

GRENADA COUNTY - TIE PLANT MS
KOPPERS INC
0960-00012
2008-----

AI 00876

enSearch[home](#) [login](#)**Koppers Inc**[MASTERFILE](#)[RELATED](#)[STATUS](#)[ATTACHMENTS](#)[TASKS](#)

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

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

Telecom Type	Address or Phone
Work Phone Number	(662) 226-4584, Ext. 11

Alt ID	Alt Name	Alt Type	Start Date	End Date
2804300012	Koppers, Inc.	Air-AIRS AFS	10/12/2000	
876	Koppers Inc Grenada Plant	Air-Notification	05/23/2008	
096000012	Koppers, Inc.	Air-Title V Fee Customer	12/11/2006	
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	03/26/2007
096000012	Koppers, Inc.	Air-Title V Operating	03/26/2007	01/01/2009
MSR220005	Koppers Industries, Inc.	GP-Wood Treating	09/25/1992	
MSD007027543	Koppers Industries, Inc.	Hazardous Waste-EPA ID	08/27/1999	01/23/2007
MSD007027543	Koppers, Inc.	Hazardous Waste-EPA ID	01/23/2007	
HW8854301	Koppers Industries, Inc.	Hazardous Waste-TSD	06/28/1988	06/28/1998
HW8854301	Koppers Industries, Inc.	Hazardous Waste-TSD	11/10/1999	03/26/2007
HW8854301	Koppers, Inc. (Owner)	Hazardous Waste-TSD	03/26/2007	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
MSP090300	Koppers, Inc.	Water - Pretreatment	03/26/2007	02/28/2012
MSU081080	Koppers Industries, Inc.	Water - SOP	11/09/1981	11/30/1985

Program	SubProgram	Start Date	End Date

Air	Title V - major	12/11/2006	
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	
Water	PT CIU - Timber Products Processing (Subpart 429)	11/14/1995	
Water	PT SIU	11/14/1995	

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 Google Maps MapQuest

10/28/2008 1:32:20 PM

Mississippi Department of Environmental Quality
Office of Pollution Control
Air Stack Test Review Report

SITE NAME: Koppers Inc
Timber and Wood Products Branch

FILE COPY

AFS ID: 2804300012

AIR PERMIT NO: 0960-00012

COUNTY: Grenada

ISSUED: 10/28/2009

MODIFIED:

EXPIRES: 09/30/2014

PHYSICAL ADDRESS

1 Koppers Drive

MAILING ADDRESS

PO Box 160

Tie Plant, MS 38960

Tie Plant, MS 38960

CMS SOURCE CATEGORY: Major - A

ECED CONTACT: Trayce Moore-Thomas

DATE REVIEWED: 06/09/2010

STACK TESTING FIRM: Environmental Monitoring Laboratories

OFFICIAL SIGNING / SUBMITTING REPORT:

NAME: Marcus C. Smith

TITLE: Plant Manager

Stack test report contains emission data not evaluated (i.e. No Requirement to test): No

Were any findings and/or recommendations relayed to the facility during the compliance evaluation?

No If yes, describe:

COMMENTS:

The average heat input for the test was 28.96. The facility stated in the testing protocol that their maximum rated capacity for the boiler is normally less than the 60 MMBTU that is listed in the description for the boiler. There maximum is based upon previous test results for the unit which indicate the boiler operates at approximately 30 MMBTUH.



**Mississippi Department of Environmental Quality
Office of Pollution Control**

Air Compliance Evaluation Report
Semi-Annual Monitoring Report (2S-09)

Site Name: Koppers Inc
Timber and Wood Products Branch

FILE COPY

AFS ID: 2804300012

Air Permit No.: 0960-00012

{Iss./Mod. Date: 10/28/09

Exp. Date: 9/30/14}

Physical Address

1 Koppers Drive
Tie Plant, MS 38960
Grenada County

Mailing Address

PO Box 160
Tie Plant, Mississippi 38960

Facility Contact: Marcus Smith

Facility Phone No.: 662-226-4584

CMS Source Category: Major - A

ECED Contact: Trayce Moore-Thomas

Compliance Evaluation Activity Type: Semiannual Monitoring Report - PX

Date Due: 1/31/10

Date Received: 1/7/10

Date Reviewed: 3/1/10

Date Observed: N/A

Date Performed: N/A

Official Signing/Submitting Report:

Name: Marcus C. Smith

Title: Plant Manager

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

SIP



PSD



NSPS



NESHAPS



MACT



Subparts: 60-Kb

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

EVALUATION OF FACILITY SUBMITTAL/REPORT

Criteria	Rating	Comments
Timeliness	Yes	
Completeness	Yes	
Methodology/Basis	Satisfactory	
Compliance w/Permit Reqs	Compliant	

**Mississippi Department of Environmental Quality
Office of Pollution Control**

Air Full Compliance Evaluation (FCE) Summary Report

SITE NAME: Koppers Inc
Timber and Wood Products Branch

FILE COPY

AFS ID: 2804300012

AIR PERMIT NO: 0960-00012

COUNTY: Grenada

ISSUED: 10/28/2009

MODIFIED:

EXPIRES: 09/30/2014

PHYSICAL ADDRESS

1 Koppers Drive

MAILING ADDRESS

PO Box 160

Tie Plant, MS 38960

Tie Plant, MS 38960

FACILITY CONTACT: Marcus C. Smith

FACILITY PHONE NO.: 662-226-4584

CMS SOURCE CATEGORY: Major - A

ECED CONTACT: Trayce Moore-Thomas

COMPLIANCE EVALUATION ACTIVITY TYPE: FCE Onsite

DATE FCE COMPLETED: 03/01/2010

AIR PROGRAMS: SIP, TITLE V

SUBPARTS:

COMPLIANCE ASSISTANCE PROVIDED: No If yes, describe:

COMMENTS:

None

Compliance Evaluation Activity

ACTIVITY	RECEIVED	REVIEWED	MON. START	MON. END	FOLDER
ACC	02/01/2010	02/22/2010	01/01/2009	12/31/2009	ACE20030001
Stack Test Review	01/22/2009	11/23/2009			STE20090001
Semi-Annual Monitoring Report	01/17/2010	03/01/2010	07/01/2009	12/31/2009	ACE20030001
Semi-Annual Monitoring Report	07/15/2009	11/12/2009	01/01/2009	06/30/2009	ACE20030001

**Mississippi Department of Environmental Quality
Office of Pollution Control**

Title V Annual Certification of Compliance Review Report

SITE NAME: Koppers Inc
Timber and Wood Products Branch

AFS ID: 2804300012

AIR PERMIT NO: 0960-00012

COUNTY: Grenada

ISSUED: 10/28/2009

MODIFIED:

EXPIRES: 09/30/2014

FILE COPY

PHYSICAL ADDRESS

1 Koppers Drive

Tie Plant, MS 38960

MAILING ADDRESS

PO Box 160

Tie Plant, MS 38960

FACILITY CONTACT: Marcus Smith

FACILITY PHONE NO.: 662-226-4584

CMS SOURCE CATEGORY: Major - A

ECED CONTACT:

Trayce Moore-
Thomas

COMPLIANCE EVALUATION ACTIVITY TYPE: ACC Review

REVIEW PERIOD: 01/01/2009 - 12/31/2009

DATE DUE: 01/31/2010

DATE REVIEWED: 02/22/2010

DATE RECEIVED: 02/01/2010

OFFICIAL SIGNING / SUBMITTING REPORT:

NAME: Marcus C. Smith

TITLE: Plant Manager

AIR PROGRAMS: SIP, TITLE V

SUBPARTS:

ECED DETERMINED COMPLIANCE STATUS: Compliant - MC



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

Site Name: Koppers Inc
Timber and Wood Products Branch

Permit Number(s): Air-Title V Operating Permit No. 0960-00012

AFS ID: 2804300012

Physical Address

1 Koppers Drive
Tie Plant, MS 38960

Grenada County

Mailing Address

PO Box 160
Tie Plant, Mississippi 38960

Evaluation Type: Compliance Evaluation Inspection - Title V

Date of Evaluation: 12/16/2009

Inspection Participants: Trayce Moore-Thomas, MDEQ
Marcus Smith, Koppers

Air Program(s)	Subpart(s)
SIP	

Purpose of Inspection

The purpose of this inspection was to determine Koppers' compliance status with the requirements outlined in their Air-Title V permit.

Permit Status

Koppers currently holds an Air-Title V permit which was issued October 28, 2009 and will expire September 30, 2014.

Facility Description

Koppers manufactures treated poles and bridge timbers for hardwoods (oak, gum, hickory, pecan, and ash). The average production rate is 12,000 cubic feet per day with 60% of that being poles and 40% bridge timbers and ties. The facility currently employees 56 people total.

Inspection Summary

I met with Mr. Marcus Smith and Mr. Blair Simpson during the inspection. They accompanied me throughout the inspection and assisted with the records review.

Photos / Other Attachments



Photo #1: Wood treating Area



Photo #2: Wood treatment cylinders are protected to limit dust and rain in the area

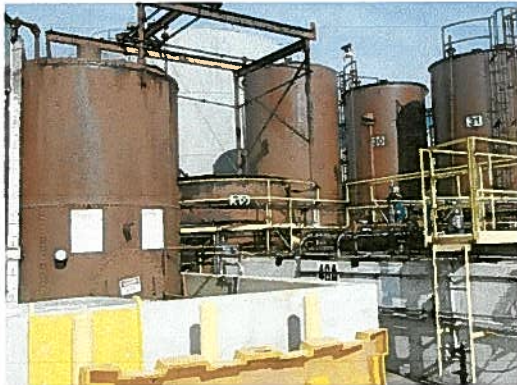


Photo # 3: Wood treatment chemicals storage tanks

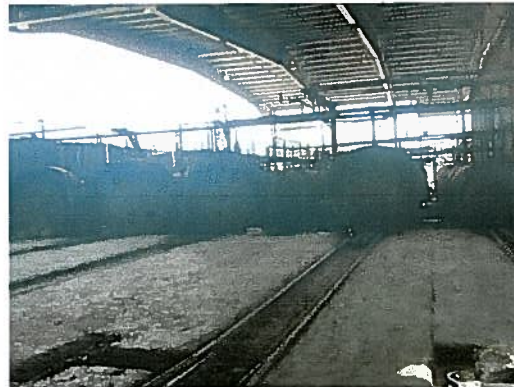


Photo #4: Wood treating cylinders

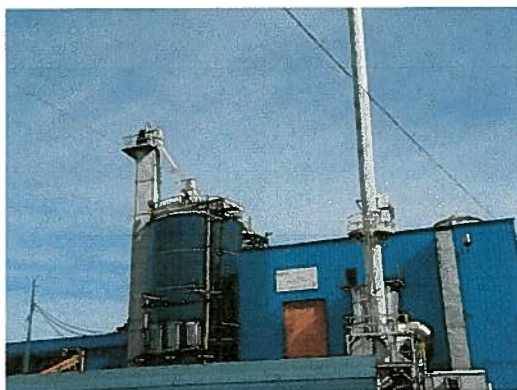


Photo #5: Wood waste boiler



Photo #6: Wood waste fuel piles



Photo #7: Log debarking area



Photo #8: Ties and timbers storage yard

Mississippi Department of Environmental Quality
Office of Pollution Control
Air Stack Test Review Report

FILE COPY

SITE NAME: Koppers Inc.
Timber and Wood Products Branch

AFS ID: 2804300012

AIR PERMIT NO: 0960-00012

COUNTY: Grenada

ISSUED: 01/13/2004

MODIFIED: 03/26/2007

EXPIRES: 01/01/2009

PHYSICAL ADDRESS

1 Koppers Drive

MAILING ADDRESS

PO Box 160

Tie Plant, MS 38960

Tie Plant, MS 38960

CMS SOURCE CATEGORY: Major - A

ECED CONTACT: Trayce Moore-Thomas

DATE REVIEWED: 11/23/2009

STACK TESTING FIRM: Environmental Monitoring Laboratories

OFFICIAL SIGNING / SUBMITTING REPORT:

NAME: Marcus C. Smith

TITLE: Plant Manager

Stack test report contains emission data not evaluated (i.e. No Requirement to test): No

Were any findings and/or recommendations relayed to the facility during the compliance evaluation?

