60	120	MG AVG	*****	300	600	0	WEEKLY	COMP24
00530 1 0 0	SAMPLE MEASUREMENT			MG AVG	*****			0	1/4	grab
EFFLUENT GROSS VOLUME	PERMIT REQUIREMENT			MG AVG	*****			0	1/4	grab
00560 1 0 0	SAMPLE MEASUREMENT			MG AVG	*****			0	1/4	grab
EFFLUENT GROSS VOLUME	PERMIT REQUIREMENT			MG AVG	*****			0	1/4	grab
PENTACHLOROPHENOL	SAMPLE MEASUREMENT	0.0033	0.0041	(01)	*****	0.029	0.033	0	1/4	grab
39032 1 0 0	PERMIT REQUIREMENT	0.0033	0.0041	(01)	*****	0.029	0.033	0	1/4	grab
EFFLUENT GROSS VOLUME	SAMPLE MEASUREMENT			MG AVG	*****			0	1/4	grab
PHENOLS	PERMIT REQUIREMENT			MG AVG	*****			0	1/4	grab
00000 1 0 0	SAMPLE MEASUREMENT			MG AVG	*****			0	1/4	grab
EFFLUENT GROSS VOLUME	PERMIT REQUIREMENT			MG AVG	*****			0	1/4	grab
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	SAMPLE MEASUREMENT	0.011	0.0175	(03)	*****			0	Daily	cont
50050 1 0 0	PERMIT REQUIREMENT	0.011	0.0175	(03)	*****			0	DAILY	CURTIN
EFFLUENT GROSS VOLUME	PERMIT REQUIREMENT			MG AVG	*****			0	DAILY	CURTIN

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME KOPPEL INDUSTRIES INC
ADDRESS P O BOX 160
TIE PLANT MS 38960

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

MSPO00300
PERMIT NUMBER

001 A
DISCHARGE NUMBER

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
01	07	01	01	07	01

FACILITY GREENADA COUNTY
LOCATION GREENADA MS
ATTN: THOMAS L HENDERSON

FROM 01 07 01 TO 01 07 01

MINOR (SUBMITTER)
F - FINANCIAL
TOTAL FUNDING DISCHARGE
*** NO DISCHARGE ***
NOTE: Read instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			Quality or Concentration			UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				

BOD, 5-DAY (20 DEG C)	SAMPLE MEASUREMENT	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	ANALYSIS	TYPE	
00310 1 0 0	PERMIT REQUIREMENT	0.359	0.465	(26)	*****	4.75	7.2	(19)	0	1/4	Comp
EFFLUENT GROSS WALL	SAMPLE MEASUREMENT	*****	*****	LBS/DAY	7.70	*****	8.00	(12)	0	2/4	Grab
00400 1 0 0	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
EFFLUENT GROSS WALL	SAMPLE MEASUREMENT	1.253	2.78	(26)	*****	19.75	49	(19)	0	1/4	Comp
SOLIDS, TOTAL SUSPENDED	PERMIT REQUIREMENT	125	175	DAILY MK	*****	200	400	DAILY MK	*****	*****	*****
00530 1 0 0	PERMIT REQUIREMENT	*****	*****	LBS/DAY	*****	*****	*****	(19)	0	1/4	Comp
EFFLUENT GROSS WALL	SAMPLE MEASUREMENT	NDDI=B	NDDI=B	(01)	*****	NDDI=B	NDDI=B	(19)	0	1/4	Grab
OIL & GREASE (FRED EXTR. - IR METHOD)	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
00560 1 0 0	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
EFFLUENT GROSS WALL	SAMPLE MEASUREMENT	0.0006	0.0011	(01)	*****	0.0075	0.009	(19)	0	1/4	Grab
PENTACHLOROPHENOL	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
00600 1 0 0	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
EFFLUENT GROSS WALL	SAMPLE MEASUREMENT	0.0101	0.0404	(01)	*****	0.143	0.57	(19)	0	1/4	Grab
PHENOLS	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
00630 1 0 0	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
EFFLUENT GROSS WALL	SAMPLE MEASUREMENT	0.012	0.024	(03)	*****	*****	*****	*****	*****	*****	*****
THRU TREATMENT PLANT	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
00650 1 0 0	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
EFFLUENT GROSS WALL	SAMPLE MEASUREMENT	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.										
Thomas L. Henderson	Plant Manager	Signature of Principal Executive Officer or Authorized Agent									
TYPED OR PRINTED		COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)		AREA CODE		NUMBER		YEAR		MO DAY	
				662		226-4584		01		08 10	

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

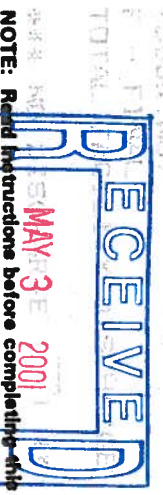
NAME: KOPPEL INDUSTRIES INC
ADDRESS: P.O. BOX 460
TIE PLANT

PERMIT NUMBER: MS00000000

DISCHARGE NUMBER: 001 A

FACILITY: GRENADEA COUNTY
LOCATION: GRENADEA

MONITORING PERIOD
FROM: YEAR MO DAY TO: YEAR MO DAY



NOTE: Read instructions before completing this form.

PARAMETER	SAMPLE MEASUREMENT	QUANTITY OR LOADING			Quality or Concentration			NO. OF ANALYSES	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
3000 E-DAY (20 DEG. C)	PERMIT REQUIREMENT	1.352	1.988	(20)		8.7	12.6	0	1/7	comp
00310 1 0 0	PERMIT REQUIREMENT			MG/L				0	2/7	Grab
EFFLUENT GROSS VAL	SAMPLE MEASUREMENT				7.91		8.30	0		
00400 1 0 0	PERMIT REQUIREMENT			(20)						
EFFLUENT GROSS VAL	SAMPLE MEASUREMENT	6.84	8.85			65.75	192	0	1/7	comp
SUSPENDED	PERMIT REQUIREMENT									
00500 1 0 0	PERMIT REQUIREMENT			MG/L		0.633	2.53	0	1/7	Grab
EFFLUENT GROSS VAL	SAMPLE MEASUREMENT	0.116	0.464	(10)						
00560 1 0 0	PERMIT REQUIREMENT			MG/L						
EFFLUENT GROSS VAL	SAMPLE MEASUREMENT	0.0025	0.0034	(10)		0.0125	0.018	0	1/7	Grab
PENTACHLOROPHENOL	PERMIT REQUIREMENT			MG/L						
39032 1 0 0	PERMIT REQUIREMENT			MG/L						
EFFLUENT GROSS VAL	SAMPLE MEASUREMENT									
00600 1 0 0	PERMIT REQUIREMENT			MG/L						
EFFLUENT GROSS VAL	SAMPLE MEASUREMENT	0.0196	0.0339	(10)						
FLOW, IN CONDUIT OF TREATMENT PLANT	PERMIT REQUIREMENT			MG/L						
00650 1 0 0	PERMIT REQUIREMENT			MG/L						
EFFLUENT GROSS VAL	SAMPLE MEASUREMENT									
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER										
TYPED OR PRINTED										
STATEMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)										
No Violations										
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT										
TELEPHONE										
DATE										
AREA CODE NUMBER YEAR MO DAY										
662 336-4584 01 04 25										

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

RECEIVED
DEC 19 2003
Dept. of Environmental Protection
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

December 12, 2003



Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7002 0460 0003 7596 1178

**Subject: Koppers Inc.
Grenada Plant -- November, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the November, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

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

Haley P. Biddy

Cc:
Tim Basilone -- Koppers
Plant File

Haley P. Biddy
Treating Supervisor
S.H.& E Coordinator

RECEIVED
NOV 26 2003
Environmental Quality
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

November 21, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7002 0460 0003 7596 1017

**Subject: Koppers Inc.
Grenada Plant – October, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the October, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley P. Biddy". The signature is fluid and cursive, with the first name "Haley" being more prominent.

Haley P. Biddy

Cc:
Tim Basilone – Koppers
Plant File

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

RECEIVED
OCT 24 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

October 20, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7002 0460 0003 7596 1154

**Subject: Koppers Inc.
Grenada Plant -- September, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the September, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

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

Haley P. Biddy

Cc:
Tim Basilone -- Koppers
Plant File

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



RECEIVED
SEP 24 2003
Mississippi Department of
Pollution Control

September 22, 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

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7002 0460 0003 7596 1147

**Subject: Koppers Inc.
Grenada Plant – August, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the August, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley P. Biddy". The signature is fluid and cursive, with the first name "Haley" being the most prominent.

Haley P. Biddy

Cc:
Tim Basilone – Koppers
Plant File

Haley P. Biddy
Treating Supervisor
S.H.& E Coordinator



AUGUST 25, 2003

RECEIVED
AUG 28 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

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7002 0460 0003 7596 1123

Subject: Koppers Inc.
Grenada Plant – July, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the July, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley P. Biddy". The signature is fluid and cursive, with the first name "Haley" being more prominent.

Haley P. Biddy

Cc: Tim Basilone - Koppers

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 14, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 8906

Subject: Koppers Inc.
Grenada Plant – June, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the June, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. Also enclosed is the January – June 2003 semi-annual metals testing results. There were no excursions during this reporting period.

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

Sincerely,



Haley P. Biddy

Environmental Supervisor

Cc: Tim Basilone - Koppers

RECEIVED
JUN 24 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

June 20, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 8876

Subject: Koppers Inc.
Grenada Plant – May, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the May, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period.

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

Sincerely,

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

Haley P. Biddy

Environmental Supervisor

Cc: Tim Basilone - Koppers

The Koppers logo features the word "KOPPERS" in a bold, blue, sans-serif font. To the right of the text is a green circular emblem with horizontal lines, resembling a stylized globe or a fan.

RECEIVED
MAY 28 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

May 16, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 8852

Subject: Koppers Inc.
Grenada Plant – April, 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the April, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period.

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

Sincerely,

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

Haley P. Bidder

Environmental Supervisor

Cc: Tim Basilone - Koppers

RECEIVED
APR 23 2003
Dept. of Environmental Quality
Office of Pollution Control

KOPPERS

APR 23 2003

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

April 22, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 8838

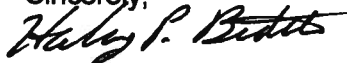
Subject: Koppers Inc.
Grenada Plant – March 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the March, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period.

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

Sincerely,



Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers



RECEIVED
APR 1 - 2003
Miss. 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

March 26, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 9163

Subject: Koppers Inc.
Grenada Plant – February 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the February, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There were no excursions during this reporting period.

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

Sincerely,

Haley P. Biddy

Environmental Supervisor

Cc: Tim Basilone - Koppers



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 5, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 9149


**Subject: Koppers Inc.
Grenada Plant – January 2003- POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the January, 2003 Discharge Monitoring Report for Koppers Inc. located in Tie Plant, MS. There was one excursion during this reporting period. On January 13th, Argus Analytical Inc. notified us of an exceedance regarding the daily max for pentachlorophenol. This incident was reported to both Mr. Clovis Tilghman (City of Grenada WWTP) and Mr. David Lee (OPC) by phone on the 13th. A follow up letter was then mailed to both Mr. Tilghman and Mr. Lee on January 17th.

MSDEQ contacted our facility on February 24th and informed us that our 2003 DMR reporting forms would be arriving late and there would be no penalty for late submittal.

Also enclosed is a copy of a letter sent to Ms Linda Vaught (MSDEQ) notifying the agency of Koppers new name and logo. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers



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

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

RECEIVED
JAN 22 2003
Dept. of Environmental Quality
Office of Pollution Control

January 21, 2003

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7099 3400 0002 5201 0697

Subject: Koppers Industries, Inc.
Grenada Plant – December, 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the December, 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There are two excursions reported during this period. First is the daily discharge limit that was reported to MSDEQ via (Voice Mail) on December 25th followed by a letter (attached) explaining the event that caused this exceedance. Also reported this period was a BOD sample taken on December 24, 2002, which expired prior to sampling (see attached analytical results). The DMR reflects that only 4 weekly samples were used for the month of December.

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

Sincerely,

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers

**KOPPERS
INDUSTRIES**

Grenada Co
Dlee

Koppers Industries,
P.O. Box
Tie Plant, MS 38

Telephone: (601) 226-4
FAX: (601) 226-4

January 15, 2003

RECEIVED
JAN 21 2003

Mississippi Department 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

Certified Mail 7099 3400 0002 5201 1021

**Subject: Koppers Industries, Inc.
Grenada Plant- POTW Permit # MSP090300
Notification of permit exceedence**

Dear Mr. Lee

This letter is to notify you of an exceedance of Koppers Industries Inc. POTW permit # MSP090300. From a sample taken on January 7, 2002 we exceeded our daily maximum limit for Pentachlorophenol. Based on analytical results provided by Argus Analytical, Inc., provided one week following the sample collection, it was determined that the Pentachlorophenol concentration was 0.565 mg/L. We are permitted for a daily max of 0.360 mg/L.

Notification from Argus Analytical, Inc. was received by telephone on Monday January 13 at approximately 11:55 a.m. At that time the discharge was immediately terminated and process water was re-circulated for treatment. A make-up sample was taken for analysis on the 13th. Argus reported the results from this make-up sample on January 14th as non-detect for Pentachlorophenol. Around 9:00 a.m. on Wednesday the system was returned to operation, and discharge resumed. You and Mr. Clovis Tilghman of the City of Grenada POTW were notified via voice mail January 13th at approximately 3:50 p.m. of with this information.

December 30, 2002

Mr. David Lee

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

RECEIVED
JAN - 3 2003
Mississippi Department of Environmental Quality
Office of Pollution Control

Certified Mail 7099 3400 0002 5201 1083

Subject: Koppers Industries, Inc.
Grenada Plant- POTW Permit # MSP090300
Notification of permit exceedence

Dear Mr. Lee

This letter is to notify you of an exceedence of Koppers Industries Inc. POTW permit # MSP090300. On December 24, 2002 we discharged to the City of Grenada 37,500 gallons. This amount exceeded our permit limit by 2,500 gallons. Due to our pump losing prime from the discharge tank we had approximately 10,000 gallons carry over from the previous day. The operator reduced the system, however the permitted limit was still exceeded. We are now in the process of installing an automatic shut off so that a desired volume can be pre-set and the system will shut down when that volume has been reached. I left a voice mail message to your office on December 25, 2002 around 10:45 a.m. concerning this matter. If you have any questions please call (662) 226-4585 ext. 40

Sincerely,



Haley P. Bidy
Environmental Supervisor

CC. Clovis Tilghman, City of Grenada-WWTP
Tim Basilone, Koppers 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





FILE COPY

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

August 27, 2001

Mr. Thomas Henderson
Plant Manager
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson:

Re: Koppers Industries Inc
Grenada County
Water Ref. No. MSP090300

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.

Please note the following important changes, conditions and requirements for the draft permit as listed below:

- Both Nickel and Zinc have been added to the permit on a "Report Only" basis.

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 me at (601) 961-5561.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Coleman".

Mary E. Coleman
Environmental Permits Division

Enclosures

876 PER20000004

August 13, 2001

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – July 2001 POTW Permit DMR**

Dear Sir or Madam:

Enclosed you will find a copy of the July 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during the month of July. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,



Blair Simpson
Treating Supervisor

Cc: Tim Basilone - Koppers

July 16, 2001

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
JUL 17 2001
Dept. of Environmental Quality
Office of Pollution Control

Subject: Koppers Industries, Inc.
Grenada Plant – June 2001 POTW Permit DMR

Dear Sir or Madam:

Enclosed you will find a copy of the June 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. In addition, the semi-annual arsenic, chromium, and copper analysis are enclosed with this month's report. There were no excursions during the month of June. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,



Blair Simpson
Treating Supervisor

Cc: Tim Basilone - Koppers



FILE COPY

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

May 28, 2001

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

Dear Mr. Henderson

Re: Koppers Industries Inc
Grenada County
Water Ref. No. MSP090300 (Revised Application)

This letter is to acknowledge receipt of your application on May 24, 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 Mary Coleman at (601) 961-5171.

Sincerely,

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

Teresa Dennington
Environmental Permits Division

876 PER20000004



FILE COPY

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

May 4, 2001

Mr. Blair Simpson
Koppers Industries, Inc.
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson:

Re: Koppers Industries, Inc.
Grenada County
Water Ref. No. MSP090300

Based upon review of the above referenced amended application received from Koppers Industries Inc. on February 9, 2001 the following deficiencies were noted:

1. On Page 3 of 31, Item 13, please list all facility discharges.
2. Additional testing is needed because your industry falls under the Timber Products Processing Point Source Category. You are responsible for the testing indicated on page 31 of the 2P application. Per our conversation on April 4, 2001, this testing includes the following GC/MS Fractions: Volatiles, Acids, Base/Neutrals, and Pesticides. Please revise all applicable application pages to reflect required testing. Please note that the "Testing Required" column must be marked for these type pollutants in addition to marking either "Believed Present" or "Believed Absent". Also, submit a copy of analysis results used for this application including test method and detection limits (i.e., laboratory bench sheets).
3. Please submit a revised process flow diagram and a water balance. The POTW discharge system information showed a combined effluent stream value instead of individual values. Individual values are needed for the process water effluent stream, the boiler blow down effluent stream, and the drip pad rain/process water effluent stream. An example line drawing is enclosed. Please refer to it for guidance. As previously stated, the line drawing and water balance must support your discharge request.
4. Please note that the laboratory bench sheets may be faxed to expedite time; however, an amended application with supplemental information must be formally submitted with a signature of an individual meeting signatory requirements of 40 CFR Part 403.12(l).

A copy of your application is enclosed. For your convenience, please note that this working copy contains highlighted sections requiring your attention. Please use this copy as guidance in preparing 876 PER20000004

your newly amended application.

Please address the above deficiencies on or before May 18, 2001. Upon receipt of this information, the Environmental Permits Division will continue the permitting process for your facility.

If you have any questions regarding the application or the permitting process, please contact me at (601) 961-5561.

Sincerely,



Mary E. Coleman
Environmental Permits Division

Enclosures

cc: Mr. Thomas Henderson, Plant Manager w/o Enclosures

876 PER20000004



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

May 4, 2001

Mr. Blair Simpson
Koppers Industries, Inc.
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson:

Re: Koppers Industries, Inc.
Grenada County
Water Ref. No. MSP090300

Based upon review of the above referenced amended application received from Koppers Industries Inc. on February 9, 2001 the following deficiencies were noted:

1. On Page 3 of 31, Item 13, please list all facility discharges.
2. Additional testing is needed because your industry falls under the Timber Products Processing Point Source Category. You are responsible for the testing indicated on page 31 of the 2P application. Per our conversation on April 4, 2001, this testing includes the following GC/MS Fractions: Volatiles, Acids, Base/Neutrals, and Pesticides. Please revise all applicable application pages to reflect required testing. Please note that the "Testing Required" column must be marked for these type pollutants in addition to marking either "Believed Present" or "Believed Absent". Also, submit a copy of analysis results used for this application including test method and detection limits (i.e., laboratory bench sheets).
3. Please submit a revised process flow diagram and a water balance. The POTW discharge system information showed a combined effluent stream value instead of individual values. Individual values are needed for the process water effluent stream, the boiler blow down effluent stream, and the drip pad rain/process water effluent stream. An example line drawing is enclosed. Please refer to it for guidance. As previously stated, the line drawing and water balance must support your discharge request.
4. Please note that the laboratory bench sheets may be faxed to expedite time; however, an amended application with supplemental information must be formally submitted with a signature of an individual meeting signatory requirements of 40 CFR Part 403.12(l).

A copy of your application is enclosed. For your convenience, please note that this working copy contains highlighted sections requiring your attention. Please use this copy as guidance in preparing 876 PER20000004

your newly amended application.

Please address the above deficiencies on or before May 18, 2001. Upon receipt of this information, the Environmental Permits Division will continue the permitting process for your facility.

If you have any questions regarding the application or the permitting process, please contact me at (601) 961-5561.

Sincerely,



Mary E. Coleman
Environmental Permits Division

Enclosures

cc: Mr. Thomas Henderson, Plant Manager w/o Enclosures

876 PER20000004

**KOPPERS
INDUSTRIES**

Koppers Industries, Inc.
P.O. Box 150
Tie Plant, MS 38960

May 15, 2001

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

Ms. Mary E. Coleman
Environmental Permits Division
Mississippi Department of Environmental Quality
Office of Pollution Control
Post Office Box 10385
Jackson, MS 39289-0385

**RE: Response to May 4, 2001 Letter
Koppers Industries, Inc.
Grenada County, Mississippi
WATER PRE-TREATMENT
Ref. No. MSP090300**

Dear Ms. Coleman,

This is in response to your letter dated May 4, 2001 requesting information pursuant to deficiencies you noted on our application for renewal of our water pre-treatment permit dated February 9, 2001.

Enclosed you will find information provided in response to items 3 (process flow diagram and supporting information) and item 4, (laboratory bench sheets, excluding dioxin results), including test methods and detection limits. Upon further examination the process flow values were found to be slightly different than originally figured and are now more detailed and itemized, supporting information is enclosed in this fax.

A complete re-signed copy of our application (complying with 40 CFR Part 403.12 (1)), including original lab results, process flow diagrams, supporting information, and dioxin test results will be sent to you no later than May 28, 2001.

We believe this information addresses the deficiencies outlined in items 3 and 4 of your May 4, 2001 letter. Please call me if you have any questions or would like to discuss this matter further.

I can be contacted at 662-226-4584, Extension 40.

Yours truly,

Blair Simpson
Environmental Supervisor

Enclosures

CC. T. Basilone, Koppers Pittsburgh

April 25, 2001

CERTIFIED MAIL

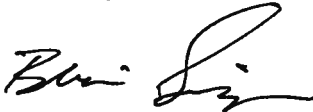
Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – March 2001 POTW Permit DMR**

Dear Sir or Madam:

Enclosed you will find a copy of the March 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. Koppers had no excursions during the month of March. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,



Blair Simpson
Treating Supervisor

Cc: Tim Basilone

File Koppers (PT)"
MSP090300
Tie Plant
Grenada Co.

PHONE CONVERSATION RECORD

Date: 4/4/01

Time: 2:50 PM

Talked to: Thomas Henderson, Steve Joy, & Blair Henderson

Of: Koppers Industries, Inc. -- Tie Plant, Grenada County, MS

Phone No. 662.226.4584 ext.11

Re: 2/5/01 supplemental info

Permit No. MSP090300

☒ I placed call

☐ Party called

My ☒ Message

☐ Reply

Additional testing is needed because of the category your industry falls under. You are responsible for the testing outlined on page 31 of the 2P application. A revised water balance is needed. An example line drawing will be faxed for guidance. Revise item 13 of application with all pertinent outfalls. You need a better estimate of the discharge flow. Request needs to be justified and fully documented by the line drawing and water balance. Consider a typical rainfall event to determine contaminated stormwater contribution to outflow. Get the analysis done and results sent to me ASAP. Follow-up with a hardcopy. The revised application pages with original signature will be needed. Testing is required for volatiles, acids, base/neutrals, and pesticides. I will proceed with draft; however, it will not be completed or released for review without info discussed today. Call if you have additional questions after reviewing my comments.

Party's ☐ Message

☒ Reply

They will have the samples pulled and testing done ASAP. They will fax results immediately.

Action or Follow up

Faxed line drawing example to Mr. Henderson.

☒ File

Signed: Mary E. Coleman

Mary E. Coleman (See Attached)

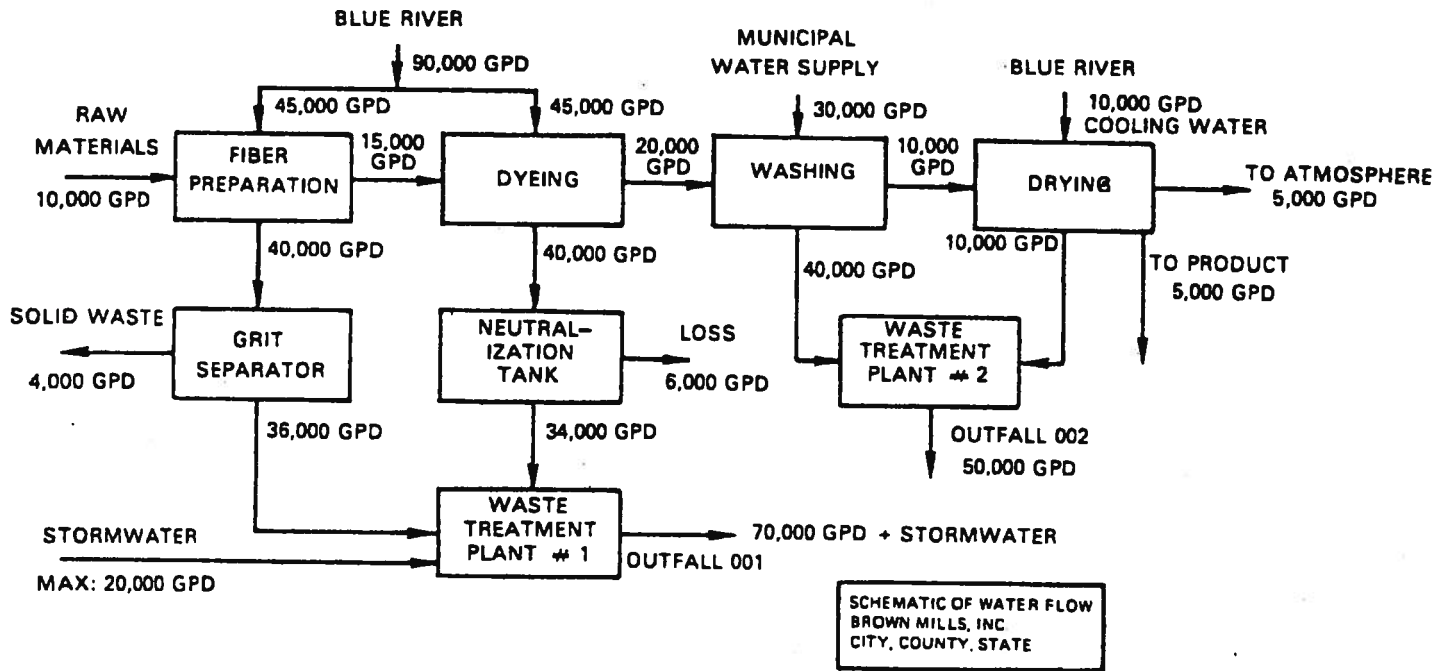
**** Transmit Conf. Report ****

Apr 4 '01 15:07

DEQ OPC ENVIR PMTS DIV--->	
No.	005
Mode	NORMAL
Pages	1 Page(s)
Result	OK

LINE DRAWING

Post-it® Fax Note	7671	Date	4.3.01	# of pages	1
To	Mr. Thomas Henderson	From	M.E. Coleman		
Co./Dept.	Koppers	Co.	M DEQ		
Phone #	662.226.4584	Phone #	601.961.5761		
Fax #	662.226.4588	Fax #	601.961.5703		



Example

February 17, 2001

CERTIFIED MAIL

Environmental Compliance Division
Mississippi Dept. of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RE: Koppers Industries Inc.
Grenada, MS Facility
January 2001 Discharge Monitoring Report

Dear Sir or Madam,

Enclosed is the Discharge Monitoring Report referenced above. No excursions or discharges exceeding the permit limits occurred during the month of January 2001.

On December 13, 2000 Ms. Melissa Collier of the MSDEQ and Mr. Clovis Tilghman of the City of Grenada were notified by telephone that Koppers stopped discharging water to the POTW, due to analytical results that were received indicating pentachlorophenol concentrations in the treated effluent at levels exceeding the permitted discharge limit. At that time, Koppers began re-circulating treated process water through the treatment facility, and collecting additional samples on a periodic basis for laboratory analysis to assess pentachlorophenol levels.

Treated water was re-circulated from January 1 through January 19, 2001. On January 19 effluent sample analytical results were obtained indicating that all parameters were below the permitted discharge limits. Koppers notified Ms. Collier and Mr. Tilghman in a letter dated January 19 of the analytical results and that discharge activities to the POTW had resumed. We believe the extremely low ambient temperatures caused our biological treatment system to become less effective in reducing pentachlorophenol concentrations during December and January.

Please call me at 662-226-4584 extension 22 if you have any questions regarding this matter.

Yours truly,


Steve Joy

Assistant Plant Manager

cc. T. Basilone, KII-Pittsburgh

February 5, 2001

Ms. Mary E. Coleman
Environmental Permits Division
Mississippi Department of Environmental Quality
Office of Pollution Control
Post Office Box 10385
Jackson, MS 39289-0385

RECEIVED
FEB - 9 2001
Dept. of Environmental Quality
Office of Pollution Control

**RE: Response to January 10, 2001 Letter
Koppers Industries, Inc.
Grenada County, Mississippi
WATER PRE-TREATMENT
Ref. No. MSP090300**

Dear Ms. Coleman,

This is in response to your letter dated January 10, 2001 requesting information pursuant to deficiencies you noted on our application for renewal of our water pre-treatment permit dated July 17, 2000.

Attached is a re-signed copy of our application, complying with 40 CFR Part 403.12 (1), and containing specific information in response to items numbered 1 through 6 outlined in your letter. Information that was changed or added to the original application in response to these deficiencies is highlighted in yellow.

Enclosed you will also find other information provided in response to items 7 and 8, including copies of analysis results for this application (including test methods and detection limits), and a process flow diagram and water balance with explanation.

We believe this information addresses each of the deficiencies outlined in your letter. Please call me if you have any questions or would like to discuss this matter further. I can be contacted at 662-226-4584, Extension 11.

Yours truly,

Thomas L. Henderson

Thomas Henderson
Plant Manager

Enclosures

CC. T. Basilone, Koppers Pittsburgh

January 29, 2001

Mary E. Coleman
MSDEQ
Environmental Permits Division
P.O. Box 10385
Jackson, MS. 39289-0385

Dear Ms. Coleman,

Our water usage at Koppers Industries can be broken down into three uses:

The first is the water that is produced as a waste from process, and boiler blow down water. This water is caught in a concrete containment area and treated through our wastewater treatment plant and then sent to the POTW. The volume of this use is about 10,000 gallons a day. Our permit allows us to treat and discharge 35,000 gallons a day. The 25,000 gallons a day difference is necessary to handle rainwater runoff that falls on containment areas.

The second water usage is the water that is drawn from our cooling pond and recirculated through the turbine on our boiler back to the cooling pond. This volume of water is about 360,000 gallons a day when the turbine is running, but very little water is lost in this process as the water continues to recirculate. Rainwater easily supplies the water demand needed to keep the cooling pond full, even during the dry summer months.

The third water usage is the sanitary water that supplies our bathrooms and washrooms. This water goes into septic systems and comprises 400 to 500 gallons a day.

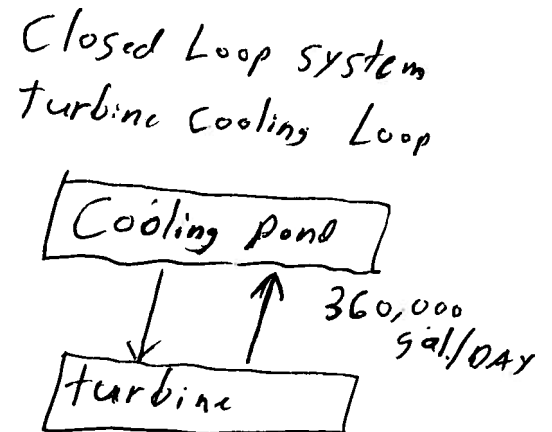
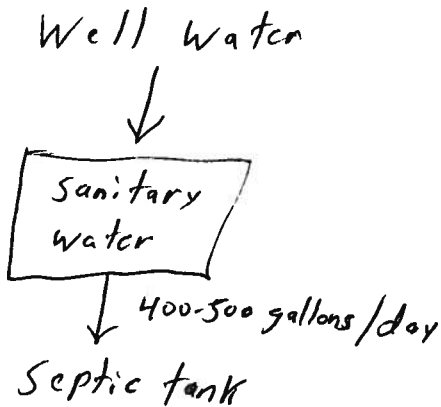
I hope this clarifies any questions that arose while reading our application. Also I enclosed a copy of our analytical results for our wastewater sampling for 3 consecutive weeks to satisfy item #7 from your letter dated January 10, 2001.

Sincerely,

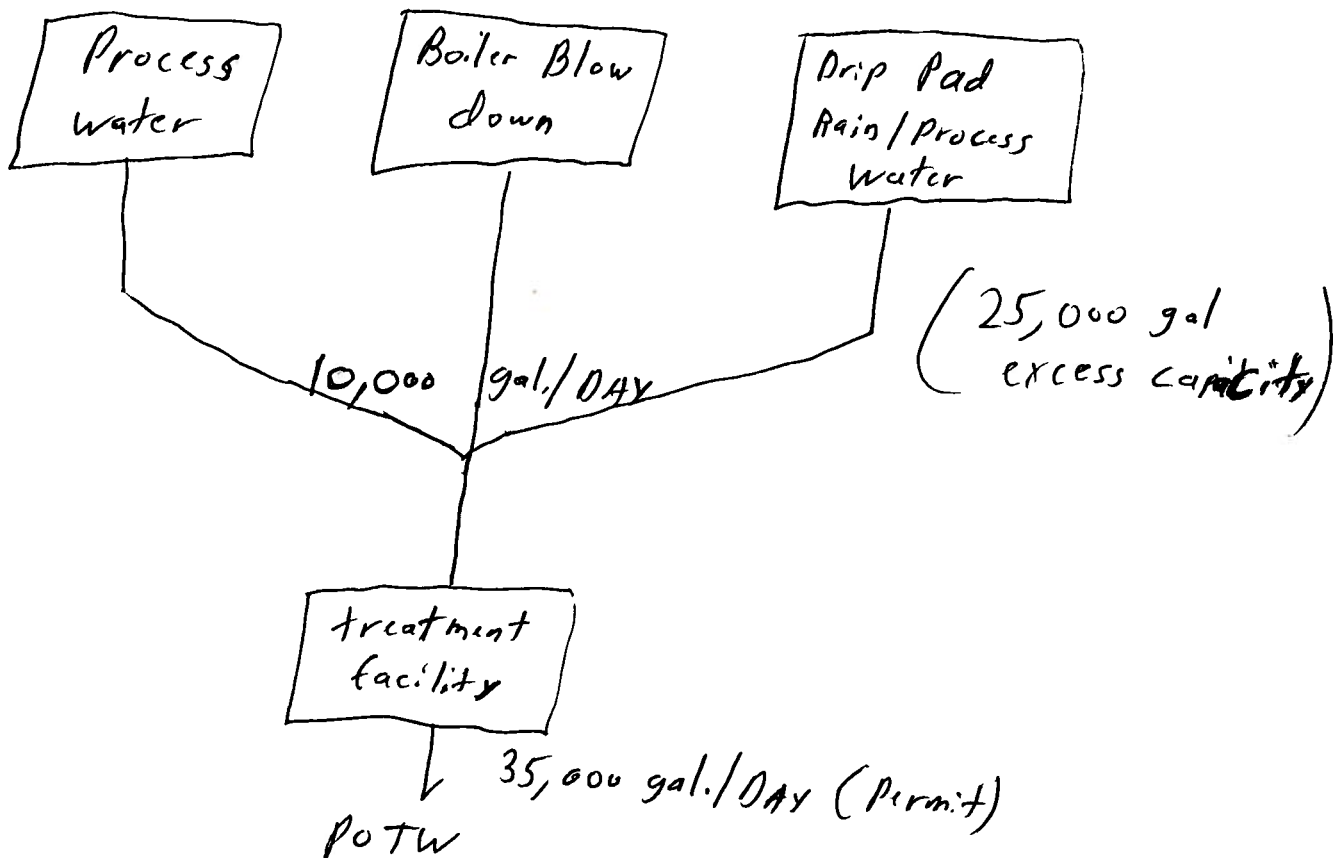


Steve Joy
Assistant Plant Mgr.

Water Usage Flow Diagram for Koppers Ind. (Grenada, MS.)



POTW Discharge System



Shreveport County
Koppers Ind.
MSP 090300
Water/Pretreatment m.c.

RECEIVED
JAN 24 2001
Miss. Dept. of Environmental Quality
Office of Pollution Control

January 19, 2001

Melissa Collier
MS Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

RE: Discharge Compliance Report, Koppers Industries Inc. – Grenada, Mississippi Facility,
Permit No. MSP090300

Dear Ms. Collier,

This letter serves as notification that the Koppers Industries Inc. (Koppers) facility in Grenada, Mississippi has resumed discharging treated process water to the City of Grenada Wastewater Treatment Plant. Notification was made by telephone on January 18, 2001 to you at the Mississippi Department of Environmental Quality (MSDEQ) and Mr. Clovis Tilghman of the City of Grenada Wastewater Treatment Plant that discharge activities would resume.

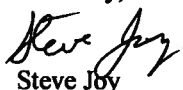
On the morning of December 19, 2000, Argus Analytical Laboratory (Argus) advised Koppers by telephone of analytical results for discharge monitoring samples collected on December 13, 2000. Argus indicated that the resulting concentration for pentachlorophenol was 4.24 mg/L. The permit limit for the daily maximum concentration of pentachlorophenol for the facility is 0.36 mg/L. After being advised of the results, discharge of water to the City of Grenada Wastewater Treatment Plant from the Koppers wastewater treatment facility was stopped. You and the City of Grenada Wastewater Treatment Plant were advised of this excursion and planned activities on December 19 by telephone and by letter.

Since December 19, process water was contained and re-circulated through the treatment system. Samples of the treated effluent from the wastewater treatment facility were collected periodically and sent for analysis at Argus Analytical. Based on the analytical results for samples collected from the system on January 17, which showed all parameters including pentachlorophenol to be below applicable permitted discharge limits, a determination was made to resume discharging treated effluent water from the wastewater treatment facility. Analytical results showing that latest samples are back in compliance are attached.

We believe the cause for this excursion is related to efficiency declines in our biological treatment system due to the sustained (low) ambient temperatures that occurred during this period. The cold weather was severe enough to drop the temperature of our aeration tank to 50 degrees F. An additional supply of heat has been added to this tank to prevent a similar occurrence. Monitoring will resume as required in the subject permit, and results will be submitted as required.

If you have any questions, please call me at 662-226-4584 ext. 22.

Sincerely,



Steve Joy
Koppers Industries Inc.

Attachments

Cc: Tim Basilone, Koppers
Clovis Tilghman, Grenada

January 12, 2001

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – December 2000 POTW Permit DMR**

Dear sir or madam:

Enclosed you will find a copy of the December 2000 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. Koppers has a discharge violation on 12-13-00. Pentachlorophenol exceeded permit parameters during the week of 12-10-00. On 12-13-00, pentachlorophenol was recorded at 4.24 mg/L; the permit limit is 0.36 mg/L. The pentachlorophenol loading and concentration results exceeded the permit limits. Koppers Industries was notified on 12-19-00 by Argus Analytical. Koppers notified the MSDEQ (Melissa Collier) on 12-19-00. The wastewater treatment plant was shutdown, and all water was circulated throughout the system. The WWTP is still shutdown at this time. We believe the problem originated due to cold weather and freezing of system. If you have any questions, please call me at 662-226-4584 ext. 22.

Sincerely,



Steve Joy
Assistant Plant Manager

Cc: Tim Basilone

Attachments: Notification letter to Melissa Collier



FILE COPY

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

January 10, 2001

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

Dear Mr. Henderson:

Re: Koppers Industries, Inc.
Grenada County, Mississippi
WATER-PRE-TREATMENT
Ref. No. MSP090300

Based upon review of the above referenced application received from Koppers Industries, Inc. on July 17, 2000, the following deficiencies were noted:

1. On Page 2, Item 7, SIC Codes, list all applicable standard industry codes for your facility.
2. On Page 3, Item 2d, Effluent No. of Analyses, provide the number of analyses used for all pollutants listed.
3. On Page 2, Item 9A, the discharge for your facility was reported at 35,000 gallons per day; however, water usage reported on Pages 3 and 5 indicate 370,000 gallons per day used. Please provide an explanation for flow difference and correct pages as necessary.
4. On Pages 7, 12, 13, 18, 19, and 25, Item 3d, Effluent No. of Analyses, provide the number of analyses used for all pollutants for which data was provided.
5. On Page 30, Item 18A, Treatment Units, indicate whether or not you provide treatment for your wastewater in the appropriate space provided.
6. On Page 30, Item 19, Contract Analysis Information, select the appropriate response to indicate whether or not the analysis reported in this application was performed by a contract laboratory or consulting firm.
7. Please submit a copy of analysis results used for this application including test method and detection limits.

8. Please submit a process flow diagram and a water balance.
9. Please note that an individual meeting the signatory requirements of 40 CFR Part 403.12(1) must sign Item 20. Enclosed is a copy of 40 CFR Part 403.12(1) for your reference.

Please address the above deficiencies by February 1, 2001. Upon receipt of this information, the Environmental Permits Division will continue the permitting process for your facility.

If you have any questions regarding the application or the permitting process, please contact me at (601) 961-5561.

Sincerely,



Mary E. Coleman
Environmental Permits Division

Enclosures

cc: Mr. Anthony Mayhan, Environmental and Safety Supervisor

Environmental Protection Agency, EPA

§ 403.12

the Industrial Users that are subject only to local Requirements.

(2) A summary of the status of Industrial User compliance over the reporting period;

(3) A summary of compliance and enforcement activities (including inspections) conducted by the POTW during the reporting period;

(4) A summary of changes to the POTW's pretreatment program that have not been previously reported to the Approval Authority; and

(5) Any other relevant information requested by the Approval Authority.

(j) Notification of changed discharge. All Industrial Users shall promptly notify the POTW in advance of any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the Industrial User has submitted initial notification under 40 CFR 403.12(p).

(k) *Compliance schedule for POTW's.* The following conditions and reporting requirements shall apply to the compliance schedule for development of an approvable POTW Pretreatment Program required by § 403.8.

(1) The schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the development and implementation of a POTW Pretreatment Program (e.g., acquiring required authorities, developing funding mechanisms, acquiring equipment);

(2) No increment referred to in paragraph (h)(1) of this section shall exceed nine months;

(3) Not later than 14 days following each date in the schedule and the final date for compliance, the POTW shall submit a progress report to the Approval Authority including, as a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with this increment of progress, the reason for delay, and the steps taken by the POTW to return to the schedule established. In no event shall more than nine months elapse between such progress reports to the Approval Authority.

(l) *Signatory requirements for industrial user reports.* The reports required by paragraphs (b), (d), and (e) of this sec-

tion shall include the certification statement as set forth in § 403.6(a)(2)(ii), and shall be signed as follows:

(1) By a responsible corporate officer, if the Industrial User submitting the reports required by paragraphs (b), (d) and (e) of this section is a corporation. For the purpose of this paragraph, a responsible corporate officer means (i) 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 corporation, or (ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(2) By a general partner or proprietor if the Industrial User submitting the reports required by paragraphs (b), (d) and (e) of this section is a partnership or sole proprietorship respectively.

(3) By a duly authorized representative of the individual designated in paragraph (l)(1) or (l)(2) of this section if:

(i) The authorization is made in writing by the individual described in paragraph (l)(1) or (l)(2);

(ii) The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

(iii) the written authorization is submitted to the Control Authority.

(4) If an authorization under paragraph (l)(3) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (l)(3) of this section

must be submitted to the Control Authority prior to or together with any reports to be signed by an authorized representative.

(m) *Signatory requirements for POTW reports.* Reports submitted to the Approval Authority by the POTW in accordance with paragraph (h) of this section must be signed by a principal executive officer, ranking elected official or other duly authorized employee if such employee is responsible for overall operation of the POTW.

(n) *Provisions Governing Fraud and False Statements:* The reports and other documents required to be submitted or maintained under this section shall be subject to:

(1) The provisions of 18 U.S.C. section 1001 relating to fraud and false statements;

(2) The provisions of sections 309(c)(4) of the Act, as amended, governing false statements, representation or certification; and

(3) The provisions of section 309(c)(6) regarding responsible corporate officers.

(o) *Record-keeping requirements.* (1) Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section. Such records shall include for all samples:

(i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;

(ii) The dates analyses were performed;

(iii) Who performed the analyses;

(iv) The analytical techniques/methods used; and

(v) The results of such analyses.

(2) Any Industrial User or POTW subject to the reporting requirements established in this section shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). This period of retention shall be extended during the course of any unresolved litigation

regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.