No If yes, describe:

COMMENTS:

None



**Mississippi Department of Environmental Quality
Office of Pollution Control**

Air Compliance Evaluation Report
Semi-Annual Monitoring Report (1S-09)

Site Name: Koppers Inc
Timber and Wood Products Branch

FILE COPY

AFS ID: 2804300012

Air Permit No.: ~~0960-00012~~ {Iss./Mod. Date: 1/13/04; 3/26/07 Exp. Date: 1/1/09}

Physical Address

1 Koppers Drive
Tie Plant, MS 38960
Grenada County

Mailing Address

PO Box 160
Tie Plant, Mississippi 38960

Facility Contact: Kevin Coker
Facility Phone No.: 662-226-4584

CMS Source Category: Major - A
ECED Contact: Trayce Moore-Thomas

Compliance Evaluation Activity Type: Semiannual Monitoring Report - PX
Semiannual Monitoring Report - PX

Date Due: 7/31/09
Date Received: 7/15/09

Date Reviewed: 11/12/09
Date Observed: N/A
Date Performed: N/A

Official Signing/Submitting Report:

Name: Marcus C. Smith

Title: Plant Manager

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

SIP



PSD



NSPS



NESHAPS



MACT



Subparts: 60-Kb

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

EVALUATION OF FACILITY SUBMITTAL/REPORT

Criteria	Rating	Comments
Timeliness	Yes	
Completeness	Yes	
Methodology/Basis	Satisfactory	
Compliance w/Permit Reqts	Compliant	



Mississippi Department of Environmental Quality
Office of Pollution Control

Air Compliance Evaluation Report
Semi-Annual Monitoring Report (2S-08)

FILE COPY

Site Name: Koppers Inc
Timber and Wood Products Branch

AFS ID: 2804300012

Air Permit No.: 0960-00012 {Iss./Mod. Date: 1/13/04; 3/26/07 Exp. Date: 1/1/09}

Physical Address

1 Koppers Drive
Tie Plant, MS 38960
Grenada County

Mailing Address

PO Box 160
Tie Plant, Mississippi 38960

Facility Contact: Kevin Coker
Facility Phone No.: 662-226-4584

CMS Source Category: Major - A
ECED Contact: Trayce Moore-Thomas

Compliance Evaluation Activity Type: Semiannual Monitoring Report - PX

Date Due: 1/31/09

Date Received: 1/28/09

Date Reviewed: 6/5/09

Date Observed: N/A

Date Performed: N/A

Official Signing/Submitting Report:

Name: Marcus C. Smith

Title: Plant Manager

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

SIP ☒
PSD ☐
NSPS ☒

NESHAPS ☐
MACT ☐
Subparts: 60-Kb

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

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

**Mississippi Department of Environmental Quality
Office of Pollution Control**

Title V Annual Certification of Compliance Review Report

SITE NAME: Koppers Inc.
Timber and Wood Products Branch

FILE COPY

AFS ID: 2804300012

AIR PERMIT NO: 0960-00012

COUNTY: Grenada

ISSUED: 01/13/2004

MODIFIED: 03/26/2007

EXPIRES: 01/01/2009

PHYSICAL ADDRESS

1 Koppers Drive

MAILING ADDRESS

PO Box 160

Tie Plant, MS 38960

Tie Plant, MS 38960

FACILITY CONTACT: Kevin Coker

CMS SOURCE CATEGORY: Major - A

FACILITY PHONE NO.: 662-226-4584

ECED CONTACT: Trayce Moore-Thomas

COMPLIANCE EVALUATION ACTIVITY TYPE: ACC Review

REVIEW PERIOD: 01/01/2008 - 12/31/2008

DATE DUE: 01/31/2009

DATE REVIEWED: 06/05/2009

DATE RECEIVED: 01/28/2009

OFFICIAL SIGNING / SUBMITTING REPORT:

NAME: Marcus C Smith

TITLE: Plant Manager

AIR PROGRAMS: MACT, NSPS, SIP, TITLE V

SUBPARTS: NSPS KB

ECED DETERMINED COMPLIANCE STATUS: Compliant - MC

**Mississippi Department of Environmental Quality
Office of Pollution Control**

FILE COPY

Air Full Compliance Evaluation (FCE) Summary Report

SITE NAME: Koppers Inc
Energy and Transportation Branch

AFS ID: 2804300012
AIR PERMIT NO: 0960-00012
COUNTY: Grenada

ISSUED: 01/13/2004
MODIFIED:
EXPIRES: 01/01/2009

PHYSICAL ADDRESS
1 Koppers Drive

MAILING ADDRESS
PO Box 160

Tie Plant, MS 38960

Tie Plant, MS 38960

FACILITY CONTACT: Mr. Kevin Coker, SH&E
Supervisor
FACILITY PHONE NO.: 662-226-4584

CMS SOURCE CATEGORY: Major - A
ECED CONTACT: Philip LaBarre

COMPLIANCE EVALUATION ACTIVITY TYPE: FCE Onsite
DATE FCE COMPLETED: 05/27/2008

AIR PROGRAMS: MACT, NSPS, SIP, TITLE V
SUBPARTS: NSPS KB

COMPLIANCE ASSISTANCE PROVIDED: No If yes, describe:

COMMENTS:
None.

Compliance Evaluation Activity

ACTIVITY	RECEIVED	REVIEWED	MON. START	MON. END	FOLDER
ACC	01/30/2008	04/11/2008	01/01/2007	12/31/2007	ACE20030001
Stack Test Review	01/03/2007	01/05/2007			STE20060001
Semi-Annual Monitoring Reports	01/17/2008	04/11/2008	07/01/2007	12/31/2007	ACE20030001
Semi-Annual Monitoring Reports	07/25/2007	08/10/2007	01/01/2007	06/30/2007	ACE20030001

**Mississippi Department of Environmental Quality
Office of Pollution Control**

FILE COPY

Air Full Compliance Evaluation (FCE) Summary Report

On-Site Compliance Evaluation Activity

ACTIVITY	CONDUCTED	FOLDER
On-Site Inspection	03/25/2008	INS20080003

Air Enforcement Actions

ACTIVITY	ISSUED	FOLDER
No air enforcement actions during evaluation period		Not Applicable

SIGNATURE:

J. Dwayne Hendrix

DATE:

6-23-08



**Mississippi Department of Environmental Quality
Office of Pollution Control
Air Compliance Inspection Report**

Site Name: Koppers Inc
Energy and Transportation Branch

Permit Number: Air-Title V Operating 096000012

Physical Address

1 Koppers Drive
Tie Plant, MS 38960
Grenada County

Mailing Address

PO Box 160
Tie Plant, Mississippi 38960

AFS Compliance Code: State Compliance Inspection - 27

Completed Date: 3/25/2008 10:05:00 AM

AFS ID: 2804300012

Inspector: Philip LaBarre

SIC 1: 2491

Air Facility Type: Title V

Region: NRO

Person Contacted:

Areas Evaluated

S PERMIT ACCURACY
S RECORD KEEPING
S SITE REVIEW
N VISIBLE EMISSION EVALUATION
S OPACITY OBSERVED
S REPORTING
S MONITORING
S OPERATION AND MAINTENANCE

S-Satisfactory M-Marginal

U-Unsatisfactory N-Not Evaluated

Air Program: (Check applicable program(s))

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

COMMENTS: Facility was inspected on March 25, 2008. The environmental contact was Mr. Kevin Coker, SH&E Supervisor, for Koppers Inc.

Five years of air records were made available upon request. The subsequent review of those records revealed no apparent violations. Details of that review are listed below.

The Title V permit was transferred from Koppers Industries Inc. to Koppers Inc. in April of 2007 and expires January 1, 2009. The need for Koppers to submit a renewal application at least 180 days prior to the expiration date of the permit was discussed. Mr. Coker was aware of this and has been working towards that goal. He noted that some recent tank evaluations revealed some minor discrepancies in tank volumes and that he had informed DEQ of this already. He also said one tank would need a contents change.

Another change is that Emission Point AA-002, an oil fired Murray boiler, was removed and replaced with a natural gas fired boiler. Mr. Coker said the change took place just before he arrived at the plant in the Fall of 2004 and was approved by MDEQ.

Permit Condition 4.2 – the facility has submitted the ACCs as required.

Permit Condition 5.A.4 - the facility has submitted the SMRs as required.

Permit Condition 5.B.1 – Emission Point AA-001, the Wellons wood-fired boiler. The permittee shall record the time and duration of any opacity excursions and the corrective actions taken. The facility uses a CEMS and continuous recorder to comply with this requirement. It appeared all excursions were noted with an explanation provided.

Permit Condition 5.B.2 - Emission Point AA-003, Ref. No. 9, the 29,786 gallon #4 Work Tank containing creosote and subject to NSPS Subpart Kb, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records are required to be kept for the life of the source. (Ref.: 40 CFR 60.116b(a) & (b)). The analysis was available.

Permit Condition 5.B.3 – Emission Point AA-001 - The permittee shall keep a record of the woodwaste feed rate and the office wastepaper as specified in 5.A.3. This is monitored by recording wood feed auger RPMs on an hourly basis. These records were being kept and appeared to meet the requirements of this condition. The chart of Specific Monitoring and Recordkeeping Requirements found at the beginning of Section 5.B appears to have a misprint. It references this requirement as 5.B.4.

Permit Condition 5.B.4 – Emission Point AA-001 – the permit appears to have a misprint – see 5.B.3 above for details.

The facility is also required to stack test Emission point AA-001. They have complied with this requirement. They have also made a request to stack test earlier than stated in their permit to help with their renewal application submittal. The request was granted by EPD. The following is an excerpt from a 502.B.10 letter Scott Hodges wrote the company on November 13, 2007:

“Additionally, the letter requested approval for modification of the permitted stack testing schedule for the facility. The request was to allow the facility to perform stack testing in the 1st or 2nd quarter of 2008 rather than the 4th quarter of 2008. It is our interpretation of the permit that the facility is allowed to do the biennial stack test earlier than scheduled in the permit. However, this would require the subsequent testing to be moved up as well. Considering this will be the last testing cycle prior to renewal of the permit, the

subsequent testing schedule could be addressed at renewal of the permit. Therefore, we believe the request can also be allowed without requiring a change to the facility's TVOP."

Another requirement found in the Chart is for AA-002 and relates to monitoring and recordkeeping for fuel oil sulfur content. This unit has been removed as described above.

Permit Condition 5.C.1 - Emission Point AA-001, the permittee shall submit a report with the time and duration of any opacity excursions and the corrective actions taken as specified in 5.A.4. These reports have been submitted and appear to meet the requirements of this condition.

Permit Condition 5.C.2 - Emission Point AA-002, the permittee shall submit a report certifying the fuel sulfur content of the fuel oil as specified in 5.A.4. As noted above AA-002 was taken out of service in 2004 and has been replaced with a natural gas fired unit. The new unit did not operate in 2007.

The facility site tour did not reveal any other air emissions issues and there were no visible emissions observed during the inspection.

Signature:

J. Dwayne Headrick

Date:

5-5-08



Mississippi Department of Environmental Quality
Office of Pollution Control

Air Compliance Evaluation Report

FILE COPY

Site Name: Koppers Inc
Energy and Transportation Branch

AFS ID: 2804300012

Air Permit No.: 0960-00012 Iss./Mod. Date: 01-13-04/03-26-07 Exp. Date: 01-01-09

Physical Address

1 Koppers Drive
Tie Plant, MS 38960
Grenada County

Mailing Address

PO Box 160
Tie Plant, Mississippi 38960

Facility Contact: Mr. Kevin B. Coker

Facility Phone No.: 662-226-4584

CMS Source Category: Major - A

ECED Contact: Dewayne Headrick
Philip LaBarre

Compliance Evaluation Activity Type: Semiannual Monitoring Report - PX

Date Due: 01-31-08

Date Received: 01-17-08

Date Reviewed: 04-11-08

Date Observed: N/A

Date Performed: N/A

Official Signing/Submitting Report:

Name: Vance R. Haskins Title Plant Manager

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

SIP ☒

PSD ☐

NSPS ☒

NESHAPS ☐

MACT ☒

Subparts: _____

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

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



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

FILE COPY

Compliance Assistance Provided: No If yes, describe:

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

Were any findings and/or recommendations relayed to the facility during the compliance evaluation: No If yes, describe:

Comments: None.

Signature:

J. Dwayne Head **Date:** *4-14-08*

**Mississippi Department of Environmental Quality
Office of Pollution Control**

FILE COPY

Title V Annual Certification of Compliance Review Report

SITE NAME: Koppers Inc
Energy and Transportation Branch

AFS ID: 2804300012

AIR PERMIT NO: 0960-00012

COUNTY: Grenada

ISSUED: 01/13/2004

MODIFIED: 03/26/2007

EXPIRES: 01/01/2009

PHYSICAL ADDRESS

1 Koppers Drive

MAILING ADDRESS

PO Box 160

Tie Plant, MS 38960

Tie Plant, MS 38960

FACILITY CONTACT: Mr. Kevin Coker, SH&E
Supervisor

CMS SOURCE CATEGORY: Major - A

FACILITY PHONE NO.: 662-226-4584 ext38

ECED CONTACT: Philip LaBarre

COMPLIANCE EVALUATION ACTIVITY TYPE: ACC Review

REVIEW PERIOD: 01/01/2007 - 12/31/2007

DATE DUE: 01/31/2008

DATE REVIEWED: 04/11/2008

DATE RECEIVED: 01/30/2008

OFFICIAL SIGNING / SUBMITTING REPORT:

NAME: Mr. Vance R. Haskin

TITLE: Plant Manager

AIR PROGRAMS: MACT, NSPS, SIP, TITLE V

SUBPARTS: NSPS KB

ECED DETERMINED COMPLIANCE STATUS: Compliant - MC

Agency Interest No.: 876

Mississippi Department of Environmental Quality
Office of Pollution Control

FILE COPY

Title V Annual Certification of Compliance Review Report

EVALUATION OF FACILITY SUBMITTAL/REPORT

CRITERIA	RATING	COMMENTS
TIMELINESS	Yes	
COMPLETENESS	Yes	
METHODOLOGY/BASIS	Satisfactory	
COMPLIANCE W/PERMIT REQTS	Compliant	

COMPLIANCE ASSISTANCE PROVIDED: No If yes, please describe:

WERE ANY FINDINGS AND/OR RECOMMENDATIONS RELAYED TO THE FACILITY DURING THE COMPLIANCE EVALUATION: No If yes, please describe:

COMMENTS:

None.

SIGNATURE:

J. Darwyn Hood

DATE:

4-14-08

Marcus C. Smith
Plant Manager



RECEIVED

FEB 1 2010

Dept of Environmental Quality
Office of Pollution Control

January 29, 2010

Ms. Trayce Moore - Thomas
Timber And Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, Mississippi 39225-2261

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



CERTIFIED MAIL NO.: 7008 1140 0001 0773 4506

Subject: 2009 Title V Air Permit Compliance Certification
Title V Permit No. 0960-00012
Koppers Inc., Grenada, MS

Dear Mrs. Thomas:

Attached is a copy of the 2009 Title V Air Permit Compliance Certification corresponding to Title V Permit No. 0960-00012. Should you have any questions please call.

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.

A handwritten signature in black ink that reads 'Marcus C. Smith'.

Marcus C. Smith
Plant Manager

Date: 01 / 29 / 2010

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

Sincerely,

Marcus C. Smith
Plant Manager

Enclosure

CC: Joyce Fankulewski – KI - CSG
Ms. Rosalyn D. Hughes – USEPA Region 4

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 1. GENERAL CONDITIONS				
1.1	1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)	Yes	Intermittent	Instances of deviations were submitted at the time of occurrence and/or biannual reports and/or the annual Certification of Compliance as appropriate.
1.2	1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)	Yes	Continuous	No enforcement actions were taken by the MDEQ.
1.3	1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)	Yes	Intermittent	Compliance with Permit conditions was sustained.
1.4	1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)	Yes	Continuous	No actions involving property rights have occurred.
1.5	1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)	Yes	Continuous	An April 1, 2009 letter from MDEQ was received by the Plant in regard to 2008 AERF information. Requested information was submitted on June 24, 2009 by Certified Mail No. 7008 1140 0001 0773 4995. An April 29, 2009 letter from MDEQ was received by the Plant in regard to 2008 CERR Emissions Request. Requested information was submitted on June 24, 2009 by Certified Mail No. 7008 1140 0001 0773 4988. An April 30, 2009 letter from MDEQ was received by the Plant in regard to Subpart QQQQQQ information. Response was submitted by email on May 6, 2009.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	SECTION 1. GENERAL CONDITIONS			
1.6	1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section II.A.5.)	YES	CONTINUOUS	No action by Koppers is necessary
1.7	1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6. (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or	YES	INTERMITTENT	Emission Fee Request was paid to the MDEQ on July 31, 2009. An estimate of actual emissions was used as the basis for the fee.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	<p>other approaches such engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)</p> <p>(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)</p> <p>(c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)</p>			

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	SECTION 1. GENERAL CONDITIONS (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)			
1.8	1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)	Yes	Continuous	No Permit revisions of this nature have been requested by Koppers
1.9	1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)	Yes	Intermittent	Although they were submitted in a timely manner, inadvertently certification statements were not included on the correspondences listed below: January 12, 2009 – Response to Requested information (Certified Mail No. 7001 1140 0000 0205 4324) June 24, 2009 – AERF Submittal (Certified Mail No. 7008 1140 0001 0773 4995). June 24, 2009 – CERR Submittal (Certified Mail No. 7008 1140 0001 0773 4988) A May 6, 2009 Subpart QQQQQQ information request was submitted by email. Comments on July 31, 2009 and August 14, 2009 regarding a draft Title V Permit were submitted by email.
1.10	1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:	Yes	Intermittent	A Multimedia inspection was conducted by MDEQ on December 16, 2009.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit; (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit; (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)			
1.11	1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))	Yes	Continuous	All necessary sampling ports are installed
1.12	1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9 (b))	Yes	Continuous	All necessary sampling ports are installed
1.13	1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)	Yes	Continuous	Plant records

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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1.14	<p>SECTION 1. GENERAL CONDITIONS</p> <p>1.14 Nothing in this permit shall alter or affect the following:</p> <p>(a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;</p> <p>(b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;</p> <p>(c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.</p> <p>(d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)</p>	Yes	Continuous	No action required of Koppers during 2009
1.15	1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(f) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)	Yes	Continuous	Not applicable under CAA Section 112 [r] (7)(B)(II)
1.16	1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and	Yes	Continuous	<p>A Title V Permit was issued on January 29, 2004 which was set to expire on January 1, 2009.</p> <p>A permit renewal application was submitted on June 25, 2008 which was more than 180 days prior to expiration.</p> <p>A new Title V Permit was issued by MDEQ to Koppers on October 28, 2009.</p>

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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1.17	<p>Section II.A.1.c.)</p> <p>1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref. Section 502(b)(10) of the Act) if:</p> <p>(a) the changes are not modifications under any provision of Title I of the Act;</p> <p>(b) the changes do not exceed the emissions allowable under this permit;</p> <p>(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:</p> <p>(1) a brief description of the change(s),</p> <p>(2) the date on which the change will occur,</p> <p>(3) any change in emissions, and</p> <p>(4) any permit term or condition that is no longer applicable as a result of the change;</p> <p>(d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)</p>	Yes	Continuous	No Section 502(b)(10) permit revisions made in 2009.
1.18	1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)	Yes	Continuous	Koppers was not informed of any air pollution emergency affecting the operation of this Plant during 2009
1.19	1.19 Except as otherwise provided by Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and Regulations APC-S-6, "Air	Yes	Continuous	No action required by Koppers

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	<p>Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", or otherwise provided herein, a modification of the facility requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <ul style="list-style-type: none"> (a) routine maintenance, repair, and replacement; (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act; (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act; (d) use of an alternative fuel or raw material by a stationary source which: <p>(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or</p>			

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	SECTION 1. GENERAL CONDITIONS			
	2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;			
	(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or			
	(f) any change in ownership of the stationary source."			
1.20	1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)	Yes	Continuous	No change of ownership occurred
1.21	1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.I)	Yes	Continuous	No action required by Koppers
1.22	1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordinance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution	Yes	Continuous	No open burning occurred in 2009

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>Episode Alert imposed by the Executive Director and must meet the following buffer zones.</p> <p>(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.</p> <p>(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.</p> <p>(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-I, Section 3.7)</p>			
1.23	<p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.</p> <p>(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p>	Yes	Continuous	No emergency events addressed in this requirement occurred in 2009.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	<p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;</p> <p>(2) the permitted facility was at the time being properly operated;</p> <p>(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and</p> <p>(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset</p>			

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	SECTION 1. GENERAL CONDITIONS provision contained in any applicable requirement specified elsewhere herein. (Re.: APC-S-6, Section III.G.)			
1.24	<p>1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.</p> <p>(a) Upsets (as defined by APC-S-1, Section 2.34)</p> <p>(1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(i) an upset occurred and that the permittee can identify the cause(s) of the upset;</p> <p>(ii) the source was at the time being properly operated;</p> <p>(iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;</p> <p>(iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and</p> <p>(v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p>	Yes	Intermittent	<p>Notifications associated with these conditions are summarized below:</p> <p>Upset Notifications:</p> <p>February 20, 2009, (Certified Mail No. 7008 1140 0001 0773 4841).</p> <p>April 3, 2009, (Certified Mail No. 7008 1140 0001 0773 4919).</p> <p>November 13, 2009, (Certified Mail No. 7008 1140 0001 0773 4353).</p> <p>Shutdown and Maintenance Notifications:</p> <p>February 5, 2009, (Certified Mail No. 7008 1140 0001 0773 4773).</p> <p>March 2, 2009, (Certified Mail No. 7008 1140 0001 0773 4865).</p> <p>December 21, 2009, (Certified Mail No. 7008 1140 0001 0773 4407).</p> <p>All instances of startup episodes were submitted in the Biannual reports of July 10, 2009, (Certified Mail No. 7008 1140 0001 0773 5008), covering the time period from January 1, 2009 through June 30, 2009 and on the January 4, 2010, (Certified Mail No. 7008 1140 0001 0773 4414), covering the time period from July 1, 2009 through December 31, 2009. An additional notification of a startup episode</p>

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p> <p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;</p> <p>(ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or</p> <p>(iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(iv) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(v) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p>			<p>that occurred on March 10, 2009, was submitted on March 11, 2009, (Certified Mail No. 7008 1140 0001 0773 4896).</p>

**KOPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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(C)	<p>Maintenance.</p> <p>(1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:</p> <ul style="list-style-type: none"> (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken. <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with</p>			

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GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009**

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	SECTION 1. GENERAL CONDITIONS another applicable requirement, the more stringent requirement shall apply.			
1.25	(Ref.: APC-S-1, Section 10) 1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.	Yes	Continuous	Plant records. No demolition or renovation activities addressed by this requirement occurred in 2009

KOPPERS, INC.
GRENADE, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2009

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	SECTION 2 EMISSION POINTS & POLLUTION CONTROL DEVICES			
	"List of Emission Points"	YES	CONTINUOUS	Plant records

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	SECTION 6: ALTERNATIVE OPERATING SCENARIOS			
	None permitted, Section 6 is Not Applicable			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 7: TITLE VI REQUIREMENTS			
	Section 7 is Not Applicable			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.A.1	3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).	Yes	Intermittent	Plant records. During Startup and soot blowing, procedures used to limit opacity. Any noncompliant events exceeding opacity limits were reported within the appropriate time frame subsequent to their occurrence and/or in the semi-annual reports submitted on July 10, 2009 (Certified Mail No. 7008 1140 0001 0773 5008) for January through June and on January 04, 2010 (Certified Mail No. 7008 1140 0001 0773 4414) for July through December. An additional notification of a startup episode that occurred on March 10, 2009, was submitted on March 11, 2009, (Certified Mail No. 7008 1140 0001 0773 4896).
	(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.			
	(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)			
3.A.2	3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)	Yes	Continuous	Plant records. Operations do not produce opacity at this level

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.B.1	Fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-product sludge, may be allowed at emission rates up to 0.30 grains per standard dry cubic feet. (State Regulation APC-S-1, Section 3.4(b)) Untreated wood will be classified as spent wood.	Yes	Continuous	Stack test records
3.B.2	Emissions from installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour, heat input shall not exceed an emission rate as determined by the relationship $E = 0.8808 \cdot I^{-0.1667}$, where E is the emission rate in pounds per million BTU per hour input and I is the heat input in millions of BTU per hour. (State Regulation APC-S-1, Section 3.4(a)(2))	Yes	Continuous	Stack Test Records
3.B.3	The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (State Regulation APC-S-1, Section 4.1(a))	Yes	Continuous	Plant records and stack test records
3.B.4	For Emission Points AA-004, AA-010, and AA-011, except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour	Yes	Continuous	Plant records. Said equipment is located well within Plant boundaries.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 3. EMISSION LIMITATIONS & STANDARDS			
	from any point source, particulate matter in total quantities in excess of the amount determined by the relationship $E = 4.1p^{0.67}$ where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour (State Regulation APC-S-1 Section 3.6(a)).			
	Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.			
3.B.5	For Emission Point AA-001, the permittee shall comply with the standards with the Permit to Construct issued November 8, 1994, and Modified thereafter.	Yes	Continuous	Plant records
3.C.1	The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input	Yes	Continuous	Plant records
3.C.2	The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.	Yes	Continuous	Plant records

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.D.1	The permittee shall minimize preservative usage (40 CFR 63.11430). The permittee shall maintain records on the type treatment and types and amounts of wood preservatives used at the facility (40 CFR 63.11430).	Yes	Continuous	Plant records
3.D.2	The permittee for the pressure treatment process shall maintain charge records identifying pressure reading(s) inside the retorts (or similarly enclosed vessels) (40 CFR 63.11430).	Yes	Continuous	Plant records
3.D.3	The permittee shall store treated wood product on drip pads or in a primary containment area to convey preservative dripage to a collection system until dripage has ceased (40 CFR 63.11430).	Yes	Continuous	Plant records
3.D.4	The permittee shall fully drain the retort to the extent practicable, prior to opening the retort door (40 CFR 63.11430).	Yes	Continuous	Plant records. Standard operating procedures address this requirement.
3.D.5	The permittee shall promptly collect any spills (40 CFR 63.11430)	Yes	Continuous	Plant records
3.D.6	The permittee shall perform relevant corrective actions or preventative measures in the event of a malfunction before resuming operations (40 CFR 63.11430)	Yes	Continuous	Plant records

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
4.1	4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit	Yes	Continuous	Plant records
4.2	4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following: (a) the identification of each term or condition of the permit that is the basis of the certification; (b) the compliance status; (c) whether compliance was continuous or intermittent; (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period; (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a., c., & d.)	Yes	Intermittent	A Certification of Compliance for Sections 1 through 7 of the Plant's Title V Operating Permit was mailed to the MDEQ on January 27, 2009 (Certified Mail No. 7008 1140 0001 0773 4650) and to USEPA Region IV on January 27, 2009 (Certified Mail No. 7008 1140 0001 0773 4582) for coverage year 2008.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.A.1	5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.	Yes	Continuous	Plant records
5.A.2	5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of requirement monitoring information the following: (a) the date, place as defined in the permit, and time of sampling or measurements; (b) the date(s) analyses were performed; (c) the company or entity that performed the analysis; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. (Ref. APC-S-6, Section III.A.3.b(1)(a)-(f))	Yes	Continuous	Plant records
5.A.3	5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: AOC-S-6, Section III.A.3.b(2))	Yes	Continuous	Plant records

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.A.4	5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))	Yes	Intermittent	Any noncompliant event exceeding 40% opacity was reported within the appropriate time frame subsequent to its occurrence and in the semi-annual reports submitted on July 10, 2009, (Certified Mail No. 7008 1140 0001 0773 5008) for January through June and on January 04, 2010 (Certified Mail No. 7008 1140 0001 0773 4414) for July through December
5.A.5	5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))	Yes	Intermittent	The Plant's CEMS monitors and records instances of opacity excursions. Such instances are communicated via correspondences as dictated by the Plant's Title V Operating Permit. The probable causes of the upsets and the required corrective actions are documented on the correspondence
5.A.6	5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.	Yes	Continuous	Emission sampling was conducted per those described in CFR 40, Part 60, Appendix A – Methods 1-5. Such was reflected in the October 10, 2008, 30-day notification of stack test letter and protocol (Certified Mail No. 7007 3020 0001 0626 5669) and the November 19, 2008, 10-day notification of stack test (Certified Mail No. 7008 1140 0001 0773 4094) and the January 20, 2009, stack test results letter (Certified Mail No. 7008 1140 0001 0773 4230.
5.A.7	5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.	Yes	Continuous	Plant records.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.B.1	The permittee shall perform Continuous Emission Monitoring (CEMS) for opacity. The permittee shall record the time and duration of any opacity excursion, the cause, and the corrective action. As part of CEMS, the permittee shall perform a quarterly calibration. Calibration records shall be maintained for three years on-site for inspection by Department of Environmental Quality (DEQ) officials. In the event CEMS is not operable the permittee shall perform an EPA Reference Method 9 within the first hour and daily inspections thereafter until CEMS has been calibrated. Records should be kept for three years for corrective action taken for CEMS and the EPA Method 9 observations associated with the CEMS occurrence. (Ref.: APC-S-6, Section III.A.3)	Yes	Continuous	Plant records
5.B.2	The permittee shall monitor and record the date, the quantity in pounds, and the % by weight of office waste paper burned in the boiler in a log book. These records shall be maintained for three years on-site for inspection by DEQ officials. (Ref.: Construction Permit issued November 8, 1994)	Yes	Continuous	Plant records - No burning of office waste paper occurred in 2009.
5.B.3	For Emission Point AA-001, the permittee shall stack test in accordance with EPA Methods 1-5 for particulate matter emissions within 180 days of reissuance and biennially thereafter. Such testing shall be performed while the boiler is operating at maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved. If the	Yes	Continuous	Scheduled to occur in 2010 prior to 180 day post Permit issuance of October 28, 2009, Title V Permit. Thirty day notification and protocol was sent to MDEQ for 2010 stack test on January 7, 2010, (Certified Mail No. 7008 1140 0001 0773 4438).