(3) Any POTW to which reports are submitted by an Industrial User pursuant to paragraphs (b), (d), (e), and (h) of this section shall retain such reports for a minimum of 3 years and shall make such reports available for inspection and copying by the Director and the Regional Administrator. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator.

(p)(1) The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the Industrial User discharges more than 100 kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the Industrial User: An identification of the hazardous constituents contained in the wastes, an estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month, and an estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve months. All notifications must take place within 180 days of the effective date of this rule. Industrial users who commence discharging after the effective date of this rule shall provide the notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph need be submitted only once for each hazardous waste discharged. However, notifications of changed discharges must be submitted under 40 CFR 403.12 (j).



FILE COPY

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

August 27, 2001

01 4222

UNITED STATES POSTAL SERVICE

Re: Koppers Industries Inc
 Grenada County
 Water Ref. No. MSP090300

• Sender: Please print y

MS Depart
 Office of P
 Post Office
 Jackson, M

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, February 2000 (Reverse)

102595-99-M-2087

used draft permit for the above referenced facility. The
 that we intend to incorporated as part of the final

ges, conditions and requirements for the draft permit as

ed to the permit on a "Report Only" basis.

the contents of the draft permit, please notify this office in
 transmittal date listed above. If you would like to contact
 se call me at (601) 961-5561.

Sincerely,

Mary E. Coleman
 Environmental Permits Division

876 PER20000004

September 5, 2001

Ms. Mary E. Coleman
Environmental Permits Division
Mississippi Department of Environmental Quality
Office of Pollution Control
Post Office Box 10385
Jackson, MS 39289-0385

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


RE: Koppers Industries, Inc.
Grenada County, Mississippi
WATER PRE-TREATMENT
Ref. No. MSP090300

Dear Ms. Coleman,

This is in response to your letter dated August 27, 2001 and our phone conversation on September 5, 2001 requesting comment on the draft Water Pre-Treatment Permit.

After reviewing the draft, Koppers Industries Inc., has no comment on the contents of the proposed permit.

Yours truly,



Blair Simpson
Environmental Supervisor

CC. T. Basilone, Koppers Pittsburgh



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

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

September 17, 2001

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant - August 2001 POTW Permit DMR**

Dear Sir or Madam:

Enclosed you will find a copy of the August 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during the month of August. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

Blair Simpson
Treating Supervisor

Cc: Tim Basilone - Koppers

COMPLETE THIS SECTION ON DELIVERY	
A. Received by (Please Print Clearly) <i>Thomas L. Henderson</i>	B. Date of Delivery <i>9/24/01</i>
C. Signature <i>Thomas L. Henderson</i>	Agent <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:	
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input type="checkbox"/> No	
2. Article Number (Copy from service label) <i>7099 3400 0014 1701 4192</i>	
Domestic Return Receipt PS Form 3811, July 1999 <i>EPD-ARS Koppers MSPO 90303 grenada</i>	

1. Article Addressed to:
**MR. THOMAS HENDERSON
PLANT MANAGER
KOPPERS INDUSTRIES INC
PO BOX 160
TIE PLANT, MS 38960**



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

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

RECEIVED
NOV 18 2002
Dept. of Environmental Quality
Office of Pollution Control

November 13, 2002

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 9101

**Subject: Koppers Industries, Inc.
Grenada Plant – October 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the October 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers

September 27, 2002



Certified Mail 7000 0520 0021 7551 9033

Mr. David Lee
Office of Pollution Control
P.O. BOX 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Tie Plant, Mississippi
POTW Permit # MSP090300
Notification of Permit Exceedence**

Dear Mr. Lee,

This letter is to notify you of an exceedence of the daily discharge volume of effluent water at the Koppers Industries Inc. (Koppers) facility in Tie Plant, Mississippi, as established in the State of Mississippi Water Pollution Control Indirect Discharge Permit #MSP090300.

On September 26, 2002, 36,700 gallons of treated effluent process water was discharged to the City of Grenada POTW. The permitted discharge level for our facility is 35,000 gallons/day.

This exceedence occurred while discharge of effluent water was maximized due to excessive process water accumulated on the site from precipitation occurring over the prior 48 hours. In an effort to prevent a reoccurrence of this nature we plan to monitor the system more closely during periods of heavy rainfall.

Sincerely,

Haley P. Biddy
Environmental Supervisor

CC. Clovis Tilghman, Grenada- WWTP
Tim Basilone, Koppers Pittsburgh

October 14, 2002

RECEIVED
OCT 18 2002
Dept. of Environmental Quality
Office of Pollution Control

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 9057

Subject: Koppers Industries, Inc.
Grenada Plant – September, 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the September, 2002 Discharge Monitoring Report, also included is the semi-annual metals report for period July 1st – December 31st 2002. for Koppers Industries, Inc. located in Tie Plant, MS. There was one (1) excursions during this reporting period. Mr. David Lee of the Office of Pollution Control was notified of this excursion. Attached is a copy of the notification letter sent to Mr. Lee on September 27, 2002. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,



Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers

September 27, 2002

Certified Mail 7000 0520 0021 7551 9033

RECEIVED
OCT - 1 2002
Office of Environmental Quality
Office of Pollution Control

Mr. David Lee
Office of Pollution Control
P.O. BOX 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Tie Plant, Mississippi
POTW Permit # MSP090300
Notification of Permit Exceedence**

Dear Mr. Lee,

This letter is to notify you of an exceedence of the daily discharge volume of effluent water at the Koppers Industries Inc. (Koppers) facility in Tie Plant, Mississippi, as established in the State of Mississippi Water Pollution Control Indirect Discharge Permit #MSP090300.

On September 26, 2002, 36,700 gallons of treated effluent process water was discharged to the City of Grenada POTW. The permitted discharge level for our facility is 35,000 gallons/day.

This exceedence occurred while discharge of effluent water was maximized due to excessive process water accumulated on the site from precipitation occurring over the prior 48 hours. In an effort to prevent a reoccurrence of this nature we plan to monitor the system more closely during periods of heavy rainfall.

Sincerely,



Haley P. Biddy
Environmental Supervisor

CC. Clovis Tilghman, Grenada- WWTP
Tim Basilone, Koppers Pittsburgh



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

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

September 12, 2002

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385



CERTIFIED MAIL 7000 0520 0021 7551 8999

**Subject: Koppers Industries, Inc.
Grenada Plant – August 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the August 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

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

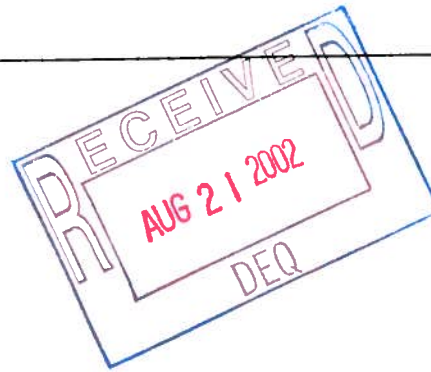
Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers



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

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



August 20, 2002

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL 7000 0520 0021 7551 8739

Subject: Koppers Industries, Inc.
Grenada Plant – July 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the July 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley P. Biddy". The signature is fluid and cursive.

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers

July 12, 2002

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385



CERTIFIED MAIL 7000 0520 0021 7551 8685

Subject: Koppers Industries, Inc.
Grenada Plant – June 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the June 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. In addition is the semi-annual metals report for January-June 2002. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

A handwritten signature in black ink that reads 'Haley P. Biddy'.

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers



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

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

JUN 17 2002

June 12, 2002

CERTIFIED MAIL 7000 0520 0021 7551 8609

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – May 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the May 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley P. Biddy". The signature is fluid and cursive, with the first name "Haley" being the most prominent.

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers



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

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

May 20, 2002

CERTIFIED MAIL 7000 0520 0021 7551 8562

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – April 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the April 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during this reporting period. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

Haley P. Bidy
Environmental Supervisor

A handwritten signature in black ink, appearing to read "Haley P. Bidy", written in a cursive style.

Cc: Tim Basilone - Koppers

MAY 22 2002



Koppers Industries, Inc.
P.O. Box 16
Tie Plant, MS 38960

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

April 11, 2002

CERTIFIED MAIL 7000 0520 0021 7551 8548

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – March 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the March 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during the month of February. If you have any questions, please call me at 662-226-4584 ext. 40.

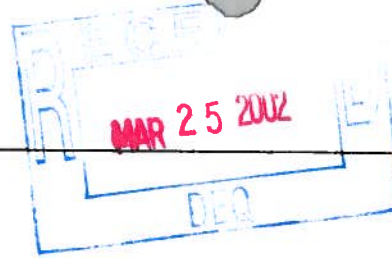
Sincerely,

A handwritten signature in blue ink, appearing to read "Haley P. Biddy". The signature is fluid and cursive.

Haley P. Biddy
Environmental Supervisor

Cc: Tim Basilone - Koppers





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

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

March 20, 2002

CERTIFIED MAIL 7000 0520 0021 7551 8500

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – February 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the February 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during the month of February. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

Blair Simpson
Environmental Supervisor

Cc: Tim Basilone - Koppers

March 8, 2002

Mr. Clovis Tilghman
City of Grenada
Waste Water Treatment Plant
P.O. Box 310
Grenada, MS 38901

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

RE: Facility Change Notification
Koppers Industries, Inc., Grenada, Mississippi
Water Ref. No. MSP090300

Dear Mr. Tilghman,

Koppers Industries, Inc. (Koppers) is providing this notification to the City of Grenada Waste Water Treatment Plant that 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. 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 is a replacement in kind, and will not cause any change in discharge volume or location, or other changes in operations or conditions, which may result in a new or increased discharge of waste. 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. Materials resulting from cleaning activities will be disposed in accordance with applicable regulations.

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

Yours truly,


Thomas L. Henderson
Plant Manager

cc. T. Basilone, KII – Pittsburgh
Mary E. Coleman, Environmental Permits Division, MDEQ



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

03/12/2002

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

Dear Mr. Henderson:

Re: Inspection Report
Koppers Industries Inc
Tie Plant, Grenada County

Hazardous Waste-EPA ID MSD007027543
Hazardous Waste-TSD HW8854301
Water-Pretreatment MSP090300

Enclosed is a copy of the RCRA and water inspection report(s) completed as a result of this office's inspection at Koppers Industries Inc on 1/16/02. The report(s) should be used by you as a guide for complying with requirements and limitations stated in your permit(s).

Facility was in compliance with applicable regulations.

If you have any questions concerning this matter, please contact me at (601)961-5171.

Sincerely,

Azzam Abumirshid
Timber and Wood Branch
Environmental Compliance and Enforcement Division

Agency Interest No. 876
INS20020001

February 20, 2002

**RECEIVED
FEB 22 2002**

CERTIFIED MAIL 7000 0520 0021 7551 8432

**Dept. of Environmental Quality
Office of Pollution Control**Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385**Subject: Koppers Industries, Inc.
Grenada Plant – January 2002 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the January 2002 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. During the month of January Koppers exceeded permitted limits for pentachlorophenol. A letter was sent to the Mr. David Lee of the MSDEQ on January 4, 2002 providing notification of the excursion (attached).

Koppers was advised by Argus Analytical Laboratory (testing lab for Koppers) on January 3, 2002 of analytical results for treated effluent samples collected on December 19th and 26th, 2001. Upon learning of the analytical results discharge to the City of Grenada Waste Water Treatment Plant was ceased. Coincidentally, treated effluent samples were collected as part of our monthly discharge monitoring program on January 2, 2002 and forwarded to the laboratory for analysis. Laboratory results for these samples, which were received on January 7, 2002, indicated pentachlorophenol levels exceeded the permitted limits.

Process water was re-circulated and through the water treatment system, and samples were obtained and analyzed periodically from January 4, 2002 through January 22, 2002. After obtaining sample analytical results indicating pentachlorophenol levels were below permitted limits (attached), Koppers resumed discharging treated water to the City of Grenada Wastewater Treatment Plant on January 23, 2002. Proper notifications were made to the City of Grenada by telephone and in writing of the commencement of discharge activities.

February 20, 2002

During the month of January 2002, Koppers discharged treated water to the City of Grenada Wastewater Treatment Plant for a total of 12 days from January 1-3, 2002 and January 23-31, 2002.

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

Sincerely,



Blair R. Simpson
Environmental Supervisor

Cc: Tim Basilone – Koppers

January 28, 2002

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

Subject: Follow-up Notification
Waste Water Pretreatment Permit #MSP090300
Koppers Industries, Inc. – Grenada, Mississippi

Dear Mr. Lee,

This letter will serve as notification that Koppers Industries, Inc. (Koppers) facility in Grenada, Mississippi has resumed discharging treated wastewater to the City of Grenada Wastewater Treatment Plant on January 23, 2002 (reference letter sent to your office dated January 4, 2002). Results from laboratory analysis (attached) indicate that the effluent pentachlorophenol concentration is below the permitted discharge level.

Telephone notification was made to your office and the City of Grenada Wastewater Treatment plant on January 23, 2002 prior to beginning discharge.

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

Sincerely,



Blair R. Simpson
Environmental Supervisor

Encl.

cc: Mr. Clovis Tilghman (City of Grenada Wastewater Treatment Plant)
Tim Basilone – Koppers Industries, Inc.

January 18, 2002

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385**Subject: Koppers Industries, Inc.**
Grenada Plant – December 2001 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the December 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. During the month of December Koppers exceeded four permitted limits for pentachlorophenol. Please reference the letter sent to MSDEQ to the attention of Mr. David Lee (attached) dated January 4, 2002 for explanation of the exceedence. In addition, the semi-annual analyses for arsenic, chromium, copper, nickel, and zinc are enclosed. There were no excursions for the semi-annual permit parameters.

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

Sincerely,

Blair R. Simpson
Environmental Supervisor

Cc: Tim Basilone – Koppers

January 4, 2002

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

Subject: Notice of Deviation of Permit Requirements
Waste Water Pretreatment Permit #MSP090300
Koppers Industries, Inc. – Grenada, Mississippi

Dear Mr. Lee,

This letter serves as notification for the Koppers Industries, Inc. (Koppers) facility in Grenada, Mississippi concerning a discharge excursion in our treated process effluent water. Sample collected on December 19 and December 26 were found to contain pentachlorophenol (penta) at levels exceeding our permit limit. The permit limit for penta is 0.36 mg/l; the laboratory results for effluent samples indicated concentrations of 0.919 and 2.54 mg/l, respectively (attached).

On January 3, 2002 at 2:30PM Argus Analytical Laboratory (Argus) informed Koppers by telephone of the analytical results for the two sampling events. At 2:35PM January 3, 2002 discharge of wastewater from the Koppers facility to the Grenada City POTW was ceased.

At 3:20PM on January 3, 2002 Mr. David Lee (MSDEQ) was notified by telephone. Repeated attempts were made from 2:45PM – 5:00PM, January 3, 2002 to notify the City of Grenada Waste Water Treatment Plant but no one could be contacted as the phone line was busy. At 5:15PM a message was left with the Grenada City Wastewater Plant detailing the situation. A confirmation call was made to Mr. Clovis Tilghman of the Grenada City Wastewater Treatment Plant at 7:15AM on January 4, 2002.

Since January 3, 2002 at 2:35PM wastewater has been re-circulated through the treatment system, without being discharged. Samples have been and continue to be taken every other day and sent for analysis to monitor penta levels.

Due to the sudden and sustained (low) ambient temperature we experienced efficiency declines in our biological treatment system, which allowed penta levels to remain higher than normal. In addition, our schedule for wasting (method of keeping activated sludge in optimal condition and age) will need to be adjusted for conditions when ambient temperatures decline. To enable temperature to be controlled in order to maintain

optimal biological activity, an additional heat source was added to the system. For wasting control a procedure will be developed and implemented describing the schedule and procedure wasting, including under conditions that are less than optimal.

Other measures taken to prevent and for the mitigation of upsets of this nature in the future include use of different pre-mix polymers and maintenance of a steady supply of microorganisms for introduction into the system. Koppers will consult with its wastewater chemical supplier to augment this process.

We will notify you by telephone and in writing once laboratory results from sampling events indicate penta levels return levels below the permit limit. Once such results are obtained and notification has been made, Koppers will resume discharging treated effluent water to the City of Grenada Wastewater Treatment Plant.

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

Sincerely,

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

Blair R. Simpson
Koppers Industries, Inc

Encl.

cc: Tim Basilone, Koppers – Pittsburgh
Clovis Tilghman, Grenada City Wastewater Treatment Plant

January 4, 2002

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

Subject: Notice of Deviation of Permit Requirements
Waste Water Pretreatment Permit #MSP090300
Koppers Industries, Inc. – Grenada, Mississippi

Dear Mr. Lee,

This letter serves as notification for the Koppers Industries, Inc. (Koppers) facility in Grenada, Mississippi concerning a discharge excursion in our treated process effluent water. Sample collected on December 19 and December 26 were found to contain pentachlorophenol (penta) at levels exceeding our permit limit. The permit limit for penta is 0.36 mg/l; the laboratory results for effluent samples indicated concentrations of 0.919 and 2.54 mg/l, respectively (attached).

On January 3, 2002 at 2:30PM Argus Analytical Laboratory (Argus) informed Koppers by telephone of the analytical results for the two sampling events. At 2:35PM January 3, 2002 discharge of wastewater from the Koppers facility to the Grenada City POTW was ceased.

At 3:20PM on January 3, 2002 Mr. David Lee (MSDEQ) was notified by telephone. Repeated attempts were made from 2:45PM – 5:00PM, January 3, 2002 to notify the City of Grenada Waste Water Treatment Plant but no one could be contacted as the phone line was busy. At 5:15PM a message was left with the Grenada City Wastewater Plant detailing the situation. A confirmation call was made to Mr. Clovis Tilghman of the Grenada City Wastewater Treatment Plant at 7:15AM on January 4, 2002.

Since January 3, 2002 at 2:35PM wastewater has been re-circulated through the treatment system, without being discharged. Samples have been and continue to be taken every other day and sent for analysis to monitor penta levels.

Due to the sudden and sustained (low) ambient temperature we experienced efficiency declines in our biological treatment system, which allowed penta levels to remain higher than normal. In addition, our schedule for wasting (method of keeping activated sludge in optimal condition and age) will need to be adjusted for conditions when ambient temperatures decline. To enable temperature to be controlled in order to maintain

optimal biological activity, an additional heat source was added to the system. For wasting control a procedure will be developed and implemented describing the schedule and procedure wasting, including under conditions that are less than optimal.

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Sincerely,

A handwritten signature in black ink, appearing to read "Blair R. Simpson". The signature is fluid and cursive, with the first name "Blair" being the most prominent.

Blair R. Simpson
Koppers Industries, Inc

Encl.

cc: Tim Basilone, Koppers – Pittsburgh
Clovis Tilghman, Grenada City Wastewater Treatment Plant

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Grenada*
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*MS Dept of Environmental Quality
Office of Pollution Control*

January 4, 2002

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

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

Sincerely,



Blair R. Simpson
Koppers Industries, Inc

Encl.

cc: Tim Basilone, Koppers – Pittsburgh
Clovis Tilghman, Grenada City Wastewater Treatment Plant

ARGUS ANALYTICAL, INC.

235 Highpoint Drive
Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tie Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/03/02

Date Sampled: 12/19/01

Time Sampled: 10:00

Sampled by: M. Harper

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/20/01

Sample Description: Outfall 001

Sample Number: BB21847

Sample Matrix: WATER

Page Number: 1

Project Number:

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	102	1.0	mg/L	405.1	MWS	12/21/01
Oil & Grease	10.3	6.7	mg/L	1664A	SMB	12/28/01
Total Suspended Solids	2	1.0	mg/L	160.2	BB	12/26/01
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.210	mg/L	625	RLT	12/31/01
2-Chlorophenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4-Dichlorophenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4-Dimethylphenol	ND	0.210	mg/L	625	RLT	12/31/01
4,6-Dinitro-2-methylphenol	ND	0.525	mg/L	625	RLT	12/31/01
2,4-Dinitrophenol	ND	0.525	mg/L	625	RLT	12/31/01
2-Nitrophenol	ND	0.210	mg/L	625	RLT	12/31/01
4-Nitrophenol	ND	0.525	mg/L	625	RLT	12/31/01
Pentachlorophenol	0.919	0.525	mg/L	625	RLT	12/31/01
Phenol	ND	0.210	mg/L	625	RLT	12/31/01
2,4,6-Trichlorophenol	ND	0.210	mg/L	625	RLT	12/31/01

ND = Not Detected



Quality Assurance/Quality Control



B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Koppers Company
1 Koppers Drive
Tic Plant, MS 38960

ATTN: Steve Joy

Date Reported: 01/07/02**Date Sampled:** 12/26/01**Time Sampled:** 10:00**Sampled by:** MH

Project ID/Location: Facility Discharge
Weekly Requirements

Date Received: 12/27/01**Sample Description:** Outfall 001**Sample Number:** BB22111**Sample Matrix:** WATER**Page Number:** 1**Project Number:**

Parameter	Result	Det Limit	Units	Method	Analysts	Date
Biochemical Oxygen Demand	37.5	1.0	mg/L	405.1	MWS	12/28/01
Total Suspended Solids	36	1.0	mg/L	160.2	MLO	12/31/01
Oil & Grease	PENDING		mg/l.	1664A		
Phenolic Compounds						
4-Chloro-3-methylphenol	ND	0.042	mg/L	625	RLT	12/31/01
2-Chlorophenol	ND	0.042	mg/L	625	RLT	12/31/01
2,4-Dichlorophenol	ND	0.042	mg/l.	625	RLT	12/31/01
2,4-Dimethylphenol	ND	0.042	mg/L	625	RLT	12/31/01
4,6-Dinitro-2-methylphenol	ND	0.105	mg/l.	625	RLT	12/31/01
2,4-Dinitrophenol	ND	0.105	mg/L	625	RLT	12/31/01
2-Nitrophenol	ND	0.042	mg/l.	625	RLT	12/31/01
4-Nitrophenol	ND	0.105	mg/L	625	RLT	12/31/01
Pentachlorophenol	2.54	0.105	mg/L	625	RLT	12/31/01
Phenol	ND	0.042	mg/l.	625	RLT	12/31/01
2,4,6-Trichlorophenol	ND	0.042	mg/l.	625	RLT	12/31/01

ND = Not Detected

Quality Assurance/Quality Control

H. G. Giessner, Ph.D.



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

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

December 14, 2001

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – November 2001 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the November 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during the month of November. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,

A handwritten signature in blue ink, appearing to read "Blair Simpson", written in a cursive style.