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
	design capacity of the boiler can not be achieved, Koppers shall propose an allowance for approval by the DEQ as part of the pre-test protocol as described in Condition 5.C.2 of this permit. Woodwaste feed rates to the boiler and opacity through CEMs shall be monitored during stack testing. Opacity and the feed rate shall be part of the stack test record as well as all standards for stack testing of particulate matter. (Ref.: APC-S-6, Section III.A.3)			
5.B.4	For Emission Point AA-001, the permittee shall monitor fuel usage hourly. From this monitoring, the permittee shall record daily in log form the maximum hourly fuel usage (LBS/HR) feed and the corresponding BTU value of the boiler (MMBTU/HR). These records shall be maintained on site for five years. (Ref.: APC-S-6, Section III.A.3)	Yes	Continuous	Plant records.
5.B.5	For Emission Point AA-026, the permittee shall assure compliance with opacity limitations by performing weekly observations for a period of six consecutive minutes. If visible emission are observed, the permittee shall perform a viable emission evaluation (VEE) utilizing EPA Reference Method 9. The permittee shall maintain records for five years of all monitoring. The permittee shall submit a summary report of the required monitoring. The summary report should include any exceedances withing the reporting period, the nature of the problem that caused the exceedance, and the action taken to correct	Yes	Continuous	Plant records. Emission Point AA-026 was not operated in 2009.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
	the exceedance. The report shall be made semi-annual and shall be submitted in accordance with Condition 5.A.4 (Ref.: APC-S-6, Section III.A.3)			
5.B.6	For Emission Point AA-026, the permittee shall record and maintain records of the natural gas combusted during each calendar month in cubic feet of natural gas burned per month. Records shall be maintained for a period of two years following the date of such record. (Ref.: 40 CFR Section 60.48c(g)2 and (i))	Yes	Continuous	Plant records. Emission Point AA-026 was not operated in 2009.
5.B.7	For the Work Practice Standards in Section 3.D to this permit, the permittee shall maintain records for five years on-site from the date of each occurrence, measurement, maintenance, corrective action, report or record. (Ref.: 40 CFR 63.10(b))	Yes	Continuous	Plant records.
5.C.1	The permittee shall submit summary report of the required monitoring for opacity for Condition 5.B.1 and 5.B.5 of the permit. The summary report should include any exceedances within the reporting period, the nature of the problem that caused the exceedance, action taken to correct the exceedance as well as any downtime with respect to CEMs for Emission Point AA-001. The report shall be made semi-annual and shall be submitted in accordance with Condition 5.A.4.	Yes	Continuous	Any noncompliant events exceeding opacity limits were reported within the appropriate time frame subsequent to their occurrence and/or in the semi-annual reports submitted on July 10, 2009 (Certified Mail No. 7008 1140 0001 0773 5008) for January through June and on January 04, 2010 (Certified Mail No. 7008 1140 0001 0773 4414) for July through December. An additional notification of a startup episode that occurred on March 10, 2009, was submitted on March 11, 2009, (Certified Mail No. 7008 1140 0001 0773 4896).
5.C.2	The permittee shall submit a written test protocol at least (30) days prior to the intended	Yes	Continuous	Emission sampling was conducted per those described in CFR 40, Part 60, Appendix A – Methods 1-5. Such

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS			
	test date(s) to ensure methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) that an observer may be afforded the opportunity to witness the test.			was reflected in the October 10, 2008, 30-day notification of stack test letter and protocol (Certified Mail No. 7007 3020 0001 0626 5669) and the November 19, 2008, 10-day notification of stack test (Certified Mail No. 7008 1140 0001 0773 4094).
5.C.3	The permittee shall submit a test report of the results of the stack test(s) required within forty-five days of the test.	Yes	Continuous	On January 20, 2009, the stack test results of the December 8, 2008 stack test were sent by letter (Certified Mail No. 7008 1140 0001 0773 4230) to the MDEQ.

Marcus C. Smith
Plant Manager



Grenada

RECEIVED
JAN - 7 2010
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
SmithMC@koppers.com
www.koppers.com

January 4, 2010

Mississippi Department of Environmental Quality
Attn: Mrs. Trayce Moore - Thomas
Timber and Wood Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39289-0385



CERTIFIED MAIL: 7008 1140 0001 0773 4414

Subject: Title V Operating Permit No. 0960-00012
Semi-Annual Air Report for July through December 2009
Koppers Inc. – Tie Plant, Mississippi


Dear Mrs. Thomas:

Enclosed please find the semi-annual report of required monitoring for the period July 1, 2009 through December 31, 2009 for the Koppers Inc. facility located at 1 Koppers Drive in Tie Plant, Mississippi. This report contains information regarding opacity emissions. The facility uses a Continuous Emissions Monitoring System (CEMS) to monitor and record the emissions from its Wellons wood-fired boiler identified as emissions point AA-001. The following bullets summarize the events surrounding the episodes reflected on the attached "Episode List Reports".

- A single episode occurred on August 3rd, and was associated with startup activities per Section 3.A.1 (a), "Emissions, Limitations & Standards", of the TVOP.
- A single episode occurred on August 17th, and was associated with startup activities per Section 3.A.1 (a), "Emissions, Limitations & Standards", of the TVOP.
- A single episode occurred on September 21st, and was associated with startup activities per Section 3.A.1 (a), "Emissions, Limitations & Standards", of the TVOP.
- On September 24th, a single episode was logged by the CEMS. This episode was associated with the CEMS vendor conducting routine, scheduled audits of the system.
- Two episodes of opacity totaling twelve minutes were logged by the CEMS on November 2nd, and were associated with startup activities per Section 3.A.1 (a), "Emissions, Limitations, & Standards", of the TVOP.
- On November 12th, a mechanical upset at the boiler operation resulted in a single episode of excess opacity. A notification correspondence detailing the investigation, cause and associated corrective actions for the event was forwarded to the MDEQ on November 13, 2009 via Certified Mail No. 7008 1140 0001 0773 5008.
- On December 22nd, a single episode was logged by the CEMS. This episode was associated with the CEMS vendor conducting routine, scheduled audits of the system.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized "M" and "S".

Marcus C. Smith
Plant Manager

CC: Joyce Fankulewski, KI-CSG

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 07/01/09 00:00 to 09/30/09 23:59
 Generated: 01/04/2010
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
08/03/09 08:54 - 08/03/09 08:59	08/03/09 08:59	1: OV	45.000	/	40.000	(12.50%)	Startup	No Action Needed
08/17/09 07:30 - 08/17/09 07:35	08/17/09 07:35	1: OV	54.800	/	40.000	(37.00%)	Startup	No Action Needed
09/21/09 07:42 - 09/21/09 07:47	09/21/09 07:47	1: OV	40.500	/	40.000	(1.25%)	Startup	No Action Needed
09/24/09 09:24 - 09/24/09 09:29	09/24/09 09:29	1: OV	61.200	/	40.000	(53.00%)	Recalibration	Recalibrated Analy

Total Reported Time: 2208.0 hours

TOTAL DURATION = 0.40 hours

1: Over limit	= 0.40 hours
3: Startup	= 0.30 hours
14: Recalibration	= 0.10 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 10/01/09 00:00 to 12/31/09 23:59
 Generated: 01/04/2010
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
11/02/09 13:36 ~ 11/02/09 13:41	11/02/09 13:41	1: OV	43.500	/	40.000	(8.75%)	Startup	Other Corrective A
11/02/09 14:12 ~ 11/02/09 14:17	11/02/09 14:17	1: OV	45.800	/	40.000	(14.50%)	Startup	No Action Needed
11/12/09 11:30 ~ 11/12/09 11:35	11/12/09 11:35	1: OV	47.200	/	40.000	(18.00%)	Control Equip. Malfunction	Repaired Control E
12/22/09 10:06 ~ 12/22/09 10:11	12/22/09 10:11	1: OV	51.900	/	40.000	(29.75%)	Recalibration	No Action Needed

Total Reported Time: 2208.0 hours

TOTAL DURATION = 0.40 hours

1: Over limit	=	0.40 hours
2: Control Equip. Malfunction	=	0.10 hours
3: Startup	=	0.20 hours
14: Recalibration	=	0.10 hours

Marcus C. Smith
Plant Manager

RECEIVED
JUL 15 2009
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
SmithMC@koppers.com
www.koppers.com

July 10, 2009

Mississippi Department of Environmental Quality
Attn: Mrs. Trayce Moore - Thomas
Timber and Wood Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39289-0385

CERTIFIED MAIL: 7008 1140 0001 0773 5008

Subject: Title V Operating Permit No. 0960-00012
Semi-Annual Air Report for January through June 2009
Koppers Inc. - Tie Plant, Mississippi

Dear Mrs. Thomas:

Enclosed please find the semi-annual report of required monitoring for the period January through June 2009 for the Koppers Inc. facility located at 1 Koppers Drive in Tie Plant, Mississippi. This report contains information regarding opacity emissions. The facility uses a Continuous Emissions Monitoring System (CEMS) to monitor and record the emissions from its Wellons wood-fired boiler identified as emissions point AA-001. The following bullets summarize the events surrounding the episodes reflected on the attached "Episode List Reports".

- On February 17th, a mechanical upset at the boiler operation resulted in a single episode of excess opacity. A notification correspondence detailing the investigation, cause and associated corrective actions for the event was forwarded to the MDEQ on February 20, 2009 via Certified Mail No. 7008 1140 0001 0773 4841.
- On February 5th, a notification correspondence letter (Certified Mail No. 7008 1140 0001 0773 4773) was forwarded to MDEQ providing details of a scheduled shutdown and maintenance for March 6th through 9th. On March 2nd, a revised notification correspondence letter (Certified Mail No. 7008 1140 0001 0773 4865) was forwarded to MDEQ providing updated details of this same scheduled shutdown and maintenance. On March 11th, a notification correspondence letter (Certified Mail No. 7008 1140 0001 0773 4896) was forwarded to MDEQ providing details of a three (3) consecutive opacity episodes (totaling 18 minutes) occurring during startup activities.
- On March 31st, a total of two (2) episodes were logged by the CEMS. These were associated with the CEMS vendor conducting routine, scheduled audits of the system.
- On, April 1st, a power outage at the boiler operation resulted in a single episode of excess opacity. A notification correspondence for the event was forwarded to the MDEQ on April 3rd via Certified Mail No. 7008 1140 0001 0773 4919.
- A single episode occurred on May 18th, and was associated with start up activities per Section 3.A.1 (a), "Emissions, Limitations & Standards", of the TVOP.

- On June 4th, a single episode was logged by the CEMS. This episode was associated with the CEMS vendor conducting routine, scheduled audits of the system.
- A single episode occurred on June 22nd, and was associated with startup activities per Section 3.A.1 (a), "Emissions, Limitation & Standards", of the TVOP.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized "M" and "S".