Blair Simpson
Environmental Supervisor

Cc: Tim Basilone - Koppers

November 12, 2001

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

**Subject: Koppers Industries, Inc.
Grenada Plant – October 2001 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)**

Dear Sir or Madam:

Enclosed you will find a copy of the October 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during the month of October. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,



Blair Simpson
Environmental Supervisor

Cc: Tim Basilone - Koppers

October 11, 2001

CERTIFIED MAIL

Environmental Compliance Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Subject: Koppers Industries, Inc.
Grenada Plant – September 2001 POTW Permit #MSP090300
Discharge Monitoring Report (DMR)

Dear Sir or Madam:

Enclosed you will find a copy of the September 2001 Discharge Monitoring Report for Koppers Industries, Inc. located in Tie Plant, MS. There were no excursions during the month of September. If you have any questions, please call me at 662-226-4584 ext. 40.

Sincerely,



Blair Simpson
Environmental Supervisor

Cc: Tim Basilone - Koppers



FILE COPY

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

September 19, 2001

CERTIFIED MAIL 7099 3400 0014 1701 4192

Mr. Thomas Henderson
Plant Manager
Koppers Industries Incorporated
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Henderson :

Re: Koppers Industries Inc
Grenada County
Water Ref. No. MSP090300

Enclosed please find the environmental permit referenced above. Please note the limitations, schedules of compliance, monitoring requirements, and monitoring reporting dates found in this permit.

Permit No. MSP090300 is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Sections 49-17-1, et seq., Mississippi Code of 1972). Any appeal of these permit actions must be made within the 30-day period provided for in Section 49-17-29(4)(b) Mississippi Code of 1972.

Sincerely,

Mary E. Coleman
Environmental Permits Division

Enclosure

Cc: Mr. J. Kenneth Mixon, Public Works Director, City of Grenada (w/ enclosure)
Mr. Blair Simpson, Koppers Industries (w/o enclosure)

876 Water PER20000004

STATE OF MISSISSIPPI WATER POLLUTION CONTROL PERMIT

TO OPERATE A WASTE DISPOSAL SYSTEM IN ACCORDANCE
WITH NATIONAL AND STATE PRETREATMENT STANDARDS

THIS CERTIFIES THAT

**Koppers Industries Inc
Tie Plant Road
Grenada, Mississippi**

has been granted permission to discharge wastewater into

Grenada POTW (MS0020397)

in accordance with effluent limitations, monitoring requirements and other conditions set forth in this permit. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

The issuance of this permit does not relieve the permittee from complying with any requirements which the Publicly Owned Treatment Works (POTW) Authority may deem necessary as a prerequisite to the use of the Authority's sewage system and associated treatment works.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued:

SEP 18 2001

Expires: August 31, 2006

Permit No.: MSP090300

Part I.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning Upon Permit Issuance, and lasting until August 31, 2006, the permittee is authorized to discharge from outfall(s) serial number(s): 001 (Total Facility Discharge)

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
	kg/day	(lbs/day)	Other Units (Specify)		Measurement Frequency	Sample Type
	Monthly Avg.	Daily Max.	Monthly Avg.	Daily Max.		
Flow (MGD)	----	----	Report	0.035	Daily	Continuous
Biochemical Oxygen Demand (5-day)	32 (70)	63 (140)	240 mg/L	480 mg/L	Once/Week	24-Hr. Composite
Total Suspended Solids	40 (88)	79 (175)	300 mg/L	600 mg/L	Once/Week	24-Hr. Composite
Total Phenols	0.40 (0.88)	0.79 (1.75)	3 mg/L	6 mg/L	Once/Week	Grab
Pentachlorophenol	0.024 (0.053)	0.048 (0.105)	0.18 mg/L	0.36 mg/L	Once/Week	Grab
Oil and Grease	Report	13.2 (29.2)	Report mg/L	100 mg/L	Once/Week	Grab

PARAMETER	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
	kg/day	(lbs/day)	Other Units (Specify)		Measurement Frequency	Sample Type
	Yearly Avg.	Yearly Max.	Yearly Avg.	Yearly Max.		
Copper, Total Recoverable	Report	0.291 (0.642)	Report mg/L	2.2 mg/L	Twice/Year	24-Hr. Composite
Chromium, Total Recoverable	Report	0.529 (1.168)	Report mg/L	4.0 mg/L	Twice/Year	24-Hr. Composite
Arsenic, Total Recoverable	Report	0.060 (0.131)	Report mg/L	0.45 mg/L	Twice/Year	24-Hr. Composite
Nickel, Total Recoverable	Report	Report	Report mg/L	Report mg/L	Twice/Year	24-Hr. Composite
Zinc, Total Recoverable	Report	Report	Report mg/L	Report mg/L	Twice/Year	24-Hr. Composite

2. The pH shall not be less than 5.5 standard units nor greater than 9.5 standard units and shall be monitored twice per week with a grab sample of the effluent.
3. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to actual discharge into the POTW collection system or mixing with non-regulated wastewater streams.

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance.

2. Within 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date. Failure to submit the written notice to the Permit Board shall be considered a violation of the compliance requirements of the permit, for which the Commission may be asked to take enforcement action.

Not Applicable.

C. GENERAL PRETREATMENT PROHIBITIONS

1. In addition to those pollutants limited in Part I.A., the following pollutants shall not be discharged into the POTW:
 - a) Pollutants which create a fire or explosion hazard in the POTW, including but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;
 - b) Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the treatment works is specifically designed to accommodate such discharges;
 - c) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in interference;
 - d) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW;
 - e) Heat in amounts which will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40oC (104oF) unless the approval Authority, upon request of the POTW, approves alternate temperature limits;
 - f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

- g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- h) Any trucked or hauled pollutants, except at discharge points designated by the POTW.

D. ORAL NOTIFICATION REQUIREMENTS

The permittee shall notify the Mississippi Environmental Quality Permit Board and the POTW orally immediately upon becoming aware of the following:

1. A spill which would result in a discharge to the POTW or to State waters;
2. Any unanticipated bypass which exceeds any effluent limitation in the permit.
3. Any upset which exceeds any effluent limitation in the permit.
4. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.

Part II.

A. MANAGEMENT REQUIREMENTS AND RESPONSIBILITIES

1. No Discharge of Wastewater to Surface Water

The discharge of any wastewater from this facility to the waters of the State of Mississippi shall constitute a violation of this permit, except as provided in Part II, A.4. and A.5. of this permit, or as authorized under separate permit pursuant to Section 402 of the Federal Water Pollution Control Act.

2. Change in Wastewater Source

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permit which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Chapter One, Section II.A. of the State of Mississippi Wastewater Permit Regulations, or if the discharge does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

3. Facilities Operation

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. The Permit Board may require regular reporting of internal operational and maintenance parameters where necessary to confirm proper operation of a waste treatment system.

4. Bypassing 40 CFR 403.17

a) Definition. "Bypass" means the intentional diversion of wastestreams from any portion of the permittee's treatment facility.

b) Notice of Bypass.

(1) If the permittee knows in advance of the need for a bypass, it shall submit

prior notice to the Permit Board, if possible at least ten days before the date of the bypass.

- (2) The permittee shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Permit Board within 24 hours from the time the permittee becomes aware of the bypass. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the bypass. The Permit Board may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.
- c) Prohibition of bypass. Bypass is prohibited, and the Permit Board may take enforcement action against the permittee for a bypass, unless;
- (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgement to prevent a bypass which occurred during normal period of equipment downtime or preventative maintenance; and
 - (3) The permittee submitted notices as required under paragraph (b) of this section.

5. Upsets 40 CFR 403.16

- a) Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with categorical pretreatment standards because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b) Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with categorical pretreatment standards if the requirements of paragraph (c) of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to

judicial review.

- c) Conditions necessary for demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The facility was at the time being properly operated in a prudent and workmanlike manner and in compliance with applicable operation and maintenance procedures; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 403.16 (c)(3) (24-hour notice of noncompliance).
- d) Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.
- e) User responsibility in case of upset. The Industrial User shall control production or all discharges to the extent necessary to maintain compliance with categorical Pretreatment Standards upon reduction, loss, or failure of its treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies in the situation where among other things, the primary source of power of the treatment facility is reduced, lost or fails.

6. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

7. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

8. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of this permit, the permittee shall either:

- a) Provide an alternative power source to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in this permit,

- b) Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.

9. Compliance with Permit Conditions

All discharges authorized by the permit shall be consistent with the terms and conditions of the permit and the permittee shall make all reasonable efforts to meet any interim or final dates for compliance specified therein.

10. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit, or if the discharge does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

B. MONITORING, REPORTING, AND RECORDKEEPING

1. Routine Reporting

Such test results, reports, or other data as the Mississippi Environmental Quality Permit Board may determine to be necessary shall be submitted on a regular basis to the following address:

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385**

2. Duty to Provide Information

The permittee shall furnish to the Permit Board, within a reasonable time, any information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also furnish to the Permit Board upon request, copies of records required to be kept by the permit.

3. Test Procedures

Testing procedures for the analysis of pollutants for all permits include those set forth

in 40 CFR 136 which is incorporated herein and adopted by reference or alternative procedures approved and/or promulgated by EPA.

4. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

5. Recording of Results

A permittee required to monitor a waste discharge pursuant to Chapter One, Section IV.A.28. of the State of Mississippi Wastewater Permit Regulations shall maintain records of all information obtained from such monitoring, including:

- a) The exact place, date, and time of sampling;
- b) The dates the analyses were performed;
- c) The person(s) who performed the analyses;
- d) The analytical techniques, procedures or methods used; and
- e) The results of all required analyses.

6. Records Retention

- a) All records and results of monitoring activities, including calibration and maintenance records, shall be retained by the permittee a minimum of three (3) years unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.
- b) The permittee shall furnish to the Permit Board upon request, copies of records required to be kept by this permit.

7. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.

8. Noncompliance Reporting

- a) The permittee shall report any noncompliance which may endanger health or the

environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.

- b) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - (1) Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - (2) Any upset which exceeds any effluent limitation in the permit.
 - (3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.
- c) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

9. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Part I.D or Part II.B.6, at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in Part II.B.6.

10. Right of Entry

The permittee shall allow the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

- a) To enter upon the permittee's premises where a wastewater source is located or in which records are required to be kept under the terms and conditions of this permit; and
- b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any wastewater generated at this facility.

- c) In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night.

11. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.

12. Signatory Requirements 40 CFR 403.12(l)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

- a) All permit applications shall be signed as follows:

- (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) 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 function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
- (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

- b) All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described above;
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a

well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and

- (3) The written authorization is submitted to the Permit Board.
- c) Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d) Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

13. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

14. Availability of Records

Except for data determined to be confidential under the Mississippi Air and Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Office of Pollution Control.

15. Permit Modification

- a) The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

- b) The permit may be modified, revoked and reissued, or terminated for cause.
- c) The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

16. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations

17. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act or the applicable provisions under Mississippi Law pertaining to the transportation, storage, treatment, or spillage of oil or hazardous substances.

18. Hazardous Waste Release

- a) The permittee shall notify the Mississippi Department of Environmental Quality, the EPA Regional Waste Management Division Director, State hazardous waste authorities, and the POTW in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the Industrial User discharges more than 100 kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the Industrial User: An identification of the hazardous constituents contained in the wastes, as estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month, and an estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve months. All notifications must take place within 180 days of the effective date of this rule. Industrial users who commence discharging after the effective date of this rule shall provide the notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph need be submitted only once. However, notifications of changed discharges must be submitted under 40 CFR 403.12(j). The notification requirement in this section does not apply to pollutants already reported under the self-monitoring requirements of 40 CFR 403.12(b), (d), and (e).

- b) Dischargers are exempt from the requirements of paragraph a. of this section during a calendar month in which they discharge no more than fifteen kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(d). Discharge of more than fifteen kilograms of non-acute hazardous wastes in a calendar month, or of any quantity of acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e), requires a one-time notification.

Subsequent months during which the Industrial User discharges more than such quantities of any hazardous waste do not require additional notification.

- c) In the case of any new regulations under section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substance as a hazardous waste, the Industrial User must notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities of the discharge of such substance within 90 days of the effective date of such regulations.
- d) In the case of any notification made under paragraph a. of this section, the Industrial User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.

19. Severability

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.

20. Closure Requirements

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall provide a Closure Plan to the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises or permanently disposed of on site such that no potential environmental hazard to the waters of the State will be presented. Closure plan(s) submitted and approved to Mississippi Department of Environmental Quality for compliance with other environmental regulations will satisfy the closure requirements for those items specifically addressed in the closure plan(s) as long as the closure does not present a potential for environmental hazard to waters of the State.

21. Submittal of Discharge Monitoring Results

Monitoring reports. Monitoring results shall be reported at the intervals specified in the permit.

- a) Monitoring results must be reported on a Discharge Monitoring Report (DMR) and/or forms provided or specified by the Permit Board for reporting results of monitoring, of sludge use or disposal practices.
- b) If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- c) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.
- d) If the results for a given sample analysis are such that any parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in calculating the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- e) Monitoring results obtained during the month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked no later than the 28th day of the following month. The first report is due on October 28, 2001. Copies of this, and any other reports required herein, shall be signed in accordance with Chapter One, Sections II.C and II.E of the State of Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address:

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

22. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

23. Civil and Criminal Liability

- a) Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
- b) Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-4 and 5), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
- c) It shall not be the defense of the 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.

24. Protection of Confidential Information

- a) Pursuant to Miss. Code Ann. ' 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. ' 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b) A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.21.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- c) Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies

of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. ' 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.

25. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State shall comply with the following conditions to prevent the potential release of these materials and storm water contaminated with these materials:

- a) Bulk storage not subject to Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall be provided with secondary containment as found in 40 CFR 112 or equivalent protective measures;
- b) A Spill Prevention Control and Countermeasures (SPCC) Plan or Best Management Practices (BMP) Plan shall be maintained for any bulk storage subject to these requirements;
- c) Tank systems, not necessarily classified as bulk storage, are also subject to the conditions above.

26. Definitions

- a) "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
- b) "Hazardous substances" are defined in 40 CFR 116.4.
- c) "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the

geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.

- d) "Weekly average" means the average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week. The weekly average for fecal coliform bacteria is the geometric mean of all "daily discharges" measured in a calendar week. In computing the geometric mean for fecal coliform bacteria, one (1) shall be substituted for sample results of zero. For self-monitoring purposes, the value to be reported is the single highest weekly average computed during a calendar month.
- e) "Daily maximum" means the highest "daily discharge" over a calendar month.

27. Other Specific Pretreatment Requirements

- a) The permittee shall report the production rate for the process which generates the wastewater discharge as required by 40 CFR 403.12(e)(3).

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PERMIT BOARD REPORT

SEP 25 2001

Permit Action Form
Koppers Industries Inc
543 Tie Plant Road
Grenada County
Tie Plant, MS 38960

Branch Manager: Maya Rao
SIC: 2491

Recommendations

Folder No. – Activity Type

PER20000004 - RA-Water-PT

Permit No.

MSP090300

DEQ Contact

Mary E. Coleman

Action: ☐ Issue
☒ Reissue
☐ Modification
☐ Name Change
☐ Transfer
☐ Deny
☐ Revoke

By: ☒ Division Chief
☐ Permit Board

Basis: The permit conditions for this straight reissuance (no flow increases, no process modifications) are based on applicable federal regulations, Timber Products Processing Point Source Category; Subpart G - Wood Preserving Steam Subcategory - 40 CFR Part 429.85 Pretreatment standards for existing sources (PSES). The regulated discharge consists of process wastewater discharge from the wood preserving operation including boiler blowdown and contaminated stormwater collected on process areas. For Nickel and Zinc, the proposed limitations are based on water quality. The application data submitted only represented one sampling event. Nickel (0.04 mg/l) was reported below the established water quality criteria (acute: 0.787 mg/l, chronic: 0.087 mg/l) while Zinc (1.36 mg/l) was reported above the established water quality criteria (acute: 0.0636 mg/l, chronic: 0.0581 mg/l). Based on these circumstances, both nickel and zinc will be added to the permit; both will be on a "report only" basis.

Coordination

Comments: The receiving stream for this project is the City of Grenada POTW; therefore, no 303d issues exist. No other permits are required in association with this renewal. There are no applicable coordination issues.

Relationships

People

Name	Address	City	State	Zip	Relationship
Thomas Henderson	PO Box 160	Tie Plant	MS	38960	Is Water Permit Contact For

Name	Address	City	State	Zip	Relationship
Thomas Henderson	PO Box 160	Tie Plant	MS	38960	Is Contact For

Administrative Tasks (Backlogged Application)

Task	Scheduled Date	Completed Date
Letter Acknowledging Receipt of Application Issued	7/19/00	7/19/00
Application Received and Processed	7/17/00	7/17/00
Draft Permit and Rationale Prepared	8/27/01	8/27/01
Issue Letter of Deficiency	1/10/01	1/10/01
Revised Application Received and Processed	1/12/01	5/24/01
Letter Acknowledging Receipt of Revised Application Issued	1/13/01	5/28/01
Draft sent to applicant and city	8/23/01	8/23/01

Existing Permits

Permit Number	Description
Air-AIRS AFS	04300012
Air-Title V Operating	096000012
Hazardous Waste-EPA ID	MSD007027543
Hazardous Waste-TSD	HW8854301
Water-SOP	MSU081080

Facility Data Screen #1 (FAC1)

PERMIT #: **MSP090300** TRANSACTION CODE: **R** (N=NEW R=REISSUANCE) IS THIS A MODIFICATION ? **N** (Y/N)

FACILITY NAME: **KOPPERS INDUSTRIES INC**

COGNIZANT OFFICIAL: **THOMAS HENDERSON, PLANT MANAGER**

PHONE: **662-226-4584** CITY: **TIE PLANT** COUNTY CODE: **043**

SIC CODE: **2491** TYPE OF APPLICATION: **2P** (See Page 11) FACILITY OWNERSHIP: **PR1**

TYPE OF PERMIT: **S** FEDERAL GRANT : ☐ 92-500 ONLY "\$" WATER QUALITY LIMITS (Y/N) **N**

FACILITY INACTIVE CODE ☐ FACILITY INACTIVE DATE ☐ - ☐ - ☐ (Use ONLY if you are inactivating an entire facility. Otherwise use OFLG)

SUB-REGION: **NO** ENGINEER: **MEC** AVERAGE DESIGN FLOW : **0.035 MGD**

COMPLIANCE: **JHB**

Facility Data Screen #2 (FAC2)

RIVER BASIN # **1011**

0338 - Upper Tombigbee River	1006 - Mississippi River
0340 - Lower Tombigbee River	1011 - Yazoo River
0342 - Pascagoula River	1018 - Big Black
0343 - Pearl River	1021 - South Independent
0408 - Tennessee River	1099 - Coastal Streams

RECEIVING WATERS **GRENADA POTW (MS0020397)**

Facility Type:

RDF1 **P**

I = Industrial
 X = Ind. No Report
 P = Pretreatment
 M = Municipal
 D = Domestic
 N = Dom. No Report
 F = Federal

Toxic and Bio-Assay Code:

RDF2 ☐

T = Toxic
 A = Acute
 C = Chronic

Treatment Type:

RDF4 **AS** (See Page 12)

AC = Activated Carbon
 AS = Activated Sludge
 AL = Aerated Lagoon
 AN = Anaerobic Lagoon
 API = API Separator
 AW = Artificial Wetlands
 CC = Contact Cooling
 CL = Conventional Lagoon
 CT = Cooling Tower
 DW = Deepwell
 DF = Diffuser
 EOP = End of Pipe
 EV = Evaporation

HC = Hydrograph Controlled
 ML = Multiple Lagoon
 NC = Non-Contact Cooling
 OS = Off Site Disposal
 OF = Overland Flow
 OD = Oxidation Ditch
 PC = Physical Chemistry
 PH = PH Adjustment
 PS = Primary Sedimentation
 RR = Recycle and Reuse
 RO = Reverse Osmosis
 RBC = Rotating Biological Contractor
 SF = Sand Filter
 SS = Secondary Sedimentation
 SI = Spray Irrigation
 SW = Statewide
 TF = Trickling Filter

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Permit Tracking Screen (PTRK)

PERMIT # : MSP090300

Permit Issuance:

TRANSACTION CODE : C
(N=NEW C=CHANGE)

PERMIT TRACKING EVENT CODE : P4099

SCHEDULED DATE : 09-18-01

ACTUAL DATE : 09-18-01

Permit Expiration:

TRANSACTION CODE : C
(N=NEW C=CHANGE)

PERMIT TRACKING EVENT CODE : P5099

SCHEDULED DATE : 08-31-06

ACTUAL DATE : 08-31-06

Permit Facility Geographic Data Screen (FAGD)

PERMIT # :

M S P 0 9 0 3 0 0

TRANSACTION CODE :

C

LATITUDE (FLAT) :

+ 3 3 4 4 1 2 3
H D D M M S S T

LONGITUDE (FLON) :

- 0 8 9 4 7 0 2 5
H D D D M M S S T

LAT/LONG METHOD (FLLM) :

A

A = Map Interpolation
B = Navigation-Quality GPS
C = Remote Sensing
D = Zip Code Centroid
U = Unknown
1 = Address Mapping
2 = Aerial Photo w/Ground Control

3 = Cadastral Survey
4 = State Plan Coord System Conv
5 = Township-Section-Range sys Conv
6 = UTM Coordinates Conversion
7 = Raw Photo Extration
8 = GPS Survey
9 = Loran-C Navigational Device

LAT/LONG DATUM (FLLT) :

1

U = Unknown 1 = NAD27 2 = NAD83

LAT/LONG SCALE (FLLS) :

3

N = Not Applicable
U = Unknown
1 = 15,840
2 = 20,000

3 = 24,000
4 = 25,000
5 = 62,500
6 = 63,000

7 = 63,350
8 = 63,360
9 = 250,000

LAT/LONG DESCRIPTION (FLLD) :

0 1 0 9 9

01099 = Centroid of Processing Area
02099 = Front Door of Facility

USGS HYDROLOGIC BASIN CODE (FHBC) :

0 8 0 3 0 2 0 5

Outfall General Data Screen #1 (OFG)

PERMIT # :

MSPO90300

TRANSACTION CODE :
(N=New C=Change)

C

DISCHARGE NUMBER :

001

REPORT DESIGNATOR :

A

INITIAL REPORT DATE :
(Date monitoring is to begin)

09-01-01

REPORT UNITS :

M

NUMBER OF MONTHS IN
REPORT PERIOD :

001

TOTAL NUMBER OF MONTHS DUE :
(Months due in 5 years)

060

INITIAL STATE SUBMISSION DATE :

10-28-01

STATE SUBMISSION UNIT :

M

NUMBER OF UNITS IN STATE SUBMISSION PERIOD

01

(See instruction sheet, #9).