Marcus C. Smith
Plant Manager

CC: Joyce Fankulewski, KI-CSG

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 01/01/09 00:00 to 03/31/09 23:59
 Generated: 07/07/2009
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
02/17/09 19:30 - 02/17/09 19:35	1: OV	58.800	/	40.000	(47.00%)	Control Equip. Malfunction	Other Mechanical C	
03/10/09 08:36 - 03/10/09 08:41	1: OV	54.700	/	40.000	(36.75%)	Startup	No Action Taken	
03/10/09 08:42 - 03/10/09 08:47	1: OV	46.100	/	40.000	(15.25%)	Startup	No Action Taken	
03/10/09 08:48 - 03/10/09 08:53	1: OV	40.400	/	40.000	(1.00%)	Startup	No Action Taken	
03/31/09 09:12 - 03/31/09 09:17	1: OV	80.500	/	40.000	(101.25%)	Recalibration	No Action Taken	
03/31/09 09:18 - 03/31/09 09:23	1: OV	77.400	/	40.000	(93.50%)	Recalibration	No Action Taken	

Total Reported Time: 4344.0 hours

TOTAL DURATION = 0.60 hours

1: Over limit	=	0.60 hours
2: Control Equip. Malfunction	=	0.10 hours
3: Startup	=	0.30 hours
14: Recalibration	=	0.20 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 04/01/09 00:00 to 06/30/09 23:59
 Generated: 07/07/2009
 Types: ALL

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
04/01/09 04:36 -	04/01/09 04:41	1: OV	41.300	/	40.000	(3.25%)	Shutdown	Other Corrective A
05/18/09 07:06 -	05/18/09 07:11	1: OV	43.400	/	40.000	(8.50%)	Startup	No Action Taken
06/04/09 10:18 -	06/04/09 10:23	1: OV	77.000	/	40.000	(92.50%)	In calibration	No Action Needed
06/22/09 07:18 -	06/22/09 07:23	1: OV	45.200	/	40.000	(13.00%)	Startup	No Action Needed

Total Reported Time: 2184.0 hours

TOTAL DURATION = 0.40 hours

1: Over limit	=	0.40 hours
3: Startup	=	0.20 hours
5: Shutdown	=	0.10 hours
252: In calibration	=	0.10 hours

Marcus C. Smith
Plant Manager



Grenada Co

RECEIVED
JAN 28 2009
Dept of Environmental Quality
Office of Pollution Control

January 27, 2009

Mississippi Department of Environmental Quality
Attn: Mrs. Trayce Moore - Thomas
Timber and Wood Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39289-0385

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



CERTIFIED MAIL: 7008 1140 0001 0773 4643

Subject: Title V Operating Permit No. 0960-00012
Semi-Annual Air Report for July through December 2008
Koppers Inc. - Tie Plant, Mississippi

Dear Mrs. Thomas:

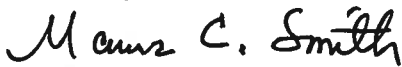
Enclosed please find the semi-annual report of required monitoring for the period July through December 2008 for the Koppers Inc. facility located at 1 Koppers Drive in Tie Plant, Mississippi. This report contains information regarding opacity emissions. The facility uses a Continuous Emissions Monitoring System (CEMS) to monitor and record the emissions from its *Wellons* wood-fired boiler identified as emissions point AA-001. The following bullets summarize the events surrounding the episodes reflected on the attached "Episode List Reports".

- On June 20th a notification letter (Certified Mail No.: 7007 3020 0001 0626 5546) was forwarded to the MDEQ providing details of a scheduled shutdown for July 3rd through 8th. Maintenance activities conducted during this shutdown resulted in the occurrence of three (3 ea.) episodes on July 7th. A second letter providing details of these episodes was forwarded to the MDEQ via Certified Mail No.: 7007 3020 0001 0626 5584 on July 21st.
- On the night of July 22nd a mechanical upset at the Boiler Operation resulted in three (3 ea.) episodes. A correspondence detailing the investigation, cause and associated corrective actions for the event was forwarded to the MDEQ on July 25th via Certified Mail No. 7007 3020 0001 0626 5591.
- Single episodes occurring on August 25th, October 20th, and December 1st were associated with start up and soot blowing activities per Section 3.A.1 (a) & (b), "Emissions, Limitations & Standards", of the TVOP.
- On September 23rd a total of four (4 ea.) episodes were logged by the CEMS. These were associated with the CEMS vendor conducting routine, scheduled audits of the system. The CEMS also logged a single (1 ea.) episode on November 25th due to the same activity.

- On November 19th a notification letter (Certified Mail No.: 7008 1140 0001 0773 4100) was forwarded to the MDEQ providing details of a scheduled shutdown from December 5th through 8th. Maintenance activities associated with this shutdown resulted in the occurrence of one (1 ea.) episode on December 6th.

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.

Sincerely,



Marcus C. Smith
Plant Manager

CC: Ms. Joyce Fankulewski, KI-CSG

Enerlec NTBanso
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38980
 From 07/01/08 00:00 to 09/30/08 23:59
 Generated: 01/26/2009
 Types: OVER

POLLUTANT: Opac EPISODE: Excess Opacity

Incident Start	Incident End	Type	Value	Limit	(%dev)	Reason	Action
07/07/08 10:06	07/07/08 10:11	1: OV	45.500	40.000	(13.75%)	Preventive Maintenance	No Action Needed
07/07/08 11:18	07/07/08 11:23	1: OV	69.000	40.000	(72.50%)	Preventive Maintenance	No Action Needed
07/07/08 11:24	07/07/08 11:29	1: OV	73.400	40.000	(83.50%)	Preventive Maintenance	No Action Needed
07/22/08 22:30	07/22/08 22:35	1: OV	60.200	40.000	(50.50%)	Control Equip. Malfunction	Other Corrective A
07/22/08 22:36	07/22/08 22:41	1: OV	57.700	40.000	(44.25%)	Control Equip. Malfunction	Other Corrective A
07/23/08 03:18	07/23/08 03:23	1: OV	55.100	40.000	(37.75%)	Control Equip. Malfunction	Other Corrective A
08/25/08 07:24	08/25/08 07:29	1: OV	40.900	40.000	(2.25%)	Startup	No Action Needed
09/23/08 10:00	09/23/08 10:05	1: OV	77.600	40.000	(94.00%)	Preventive Maintenance	No Action Needed
09/23/08 10:06	09/23/08 10:11	1: OV	59.500	40.000	(48.75%)	Preventive Maintenance	No Action Needed
09/23/08 11:30	09/23/08 11:35	1: OV	49.300	40.000	(23.25%)	Preventive Maintenance	No Action Needed
09/23/08 13:00	09/23/08 13:05	1: OV	40.900	40.000	(2.25%)	Preventive Maintenance	No Action Needed

Total Reported Time: 2208.0 hours

TOTAL DURATION = 1.10 hours

1: Over limit	=	1.10 hours
2: Control Equip. Malfunction	=	0.30 hours
3: Startup	=	0.10 hours
15: Preventive Maintenance	=	0.70 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 10/01/08 00:00 to 12/31/08 23:59
 Generated: 01/26/2009
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
10/20/08 11:24 -	10/20/08 11:29	1: OV	45.600	/	40.000	(14.00%)	Other/Known Excess Cause	No Action Needed
11/25/08 10:18 -	11/25/08 10:23	1: OV	88.000	/	40.000	(120.00%)	Preventive Maintenance	No Action Needed
12/01/08 10:18 -	12/01/08 10:23	1: OV	44.900	/	40.000	(12.25%)	Startup	No Action Needed
12/06/08 12:12 -	12/06/08 12:17	1: OV	58.100	/	40.000	(45.25%)	Preventive Maintenance	No Action Needed

Total Reported Time: 2208.0 hours

TOTAL DURATION = 0.40 hours

1: Over limit	=	0.40 hours
3: Startup	=	0.10 hours
9: Other/Known Excess Cause	=	0.10 hours
15: Preventive Maintenance	=	0.20 hours

Vance R. Haskin
Plant Manager



July 2, 2008

Mr. Philip LaBarre
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

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

AL 876
Grenada
ASK

CERTIFIED MAIL: 7007 3020 0001 0626 5553

Subject: Title V Operating Permit No. 0960-00012
Semi-Annual Air Report for January 2008 through June 2008
Koppers Inc. – Tie Plant, Mississippi

Dear Mr. LaBarre:

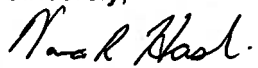
Enclosed please find the semi-annual report of required monitoring for the period January through June 2008 for the Koppers Inc. facility located at 1 Koppers Drive in Tie Plant, Mississippi. This report contains information regarding opacity emissions. The facility uses a Continuous Emissions Monitoring System (CEMS) to monitor the emissions from its *Wellons* wood-fired boiler identified as emissions point AA-001. The following bullets summarize the events surrounding the episodes reflected on the attached "Episode List Reports".

- On March 8 at approximately 1:55 AM a failure in the boiler's fuel feed system resulted in a mechanical upset. A total of eight six-minute episodes were logged by the CEMS. A correspondence relaying the details of this event and the resulting corrective actions was forwarded to you via certified mail (7009 3400 0002 5200 9943). A copy of this correspondence is attached for review.
- On March 13 a total of two consecutive six-minute episodes were logged by the CEMS. These were associated with the CEMS vendor conducting audits of the system. The CEMS also logged a single six minute episode on May 20 due to the same activity.
- Other episodes reflected on January 3, March 8, March 9 and May 20 were associated with start-up activities per Section 3.A.1 (a) of the TVOP.

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.

July 1, 2008
Page 2

Sincerely,

A handwritten signature in cursive script, appearing to read "Vance R. Haskin".

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, KI-CSG

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 01/01/08 00:00 to 03/31/08 23:59
 Generated: 07/01/2008
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
01/03/08 01:18	- 01/03/08 01:23	1: OV	49.400	/	40.000	(23.50%)	Startup	No Action Taken
03/08/08 01:54	- 03/08/08 01:59	1: OV	40.300	/	40.000	(0.75%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:00	- 03/08/08 02:05	1: OV	62.800	/	40.000	(57.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:06	- 03/08/08 02:11	1: OV	41.500	/	40.000	(3.75%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:18	- 03/08/08 02:23	1: OV	59.600	/	40.000	(49.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:24	- 03/08/08 02:29	1: OV	54.000	/	40.000	(35.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:30	- 03/08/08 02:35	1: OV	43.600	/	40.000	(9.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:36	- 03/08/08 02:41	1: OV	62.400	/	40.000	(56.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:54	- 03/08/08 02:59	1: OV	44.600	/	40.000	(11.50%)	Control Equip. Malfunction	Repaired Control E
03/08/08 03:36	- 03/08/08 03:41	1: OV	43.300	/	40.000	(8.25%)	Startup	No Action Needed
03/08/08 03:42	- 03/08/08 03:47	1: OV	64.600	/	40.000	(61.50%)	Startup Continued	No Action Needed
03/08/08 03:48	- 03/08/08 03:53	1: OV	45.500	/	40.000	(13.75%)	Startup Continued	No Action Needed
03/09/08 22:30	- 03/09/08 22:35	1: OV	43.700	/	40.000	(9.25%)	Startup	No Action Needed
03/13/08 10:36	- 03/13/08 10:41	1: OV	56.600	/	40.000	(41.50%)	Preventive Maintenance	No Action Needed
03/13/08 10:42	- 03/13/08 10:47	1: OV	48.500	/	40.000	(21.25%)	Preventive Maintenance	No Action Needed

Total Reported Time: 4368.0 hours

TOTAL DURATION = 1.50 hours

1: Over limit	= 1.50 hours	
2: Control Equip. Malfunction	=	0.80 hours
3: Startup	=	0.30 hours
4: Startup Continued	=	0.20 hours
15: Preventive Maintenance	=	0.20 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 04/01/08 00:00 to 06/30/08 23:59
 Generated: 07/01/2008
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit	(%dev)	Reason	Action
05/20/08 09:18 - 05/20/08 09:23		1: OV	90.500	/ 40.000	(126.25%)	Preventive Maintenance	No Action Needed

Total Reported Time: 2184.0 hours

TOTAL DURATION = 0.10 hours

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

Vance R. Haskin
Plant Manager



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

March 11, 2008

Mr. Azzam Abu-Mirshid, P.E.
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL: 7099 3400 0002 5200 9943

Subject: CEMS Episodes
Title V Operating Permit #0960-00012
Koppers Inc. – Tie Plant, Mississippi

Dear Mr. Abu-Mirshid:

On the night of March 8, 2008 around 1:55 AM a component of the wood fuel feed system transferring fuel from storage silos to the boiler's fire cells failed. This component, a timing mechanism, works in conjunction with sonar and paddle-wheel operated fuel-bin level indicators and serves to control the timing and thus rate at which the fuel feed system engages to transfer wood fuel to fuel bins and thus the fire cells. Once it failed the volume of wood fuel being transferred to the fire cells slowed significantly and the combustion rates in them dropped. Subsequent slugs of fuel fed to the cells due to the erratic operation of the timer served to generate a smothering effect thus resulting in a rise in opacity. Per Section 1.24(a) of the plant's permit this would represent an upset. A copy of the corresponding "Episode List Report" generated by the Continuous Emissions Monitoring System is attached for review.

The Boiler Operator and Maintenance Supervisor were called to the site to troubleshoot and correct the occurrence. Inevitably the failing of the timer was identified as the key factor. The Maintenance Supervisor replaced the timer with a spare unit maintained at the site and adjusted the sonar bin-level indicator. The excess wood fuel was pulled from the fire cells and the boiler was restarted. Upon evaluation it was determined that the weather stripping around the door of the control cabinet housing the timer was worn. Dust entering the panel around the door edges may have contributed to the timer failing. Consequently, the weather stripping is being replaced.

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.

Sincerely,

Vance R. Haskin

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, Koppers Inc.

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 03/08/08 00:00 to 03/08/08 23:59
 Generated: 03/11/2008
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
03/08/08 01:54	- 03/08/08 01:59	1: OV	40.300	/	40.000	(0.75%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:00	- 03/08/08 02:05	1: OV	62.800	/	40.000	(57.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:06	- 03/08/08 02:11	1: OV	41.500	/	40.000	(3.75%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:18	- 03/08/08 02:23	1: OV	59.600	/	40.000	(49.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:24	- 03/08/08 02:29	1: OV	54.000	/	40.000	(35.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:30	- 03/08/08 02:35	1: OV	43.600	/	40.000	(9.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:36	- 03/08/08 02:41	1: OV	62.400	/	40.000	(56.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:54	- 03/08/08 02:59	1: OV	44.600	/	40.000	(11.50%)	Control Equip. Malfunction	Repaired Control E
03/08/08 03:36	- 03/08/08 03:41	1: OV	43.300	/	40.000	(8.25%)	Startup	No Action Needed
03/08/08 03:42	- 03/08/08 03:47	1: OV	64.600	/	40.000	(61.50%)	Startup Continued	No Action Needed
03/08/08 03:48	- 03/08/08 03:53	1: OV	45.500	/	40.000	(13.75%)	Startup Continued	No Action Needed

Total Reported Time: 24.0 hours

~~TOTAL DURATION = 1.10 hours~~

1: Over limit	=	1.10 hours
2: Control Equip. Malfunction	=	0.80 hours
3: Startup	=	0.10 hours
4: Startup Continued	=	0.20 hours

Marcus C. Smith
Plant Manager

KOPPERS

Grenada Co.

January 27, 2009

Ms. Trayce Moore - Thomas
Timber And Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, Mississippi 39225-2261

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

CERTIFIED MAIL NO.: 7008 1140 0001 0773 4650

Subject: 2008 Title V Air Permit Compliance Certification
Title V Permit No. 0960-00012
Koppers Inc., Grenada, MS

RECEIVED

JAN 28 2009

Dept of Environmental Quality
Office of Pollution Control

Dear Mrs. Thomas:

Attached is a copy of the 2008 Title V Air Permit Compliance Certification corresponding to Title V Permit No. 0960-00012. Should you have any questions please call.

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.

Marcus C. Smith / Marcus C. Smith Date: 1/27/2009
Plant Manager

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

Sincerely,

Marcus C. Smith
Plant Manager

Enclosure

CC: Joyce Fankulewski – KI - CSG
Ms. Rosalyn D. Hughes – USEPA Region 4

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.1	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)</p>	YES	INTERMITTENT	<p>A CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS) IS USED AT THE FACILITY.</p> <p>ON MARCH 8 AND JULY 22 THE CEMS RECORDED EPISODES RESULTING FROM MECHANICAL UPSETS IN THE BOILER OPERATION. DETAILS OF THESE OCCURANCES WERE FORWARDED TO THE MDEQ ON MARCH 11 (CERTIFIED MAIL NO: 7099 3400 0002 5200 9943) AND JULY 25 (CERTIFIED MAIL NO: 7007 3020 0001 0626 5591). ROOT CAUSES WERE IDENTIFIED FOR EACH OCCURENCE. CORRECTIVE ACTIONS WERE IMPLEMENTED TO ADDRESS THESE ROOT CAUSES.</p>
1.2	1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)	YES	CONTINUOUS	NO ENFORCEMENT ACTIONS WERE TAKEN BY THE MDEQ.
1.3	1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)	YES	INTERMITTENT	COMPLIANCE WITH PERMIT CONDITIONS WAS SUSTAINED.
1.4	1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)	YES	CONTINUOUS	NO ACTIONS INVOLVING PROPERTY RIGHTS HAVE OCCURRED.

**KOPPERS , INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.5	SECTION 1. GENERAL CONDITIONS 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)	YES	CONTINUOUS	NO INFORMATION REQUESTS WERE SUBMITTED BY THE MDEQ DURING THIS REPORTING PERIOD.
1.6	1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)	YES	CONTINUOUS	NO ACTION BY KOPPERS IS NECESSARY.
1.7	1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6. (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations	YES	INTERMITTENT	EMISSION FEE REQUEST WAS PAID TO THE MDEQ IN AUGUST 2008. AN ESTIMATE OF ACTUAL EMISSIONS WAS USED AS THE BASIS FOR THE FEE.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)</p> <p>(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)</p> <p>(c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of</p>			

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)</p> <p>(d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)</p>			
1.8	1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)	YES	CONTINUOUS	NO PERMIT REVISIONS OF THIS NATURE HAVE BEEN REQUESTED BY PERMITTEE.
1.9	1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)	NO	INTERMITTENT	<p>ALTHOUGH THEY WERE SUBMITTED IN A TIMELY MANNER, INADVERTANTLY CERTIFICATION STATEMENTS WERE NOT INCLUDED ON CORRESPONDENCES IN JUNE AND SEPTEMBER OF 2008.</p> <p>INFORMATION ASSOCIATED WITH THE CORRESPONDENCES FOLLOW:</p> <p>JUNE 25, 2008 – CERTIFIED MAIL: 7007 3020 0001 0626 5621; RENEWAL APPLICATION</p> <p>SEPTEMBER 8, 2008 – CERTIFIED MAIL: 7008 1300 0001 3325 7321;</p>

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.10	<p>1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:</p> <p>(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;</p> <p>(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;</p> <p>(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and</p> <p>(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)</p>	YES	INTERMITTENT	<p>RESPONSE TO AIR APPLICATION DEFICIENCY</p> <p>A MULTIMEDIA INSPECTION WAS CONDUCTED ON MARCH 25 BY TWO REPRESENTATIVES OF THE MDEQ.</p>
1.11	<p>1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))</p>	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.
1.12	<p>1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9 (b))</p>	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.
1.13	<p>1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements</p>	YES	CONTINUOUS	PLANT RECORDS.

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)</p>			
1.14	<p>1.14 Nothing in this permit shall alter or affect the following:</p> <p>(a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;</p> <p>(b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;</p> <p>(c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.</p> <p>(d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)</p>	YES	CONTINUOUS	NO ACTION REQUIRED OF KOPPERS DURING 2008.
1.15	<p>1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)</p>	YES	CONTINUOUS	NOT APPLICABLE UNDER CAA SECTION 112 (r)(7)(B)(II).
1.16	<p>1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit</p>	YES	CONTINUOUS	<p>MSDEQ ISSUED A DRAFT PERMIT SEPTEMBER 19, 2003.</p> <p>COMMENTS WERE MADE TO MDEQ OCTOBER 6, 2003</p> <p>A FINAL VERSION WAS ISSUED</p>

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)</p>			<p>JANUARY 29, 2004</p> <p>A PERMIT RENEWAL APPLICATION WAS ISSUED ON JUNE 25, 2008. ISSUANCE OF A NEW PERMIT IS PENDING.</p>
1.17	<p>1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:</p> <p>(a) the changes are not modifications under any provision of Title I of the Act;</p> <p>(b) the changes do not exceed the emissions allowable under this permit;</p> <p>(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:</p> <p>(1) a brief description of the change(s),</p> <p>(2) the date on which the change will occur,</p> <p>(3) any change in emissions, and</p> <p>(4) any permit term or condition that is no longer applicable as a result of the change;</p> <p>(d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)</p>	YES	CONTINUOUS	<p>A CORRESPONDENCE RELATED TO CONDITION 1.17 WAS SUBMITTED TO THE MDEQ ON MARCH 25, 2008. INFORMATION ASSOCIATED WITH THE LETTER FOLLOWS:</p> <p>MARCH 25, 2008 – CERTIFIED MAIL NO.: 7099 3400 0002 5200 9851; NOTIFICATION OF BOILER CONTROL INSTALLATION.</p> <p>ADDITIONALLY, AN UPDATED RCRA SUBTITLE C SITE IDENTIFICATION FORM WAS SUBMITTED TO THE MDEQ ON DECEMBER 4, 2008 VIA CERTIFIED MAIL NO. 7008 1140 0001 0773 4124. THIS CORRESPONDENCE WAS PROMPTED BY A NEW SITE CONTACT BEING ASSIGNED TO THE FACILITY.</p>
1.18	<p>1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions</p>	YES	CONTINUOUS	<p>KOPPERS WAS NOT INFORMED OF ANY AIR POLLUTION EMERGENCY AFFECTING THE OPERATION OF THIS PLANT DURING 2008.</p>

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 1. GENERAL CONDITIONS Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)			
1.19	<p>1.19 Except as otherwise provided by Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", or otherwise provided herein, a modification of the facility requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <p>(a) routine maintenance, repair, and replacement;</p> <p>(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;</p> <p>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</p> <p>(d) use of an alternative fuel or raw material by a stationary</p>	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>source which:</p> <p>(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or</p> <p>2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;</p> <p>(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or</p> <p>(f) any change in ownership of the stationary source."</p>			
1.20	1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)	YES	CONTINUOUS	NO CHANGE OF OWNERSHIP HAS OCCURRED.
1.21	1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.I.)	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS.
1.22	1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 2008.

**KOPPERS , INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.</p> <p>(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.</p> <p>(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.</p> <p>(C) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-I, Section 3.7)</p>			
1.23	<p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.</p> <p>(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source,</p>	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT OCCURRED IN 2008.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;</p> <p>(2) the permitted facility was at the time being properly operated;</p> <p>(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and</p> <p>(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must</p>			

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Re.: APC-S-6, Section III.G.)</p>			
1.24	<p>1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.</p> <p>(a) Upsets (as defined by APC-S-1, Section 2.34)</p> <p>(1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(a) an upset occurred and that the permittee can identify the cause(s) of the upset;</p> <p>(b) the source was at the time being properly operated;</p> <p>(c) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;</p>	YES	INTERMITTENT	<p>NOTIFICATIONS ASSOCIATED WITH THIS CONDITION ARE SUMMARIZED BELOW:</p> <p>MARCH 11, 2008 – CERTIFIED MAIL: 7099 3400 0002 5200 9943; MECHANICAL UPSET</p> <p>MARCH 12, 2008 – CERTIFIED MAIL: 7099 3400 0002 5200 9912; NOTIFICATION OF BOILER (SOURCE AA-001) SHUTDOWN FOR MAINTENANCE</p> <p>JUNE 20, 2008 – CERTIFIED MAIL: 7007 3020 0001 0626 5546; NOTIFICATION OF BOILER (SOURCE AA-001) SHUTDOWN AND MAINTENANCE</p> <p>JULY 21, 2008 – CERTIFIED MAIL: 7007 3020 0001 0626 5584; BOILER MAINTENANCE</p>

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>(d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and</p> <p>(e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p> <p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;</p> <p>(b) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or</p> <p>(c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit</p>			<p>JULY 25, 2008 – CERTIFIED MAIL: 7007 3020 0001 0626 5591; MECHANICAL UPSET</p> <p>NOVEMBER 19, 2008 – CERTIFIED MAIL: 7008 1140 0001 0773 4100; NOTIFICATION OF BOILER (SOURCE AA-001) SHUTDOWN AND MAINTENANCE</p>

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

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

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(Ref.: APC-S-I, Section 10)</p>			
1.25	<p>1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.</p>	YES	CONTINUOUS	PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 2008.

KOPPERS , INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 2 EMISSION POINTS & POLLUTION CONTROL DEVICES "List of Emission Points"	YES	CONTINUOUS	MINOR DISCREPANCIES IN TANK VOLUMES HAVE BEEN DETERMINED TO EXIST. THE EXTENT OF THESE DISCREPANCIES HAS MINIMAL IMPACT ON EMISSION LEVELS. ADJUSTED TANK DIMENSIONS AND VOLUMES ARE REFLECTED ON RENEWAL APPLICATION SUBMITTED ON JUNE 25, 2008 VIA CERTIFIED MAIL NO.: 7007 3020 0001 0626 5621.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 6: ALTERNATIVE OPERATING SCENARIOS None permitted, Section 6 is Not Applicable			

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	SECTION 7: TITLE VI REQUIREMENTS Section 7 is Not Applicable			

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.A.1	<p>3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a)& (b).</p> <p>(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.</p> <p>(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-I, Section 3.1)</p>	YES	INTERMITTENT	<p>PLANT RECORDS. DURING STARTUP AND SOOT BLOWING, PROCEDURES USED LIMIT OPACITY.</p> <p>ANY NONCOMPLIANT EVENTS EXCEEDING 40% OPACITY WERE REPORTED WITHIN THE APPROPRIATE TIME FRAME SUBSEQUENT TO THEIR OCCURRENCE AND IN THE SEMI-ANNUAL REPORTS SUBMITTED ON JULY 2, 2008 (CERTIFIED MAIL: 7007 3020 0001 0626 5553) FOR JANUARY THROUGH JUNE AND JANUARY 27, 2009 (CERTIFIED MAIL: 7008 1140 0001 0773 4643) FOR JULY THROUGH DECEMBER.</p>
3.A.2	3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)	YES	CONTINUOUS	PLANT RECORDS. OPERATIONS DO NOT PRODUCE OPACITY AT THIS LEVEL.

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SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.B.1	3.B.1 For Emission Points AA-001 particulate matter emission rates shall not exceed 0.30 grains per standard dry cubic foot and the total wood waste feed rate shall not exceed 15,500 lbs/hr.	YES	CONTINUOUS	PLANT RECORDS REFLECT TEST DATA AND VENDOR INFORMATION. AA-001 WAS TESTED ON DECEMBER 8, 2008 AND DEMONSTRATED COMPLIANCE. THIS IS A BIENNIAL TEST THAT IS SCHEDULED FOR 2010.
3.B.2	3.B.2 For Emission Points AA-001 and AA-002, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.	YES	CONTINUOUS	AA-002 WAS REPLACED WITH A NATURAL GAS FIRED BOILER. THIS UNIT WAS NOT USED IN 2008. PLANT RECORDS REFLECT COMPLIANCE. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMITATION.
3.B.3	3.B.3 For Emission Point AA-002, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{-0.1667}$ where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.	YES	CONTINUOUS	EMISSION POINT AA-002 WAS REPLACED WITH A NATURAL GAS FIRED BOILER WHICH WAS APPROVED BY THE MDEQ. THE GAS FIRED BOILER WAS NOT OPERATED IN 2008.
3.B.4	3.B.5 For Emission Points AA-004 and AA-008 through AA-012, the particulate matter emission rate shall not exceed the amount determined by the relationship $E = 4.1 p^{0.67}$	YES	CONTINUOUS	PLANT RECORDS.