PIPE DESCRIPTION :

TOTAL FACILITY DISCHARGE

SEASONAL DMR PRINTING INDICATORS :

Y Y Y Y Y Y Y Y Y Y Y Y

INITIAL LIMIT DATES :

START

- - -

END

- - -

INTERIM LIMIT DATES :

START

- - -

END

- - -

FINAL LIMIT DATES :

START

09-18-01

END

08-31-06

PIPE INACTIVE CODE :

PIPE INACTIVE DATE :

- - -

AGENCY REVIEWER
(ENGINEER) :

MEC

(Use if only the pipe itself is not active.
To inactivate an entire facility, use FAC1.)

Outfall General Data Screen #2 (OFLT)

Use these nine lines if

you want comments or

instructions to appear

in the bottom of the DMR

when it is preprinted

or the facility.

Outfall General Data Screen #1 (FLG)

PERMIT # : msp090300

TRANSACTION CODE : C
(N=New C=Change)

DISCHARGE NUMBER : 001

REPORT DESIGNATOR : Y

INITIAL REPORT DATE : 09-01-01
(Date monitoring is to begin)

REPORT UNITS : M

NUMBER OF MONTHS IN REPORT PERIOD : 012

TOTAL NUMBER OF MONTHS DUE : 005
(Months due in 5 years)

INITIAL STATE SUBMISSION DATE : 01-28-02

STATE SUBMISSION UNIT : M

NUMBER OF UNITS IN STATE SUBMISSION PERIOD 12 (See instruction sheet, #9).

PIPE DESCRIPTION : TOTAL FACILITY DISCHARGE

SEASONAL DMR PRINTING INDICATORS : Y Y Y Y Y Y Y Y Y Y Y Y

INITIAL LIMIT DATES : START - - END - -

INTERIM LIMIT DATES : START - - END - -

FINAL LIMIT DATES : START 09-18-01 END 08-31-06

PIPE INACTIVE CODE : PIPE INACTIVE DATE : - -

AGENCY REVIEWER (ENGINEER) : MEC

(Use if only the pipe itself is not active.
To inactivate an entire facility, use FAC1.)

Outfall General Data Screen #2 (OFLT)

Use these nine lines if
you want comments or
instructions to appear
on the bottom of the DMR
when it is preprinted
for the facility.

Koppers Industries, Inc.
Grenada, Mississippi
Pretreatment Permit No. MSP090300
Rationale (Reissuance)
August 24, 2001

I. Facility Information

- A. Nature of Business: Wood preservation
- B. Regulated Discharge: Process wastewater discharge from the wood preserving operation including boiler blowdown and contaminated stormwater collected on process areas.
- C. Applicable Federal Regulations: Timber Products Processing Point Source Category; Subpart G - Wood Preserving Steam Subcategory - 40 CFR Part 429.85 Pretreatment standards for existing sources (PSES)

II. POTW Information

- A. Name: City of Grenada Aerated Multi-Cell Lagoon (MS0020397)
- B. Average Design Flowrate: 3.4 MGD
- C. POTW Receiving Stream: Yalobusha River
- D. POTW Receiving Stream 7Q10 Flowrate: 35.55 MGD ($Q_{7/10}$)

III. Flowrate Data and Loading Conditions:

- A. POTW Average Flowrate (Q_{POTW}) from discharge monitoring report (DMR) data.

<u>Month</u>	<u>Flowrate, MGD</u>
Jan 00	1.781
Feb 00	1.825
Mar 00	2.167
Apr 00	2.800
May 00	1.600
Jun 00	1.724
Jul 00	1.300
Aug 00	1.400
Sept 00	1.500
Oct 00	1.356
Nov 00	1.500
Dec 00	1.750
Sum	20.703
	/12
$Q_{POTW} =$	1.725 MGD

- B. Indirect Dischargers Process Flowrate Data (Metal Contributing Industries)

<u>Indirect Discharger</u>	<u>$Q_{process}$ or (Q_I), MGD</u>
Koppers	0.035
Binswanger	0.121
Heatcraft ADP	0.093
Heatcraft North	0.030
Heatcraft South (OEM)	0.030
Pennaco	0.160
Valley Racks	0.0025
Total =	0.472 MGD (Q_T)

C. X_i – Maximum 30 Day Average Value Utilizing DMR data – Year 2000 Data.

Parameter	Binswanger (#/day)	Heatcraft ADP Outfall 001 (#/day)	Heatcraft ADP Outfall 002 (#/day)	Heatcraft North (#/day)	Heatcraft South (OEM) (#/day)	Pennaco (#/day)	Valley Racks (#/day)	Koppers (#/day)	X _{it} Total (#/day)
As	—	—	—	—	—	—	—	0	0.0
Cr	0	—	—	0.005	0.045	0.28	0.0005	0	0.3305
Cu	0.85	1.52	0.43	0.478	1.68	—	0.001	0.0023	4.9613
Ni	0.019	—	—	0.007	0.015	—	0.0005	—	0.0415
Zn	0.04	0.199	0.005	0.322	2.44	—	0.001	—	3.007
Penta	—	—	—	—	—	—	—	0.4263	0.4263
Phenol	—	—	—	—	—	0.02	—	0.0286	0.0486

D. X_{ia} – Current Maximum Permitted Loadings.

Parameter	Binswanger (#/day)	Heatcraft ADP Outfall 001 (#/day)	Heatcraft ADP Outfall 002 (#/day)	Heatcraft North (#/day)	Heatcraft South (OEM) (#/day)	Pennaco (#/day)	Valley Racks (#/day)	Koppers (#/day)	X _{iat} Total (#/day)
As	—	—	—	—	—	—	—	0.131	0.131
Cr	2.079	—	—	0.693	0.636	1.6	0.058	1.168	6.234
Cu	2.537	1.4	0.01	0.846	4.6	—	0.06	0.642	10.095
Ni	2.987	—	—	0.996	2.84	—	0.083	—	6.906
Zn	1.959	3.73	0.028	0.653	6.32	—	0.054	—	12.744
Penta	—	—	—	—	—	—	—	0.105	0.105
Phenol	—	—	—	—	—	0.5	—	1.75	2.25

IV. Background / Domestic Loading Calculations:

$$BG_L \text{ \#/day} = 8.34 (BG_{C(1)}, \text{ mg/L}) (Q_{POTW} - \text{Sum } Q_{\text{Industrial}(2)}, \text{ MGD})$$

$$BG_L (\text{As}) = 8.34 (0.0014119) (1.725 - 0.420) = 0.015 \text{ \#/day}$$

$$BG_L (\text{Cu}) = 8.34 (0.1450994) (1.725 - 0.420) = 1.58 \text{ \#/day}$$

$$BG_L (\text{Cr}) = 8.34 (0.0653852) (1.725 - 0.420) = 0.712 \text{ \#/day}$$

$$BG_L (\text{Ni}) = 8.34 (0.021) (1.725 - 0.420) = 0.229 \text{ \#/day}$$

$$BG_L (\text{Zn}) = 8.34 (0.175) (1.725 - 0.420) = 1.90 \text{ \#/day}$$

$$BG_L (\text{Penta}) = 8.34 (0.0) (1.725 - 0.420) = 0.0 \text{ \#/day}$$

$$BG_L (\text{Phenol}) = 8.34 (0.0) (1.725 - 0.420) = 0.0 \text{ \#/day}$$

(1) BG_C = Background concentration in domestic sewage. See Attachment A for tabulation of values from the City of Grenada Toxicity Study. Values for Nickel and Zinc were taken from Table 3-13 (Typical Domestic Wastewater Levels). Background values for both pentachlorophenol and phenol.

(2) $\text{Sum } Q_w = Q_{w1} + Q_{w2} + Q_{w3} + \dots + Q_{wn}$ where Q_w is the maximum 30 day average from DMR flowrate data for the existing indirect discharger from the last 12 months of monthly DMR data.

V. Water Quality Analysis:

A. $IWC = Q_{POTW} / (Q_{POTW} + Q_{7/10})$

$$IWC = 1.725 / (1.725 + 35.55) = 0.04627$$

IWC = 4.63%; therefore, develop an acute and chronic water quality screens.

B. Acute Allowable Water Quality Criteria (AWQC) Headworks Loading Calculations:

$$AWQC, \#/\text{day} = 8.34 (C_{\text{CRITICAL}(1)}, \text{mg/L}) (Q_{POTW} + Q_{7/10}, \text{MGD}) / (1 - R_{POTW(2)})$$

$$AWQC (As) = 8.34 (0.360) (1.725 + 35.55) / (1 - 0.95) = 203.48 \#/\text{day}$$

$$AWQC (Cu) = 8.34 (0.00845) (1.725 + 35.55) / (1 - 0.95) = 55.02 \#/\text{day}$$

$$AWQC (Cr) = 8.34 (0.311) (1.725 + 35.55) / (1 - 0.91) = 1074.24 \#/\text{day}$$

$$AWQC (Ni) = 8.34 (0.787) (1.725 + 35.55) / (1 - 0.56) = 556.04 \#/\text{day}$$

$$AWQC (Zn) = 8.34 (0.0636) (1.725 + 35.55) / (1 - 0.64) = 54.92 \#/\text{day}$$

$$AWQC (Penta) = 8.34 (0.00332) (1.725 + 35.55) / (1 - 0) = 1.03 \#/\text{day}$$

$$AWQC (Phenol) = 8.34 (0.300) (1.725 + 35.55) / (1 - 0) = 93.26 \#/\text{day}$$

C. Chronic Allowable Water Quality Criteria (AWQC) Headworks Loading Calculations:

$$AWQC, \#/\text{day} = 8.34 (C_{\text{CRITICAL}(1)}, \text{mg/L}) (Q_{POTW} + Q_{7/10}, \text{MGD}) / (1 - R_{POTW(2)})$$

$$AWQC (As) = 8.34 (0.190) (1.725 + 35.55) / (1 - 0.45) = 107.39 \#/\text{day}$$

$$AWQC (Cu) = 8.34 (0.00628) (1.725 + 35.55) / (1 - 0.95) = 39.05 \#/\text{day}$$

$$AWQC (Cr) = 8.34 (0.101) (1.725 + 35.55) / (1 - 0.91) = 348.87 \#/\text{day}$$

$$AWQC (Ni) = 8.34 (0.087) (1.725 + 35.55) / (1 - 0.56) = 61.47 \#/\text{day}$$

$$AWQC (Zn) = 8.34 (0.0581) (1.725 + 35.55) / (1 - 0.64) = 6.50 \#/\text{day}$$

$$AWQC (Penta) = 8.34 (0.0021) (1.725 + 35.55) / (1 - 0) = 0.653 \#/\text{day}$$

$$AWQC (Phenol) = 8.34 (0.102) (1.725 + 35.55) / (1 - 0) = 31.71 \#/\text{day}$$

- (1) State of Mississippi Water Quality Criteria For Intrastate, Interstate and Coastal Waters...Adopted November 16, 1995 (Appendix A). Freshwater acute and chronic values.
- (2) Removal efficiencies developed by OPC from the City of Grenada toxicity data. Attachment A. For Arsenic, no removal efficiency data was available for aerated lagoons. Table 3.10 (Priority Pollutant Removal Efficiencies Through Activated Sludge Treatment) was used. For Nickel, an OPC Study document (Observed Removal Efficiency v Literature Removal Efficiency) was used for a removal efficiency value.

VI. POTW Inhibition Analysis:

A. Allowable Loading at POTW:

$$HWI_L, \text{ \#/day} = 8.34 (Q_{\text{POTW}}, \text{MGD}) (C_{\text{INHIBITION}(1)}, \text{mg/L})$$

$$HWI_L, (\text{As}) = 8.34 (1.725) (0.1) = 1.44 \text{ \#/day}$$

$$HWI_L, (\text{Cu}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#/day}$$

$$HWI_L, (\text{Cr}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#/day}$$

$$HWI_L, (\text{Ni}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#/day}$$

$$HWI_L, (\text{Zn}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#/day}$$

$$HWI_L, (\text{Penta}) = 8.34 (1.725) (0.95) = 13.67 \text{ \#/day}$$

$$HWI_L, (\text{Phenol}) = 8.34 (1.725) (50) = 719.33 \text{ \#/day}$$

- (1) Inhibition concentrations from EPA Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program – Table 3-2. Activated Sludge Inhibition Threshold Levels. See Attachment A for table.

VII. Limiting Case Summary:

Parameter	HWI _L	Acute AWQC	Chronic AWQC	LC If HWI < AWQC LC = HWI If AWQC < HWI LC = AWQC	X _{tt}	X _{tat}	BGL	BGL < LC (Pass/Fail)	X _{tt} < LC (Pass/Fail)	X _{tat} < LC (Pass/Fail)
	(#/day)	(#/day)	(#/day)	(#/day)	(#/day)	(#/day)	(#/day)	(#/day)	(#/day)	(#/day)
As	1.44	203.48	107.39	1.44	0	0.131	0.015	Pass	Pass	Pass
Cr	14.39	1074.2	348.87	14.39	0.3305	6.234	1.58	Pass	Pass	Pass
Cu	14.39	55.02	39.05	14.39	4.959	10.095	0.712	Pass	Pass	Pass
Ni	14.39	556.04	61.47	14.39	0.0415	6.906	0.229	Pass	Pass	Pass
Zn	14.39	54.92	6.5	6.5	3.007	12.744	1.9	Pass	Pass	Pass
Penta	13.67	1.03	0.653	0.653	0.4263	0.105	0	Pass	Pass	Pass
Phenol	719.33	93.26	31.71	31.71	0.0486	2.25	0	Pass	Pass	Pass

VIII. Uniform Concentration Method Based upon Total Industrial Flow for the Development of Allowable Acute and Chronic Concentrations:

The remaining industrial waste load allocation will be used in calculating allowable acute concentrations using the "Concentration Limit Method Based on Industrial Contributory Flow" method as described in the EPA Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program.

EQUATIONS:

$$P_{AI}, \text{ \#/day} = (LC, \text{ \#/day} - BG_L, \text{ \#/day}) (Q_i, \text{MGD} / Q_T, \text{MGD})$$

$$C_{\text{ALLOW}}, \text{mg/L} = P_{\text{AI}}, \text{\#/day} / (8.34 * Q_{\text{I}}, \text{MGD})$$

Where,

P_{AI}	=	Permit Allocation for Indirect Discharger
C_{ALLOW}	=	Allowable Concentration for Indirect Discharger
Q_{I}	=	Applicant's Process Discharge
Q_{T}	=	Total Indirect Discharger Flow for Metals
L_{C}	=	Limiting Case Loading
BG_{L}	=	Background/Domestic Loading

Arsenic

Acute: $P_{\text{AI}} = (1.44 - 0.015) * (0.035 / 0.035) = 1.425 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.425 / (8.34 * 0.035) = 4.88 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (1.44 - 0.015) * (0.035 / 0.035) = 1.425 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.425 / (8.34 * 0.035) = 4.88 \text{ mg/L}$

Chromium

Acute: $P_{\text{AI}} = (14.39 - 1.58) * (0.035 / 0.379) = 1.183 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.183 / (8.34 * 0.035) = 4.05 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (14.39 - 1.58) * (0.035 / 0.379) = 1.183 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.183 / (8.34 * 0.035) = 4.05 \text{ mg/L}$

Copper

Acute: $P_{\text{AI}} = (14.39 - 0.712) * (0.035 / 0.312) = 1.534 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.534 / (8.34 * 0.035) = 5.26 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (14.39 - 0.712) * (0.035 / 0.312) = 1.534 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.534 / (8.34 * 0.035) = 5.26 \text{ mg/L}$

Nickel

Acute: $P_{\text{AI}} = (14.39 - 0.229) * (0.035 / 0.184) = 2.694 \text{ \#/day}$
 $C_{\text{ALLOW}} = 2.694 / (8.34 * 0.035) = 9.23 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (14.39 - 0.229) * (0.035 / 0.184) = 2.694 \text{ \#/day}$
 $C_{\text{ALLOW}} = 2.694 / (8.34 * 0.035) = 9.23 \text{ mg/L}$

Zinc

Acute: $P_{\text{AI}} = (6.5 - 1.9) * (0.035 / 0.277) = 0.581 \text{ \#/day}$

$$C_{\text{ALLOW}} = 0.581 / (8.34 * 0.035) = 1.99 \text{ mg/L}$$

Chronic: $P_{\text{AI}} = (6.5 - 1.9) * (0.035 / 0.277) = 0.581 \text{ \#/day}$
 $C_{\text{ALLOW}} = 0.581 / (8.34 * 0.035) = 1.99 \text{ mg/L}$

Pentachlorophenol

Acute: $P_{\text{AI}} = (1.03 - 0.0) * (0.035 / 0.035) = 1.03 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.03 / (8.34 * 0.035) = 3.53 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (0.653 - 0) * (0.035 / 0.035) = 0.653 \text{ \#/day}$
 $C_{\text{ALLOW}} = 0.653 / (8.34 * 0.035) = 2.24 \text{ mg/L}$

Phenol

Acute: $P_{\text{AI}} = (93.26 - 0.0) * (0.035 / 0.035) = 93.26 \text{ \#/day}$
 $C_{\text{ALLOW}} = 93.26 / (8.34 * 0.035) = 319.5 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (31.71 - 0.0) * (0.035 / 0.035) = 31.71 \text{ \#/day}$
 $C_{\text{ALLOW}} = 31.71 / (8.34 * 0.035) = 108.6 \text{ mg/L}$

IX. SUMMARY OF ALLOWABLE LIMITATIONS AND DECISION PROCESS:

A. Allowable Limitations Table:

Parameter	Allowable Chronic Concentration Cchronic (mg/l)	Allowable Acute Concentration Cacute (mg/l)	Categorical Average Limitation (mg/l)	Categorical Maximum Limitation Ccat/max (mg/l)	Proposed Average Permit Limitation Pavg (mg/l)	Proposed Maximum Permit Limitation Pmax (mg/l)
Biochemical Oxygen Demand <u>1/</u>	----	----	----	----	240	480
Total Suspended Solids <u>1/</u>	----	----	----	----	300	600
Oil and Grease <u>2/</u>	----	----	----	100	Report	100
Arsenic <u>3/</u>	4.88	4.88	----	4	Report	0.45
Chromium <u>4/</u>	4.05	4.05	----	4	Report	4
Copper <u>4/</u>	5.26	5.26	----	5	Report	2.2
Nickel <u>5/</u>	9.23	9.23	----	----	Report	Report
Zinc <u>5/</u>	1.99	1.99	----	----	Report	Report
Pentachlorophenol <u>6/</u>	2.24	3.53	----	----	0.18	0.36
Phenol <u>6/</u>	108.6	31.71	----	----	3	6

1/ For Biochemical Oxygen Demand (BOD₅) and Total Suspended Solids (TSS), the proposed limitations will not change from the previously issued permit. Data supplied in the application supports this decision.

2/ For Oil and Grease, the proposed limitations are the Categorical Standards from 40 CFR Part 429.

3/ For Arsenic, the proposed limitations will not change from the previously issued permit. DMR data supports this decision.

4/ For Chromium and Copper, the proposed limitations will not change from the previously issued permit. DMR and application data supports this decision.

5/ For Nickel and Zinc, the proposed limitations are based on water quality. The application data submitted only represented one sampling event. Nickel (0.04 mg/l) was reported below the established water quality criteria (acute: 0.787 mg/l, chronic: 0.087 mg/l) while Zinc (1.36 mg/l) was reported above the established water quality criteria (acute: 0.0636 mg/l , chronic: 0.0581 mg/l). Based on these circumstances, both nickel and zinc will be added to the permit; both will be on a "report only" basis.

6/ For Pentachlorophenol and Phenol, the proposed limitations are will not change from the previously issued permit. The limits for both Pentachlorophenol and Phenol are less than the AWQC and HWI.

Note: Flow, pH limits, and sampling frequencies will remain unchanged from the previously issued permit. Sampling frequencies for both Nickel and Zinc will be set at Twice/Year along with other permitted heavy metals.

Attachment A

Raw WET Data from the Grenada POTW

Parameter	units	stream	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000	Removal Eff.
Arsenic (As)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005 use lit values
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Cadmium (Cd)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	<0.020 use lit values
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	<0.020
Chromium (Cr)	mg/L	Inf	<0.050	<0.050	0.19	0.35	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	calc re
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
Copper (Cu)	mg/L	Inf	<0.010	0.07	0.28	0.18	0.1	0.15	0.3	0.09	0.1	0.06	0.05	0.07	calc re
	Eff		0.04	<0.010	<0.010	<0.010	0.1	0.01	0.01	0.01	0.01	0.01	<0.010	<0.010	<0.010
Lead (Pb)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050 use lit values
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
Mercury (Hg)	mg/L	Inf	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002 use lit values
	Eff		<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
Nickel (Ni)	mg/L	Inf	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	<0.020 use lit values
	Eff		<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	<0.020
Silver (Ag)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	0.07	<0.050	<0.050	<0.005	<0.005	calc re
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.005	<0.005	<0.005
Zinc (Zn)	mg/L	Inf	0.12	0.14	0.08	0.08	0.08	0.08	0.08	0.12	0.15	0.1	0.05	0.06	calc re
	Eff		0.28	0.09	<0.020	<0.020	<0.020	0.03	<0.020	<0.020	0.02	0.15	<0.025	<0.025	<0.025
Cyanide (CN)	mg/L	Inf	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010 use lit values
	Eff		<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.01	<0.010	<0.010	<0.010

Data points used in the calculation of the removal efficiencies.
Less than values used in the calculation of the removal efficiencies were divided by 2.