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>SECTION 3. EMISSION LIMITATIONS & STANDARDS</p> <p>where E is the emission rate in pounds per hour, and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.</p>			
3.B.5	<p>For Emission Point AA-003, Ref. No. 9, the permittee is subject to and shall comply with 40 CFR 60.110b, the New Source Performance Standards (NSPS) Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Storage vessels with a design capacity greater than or equal to 75 m3 but less than 151 m3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from the General Provisions (NSPS Subpart A) and from other provisions of Subpart Kb, except the monitoring requirements specified in 40 CFR 60.116b (See Continued 5.B.1). A copy of Subpart Kb is attached in Appendix C.</p>	YES	CONTINUOUS	PLANT RECORDS AND DATA SUBMITTED WITH APPLICATION. THESE SOURCES DO NOT PRODUCE PARTICULATE EMISSIONS IN EXCESS OF THIS LIMIT.

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 4 COMPLIANCE SCHEDULE				
4.1	4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit	YES	CONTINUOUS	PLANT RECORDS
4.2	4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following: (a) the identification of each term or condition of the permit that is the basis of the certification; (b) the compliance status; (c) whether compliance was continuous or intermittent; (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period; (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a., c., & d.)	YES	INTERMITTENT	A CERTIFICATE OF COMPLIANCE FOR SECTIONS 1 THROUGH 7 OF THE PLANT'S TVOP WAS MAILED TO THE MDEQ AND USEPA - REGION 4 ON JANUARY 29, 2008 FOR COVERAGE YEAR 2007.

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.A.1	5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.	YES	CONTINUOUS	PLANT RECORDS
5.A.2	5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of requirement monitoring information the following: (a) the date, place as defined in the permit, and time of sampling or measurements; (b) the date(s) analyses were performed; (c) the company or entity that performed the analysis; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. (Ref. APC-S-6, Section III.A.3.bb(1)(a)-(f))	YES	CONTINUOUS	PLANT RECORDS
5.A.3	5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: AOC-S-6, Section III.A.3.b(2))	NO	CONTINUOUS	ALTHOUGH ALL REQUIRED CALIBRATION BEEN PERFORMED, SOME CALIBRATION REPORTS ARE MISSING FROM THE PLANT'S RECORDS. THESE HAVE BEEN REQUESTED FROM THE VENDOR WHO SERVICES THE SYSTEM.

KOPPERS, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.A.4	5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))	YES	INTERMITTENT	ANY NONCOMPLIANT EVENT EXCEEDING 40% OPACITY WAS REPORTED WITHIN THE APPROPRIATE TIME FRAME SUBSEQUENT TO ITS OCCURRENCE AND IN THE SEMI-ANNUAL REPORTS SUBMITTED ON JULY 2, 2008 (CERTIFIED MAIL NO.: 7007 3020 0001 0626 5553) FOR JANUARY THROUGH JUNE AND JANUARY 26, 2009 (CERTIFIED MAIL: 7008 1140 0001 0773 4843) FOR JULY THROUGH DECEMBER.
5.A.5	5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))	YES	INTERMITTENT	THE PLANT'S CEMS MONITORS AND RECORDS INSTANCES OF OPACITY EXCURSIONS. SUCH INSTANCES ARE COMMUNICATED VIA CORRESPONDENCES AS DICTATED BY THE PLANT'S TVOP. THE PROBABLE CAUSES OF THE UPSETS AND THE REQUIRED CORRECTIVE ACTIONS ARE DOCUMENTED ON THE CORRESPONDENCE.
5.A.6	5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.	YES	CONTINUOUS	EMMISSION SAMPLING WAS CONDUCTED PER THOSE DESCRIBED IN CFR 40, PART 60, APPENDIX A - METHODS 1 THROUGH 5. SUCH WAS REFLECTED IN THE OCTOBER 10, 2008 30 DAY NOTIFICATION OF STACK TEST LETTER (CERTIFIED MAIL NO. 7007 3020 0001 0626 5669)
5.A.7	5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.	YES	CONTINUOUS	SUCH RECORDS ARE MAINTAINED AT THE SITE.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.B.1	5.B.1 The permittee shall record the time and duration of any opacity excursions and the corrective actions taken.	YES	INTERMITTENT	THE PLANT'S CEMS MONITORS AND RECORDS INSTANCES OF OPACITY EXCURSIONS. SUCH INSTANCES ARE COMMUNICATED VIA CORRESPONDENCES AS DICTATED BY THE PLANT'S TVOP. THE PROBABLE CAUSES OF THE UPSETS AND THE REQUIRED CORRECTIVE ACTIONS ARE DOCUMENTED ON THE CORRESPONDENCE. THE TIME AND DURATION OF A GIVEN EXCURSION IS RECORDED BY THE CEMS AND RELAYED IN THE RESPECTIVE CORRESPONDENCE.
5.B.2	5.B.2 For Emission Point AA-003, Ref. No. 9, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records are required to be kept for the life of the source. (Ref.: 40 CFR 60.116b(a) & (b))	YES	CONTINUOUS	A TABLE IS MAINTAINED REFLECTING THE DIMENSIONS OF THE VESSELS REFERENCED IN THE TVOP.
5.B.3	5.B.3 The permittee shall keep a record of the woodwaste feed rate and the office wastepaper as specified in 5.A.3.	YES	CONTINUOUS	PLANT RECORDS
5.C.1	5.C.1 For Emission Point AA-001, the permittee shall submit a report with the time and duration of any opacity excursions and the corrective actions taken as specified in 5.A.4.	YES	INTERMITTENT	THE PLANT'S CEMS MONITORS AND RECORDS INSTANCES OF OPACITY EXCURSIONS. SUCH INSTANCES ARE COMMUNICATED VIA CORRESPONDENCES AS DICTATED BY THE PLANT'S TVOP. THE PROBABLE CAUSES OF THE UPSETS AND THE REQUIRED CORRECTIVE ACTIONS ARE DOCUMENTED ON THE CORRESPONDENCE. THE TIME AND DURATION OF A GIVEN EXCURSION IS RECORDED BY THE CEMS AND RELAYED IN THE RESPECTIVE CORRESPONDENCE.

KOPPERS, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 2008

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.C.2	5.C.2 For Emission Point AA-002, the permittee shall submit a report certifying the fuel sulfur content of the fuel oil as specified in 5.A.4	N/A	INTERMITTENT	THE OIL FIRED BOILER HAS BEEN TAKEN OUT OF SERVICE. IT IS NO LONGER USED FOR THE SAKE OF STEAM GENERATION.

Vance R. Haskins
Plant Manager

KOPPERS

AI 876

Grenada County

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NOV 26 2008
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 X11
Fax 662 226 4588
HaskinVR@koppers.com
www.koppers.com

November 19, 2008

Mr. Phillip LaBarre
Mississippi Department of Environmental Quality (DEQ)
Office of Pollution Control
Environmental Permits Division
Timber and Wood Products Branch – ECED
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL: 7008 1140 0001 0773 4094

Subject: Title V Operating Permit - #0960-00012
10 Day Notification of Stack Test
Koppers Inc. – Tie Plant, Mississippi

Dear Mr. LaBarre:

The Koppers Inc. facility, located at 1 Koppers Drive in Tie Plant, Grenada County, Mississippi, plans to conduct its biennial stack test to monitor particulate emissions and opacity for the Wellons wood-fired boiler (Emission Point AA-001) on December 8, 2008, in accordance with Sections 5.B and C of the Title V Operating Permit (TVOP) #0960-00012. Per Section 5.C of the TVOP, Koppers is submitting a written notification to the Mississippi Department of Environmental Quality (MDEQ) at least 10 days prior to the intended test date so that an observer may be afforded the opportunity to witness the test. Koppers previously submitted the written stack test protocol to the MDEQ on October 10, 2008 via Certified Mail No. 7007 3020 0001 0626 5669.

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.

If you have any questions or comments regarding this notification, please do not hesitate to contact me at 662-226-4584, ext. 11.

Sincerely,

A handwritten signature in black ink, appearing to read "Vance R. Haskin". The signature is written in a cursive style with a large initial "V".

Vance R. Haskin
Plant Manager

cc: Ms. Joyce Fankulewski, Koppers Inc.

Vance R. Haskin
Plant Manager

KOPPERS

A1-876
Grenada County

RECEIVED

NOV 25 2008

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
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www.koppers.com

November 19, 2008

Mr. Philip LaBarre
Mississippi Department of Environmental
Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL: 7008 1140 0001 0773 4100

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance
Koppers Inc. - Grenada, Mississippi

Dear Mr. Abu-Mirshid::

In accordance with Title V Operating Permit #0960-00012, Section 1.24(c), this letter provides notification of a scheduled shutdown of the wood fired boiler (Source AA-001) at the Koppers Inc. facility in Grenada, Mississippi for maintenance purposes. Shutdown will occur on Friday, December 5, 2008. We will commence maintenance activities on the morning of Saturday, December 6th and will continue until these are complete. Startup is anticipated to occur on Monday, December 8th. Although the boiler is currently being properly operated, we believe that the work performed on this boiler during the shutdown will improve the operating efficiency of the boiler.

The maintenance to be performed on the boiler will include the removal of ash build up from around the tubes, combustion chamber, heat exchanger, and modi-cones. Additionally, various operational and environmental controls will be replaced and or added to the system. Emissions during and upon startup following the completion of these maintenance activities may exceed the permit limit for opacity. However, every possible measure will be taken to minimize excess emissions during and following the performance of these activities, and upon startup of the boiler.

If you have any questions or comments regarding the scheduled shutdown and maintenance of the boiler, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Vance R. Haskin". The signature is written in a cursive style with a large initial 'V'.

Vance R. Haskin

CC: Joyce Fankulewski – KI CSG

Vance R. Haskin
Plant Manager



RECEIVED

JUN 25 2008

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
HaskingVR@koppers.com
www.koppers.com

June 20, 2008

Mr. Philip LaBarre
Mississippi Department of Environmental
Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL: 7007 3020 0001 0626 5546

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance
Koppers Inc. - Grenada, Mississippi (Grenada County)

Dear Mr. Abu-Mirshid::

In accordance with Title V Operating Permit #0960-00012, Section 1.24(c), this letter provides notification of a scheduled shutdown of the wood fired boiler (Source AA-001) at the Koppers Inc. facility in Grenada, Mississippi for maintenance purposes. Shutdown will occur on Thursday, July 3, 2008. We will commence maintenance activities on the morning of Saturday, July 5 and will continue until these are complete. Startup is anticipated to occur on Tuesday, July 8. Although the boiler is currently being properly operated, we believe that the work performed on this boiler during the shutdown will improve the operating efficiency of the boiler.

The maintenance to be performed on the boiler will include the removal of ash build up from around the tubes, combustion chamber, heat exchanger, and modi-cones. Additionally, various operational and environmental controls will be replaced and or added to the system. Emissions during and upon startup following the completion of these maintenance activities may exceed the permit limit for opacity. However, every possible measure will be taken to minimize excess emissions during and following the performance of these activities, and upon startup of the boiler.

If you have any questions or comments regarding the scheduled shutdown and maintenance of the boiler, please do not hesitate to contact me at 662-226-4584.

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,

AI # 876

P.L.

and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in cursive script that reads "Vance R. Haskin".

Vance R. Haskin

CC: Joyce Fankulewski – KI CSG

Vance R. Haskin
Plant Manager



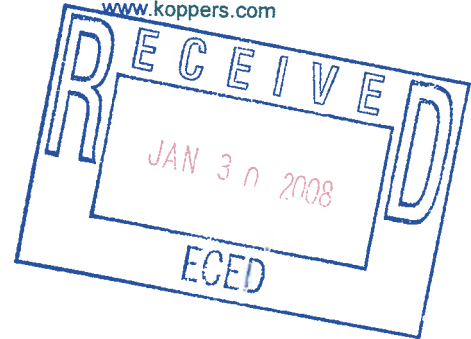
AI#876



January 29, 2008

Azzam Abu-Mirshid
Timber And Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385

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



Subject: 2007 Title V Air Permit Compliance Certification
Title V Permit No. 0960-00012
Koppers Inc., Grenada, MS

Dear Mr. Abu-Mirshid:

Attached is a copy of the 2007 Title V Air Permit Compliance Certification corresponding to Title V Permit No. 0960-00012. Should you have any questions please call.

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.

Vance R. Haskin / Vance R. Haskin Date: 01/29/08
Plant Manager

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

Sincerely,

Vance R. Haskin
Plant Manager

Enclosure

CC: Joyce Fankulewski – CSG, Koppers – Pittsburgh, PA
Ms. Rosalyn D. Hughes – USEPA Region 4

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
1.1	SECTION 1. GENERAL CONDITIONS 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)	NO	INTERMITTENT	A CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS) IS USED AT THE FACILITY. ON THE EVENING OF JANUARY 8, 2007 JUNE 12 THE CEMS RECORDED A SINGLE SIX MINUTE EPISODE. DETAILS OF THE OCCURRENCE WERE FORWARDED TO THE MDEQ. (CERTIFIED MAIL NO: 7002 0460 0003 2212)
1.2	1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)	YES	CONTINUOUS	NO ENFORCEMENT ACTIONS WERE TAKEN BY THE MDEQ.
1.3	1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)	YES	INTERMITTENT	COMPLIANCE WITH PERMIT CONDITIONS WAS SUSTAINED.
1.4	1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)	YES	CONTINUOUS	NO ACTIONS INVOLVING PROPERTY RIGHTS HAVE OCCURRED.
1.5	1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee	YES	CONTINUOUS	PER REQUEST BY THE MDEQ INFORMATION WAS PROVIDED ON MAY 30, 2007 VIA CERTIFIED MAIL: 7002 0460 0003 7596 2366 AND ON JUNE 14, 2007 VIA A FAX.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 1. GENERAL CONDITIONS shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)			
1.6	1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)	YES	CONTINUOUS	NO ACTION BY KOPPERS IS NECESSARY.
1.7	1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6. (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such engineering calculations (e.g.,	YES	INTERMITTENT	EMISSION FEE REQUEST WAS PAID TO THE MSDEQ IN AUGUST 2007. AN ESTIMATE OF ACTUAL EMISSIONS WERE USED AS THE BASIS FOR THE FEE.