Removal Efficiencies for the Grenada POTW

Parameter	units	stream	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000	Removal Eff.
Arsenic (As)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	NA
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	
Cadmium (Cd)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	NA
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	
Chromium (Cr)	mg/L	Inf	<0.050	<0.050	0.19	0.35	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	91%
	Eff		<0.050	<0.050	0.025	0.025	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	
Copper (Cu)	mg/L	Inf	<0.010	0.07	0.2	0.18	0.51	0.15	0.13	0.09	0.1	0.06	0.05	0.07	95%
	Eff		0.04	0.005	0.005	0.005	0.01	0.01	0.01	0.01	0.01	0.01	0.005	0.005	
Lead (Pb)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	NA
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	
Mercury (Hg)	mg/L	Inf	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	NA
	Eff		<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	
Nickel (Ni)	mg/L	Inf	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	NA
	Eff		<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	
Silver (Ag)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	0.07	<0.050	<0.050	<0.005	<0.005	64%
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	0.025	<0.050	<0.050	<0.005	<0.005	
Zinc (Zn)	mg/L	Inf	0.12	0.14	0.08	0.08	0.08	0.08	0.08	0.12	0.15	0.1	0.05	0.06	64%
	Eff		0.28	0.09	0.01	0.01	0.01	0.03	0.01	0.01	0.02	0.15	0.0125	0.0125	
Cyanide (CN)	mg/L	Inf	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	NA
	Eff		<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	

Data points used in the calculation of the removal efficiencies.
Less than values used in the calculation of the removal efficiencies were divided by 2.

Grenada POTW Sewer Domestic Concentrations

Parameter	units	stream	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
Arsenic (As)	mg/L	Inf	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025
		Eff	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025
Cadmium (Cd)	mg/L	Inf	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.01	0.01
		Eff	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.01	0.01
Chromium (Cr)	mg/L	Inf	0.025	0.025	0.19	0.35	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
		Eff	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Copper (Cu)	mg/L	Inf	0.005	0.07	0.28	0.18	0.51	0.15	0.13	0.09	0.1	0.06	0.05	0.07
		Eff	0.04	0.005	0.005	0.005	0.01	0.01	0.01	0.01	0.01	0.01	0.005	0.005
Lead (Pb)	mg/L	Inf	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
		Eff	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Mercury (Hg)	mg/L	Inf	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001
		Eff	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001
Nickel (Ni)	mg/L	Inf	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.01
		Eff	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.01
Silver (Ag)	mg/L	Inf	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.07	0.025	0.025	0.025	0.025
		Eff	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Zinc (Zn)	mg/L	Inf	0.12	0.14	0.08	0.08	0.08	0.08	0.08	0.12	0.15	0.1	0.05	0.06
		Eff	0.28	0.09	0.01	0.01	0.01	0.03	0.01	0.01	0.02	0.15	0.0125	0.0125
Cyanide (CN)	mg/L	Inf	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005
		Eff	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005

Less than values used in the calculation of the domestic concentrations were divided by 2.
(See raw data for identification of original less than values.)
Facilities domestic concentrations based on influent POTW domestic concentrations only.

Background Concentration in Domestic Sewage

Arsenic

	Month	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
POTW Data													
Conc		0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025
Flow		1.592	1.592	1.743	1.743	1.781	1.781	1.825	1.825	2.167	2.167	2.800	2.800
Total Load		0.0331932	0.0331932	0.0363416	0.0363416	0.0371339	0.0371339	0.0380513	0.0380513	0.045182	0.045182	0.05838	0.05838
Koppers*													
Flow		0.014086	0.014086	0.020625	0.020625	0.019516	0.019516	0.013334	0.013334	0.015058	0.015058	No Data Available	No Data Available
Load		0	0	0	0	0	0	0	0	0	0	0	0
Binswanger													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft ADP outfall 001													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft ADP outfall 002													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft North													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft South													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Pennaco													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Valley Racks													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Monthly Domestic Calculations:													
Domestic Load, #/d		0.0191072	0.0191072	0.0157166	0.0157166	0.0176179	0.0176179	0.0247173	0.0247173	0.030124	0.030124	0.030124	0.030124
Domestic Conc, mg/l		0.0014519	0.0014519	0.0010941	0.0010941	0.0011992	0.0011992	0.0016359	0.0016359	0.0016785	0.0016785	0.0016785	0.0016785
Domestic Average Load, #/d		0.0214566											
Domestic Average Conc, mg/l		0.0014119											

*Twice per year sampling frequency

Background Concentration in Domestic Sewage

Copper

Month	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
POTW Data												
Conc	0.005	0.070	0.280	0.180	0.510	0.150	0.130	0.090	0.100	0.060	0.050	0.070
Flow	1.592	1.592	1.743	1.743	1.781	1.781	1.825	1.825	2.167	2.167	2.800	2.800
Total Load	0.0663864	0.9294096	4.0702536	2.6165918	7.5753054	2.228031	1.378665	1.369845	1.807278	1.0843668	1.1676	1.63464
Koppers*												
Flow	0.014086	0.014086	0.020625	0.020625	0.0348	0.0348	0.0314	0.0314	0.0298	0.0298	Flow Data	Flow Data
Load	0.00101	0.00101	0.00101	0.00101	0.001	0.001	0.001	0.001	0.001	0.001	Unavailable	Unavailable
Blinswanger												
Flow	0.080	0.080	0.080	0.080	0.080	0.080	0.070	0.070	0.070	0.070	0.070	0.070
Load	0.120	0.120	0.230	0.230	0.620	0.620	0.490	0.490	0.490	0.490	0.130	0.130
Heatcraft ADP outfall 001												
Flow	0.023	0.023	0.01296	0.01296	0.032	0.032	0.044	0.044	0.0418	0.0418	0.036	0.036
Load	0.054	0.054	0.076	0.076	0.075	0.075	1.52	1.52	0.275	0.275	0.515	0.515
Heatcraft ADP** outfall 002												
Flow	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	0.0003	0.0003	No Discharge	No Discharge
Load	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	0.43	0.43	No Discharge	No Discharge
Heatcraft North												
Flow***	0.0273	0.0273	0.0235	0.0235	0.028	0.028	0.0297	0.0297	0.03	0.03	0.0298	0.0298
Load	0.169	0.169	0.135	0.135	0.169	0.169	0.137	0.137	0.401	0.401	0.196	0.196
Heatcraft South												
Flow***	0.208	0.208	0.156	0.156	0.201	0.201	0.2049	0.2049	0.196	0.196	0.2048	0.2048
Load	0.19	0.19	0.26	0.26	0.27	0.27	0.41	0.41	0.17	0.17	0.15	0.15
Pennaco												
Flow	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Valley Racks												
Flow	No Data Available	No Data Available	No Data Available	No Data Available	0.0011	0.0011	0.0011	0.0011	No Discharge	No Discharge	0.0011	0.0011
Load	No Data Available	No Data Available	No Data Available	No Data Available	0.001	0.001	0.001	0.001	Discharge	Discharge	0.001	0.001
Monthly Domestic Calculations:												
Domestic Load, #/d	-0.468	0.395	3.368	1.915	6.439	1.092	-0.580	-1.189	0.040	-0.683	0.176	0.643
Domestic Conc, mg/l	-0.0452318	0.0382458	0.2785447	0.1583308	0.5498487	0.0932481	-0.048189	-0.0967428	0.0026839	-0.0454877	0.0085611	0.0313309
Domestic Average Load, #/d	1.759											
Domestic Average Conc, mg/l	0.1450994											

* Twice per year frequency

** Batch process

***Max flow reported only

Note: Negative values not used in calculating domestic average load and concentration values.

Background Concentration in Domestic Sewage

Chromium

Month	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
POTW Data												
Conc	0.025	0.025	0.190	0.350	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Flow	1.592	1.592	1.743	1.743	1.781	1.781	1.825	1.825	2.167	2.167	2.800	2.800
Total Load	0.331932	0.331932	2.7619578	5.087817	0.3713385	0.3713385	0.3805125	0.3805125	0.4518195	0.4518195	0.5838	0.5838
Koppers												
Flow	0	0	0	0	0	0	0	0	0	0	0	0
Load												
Binswanger*												
Flow												
Load	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Heatcraft ADP outfall 001												
Flow	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load												
Heatcraft ADP outfall 002												
Flow	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load												
Heatcraft North												
Flow**	0.0273	0.0273	0.0235	0.0235	0.028	0.028	0.0297	0.0297	0.03	0.03	0.0298	0.0298
Load	0.0045	0.0045	0.0045	0.0045	0.0005	0.0005	0.004	0.004	0.005	0.005	0.002	0.002
Heatcraft South												
Flow**	0.208	0.208	0.156	0.156	0.201	0.201	0.2049	0.2049	0.196	0.196	0.2048	0.2048
Load	0.035	0.035	0.03	0.03	0.035	0.035	0.045	0.045	0.035	0.035	0.025	0.025
Pennaco												
Flow	0.046	0.046	0.064	0.064	0.089	0.089	0.075	0.075	0.071	0.071	0.087	0.087
Load	0.08	0.08	0.18	0.18	0.08	0.08	0.12	0.12	0.11	0.11	0.16	0.16
Valley Racks***												
Flow	No Data Available	No Data Available	No Data Available	No Data Available	0.0011	0.0011	0.0011	0.0011	No Discharge	No Discharge	0.0011	0.0011
Load					0.0005	0.0005	0.0005	0.0005			0.0005	0.0005
Monthly Domestic Calculations:												
Domestic Load, #/d	0.212	0.212	2.547	4.873	0.255	0.255	0.211	0.211	0.302	0.302	0.396	0.396
Domestic Conc, mg/l	0.0194335	0.0194335	0.2037016	0.3896836	0.0209427	0.0209427	0.0167082	0.0167082	0.0193526	0.0193526	0.0191814	0.0191814
Domestic Average Load, #/d	0.848											
Domestic Average Conc, mg/l	0.0653852											

* Twice per year frequency

**Maximum flow reported only

*** 1-6/00 7-12/00 reported as NOBI

TABLE 3-13. TYPICAL DOMESTIC WASTEWATER LEVELS*

<u>Pollutant</u>	<u>Concentration, mg/l</u>
Cadmium	0.003
Chromium	0.05
Copper	0.061
Lead	0.049
Nickel	0.021
Zinc	0.175
Arsenic	0.003
Mercury	0.0003
Silver	0.005
Cyanide	0.041

*From "Assessment of the Impacts of Industrial Discharges on Publicly Owned Treatment Works, Appendices," prepared by JRB Associates for the U.S. Environmental Protection Agency, November 1981, p. C-38.

TABLE 3-10. PRIORITY POLLUTANT REMOVAL EFFICIENCIES THROUGH ACTIVATED SLUDGE TREATMENT*

<u>Metals/Nonmetal Inorganics**</u>	<u>Range</u>	<u>Second Decile</u>	<u>Median</u>	<u>Eighth Decile</u>	<u>No. of POTWs with Removal Data</u>
Cadmium	25-99	33	67	91	19 of 26
Chromium	25-97	68	82	91	25 of 26
Copper	2-99	67	86	95	26 of 26
Lead	1-92	39	61	76	23 of 26
Nickel	2-99	25	42	62	23 of 26
Zinc	23-99	64	79	88	26 of 26
Arsenic	11-78	31	45	53	5 of 26
Mercury	1-95	50	60	79	20 of 26
Selenium	25-89	33	50	67	4 of 26
Silver	17-95	50	75	88	24 of 26
Cyanide	3-99	41	69	84	25 of 26
<u>Organics**</u>					
Benzene	25-99	50	80	96	18 of 26
Chloroform	17-99	50	67	83	24 of 26
1,2-trans-Dichloroethylene	17-99	50	67	91	17 of 26
Ethylbenzene	25-99	67	86	97	25 of 26
Methylene chloride	2-99	36	62	77	26 of 26
Tetrachloroethylene	15-99	50	80	93	26 of 26
Toluene	25-99	80	93	98	26 of 26
1,1,1-Trichloroethane	18-99	75	85	94	23 of 26
Trichloroethylene	20-99	75	89	98	25 of 26
Anthracene	29-99	44	67	91	5 of 26
Bis (2-ethylhexyl) phthalate	17-99	47	72	87	25 of 26
Butyl benzyl phthalate	25-99	50	67	92	16 of 26
Di-n-butyl phthalate	11-97	39	64	87	19 of 26
Diethyl phthalate	17-98	39	62	90	15 of 26
Napthalene	25-98	40	78	90	16 of 26
Phenanthrene	29-99	37	68	86	6 of 26
Phenol	3-99	75	90	98	19 of 26
Pyrene	73-95	76	86	95	2 of 26

*Pollutant removals between POTW influent and secondary effluent (including secondary clarification). Based on a computer analysis of POTW removal efficiency data, (derived from actual POTW influent and effluent sampling data) provided in Fate of Priority Pollutants in Publicly Owned Treatment Works, Volume II, (EPA 440/1-82/303), U.S. Environmental Protection Agency, Washington, D.C., September 1982.

**For the purpose of deriving removal efficiencies, effluent levels reported as below detection were set equal to the reported detection limits. All secondary activated sludge treatment plants sampled as part of the study were considered.

TABLE 3-2. ACTIVATED SLUDGE INHIBITION THRESHOLD LEVELS

<u>Pollutant</u>	<u>Minimum Reported Inhibition Threshold mg/l</u>	<u>Reported Range of Inhibition Threshold Level, mg/l</u>	<u>Laboratory, Pilot, or Full-scale</u>	<u>References*</u>
<u>Metals/Nonmetal Inorganics</u>				
Cadmium	1	1 - 10	Unknown	(29), (32)
Chromium (Total)	1	1 - 100	Pilot	(28)
Chromium (III)	10	10 - 50	Unknown	(29), (32)
Chromium (VI)	1	1	Unknown	(29), (32)
Copper	1	1	Pilot	(29), (28), (32)
Lead	0.1	0.1 - 5.0 10 - 100	Unknown Lab	(32) (28)
Nickel	1	1.0 - 2.5 5	Unknown Pilot	(29), (32) (28)
Zinc	0.08	0.08 - 5 5 - 10	Unknown Pilot	(32) (28)
Arsenic	0.1	0.1	Unknown	(28), (29), (32)
Mercury	0.1	0.1 - 1 2.5 as Hg (II)	Unknown Lab	(29), (32) (28)
Silver	0.25	0.25-5	Unknown	(29), (32)
Cyanide	0.1	0.1 - 5 5	Unknown Full	(28), (29), (32) (28)
Ammonia	480	480	Unknown	(46)
Iodine	10	10	Unknown	(46)
Sulfide	25	25 - 30	Unknown	(46)
<u>Organics:</u>				
Anthracene	500	500	Lab	(28)
Benzene	100	100 - 500 125 - 500	Unknown Laboratory	(32) (28)

*References did not distinguish between total or dissolved pollutant inhibition levels.

TABLE 3-2. ACTIVATED SLUDGE INHIBITION THRESHOLD LEVELS (Continued)

Pollutant	Minimum Reported Inhibition Threshold mg/l	Reported Range of Inhibition Threshold Level, mg/l	Laboratory, Pilot, or Full-scale	References*
2-Chlorophenol	5	5 20 - 200	Unknown Unknown	(29) (32)
1,2 Dichlorobenzene	5	5	Unknown	(29)
1,3 Dichlorobenzene	5	5	Unknown	(29)
1,4 Dichlorobenzene	5	5	Unknown	(29)
2,4-Dichlorophenol	64	64	Unknown	(32)
2,4 Dimethylphenol	50	40 - 200	Unknown	(32)
2,4-Dinitrotoluene	5	5	Unknown	(29)
1,2-Diphenylhydrazine	5	5	Unknown	(29)
Ethylbenzene	200	200	Unknown	(32)
Hexachlorobenzene	5	5	Unknown	(29)
Naphthalene	500	500 500 500	Lab Unknown Unknown	(28) (29) (32)
Nitrobenzene	30	30 - 500 500 500	Unknown Lab Unknown	(32) (28) (29)
Pentachlorophenol	0.95	0.95 50 75 - 150	Unknown Unknown Lab	(29) (32) (28)
Phenathrene	500	500 500	Lab Unknown	(28) (29)
Phenol	50	50 - 200 200 200	Unknown Unknown Unknown	(32) (29) (28)
Toluene	200	200	Unknown	(32)
2,4,6 Trichlorophenol	50	50 - 100	Lab	(28)
Surfactants	100	100 - 500	Unknown	(46)

*References did not distinguish between total or dissolved pollutant inhibition levels.

**OBSERVED REMOVAL EFFICIENCY vs. LITERATURE
REMOVAL EFFICIENCY ()**

PARAMETER	CONVENTIONAL LAGOONS	AERATED LAGOONS	TRICKLING FILTERS	ACTIVATED SLUDGE
Chromium	83% (NA)	24% (NA)	55% (55%)	78% (82%)
Zinc	66% (NA)	75% (NA)	65% (67%)	68% (79%)
Copper	61% (NA)	70% (NA)	62% (61%)	62% (86%)
Lead	56% (NA)	53% (NA)	63% (55%)	62% (61%)
Cyanide	81% (NA)	NA (NA)	NA (59%)	62% (69%)
Silver	74% (NA)	NA (NA)	62% (66%)	75% (75%)
Cadmium	75% (NA)	NA (NA)	10% (68%)	63% (67%)
Nickel	32% (NA)	56% (NA)	56% (29%)	49% (42%)
PCP	NA (NA)	71% (NA)	77% (NA)	77% (NA)
Phenol	72% (NA)	71% (NA)	48% (84%)	55% (90%)

NOTE: NA = NOT AVAILABLE

TABLE 3-2. ACTIVATED SLUDGE INHIBITION THRESHOLD LEVELS

<u>Pollutant</u>	<u>Minimum Reported Inhibition Threshold mg/l</u>	<u>Reported Range of Inhibition Threshold Level, mg/l</u>	<u>Laboratory, Pilot, or Full-scale</u>	<u>References*</u>
<u>Metals/Nonmetal Inorganics</u>				
Cadmium	1	1 - 10	Unknown	(29), (32)
Chromium (Total)	1	1 - 100	Pilot	(28)
Chromium (III)	10	10 - 50	Unknown	(29), (32)
Chromium (VI)	1	1	Unknown	(29), (32)
Copper	1	1	Pilot	(29), (28), (32)
Lead	0.1	0.1 - 5.0 10 - 100	Unknown Lab	(32) (28)
Nickel	1	1.0 - 2.5 5	Unknown Pilot	(29), (32) (28)
Zinc	0.08	0.08 - 5 5 - 10	Unknown Pilot	(32) (28)
Arsenic	0.1	0.1	Unknown	(28), (29), (32)
Mercury	0.1	0.1 - 1 2.5 as Hg (II)	Unknown Lab	(29), (32) (28)
Silver	0.25	0.25-5	Unknown	(29), (32)
Cyanide	0.1	0.1 - 5 5	Unknown Full	(28), (29), (32) (28)
Ammonia	480	480	Unknown	(46)
Iodine	10	10	Unknown	(46)
Sulfide	25	25 - 30	Unknown	(46)
<u>Organics:</u>				
Anthracene	500	500	Lab	(28)
Benzene	100	100 - 500 125 - 500	Unknown Laboratory	(32) (28)

*References did not distinguish between total or dissolved pollutant inhibition levels.

TABLE 3-2. ACTIVATED SLUDGE INHIBITION THRESHOLD LEVELS (Continued)

<u>Pollutant</u>	<u>Minimum Reported Inhibition Threshold mg/l</u>	<u>Reported Range of Inhibition Threshold Level, mg/l</u>	<u>Laboratory, Pilot, or Full-scale</u>	<u>References*</u>
2-Chlorophenol	5	5 20 - 200	Unknown Unknown	(29) (32)
1,2 Dichlorobenzene	5	5	Unknown	(29)
1,3 Dichlorobenzene	5	5	Unknown	(29)
1,4 Dichlorobenzene	5	5	Unknown	(29)
2,4-Dichlorophenol	64	64	Unknown	(32)
2,4 Dimethylphenol	50	40 - 200	Unknown	(32)
2,4-Dinitrotoluene	5	5	Unknown	(29)
1,2-Diphenylhydrazine	5	5	Unknown	(29)
Ethylbenzene	200	200	Unknown	(32)
Hexachlorobenzene	5	5	Unknown	(29)
Naphthalene	500	500 500 500	Lab Unknown Unknown	(28) (29) (32)
Nitrobenzene	30	30 - 500 500 500	Unknown Lab Unknown	(32) (28) (29)
Pentachlorophenol	0.95	0.95 50 75 - 150	Unknown Unknown Lab	(29) (32) (28)
Phenathrene	500	500 500	Lab Unknown	(28) (29)
Phenol	50	50 - 200 200 200	Unknown Unknown Unknown	(32) (29) (28)
Toluene	200	200	Unknown	(32)
2,4,6 Trichlorophenol	50	50 - 100	Lab	(28)
Surfactants	100	100 - 500	Unknown	(46)

*References did not distinguish between total or dissolved pollutant inhibition levels.

**OBSERVED REMOVAL EFFICIENCY vs. LITERATURE
REMOVAL EFFICIENCY ()**

PARAMETER	CONVENTIONAL LAGOONS	AERATED LAGOONS	TRICKLING FILTERS	ACTIVATED SLUDGE
Chromium	83% (NA)	24% (NA)	55% (55%)	78% (82%)
Zinc	66% (NA)	75% (NA)	65% (67%)	68% (79%)
Copper	61% (NA)	70% (NA)	62% (61%)	62% (86%)
Lead	56% (NA)	53% (NA)	63% (55%)	62% (61%)
Cyanide	81% (NA)	NA (NA)	NA (59%)	62% (69%)
Silver	74% (NA)	NA (NA)	62% (66%)	75% (75%)
Cadmium	75% (NA)	NA (NA)	10% (68%)	63% (67%)
Nickel	32% (NA)	56% (NA)	56% (29%)	49% (42%)
PCP	NA (NA)	71% (NA)	77% (NA)	77% (NA)
Phenol	72% (NA)	71% (NA)	48% (84%)	55% (90%)

NOTE: NA = NOT AVAILABLE

STATE OF MISSISSIPPI WATER POLLUTION CONTROL PERMIT

TO OPERATE A WASTE DISPOSAL SYSTEM IN ACCORDANCE
WITH NATIONAL AND STATE PRETREATMENT STANDARDS

THIS CERTIFIES THAT

**Koppers Industries Inc
Tie Plant Road
Grenada, Mississippi**

has been granted permission to discharge wastewater into

Grenada POTW (MS0020397)

in accordance with effluent limitations, monitoring requirements and other conditions set forth in this permit. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

The issuance of this permit does not relieve the permittee from complying with any requirements which the Publicly Owned Treatment Works (POTW) Authority may deem necessary as a prerequisite to the use of the Authority's sewage system and associated treatment works.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: Issuance Date

Expires: Expiration Date

Permit No.: MSP090300

Part I.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning upon **Issuance Date** permit issuance, and lasting until **Expiration Date**, the permittee is authorized to discharge from outfall(s) serial number(s): **001 (Total Facility Discharge)**

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
	kg/day	(lbs/day)	Other Units (Specify)		Measurement Frequency	Sample Type
	Monthly Avg.	Daily Max.	Monthly Avg.	Daily Max.		
Flow (MGD)	-----	-----	Report	0.035	Daily	Continuous
Biochemical Oxygen Demand (5-day)	32 (70)	63 (140)	240 mg/L	480 mg/L	Once/Week	24-Hr. Composite
Total Suspended Solids	40 (88)	79 (175)	300 mg/L	600 mg/L	Once/Week	24-Hr. Composite
Total Phenols	0.40 (0.88)	0.79 (1.75)	3 mg/L	6 mg/L	Once/Week	Grab
Pentachlorophenol	0.024 (0.053)	0.048 (0.105)	0.18 mg/L	0.36 mg/L	Once/Week	Grab
Oil and Grease	Report	13.2 (29.2)	Report mg/L	100 mg/L	Once/Week	Grab

PARAMETER	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
	kg/day	(lbs/day)	Other Units (Specify)		Measurement Frequency	Sample Type
	Yearly Avg.	Yearly Max.	Yearly Avg.	Yearly Max.		
Copper, Total Recoverable	Report	0.291 (0.642)	Report mg/L	2.2 mg/L	Twice/Year	24-Hr. Composite
Chromium, Total Recoverable	Report	0.529 (1.168)	Report mg/L	4.0 mg/L	Twice/Year	24-Hr. Composite
Arsenic, Total Recoverable	Report	0.060 (0.131)	Report mg/L	0.45 mg/L	Twice/Year	24-Hr. Composite
Nickel, Total Recoverable	Report	Report	Report mg/L	Report mg/L	Twice/Year	24-Hr. Composite
Zinc, Total Recoverable	Report	Report	Report mg/L	Report mg/L	Twice/Year	24-Hr. Composite

2. The pH shall not be less than 5.5 standard units nor greater than 9.5 standard units and shall be monitored twice per week with a grab sample of the effluent.
3. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to actual discharge into the POTW collection system or mixing with non-regulated wastewater streams.

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance.

2. Within 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date. Failure to submit the written notice to the Permit Board shall be considered a violation of the compliance requirements of the permit, for which the Commission may be asked to take enforcement action.

Not Applicable.

C. GENERAL PRETREATMENT PROHIBITIONS

1. In addition to those pollutants limited in Part I.A., the following pollutants shall not be discharged into the POTW:
 - a) Pollutants which create a fire or explosion hazard in the POTW, including but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;
 - b) Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the treatment works is specifically designed to accommodate such discharges;
 - c) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in interference;
 - d) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW;
 - e) Heat in amounts which will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40oC (104oF) unless the approval Authority, upon request of the POTW, approves alternate temperature limits;
 - f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

- g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- h) Any trucked or hauled pollutants, except at discharge points designated by the POTW.

D. ORAL NOTIFICATION REQUIREMENTS

The permittee shall notify the Mississippi Environmental Quality Permit Board and the POTW orally immediately upon becoming aware of the following:

1. A spill which would result in a discharge to the POTW or to State waters;
2. Any unanticipated bypass which exceeds any effluent limitation in the permit.
3. Any upset which exceeds any effluent limitation in the permit.
4. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.

Part II.

A. MANAGEMENT REQUIREMENTS AND RESPONSIBILITIES

1. No Discharge of Wastewater to Surface Water

The discharge of any wastewater from this facility to the waters of the State of Mississippi shall constitute a violation of this permit, except as provided in Part II, A.4. and A.5. of this permit, or as authorized under separate permit pursuant to Section 402 of the Federal Water Pollution Control Act.

2. Change in Wastewater Source

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permit which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Chapter One, Section II.A. of the State of Mississippi Wastewater Permit Regulations, or if the discharge does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

3. Facilities Operation

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. The Permit Board may require regular reporting of internal operational and maintenance parameters where necessary to confirm proper operation of a waste treatment system.

4. Bypassing 40 CFR 403.17

a) Definition. "Bypass" means the intentional diversion of wastestreams from any portion of the permittee's treatment facility.

b) Notice of Bypass.

(1) If the permittee knows in advance of the need for a bypass, it shall submit

prior notice to the Permit Board, if possible at least ten days before the date of the bypass.

- (2) The permittee shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Permit Board within 24 hours from the time the permittee becomes aware of the bypass. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the bypass. The Permit Board may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.
- c) Prohibition of bypass. Bypass is prohibited, and the Permit Board may take enforcement action against the permittee for a bypass, unless;
 - (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgement to prevent a bypass which occurred during normal period of equipment downtime or preventative maintenance; and
 - (3) The permittee submitted notices as required under paragraph (b) of this section.

5. Upsets 40 CFR 403.16

- a) Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with categorical pretreatment standards because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b) Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with categorical pretreatment standards if the requirements of paragraph (c) of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to

judicial review.

- c) Conditions necessary for demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The facility was at the time being properly operated in a prudent and workmanlike manner and in compliance with applicable operation and maintenance procedures; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 403.16 (c)(3) (24-hour notice of noncompliance).
- d) Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.
- e) User responsibility in case of upset. The Industrial User shall control production or all discharges to the extent necessary to maintain compliance with categorical Pretreatment Standards upon reduction, loss, or failure of its treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies in the situation where among other things, the primary source of power of the treatment facility is reduced, lost or fails.

6. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

7. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

8. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of this permit, the permittee shall either:

- a) Provide an alternative power source to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in this permit,

- b) Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.

9. Compliance with Permit Conditions

All discharges authorized by the permit shall be consistent with the terms and conditions of the permit and the permittee shall make all reasonable efforts to meet any interim or final dates for compliance specified therein.

10. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit, or if the discharge does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

B. MONITORING, REPORTING, AND RECORDKEEPING

1. Routine Reporting

Such test results, reports, or other data as the Mississippi Environmental Quality Permit Board may determine to be necessary shall be submitted on a regular basis to the following address:

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385**

2. Duty to Provide Information

The permittee shall furnish to the Permit Board, within a reasonable time, any information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also furnish to the Permit Board upon request, copies of records required to be kept by the permit.

3. Test Procedures

Testing procedures for the analysis of pollutants for all permits include those set forth

in 40 CFR 136 which is incorporated herein and adopted by reference or alternative procedures approved and/or promulgated by EPA.

4. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

5. Recording of Results

A permittee required to monitor a waste discharge pursuant to Chapter One, Section IV.A.28. of the State of Mississippi Wastewater Permit Regulations shall maintain records of all information obtained from such monitoring, including:

- a) The exact place, date, and time of sampling;
- b) The dates the analyses were performed;
- c) The person(s) who performed the analyses;
- d) The analytical techniques, procedures or methods used; and
- e) The results of all required analyses.

6. Records Retention

- a) All records and results of monitoring activities, including calibration and maintenance records, shall be retained by the permittee a minimum of three (3) years unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.
- b) The permittee shall furnish to the Permit Board upon request, copies of records required to be kept by this permit.

7. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.

8. Noncompliance Reporting

- a) The permittee shall report any noncompliance which may endanger health or the

environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.

- b) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - (1) Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - (2) Any upset which exceeds any effluent limitation in the permit.
 - (3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.
- c) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

9. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Part I.D or Part II.B.6, at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in Part II.B.6.

10. Right of Entry

The permittee shall allow the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

- a) To enter upon the permittee's premises where a wastewater source is located or in which records are required to be kept under the terms and conditions of this permit; and
- b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any wastewater generated at this facility.

- c) In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night.

11. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.

12. Signatory Requirements 40 CFR 403.12(l)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

- a) All permit applications shall be signed as follows:

- (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) 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 function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
- (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

- b) All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described above;
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a

well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and

(3) The written authorization is submitted to the Permit Board.

- c) Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d) Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

13. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

14. Availability of Records

Except for data determined to be confidential under the Mississippi Air and Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Office of Pollution Control.

15. Permit Modification

- a) The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

- b) The permit may be modified, revoked and reissued, or terminated for cause.
- c) The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

16. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations

17. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act or the applicable provisions under Mississippi Law pertaining to the transportation, storage, treatment, or spillage of oil or hazardous substances.

18. Hazardous Waste Release

- a) The permittee shall notify the Mississippi Department of Environmental Quality, the EPA Regional Waste Management Division Director, State hazardous waste authorities, and the POTW in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the Industrial User discharges more than 100 kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the Industrial User: An identification of the hazardous constituents contained in the wastes, as estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month, and an estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve months. All notifications must take place within 180 days of the effective date of this rule. Industrial users who commence discharging after the effective date of this rule shall provide the notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph need be submitted only once. However, notifications of changed discharges must be submitted under 40 CFR 403.12(j). The notification requirement in this section does not apply to pollutants already reported under the self-monitoring requirements of 40 CFR 403.12(b), (d), and (e).

- b) Dischargers are exempt from the requirements of paragraph a. of this section during a calendar month in which they discharge no more than fifteen kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(d). Discharge of more than fifteen kilograms of non-acute hazardous wastes in a calendar month, or of any quantity of acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e), requires a one-time notification.

Subsequent months during which the Industrial User discharges more than such quantities of any hazardous waste do not require additional notification.

- c) In the case of any new regulations under section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substance as a hazardous waste, the Industrial User must notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities of the discharge of such substance within 90 days of the effective date of such regulations.
- d) In the case of any notification made under paragraph a. of this section, the Industrial User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.

19. Severability

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.

20. Closure Requirements

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall provide a Closure Plan to the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises or permanently disposed of on site such that no potential environmental hazard to the waters of the State will be presented. Closure plan(s) submitted and approved to Mississippi Department of Environmental Quality for compliance with other environmental regulations will satisfy the closure requirements for those items specifically addressed in the closure plan(s) as long as the closure does not present a potential for environmental hazard to waters of the State.

21. Submittal of Discharge Monitoring Results

Monitoring reports. Monitoring results shall be reported at the intervals specified in the permit.

- a) Monitoring results must be reported on a Discharge Monitoring Report (DMR) and/or forms provided or specified by the Permit Board for reporting results of monitoring, of sludge use or disposal practices.
- b) If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- c) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.
- d) If the results for a given sample analysis are such that any parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in calculating the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- e) Monitoring results obtained during the month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked no later than the 28th day of the following month. The first report is due on [month day, year]. Copies of this, and any other reports required herein, shall be signed in accordance with Chapter One, Sections II.C and II.E of the State of Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address:

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

22. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

23. Civil and Criminal Liability

- a) Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
- b) Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-4 and 5), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
- c) It shall not be the defense of the 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.

24. Protection of Confidential Information

- a) Pursuant to Miss. Code Ann. ' 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. ' 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b) A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.21.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- c) Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies

of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. ' 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.

25. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State shall comply with the following conditions to prevent the potential release of these materials and storm water contaminated with these materials:

- a) Bulk storage not subject to Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall be provided with secondary containment as found in 40 CFR 112 or equivalent protective measures;
- b) A Spill Prevention Control and Countermeasures (SPCC) Plan or Best Management Practices (BMP) Plan shall be maintained for any bulk storage subject to these requirements;
- c) Tank systems, not necessarily classified as bulk storage, are also subject to the conditions above.

26. Definitions

- a) "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
- b) "Hazardous substances" are defined in 40 CFR 116.4.
- c) "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the

geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.

- d) "Weekly average" means the average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week. The weekly average for fecal coliform bacteria is the geometric mean of all "daily discharges" measured in a calendar week. In computing the geometric mean for fecal coliform bacteria, one (1) shall be substituted for sample results of zero. For self-monitoring purposes, the value to be reported is the single highest weekly average computed during a calendar month.
- e) "Daily maximum" means the highest "daily discharge" over a calendar month.

27. Other Specific Pretreatment Requirements

- a) The permittee shall report the production rate for the process which generates the wastewater discharge as required by 40 CFR 403.12(e)(3).

Koppers Industries, Inc.
Grenada, Mississippi
Pretreatment Permit No. MSP090300
Rationale (Reissuance)
August 24, 2001

I. Facility Information

- A. Nature of Business: Wood preservation
- B. Regulated Discharge: Process wastewater discharge from the wood preserving operation including boiler blowdown and contaminated stormwater collected on process areas.
- C. Applicable Federal Regulations: Timber Products Processing Point Source Category; Subpart G - Wood Preserving Steam Subcategory - 40 CFR Part 429.85 Pretreatment standards for existing sources (PSES)

II. POTW Information

- A. Name: City of Grenada Aerated Multi-Cell Lagoon (MS0020397)
- B. Average Design Flowrate: 3.4 MGD
- C. POTW Receiving Stream: Yalobusha River
- D. POTW Receiving Stream 7Q10 Flowrate: 35.55 MGD ($Q_{7/10}$)

III. Flowrate Data and Loading Conditions:

- A. POTW Average Flowrate (Q_{POTW}) from discharge monitoring report (DMR) data.

<u>Month</u>	<u>Flowrate, MGD</u>
Jan 00	1.781
Feb 00	1.825
Mar 00	2.167
Apr 00	2.800
May 00	1.600
Jun 00	1.724
Jul 00	1.300
Aug 00	1.400
Sept 00	1.500
Oct 00	1.356
Nov 00	1.500
Dec 00	1.750
Sum	20.703
	/12
$Q_{POTW} =$	1.725 MGD

- B. Indirect Dischargers Process Flowrate Data (Metal Contributing Industries)

<u>Indirect Discharger</u>	<u>$Q_{process}$ or (Q_i), MGD</u>
Koppers	0.035
Binswanger	0.121
Heatcraft ADP	0.093
Heatcraft North	0.030
Heatcraft South (OEM)	0.030
Pennaco	0.160
Valley Racks	0.0025
Total =	0.472 MGD (Q_T)

C. X_t – Maximum 30 Day Average Value Utilizing DMR data – Year 2000 Data.

Parameter	Binswanger (#/day)	Heatcraft ADP Outfall 001 (#/day)	Heatcraft ADP Outfall 002 (#/day)	Heatcraft North (#/day)	Heatcraft South (OEM) (#/day)	Pennaco (#/day)	Valley Racks (#/day)	Koppers (#/day)	Xtt Total (#/day)
As	---	---	---	---	---	---	---	0	0.0
Cr	0	---	---	0.005	0.045	0.28	0.0005	0	0.3305
Cu	0.85	1.52	0.43	0.478	1.68	---	0.001	0.0023	4.9613
Ni	0.019	---	---	0.007	0.015	---	0.0005	---	0.0415
Zn	0.04	0.199	0.005	0.322	2.44	---	0.001	---	3.007
Penta	---	---	---	---	---	---	---	0.4263	0.4263
Phenol	---	---	---	---	---	0.02	---	0.0286	0.0486

D. X_{la} – Current Maximum Permitted Loadings.

Parameter	Binswanger (#/day)	Heatcraft ADP Outfall 001 (#/day)	Heatcraft ADP Outfall 002 (#/day)	Heatcraft North (#/day)	Heatcraft South (OEM) (#/day)	Pennaco (#/day)	Valley Racks (#/day)	Koppers (#/day)	Xlat Total (#/day)
As	---	---	---	---	---	---	---	0.131	0.131
Cr	2.079	---	---	0.693	0.636	1.6	0.058	1.168	6.234
Cu	2.537	1.4	0.01	0.846	4.6	---	0.06	0.642	10.095
Ni	2.987	---	---	0.996	2.84	---	0.083	---	6.906
Zn	1.959	3.73	0.028	0.653	6.32	---	0.054	---	12.744
Penta	---	---	---	---	---	---	---	0.105	0.105
Phenol	---	---	---	---	---	0.5	---	1.75	2.25

IV. Background / Domestic Loading Calculations:

$$BG_L \text{ \#/day} = 8.34 (BG_{C(1)}, \text{ mg/L}) (Q_{POTW} - \text{Sum } Q_{\text{Industrial}(2)}, \text{ MGD})$$

$$BG_L (\text{As}) = 8.34 (0.0014119) (1.725 - 0.420) = 0.015 \text{ \#/day}$$

$$BG_L (\text{Cu}) = 8.34 (0.1450994) (1.725 - 0.420) = 1.58 \text{ \#/day}$$

$$BG_L (\text{Cr}) = 8.34 (0.0653852) (1.725 - 0.420) = 0.712 \text{ \#/day}$$

$$BG_L (\text{Ni}) = 8.34 (0.021) (1.725 - 0.420) = 0.229 \text{ \#/day}$$

$$BG_L (\text{Zn}) = 8.34 (0.175) (1.725 - 0.420) = 1.90 \text{ \#/day}$$

$$BG_L (\text{Penta}) = 8.34 (0.0) (1.725 - 0.420) = 0.0 \text{ \#/day}$$

$$BG_L (\text{Phenol}) = 8.34 (0.0) (1.725 - 0.420) = 0.0 \text{ \#/day}$$

(1) BG_C = Background concentration in domestic sewage. See Attachment A for tabulation of values from the City of Grenada Toxicity Study. Values for Nickel and Zinc were taken from Table 3-13 (Typical Domestic Wastewater Levels). Background values for both pentachlorophenol and phenol.

(2) $\text{Sum } Q_w = Q_{w1} + Q_{w2} + Q_{w3} + \dots + Q_{wn}$ where Q_w is the maximum 30 day average from DMR flowrate data for the existing indirect discharger from the last 12 months of monthly DMR data.

V. Water Quality Analysis:

A. $IWC = Q_{POTW} / (Q_{POTW} + Q_{7/10})$

$$IWC = 1.725 / (1.725 + 35.55) = 0.04627$$

IWC = 4.63%; therefore, develop an acute and chronic water quality screens.

B. Acute Allowable Water Quality Criteria (AWQC) Headworks Loading Calculations:

$$AWQC, \text{ \#/day} = 8.34 (C_{\text{CRITICAL}(1)}, \text{ mg/L}) (Q_{POTW} + Q_{7/10}, \text{ MGD}) / (1 - R_{POTW(2)})$$

$$AWQC (As) = 8.34 (0.360) (1.725 + 35.55) / (1 - 0.95) = 203.48 \text{ \#/day}$$

$$AWQC (Cu) = 8.34 (0.00845) (1.725 + 35.55) / (1 - 0.95) = 55.02 \text{ \#/day}$$

$$AWQC (Cr) = 8.34 (0.311) (1.725 + 35.55) / (1 - 0.91) = 1074.24 \text{ \#/day}$$

$$AWQC (Ni) = 8.34 (0.787) (1.725 + 35.55) / (1 - 0.56) = 556.04 \text{ \#/day}$$

$$AWQC (Zn) = 8.34 (0.0636) (1.725 + 35.55) / (1 - 0.64) = 54.92 \text{ \#/day}$$

$$AWQC (Penta) = 8.34 (0.00332) (1.725 + 35.55) / (1 - 0) = 1.03 \text{ \#/day}$$

$$AWQC (Phenol) = 8.34 (0.300) (1.725 + 35.55) / (1 - 0) = 93.26 \text{ \#/day}$$

C. Chronic Allowable Water Quality Criteria (AWQC) Headworks Loading Calculations:

$$AWQC, \text{ \#/day} = 8.34 (C_{\text{CRITICAL}(1)}, \text{ mg/L}) (Q_{POTW} + Q_{7/10}, \text{ MGD}) / (1 - R_{POTW(2)})$$

$$AWQC (As) = 8.34 (0.190) (1.725 + 35.55) / (1 - 0.45) = 107.39 \text{ \#/day}$$

$$AWQC (Cu) = 8.34 (0.00628) (1.725 + 35.55) / (1 - 0.95) = 39.05 \text{ \#/day}$$

$$AWQC (Cr) = 8.34 (0.101) (1.725 + 35.55) / (1 - 0.91) = 348.87 \text{ \#/day}$$

$$AWQC (Ni) = 8.34 (0.087) (1.725 + 35.55) / (1 - 0.56) = 61.47 \text{ \#/day}$$

$$AWQC (Zn) = 8.34 (0.0581) (1.725 + 35.55) / (1 - 0.64) = 6.50 \text{ \#/day}$$

$$AWQC (Penta) = 8.34 (0.0021) (1.725 + 35.55) / (1 - 0) = 0.653 \text{ \#/day}$$

$$AWQC (Phenol) = 8.34 (0.102) (1.725 + 35.55) / (1 - 0) = 31.71 \text{ \#/day}$$

- (1) State of Mississippi Water Quality Criteria For Intrastate, Interstate and Coastal Waters...Adopted November 16, 1995 (Appendix A). Freshwater acute and chronic values.
- (2) Removal efficiencies developed by OPC from the City of Grenada toxicity data. Attachment A. For Arsenic, no removal efficiency data was available for aerated lagoons. Table 3.10 (Priority Pollutant Removal Efficiencies Through Activated Sludge Treatment) was used. For Nickel, an OPC Study document (Observed Removal Efficiency v Literature Removal Efficiency) was used for a removal efficiency value.

VI. POTW Inhibition Analysis:

A. Allowable Loading at POTW:

$$HWI_L, \text{ \#day} = 8.34 (Q_{POTW}, \text{MGD}) (C_{INHIBITION(1)}, \text{mg/L})$$

$$HWI_L, (\text{As}) = 8.34 (1.725) (0.1) = 1.44 \text{ \#day}$$

$$HWI_L, (\text{Cu}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#day}$$

$$HWI_L, (\text{Cr}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#day}$$

$$HWI_L, (\text{Ni}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#day}$$

$$HWI_L, (\text{Zn}) = 8.34 (1.725) (1.0) = 14.39 \text{ \#day}$$

$$HWI_L, (\text{Penta}) = 8.34 (1.725) (0.95) = 13.67 \text{ \#day}$$

$$HWI_L, (\text{Phenol}) = 8.34 (1.725) (50) = 719.33 \text{ \#day}$$

- (1) Inhibition concentrations from EPA Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program – Table 3-2. Activated Sludge Inhibition Threshold Levels. See Attachment A for table.

VII. Limiting Case Summary:

Parameter	HWIL	Acute AWQC	Chronic AWQC	LC If HWI < AWQC LC = HWI If AWQC < HWI LC = AWQC	X _{tt}	X _{tat}	BGL	BGL < LC (Pass/Fail)	X _{tt} < LC (Pass/Fail)	X _{tat} < LC (Pass/Fail)
	(\#/day)	(\#/day)	(\#/day)	(\#/day)	(\#/day)	(\#/day)	(\#/day)	(\#/day)	(\#/day)	(\#/day)
As	1.44	203.48	107.39	1.44	0	0.131	0.015	Pass	Pass	Pass
Cr	14.39	1074.2	348.87	14.39	0.3305	6.234	1.58	Pass	Pass	Pass
Cu	14.39	55.02	39.05	14.39	4.959	10.095	0.712	Pass	Pass	Pass
Ni	14.39	556.04	61.47	14.39	0.0415	6.906	0.229	Pass	Pass	Pass
Zn	14.39	54.92	6.5	6.5	3.007	12.744	1.9	Pass	Pass	Pass
Penta	13.67	1.03	0.653	0.653	0.4263	0.105	0	Pass	Pass	Pass
Phenol	719.33	93.26	31.71	31.71	0.0486	2.25	0	Pass	Pass	Pass

VIII. Uniform Concentration Method Based upon Total Industrial Flow for the Development of Allowable Acute and Chronic Concentrations:

The remaining industrial waste load allocation will be used in calculating allowable acute concentrations using the "Concentration Limit Method Based on Industrial Contributory Flow" method as described in the EPA Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program.

EQUATIONS:

$$P_{AI}, \text{ \#day} = (L_C, \text{ \#day} - BGL, \text{ \#day}) (Q_i, \text{MGD} / Q_T, \text{MGD})$$

$$C_{\text{ALLOW}}, \text{mg/L} = P_{\text{AI}}, \text{\#/day} / (8.34 * Q_{\text{I}}, \text{MGD})$$

Where,

P_{AI}	=	Permit Allocation for Indirect Discharger
C_{ALLOW}	=	Allowable Concentration for Indirect Discharger
Q_{I}	=	Applicant's Process Discharge
Q_{T}	=	Total Indirect Discharger Flow for Metals
L_{C}	=	Limiting Case Loading
BG_{L}	=	Background/Domestic Loading

Arsenic

Acute: $P_{\text{AI}} = (1.44 - 0.015) * (0.035 / 0.035) = 1.425 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.425 / (8.34 * 0.035) = 4.88 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (1.44 - 0.015) * (0.035 / 0.035) = 1.425 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.425 / (8.34 * 0.035) = 4.88 \text{ mg/L}$

Chromium

Acute: $P_{\text{AI}} = (14.39 - 1.58) * (0.035 / 0.379) = 1.183 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.183 / (8.34 * 0.035) = 4.05 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (14.39 - 1.58) * (0.035 / 0.379) = 1.183 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.183 / (8.34 * 0.035) = 4.05 \text{ mg/L}$

Copper

Acute: $P_{\text{AI}} = (14.39 - 0.712) * (0.035 / 0.312) = 1.534 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.534 / (8.34 * 0.035) = 5.26 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (14.39 - 0.712) * (0.035 / 0.312) = 1.534 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.534 / (8.34 * 0.035) = 5.26 \text{ mg/L}$

Nickel

Acute: $P_{\text{AI}} = (14.39 - 0.229) * (0.035 / 0.184) = 2.694 \text{ \#/day}$
 $C_{\text{ALLOW}} = 2.694 / (8.34 * 0.035) = 9.23 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (14.39 - 0.229) * (0.035 / 0.184) = 2.694 \text{ \#/day}$
 $C_{\text{ALLOW}} = 2.694 / (8.34 * 0.035) = 9.23 \text{ mg/L}$

Zinc

Acute: $P_{\text{AI}} = (6.5 - 1.9) * (0.035 / 0.277) = 0.581 \text{ \#/day}$

$$C_{\text{ALLOW}} = 0.581 / (8.34 * 0.035) = 1.99 \text{ mg/L}$$

Chronic: $P_{\text{AI}} = (6.5 - 1.9) * (0.035 / 0.277) = 0.581 \text{ \#/day}$
 $C_{\text{ALLOW}} = 0.581 / (8.34 * 0.035) = 1.99 \text{ mg/L}$

Pentachlorophenol

Acute: $P_{\text{AI}} = (1.03 - 0.0) * (0.035 / 0.035) = 1.03 \text{ \#/day}$
 $C_{\text{ALLOW}} = 1.03 / (8.34 * 0.035) = 3.53 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (0.653 - 0) * (0.035 / 0.035) = 0.653 \text{ \#/day}$
 $C_{\text{ALLOW}} = 0.653 / (8.34 * 0.035) = 2.24 \text{ mg/L}$

Phenol

Acute: $P_{\text{AI}} = (93.26 - 0.0) * (0.035 / 0.035) = 93.26 \text{ \#/day}$
 $C_{\text{ALLOW}} = 93.26 / (8.34 * 0.035) = 319.5 \text{ mg/L}$

Chronic: $P_{\text{AI}} = (31.71 - 0.0) * (0.035 / 0.035) = 31.71 \text{ \#/day}$
 $C_{\text{ALLOW}} = 31.71 / (8.34 * 0.035) = 108.6 \text{ mg/L}$

IX. SUMMARY OF ALLOWABLE LIMITATIONS AND DECISION PROCESS:

A. Allowable Limitations Table:

Parameter	Allowable Chronic Concentration Cchronic (mg/l)	Allowable Acute Concentration Cacute (mg/l)	Categorical Average Limitation (mg/l)	Categorical Maximum Limitation Ccat/max (mg/l)	Proposed Average Permit Limitation Pavg (mg/l)	Proposed Maximum Permit Limitation Pmax (mg/l)
Biochemical Oxygen Demand <u>1/</u>	---	---	---	---	240	480
Total Suspended Solids <u>1/</u>	---	---	---	---	300	600
Oil and Grease <u>2/</u>	---	---	---	100	Report	100
Arsenic <u>3/</u>	4.88	4.88	---	4	Report	0.45
Chromium <u>4/</u>	4.05	4.05	---	4	Report	4
Copper <u>4/</u>	5.26	5.26	---	5	Report	2.2
Nickel <u>5/</u>	9.23	9.23	---	---	Report	Report
Zinc <u>5/</u>	1.99	1.99	---	---	Report	Report
Pentachlorophenol <u>6/</u>	2.24	3.53	---	---	0.18	0.36
Phenol <u>6/</u>	108.6	31.71	---	---	3	6

1/ For Biochemical Oxygen Demand (BOD₅) and Total Suspended Solids (TSS), the proposed limitations will not change from the previously issued permit. Data supplied in the application supports this decision.

2/ For Oil and Grease, the proposed limitations are the Categorical Standards from 40 CFR Part 429.

3/ For Arsenic, the proposed limitations will not change from the previously issued permit. DMR data supports this decision.

4/ For Chromium and Copper, the proposed limitations will not change from the previously issued permit. DMR and application data supports this decision.

5/ For Nickel and Zinc, the proposed limitations are based on water quality. The application data submitted only represented one sampling event. Nickel (0.04 mg/l) was reported below the established water quality criteria (acute: 0.787 mg/l, chronic: 0.087 mg/l) while Zinc (1.36 mg/l) was reported above the established water quality criteria (acute: 0.0636 mg/l, chronic: 0.0581 mg/l). Based on these circumstances, both nickel and zinc will be added to the permit; both will be on a "report only" basis.

6/ For Pentachlorophenol and Phenol, the proposed limitations are will not change from the previously issued permit. The limits for both Pentachlorophenol and Phenol are less than the AWQC and HWI.

Note: Flow, pH limits, and sampling frequencies will remain unchanged from the previously issued permit. Sampling frequencies for both Nickel and Zinc will be set at Twice/Year along with other permitted heavy metals.

Attachment A

Raw WET Data from the Grenada POTW

Parameter	units	stream	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000	Removal Eff.
Arsenic (As)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005 use lit values
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Cadmium (Cd)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	<0.020 use lit values
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	<0.020
Chromium (Cr)	mg/L	Inf	<0.050	<0.050	0.19	0.35	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	calc re
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
Copper (Cu)	mg/L	Inf	<0.010	0.07	0.28	0.18	0.51	0.15	0.13	0.09	0.1	0.06	0.05	0.07	calc re
	Eff		0.04	<0.010	<0.010	<0.010	0.01	0.01	0.01	0.01	0.01	0.01	<0.010	<0.010	<0.010
Lead (Pb)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050 use lit values
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
Mercury (Hg)	mg/L	Inf	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002 use lit values
	Eff		<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
Nickel (Ni)	mg/L	Inf	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	<0.020 use lit values
	Eff		<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	<0.020
Silver (Ag)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	0.07	<0.050	<0.050	<0.005	<0.005	calc re
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.005	<0.005	<0.005
Zinc (Zn)	mg/L	Inf	0.12	0.14	0.08	0.08	0.08	0.08	0.08	0.12	0.15	0.1	0.05	0.06	calc re
	Eff		0.28	0.09	<0.020	<0.020	<0.020	0.03	<0.020	<0.020	0.02	0.15	<0.025	<0.025	<0.025
Cyanide (CN)	mg/L	Inf	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010 use lit values
	Eff		<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.01	<0.010	<0.010	<0.010

Data points used in the calculation of the removal efficiencies.
Less than values used in the calculation of the removal efficiencies were divided by 2.

Removal Efficiencies for the Grenada POTW

Parameter	units	stream	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000	Removal Eff.
Arsenic (As)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	NA
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	
Cadmium (Cd)	mg/L	Inf	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	NA
	Eff		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.020	<0.020	
Chromium (Cr)	mg/L	Inf	<0.050	<0.050	0.19	0.35	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	91%
	Eff		<0.050	<0.050	0.025	0.025	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	
Copper (Cu)	mg/L	Inf	<0.010	0.07	0.28	0.18	0.51	0.15	0.13	0.09	0.1	0.06	0.05	0.07	95%
	Eff		0.04	0.005	0.005	0.005	0.01	0.01	0.01	0.01	0.01	0.01	0.005	0.005	
Lead (Pb)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	NA
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	
Mercury (Hg)	mg/L	Inf	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	NA
	Eff		<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	
Nickel (Ni)	mg/L	Inf	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	NA
	Eff		<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.020	<0.020	
Silver (Ag)	mg/L	Inf	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	0.07	<0.050	<0.050	<0.005	<0.005	64%
	Eff		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	0.025	<0.050	<0.050	<0.005	<0.005	
Zinc (Zn)	mg/L	Inf	0.12	0.14	0.08	0.08	0.08	0.08	0.08	0.12	0.15	0.1	0.05	0.06	64%
	Eff		0.28	0.09	0.0	0.01	0.01	0.03	0.01	0.01	0.02	0.15	0.0125	0.0125	
Cyanide (CN)	mg/L	Inf	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	NA
	Eff		<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	

Data points used in the calculation of the removal efficiencies.
Less than values used in the calculation of the removal efficiencies were divided by 2.

Grenada POTW Sewer Domestic Concentrations

Parameter	units	stream	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
Arsenic (As)	mg/L	Inf	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025
		Eff	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025
Cadmium (Cd)	mg/L	Inf	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.01	0.01
		Eff	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.01	0.01
Chromium (Cr)	mg/L	Inf	0.025	0.025	0.19	0.28	0.35	0.025	0.025	0.025	0.025	0.025	0.025	0.025
		Eff	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Copper (Cu)	mg/L	Inf	0.005	0.07	0.07	0.28	0.18	0.51	0.15	0.13	0.09	0.1	0.06	0.05
		Eff	0.04	0.005	0.005	0.005	0.005	0.01	0.01	0.01	0.01	0.01	0.01	0.005
Lead (Pb)	mg/L	Inf	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
		Eff	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Mercury (Hg)	mg/L	Inf	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001
		Eff	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001
Nickel (Ni)	mg/L	Inf	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.01
		Eff	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.01
Silver (Ag)	mg/L	Inf	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.07	0.025	0.025	0.025
		Eff	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Zinc (Zn)	mg/L	Inf	0.12	0.14	0.08	0.08	0.08	0.08	0.08	0.08	0.12	0.15	0.1	0.05
		Eff	0.28	0.09	0.01	0.01	0.01	0.01	0.03	0.01	0.01	0.02	0.15	0.0125
Cyanide (CN)	mg/L	Inf	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005
		Eff	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005

Less than values used in the calculation of the domestic concentrations were divided by 2.

(See raw data for identification of original less than values.)

Facilities domestic concentrations based on influent POTW domestic concentrations only.

Background Concentration in Domestic Sewage

Arsenic

	Month	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
POTW Data													
Conc		0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025
Flow		1.592	1.592	1.743	1.743	1.781	1.781	1.825	1.825	2.167	2.167	2.800	2.800
Total Load		0.0331932	0.0331932	0.0363416	0.0363416	0.0371339	0.0371339	0.0380513	0.0380513	0.045182	0.045182	0.05838	0.05838
Koppers*													
Flow		0.014086	0.014086	0.020625	0.020625	0.019516	0.019516	0.013334	0.013334	0.015058	0.015058	No Data Available	No Data Available
Load		0	0	0	0	0	0	0	0	0	0		
Binswanger													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft ADP outfall 001													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft ADP outfall 002													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft North													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Heatcraft South													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Pennaco													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Valley Racks													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load													
Monthly Domestic Calculations:													
Domestic Load, #/d		0.0191072	0.0191072	0.0157166	0.0157166	0.0176179	0.0176179	0.0247173	0.0247173	0.030124	0.030124	0.030124	0.030124
Domestic Conc, mg/l		0.0014519	0.0014519	0.0010941	0.0010941	0.0011992	0.0011992	0.0016359	0.0016359	0.0016785	0.0016785	0.0016785	0.0016785
Domestic Average Load, #/d		0.0214566											
Domestic Average Conc, mg/l		0.0014119											

*Twice per year sampling frequency

Background Concentration in Domestic Sewage

Copper

	Month	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
POTW Data													
Conc		0.005	0.070	0.280	0.180	0.510	0.150	0.130	0.090	0.100	0.060	0.050	0.070
Flow		1.592	1.592	1.743	1.743	1.781	1.781	1.825	1.825	2.167	2.167	2.800	2.800
Total Load		0.0663864	0.9284096	4.0702536	2.6165916	7.5753054	2.228031	1.978665	1.369845	1.807278	1.0843668	1.1676	1.63464
Koppers*													
Flow		0.014086	0.014086	0.020625	0.020625	0.0348	0.0348	0.0314	0.0314	0.0298	0.0298	Flow Data Unavailable	Flow Data Unavailable
Load		0.00101	0.00101	0.00101	0.00101	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001
Blinswanger													
Flow		0.080	0.080	0.080	0.080	0.080	0.080	0.070	0.070	0.070	0.070	0.070	0.070
Load		0.120	0.120	0.230	0.230	0.620	0.620	0.490	0.490	0.490	0.490	0.130	0.130
Heatcraft ADP outfall 001													
Flow		0.023	0.023	0.01296	0.01296	0.032	0.032	0.044	0.044	0.0418	0.0418	0.036	0.036
Load		0.054	0.054	0.076	0.076	0.075	0.075	1.52	1.52	0.275	0.275	0.515	0.515
Heatcraft ADP** outfall 002													
Flow		No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	0.0003	0.0003	No Discharge	No Discharge
Load		No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	0.43	0.43	No Discharge	No Discharge
Heatcraft North													
Flow***		0.0273	0.0273	0.0235	0.0235	0.028	0.028	0.0297	0.0297	0.03	0.03	0.0298	0.0298
Load		0.169	0.169	0.135	0.135	0.169	0.169	0.137	0.137	0.401	0.401	0.196	0.196
Heatcraft South													
Flow***		0.208	0.208	0.156	0.156	0.201	0.201	0.2049	0.2049	0.196	0.196	0.2048	0.2048
Load		0.19	0.19	0.26	0.26	0.27	0.27	0.41	0.41	0.17	0.17	0.15	0.15
Pennaco													
Flow		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Valley Racks													
Flow		No Data Available	No Data Available	No Data Available	No Data Available	0.0011	0.0011	0.0011	0.0011	No Discharge	No Discharge	0.0011	0.0011
Load		No Data Available	No Data Available	No Data Available	No Data Available	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001
Monthly Domestic Calculations:													
Domestic Load, #/d		-0.468	0.395	3.368	1.915	6.439	1.092	-0.580	-1.189	0.040	-0.683	0.176	0.643
Domestic Conc, mg/l		-0.0452318	0.0382458	0.2785447	0.1563308	0.5498497	0.0932461	-0.048189	-0.0987428	0.0026839	-0.0454877	0.0085611	0.0313309
Domestic Average Load, #/d													
Domestic Average Conc, mg/l		1.759	0.1450994										

* Twice per year frequency

** Batch process

***Max flow reported only

Note: Negative values not used in calculating domestic average load and concentration values.

Background Concentration in Domestic Sewage

Chromium

Month	11/08/1999	11/09/1999	12/06/1999	12/07/1999	01/04/2000	01/05/2000	02/02/2000	02/07/2000	03/06/2000	03/07/2000	04/18/2000	04/19/2000
POTW Data												
Conc	0.025	0.025	0.190	0.350	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
Flow	1.592	1.592	1.743	1.743	1.781	1.825	1.825	1.825	2.167	2.167	2.800	2.800
Total Load	0.331932	0.331932	2.7619578	5.087817	0.3713385	0.3713385	0.3805125	0.3805125	0.4518195	0.4518195	0.5838	0.5838
Koppers												
Flow	0	0	0	0	0	0	0	0	0	0	0	0
Load												
Binswanger*												
Flow												
Load												
Heatcraft ADP outfall 001												
Flow	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load												
Heatcraft ADP outfall 002												
Flow	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Load												
Heatcraft North												
Flow**	0.0273	0.0273	0.0235	0.0235	0.028	0.028	0.0297	0.0297	0.03	0.03	0.0298	0.0298
Load	0.0045	0.0045	0.0045	0.0045	0.0005	0.0005	0.004	0.004	0.005	0.005	0.002	0.002
Heatcraft South												
Flow**	0.208	0.208	0.156	0.156	0.201	0.201	0.2049	0.2049	0.196	0.196	0.2048	0.2048
Load	0.035	0.035	0.03	0.03	0.035	0.035	0.045	0.045	0.035	0.035	0.025	0.025
Pennaco												
Flow	0.046	0.046	0.064	0.064	0.089	0.089	0.075	0.075	0.071	0.071	0.087	0.087
Load	0.08	0.08	0.18	0.18	0.08	0.08	0.12	0.12	0.11	0.11	0.16	0.16
Valley Racks***												
Flow	No Data Available	No Data Available	No Data Available	No Data Available	0.0011	0.0011	0.0011	0.0011	No Discharge	No Discharge	0.0011	0.0011
Load					0.0005	0.0005	0.0005	0.0005			0.0005	0.0005
Monthly Domestic Calculations:												
Domestic Load, #/d	0.212	0.212	2.547	4.873	0.255	0.255	0.211	0.211	0.302	0.302	0.396	0.396
Domestic Conc, mg/l	0.0194335	0.0194335	0.2037016	0.3896836	0.0209427	0.0209427	0.0167082	0.0167082	0.0193526	0.0193526	0.0191814	0.0191814
Domestic Average Load, #/d												
Domestic Average Conc, mg/l	0.848	0.848										

* Twice per year frequency

**Maximum flow reported only

*** 1-6/00 7-12/00 reported as NOBI

TABLE 3-13. TYPICAL DOMESTIC WASTEWATER LEVELS*

<u>Pollutant</u>	<u>Concentration, mg/l</u>
Cadmium	0.003
Chromium	0.05
Copper	0.061
Lead	0.049
Nickel	0.021
Zinc	0.175
Arsenic	0.003
Mercury	0.0003
Silver	0.005
Cyanide	0.041

*From "Assessment of the Impacts of Industrial Discharges on Publicly Owned Treatment Works, Appendices," prepared by JRB Associates for the U.S. Environmental Protection Agency, November 1981, p. C-38.

TABLE 3-10. PRIORITY POLLUTANT REMOVAL EFFICIENCIES THROUGH ACTIVATED SLUDGE TREATMENT*

<u>Metals/Nonmetal Inorganics**</u>	<u>Range</u>	<u>Second Decile</u>	<u>Median</u>	<u>Eighth Decile</u>	<u>No. of POTWs with Removal Data</u>
Cadmium	25-99	33	67	91	19 of 26
Chromium	25-97	68	82	91	25 of 26
Copper	2-99	67	86	95	26 of 26
Lead	1-92	39	61	76	23 of 26
Nickel	2-99	25	42	62	23 of 26
Zinc	23-99	64	79	88	26 of 26
Arsenic	11-78	31	45	53	5 of 26
Mercury	1-95	50	60	79	20 of 26
Selenium	25-89	33	50	67	4 of 26
Silver	17-95	50	75	88	24 of 26
Cyanide	3-99	41	69	84	25 of 26
<u>Organics**</u>					
Benzene	25-99	50	80	96	18 of 26
Chloroform	17-99	50	67	83	24 of 26
1,2-trans-Dichloroethylene	17-99	50	67	91	17 of 26
Ethylbenzene	25-99	67	86	97	25 of 26
Methylene chloride	2-99	36	62	77	26 of 26
Tetrachloroethylene	15-99	50	80	93	26 of 26
Toluene	25-99	80	93	98	26 of 26
1,1,1-Trichloroethane	18-99	75	85	94	23 of 26
Trichloroethylene	20-99	75	89	98	25 of 26
Anthracene	29-99	44	67	91	5 of 26
Bis (2-ethylhexyl) phthalate	17-99	47	72	87	25 of 26
Butyl benzyl phthalate	25-99	50	67	92	16 of 26
Di-n-butyl phthalate	11-97	39	64	87	19 of 26
Diethyl phthalate	17-98	39	62	90	15 of 26
Napthalene	25-98	40	78	90	16 of 26
Phenanthrene	29-99	37	68	86	6 of 26
Phenol	3-99	75	90	98	19 of 26
Pyrene	73-95	76	86	95	2 of 26

*Pollutant removals between POTW influent and secondary effluent (including secondary clarification). Based on a computer analysis of POTW removal efficiency data, (derived from actual POTW influent and effluent sampling data) provided in Fate of Priority Pollutants in Publicly Owned Treatment Works, Volume II, (EPA 440/1-82/303), U.S. Environmental Protection Agency, Washington, D.C., September 1982.

**For the purpose of deriving removal efficiencies, effluent levels reported as below detection were set equal to the reported detection limits. All secondary activated sludge treatment plants sampled as part of the study were considered.