**KOPPERS , INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)</p> <p>(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)</p> <p>(c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)</p> <p>(d) If in disagreement with the calculation or applicability of</p>			

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 1. GENERAL CONDITIONS the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)			
1.8	1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)	YES	CONTINUOUS	NO PERMIT REVISIONS OF THIS NATURE HAVE BEEN REQUESTED BY PERMITTEE.
1.9	1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)	NO	INTERMITTENT	ALTHOUGH IT WAS SUBMITTED IN A TIMELY MANNER, INADVERTANTLY A CERTIFICATION STATEMENT WAS NOT INCLUDED ON A LETTER IN 2007. INFORMATION ASSOCIATED WITH THE LETTER FOLLOWS: MAY 18, 2007 - CERTIFIED MAIL: 7002 0460 0003 7596 2465; NOTIFICATION OF BOILER SHUTDOWN AND MAINTENANCE.
1.10	1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following: (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit; (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit; (c) inspect at reasonable times any facilities, equipment	YES	INTERMITTENT	A MULTIMEDIA INSPECTION WAS CONDUCTED ON APRIL 5, 2007 BY THE MDEQ.

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>(including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and</p> <p>(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)</p>			
1.11	1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9 (a))	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.
1.12	1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9 (b))	YES	CONTINUOUS	ALL NECESSARY SAMPLING PORTS ARE INSTALLED.
1.13	1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)	YES	CONTINUOUS	PLANT RECORDS.
1.14	<p>1.14 Nothing in this permit shall alter or affect the following:</p> <p>(a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;</p> <p>(b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of</p>	YES	CONTINUOUS	NO ACTION REQUIRED OF KOPPERS DURING 2007.

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>permit issuance;</p> <p>(c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.</p> <p>(d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)</p>			
1.15	1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)	YES	CONTINUOUS	NOT APPLICABLE UNDER CAA SECTION 112 (r)(7)(B)(II).
1.16	1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)	YES	CONTINUOUS	MSDEQ ISSUED A DRAFT PERMIT SEPTEMBER 19, 2003. COMMENTS WERE MADE TO MSDEQ OCTOBER 6, 2003 A FINAL VERSION WAS ISSUED JANUARY 29, 2004 THE PERMIT WILL EXPIRE ON JANUARY 1, 2009
1.17	1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if: (a) the changes are not modifications under any provision of Title I of the Act; (b) the changes do not exceed the emissions allowable under this permit;	YES	CONTINUOUS	A CORRESPONDENCE RELATED TO CONDITION 1.17 WAS SUBMITTED TO THE MDEQ ON OCTOBER 2, 2007. INFORMATION ASSOCIATED WITH THE LETTER FOLLOWS: OCTOBER 2, 2007 – NOTIFICATION OF

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:</p> <p>(1) a brief description of the change(s),</p> <p>(2) the date on which the change will occur,</p> <p>(3) any change in emissions, and</p> <p>(4) any permit term or condition that is no longer applicable as a result of the change;</p> <p>(d) the permit shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)</p>			BOILER CONTROL INSTALLATION.
1.18	1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)	YES	CONTINUOUS	KOPPERS WAS NOT INFORMED OF ANY AIR POLLUTION EMERGENCY AFFECTING THE OPERATION OF THIS PLANT DURING 2007.
1.19	1.19 Except as otherwise provided by Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", or otherwise provided herein, a modification of the facility requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS

KOPPERS , INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <p>(a) routine maintenance, repair, and replacement;</p> <p>(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;</p> <p>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</p> <p>(d) use of an alternative fuel or raw material by a stationary source which:</p> <p>(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or</p> <p>2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;</p> <p>(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under</p>			

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or</p> <p>(f) any change in ownership of the stationary source."</p>			
1.20	1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)	YES	CONTINUOUS	NO CHANGE OF OWNERSHIP HAS OCCURRED.
1.21	1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.I)	YES	CONTINUOUS	NO ACTION REQUIRED BY KOPPERS.
1.22	<p>1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.</p> <p>(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.</p> <p>(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied</p>	YES	CONTINUOUS	PLANT RECORDS. NO OPEN BURNING HAS OCCURRED IN 2007.

**KOPPERS , INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	dwelling. (C) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-I, Section 3.7)			
1.23	<p>1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.</p> <p>(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be</p>	YES	CONTINUOUS	NO EMERGENCY EVENTS ADDRESSED IN THIS REQUIREMENT OCCURRED IN 2007.

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p style="text-align: center;">SECTION 1. GENERAL CONDITIONS</p> <p>demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <p>(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;</p> <p>(2) the permitted facility was at the time being properly operated;</p> <p>(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and</p> <p>(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Re.: APC-S-6, Section III.G.)</p>			
1.24	<p>1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.</p> <p>(a) Upsets (as defined by APC-S-1, Section 2.34)</p>	YES	INTERMITTENT	<p>NOTIFICATION OF ALL RELATED EPISODES WAS MADE TO THE MDEQ.</p> <p>JANUARY 5, 2007 – CERTIFIED MAIL: 7002 0460 0003 7596 2236;</p>

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>(1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:</p> <ul style="list-style-type: none"> (a) an upset occurred and that the permittee can identify the cause(s) of the upset; (b) the source was at the time being properly operated; (c) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and (e) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken. <p>2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(3) This provision is in addition to any upset provision contained in any applicable requirement.</p> <p>(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)</p>			<p>MECHANICAL UPSET</p> <p>MAY 18, 2007 – CERTIFIED MAIL: 7002 0460 0003 7596 2465; SCHEDULED SHUTDOWN FOR MAINTENANCE</p> <p>JUNE 1, 2007 – CERTIFIED MAIL: 7002 0460 0003 7596 2373; SCHEDULED SHUTDOWN COMPLETION</p> <p>JULY 27, 2007 – CERTIFIED MAIL: 7006 0810 0004 3592 9992; MECHANICAL UPSET</p> <p>DECEMBER 10, 2007 – CERTIFIED MAIL: 7006 3450 0000 5962 5921; SCHEDULED SHUTDOWN FOR MAINTENANCE</p> <p>OCTOBER 30, 2007 – CERTIFIED MAIL: 7006 3450 0000 5962 5891; MECHANICAL UPSET</p>

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION SECTION 1. GENERAL CONDITIONS	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/ INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:</p> <p>(a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;</p> <p>(b) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or</p> <p>(c) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(C) Maintenance.</p> <p>(1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other</p>			

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>SECTION 1. GENERAL CONDITIONS</p> <p>regulatory requirements if the permittee can demonstrate the following:</p> <p>(a) the permittee can identify the need for the maintenance;</p> <p>(b) the source was at the time being properly operated;</p> <p>(c) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;</p> <p>(d) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and</p> <p>(e) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply.</p> <p>(Ref.: APC-S-I, Section 10)</p>			
1.25	<p>1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in</p>	YES	CONTINUOUS	PLANT RECORDS. NO DEMOLITION OR RENOVATION ACTIVITIES ADDRESSED BY THIS REQUIREMENT OCCURRED IN 2007.

KOPPERS , INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 1. GENERAL CONDITIONS			
	order to perform the referenced activities.			

**KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007**

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 2 EMISSION POINTS & POLLUTION CONTROL DEVICES "List of Emission Points"	YES	CONTINUOUS	Minor discrepancies in tank volumes have been determined to exist. The extent of these discrepancies has minimal impact on emission levels.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 6: ALTERNATIVE OPERATING SCENARIOS None permitted, Section 6 is Not Applicable			

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS/INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	SECTION 7: TITLE VI REQUIREMENTS Section 7 is Not Applicable			

KOPPERS, INC.
GRENADA, MS PLANT
TITLE V OPERATING PERMIT
COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.A.1	<p>3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).</p> <p>(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.</p> <p>(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)</p>	YES	INTERMITTENT	<p>PLANT RECORDS. DURING STARTUP AND SOOT BLOWING, PROCEDURES USED LIMIT OPACITY.</p> <p>ANY NONCOMPLIANT EVENTS EXCEEDING 40% OPACITY WERE REPORTED WITHIN THE APPROPRIATE TIME FRAME SUBSEQUENT TO THEIR OCCURRENCE AND IN THE SEMI-ANNUAL REPORTS SUBMITTED ON JULY 24, 2007 (CERTIFIED MAIL: 7006 0810 0004 3593 0097) FOR JANUARY THROUGH JUNE AND JANUARY 16, 2008 (CERTIFIED MAIL: 7006 3450 0000 5965 0084) FOR JULY THROUGH DECEMBER.</p>
3.A.2	3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)	YES	CONTINUOUS	PLANT RECORDS. OPERATIONS DO NOT PRODUCE OPACITY AT THIS LEVEL.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 3. EMISSION LIMITATIONS & STANDARDS				
3.B.1	3.B.1 For Emission Points AA-001 particulate matter emission rates shall not exceed 0.30 grains per standard dry cubic foot and the total wood waste feed rate shall not exceed 15,500 lbs/hr.	YES	CONTINUOUS	PLANT RECORDS, TEST DATA AND VENDOR INFORMATION. AA-001 WAS TESTED ON NOVEMBER 14, 2006 AND DEMONSTRATED COMPLIANCE. THIS IS A BIENNIAL TEST THAT IS SCHEDULED FOR 2008.
3.B.2	3.B.2 For Emission Points AA-001 and AA-002, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMITATION.
3.B.3	3.B.3 For Emission Point AA-002, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{-0.1667}$ <p>where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.</p>	YES	CONTINUOUS	EMISSION POINT AA-002 WAS REPLACED WITH A NATURAL GAS FIRED BOILER WHICH WAS APPROVED BY THE MDEQ. THE GAS FIRED BOILER WAS NOT OPERATED IN 2007.
3.B.4	3.B.5 For Emission Points AA-004 and AA-008 through AA-012, the particulate matter emission rate shall not exceed the amount determined by the relationship $E = 4.1 p^{0.67}$	YES	CONTINUOUS	PLANT RECORDS. FUEL USED PRECLUDES EMISSIONS ABOVE THIS LIMIT.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
	<p>SECTION 3. EMISSION LIMITATIONS & STANDARDS</p> <p>where E is the emission rate in pounds per hour, and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.</p>			
3.B.5	<p>For Emission Point AA-003, Ref. No. 9, the permittee is subject to and shall comply with 40 CFR 60.110b, the New Source Performance Standards (NSPS) Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Storage vessels with a design capacity greater than or equal to 75 m3 but less than 151 m3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from the General Provisions (NSPS Subpart A) and from other provisions of Subpart Kb, except the monitoring requirements specified in 40 CFR 60.116b (See Continued 5.B.1). A copy of Subpart Kb is attached in Appendix C.</p>	YES	CONTINUOUS	PLANT RECORDS AND DATA SUBMITTED WITH APPLICATION. THESE SOURCES DO NOT PRODUCE PARTICULATE EMISSIONS IN EXCESS OF THIS LIMIT.

KOPPERS, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 4 COMPLIANCE SCHEDULE				
4.1	4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit	YES	CONTINUOUS	Plant Records
4.2	4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following: (a) the identification of each term or condition of the permit that is the basis of the certification; (b) the compliance status; (c) whether compliance was continuous or intermittent; (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period; (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)	YES	INTERMITTENT	A Certificate of Compliance for Sections 1 & 3 of the plant's TVOP was mailed on January 26, 2007 as has been historical practice. (Certified Mail No.: 7006 0810 0004 3593 0141 & 7006 0810 004 3593 0134) Per the MDEQ's request a Certificate of Compliance for Sections 2, 4, 5, 6 and 7 was mailed on May 25, 2007 (Certified Mail No.: 7002 0460 0003 7596 2458).

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.A.1	5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.	YES	CONTINUOUS	PLANT RECORDS
5.A.2	5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of requirement monitoring information the following: (a) the date, place as defined in the permit, and time of sampling or measurements; (b) the date(s) analyses were performed; (c) the company or entity that performed the analysis; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. (Ref. APC-S-6, Section III.A.3.bb(1)(a)-(f))	YES	CONTINUOUS	PLANT RECORDS
5.A.3	5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: AOC-S-6, Section III.A.3.b(2))	NO	CONTINUOUS	ALTHOUGH ALL REQUIRED CALIBRATION BEEN PERFORMED, SOME CALIBRATION REPORTS ARE MISSING FROM THE PLANT'S RECORDS. THESE HAVE BEEN REQUESTED FROM THE WHO SERVICES THE SYSTEM.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.A.4	5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))	YES	INTERMITTENT	ANY NONCOMPLIANT EVENT EXCEEDING 40% OPACITY WAS REPORTED WITHIN THE APPROPRIATE TIME FRAME SUBSEQUENT TO ITS OCCURRENCE AND IN THE SEMI-ANNUAL REPORTS SUBMITTED ON JULY 24, 2007 (CERTIFIED MAIL: 7006 0810 0004 3593 0097) FOR JANUARY THROUGH JUNE AND JANUARY 16, 2008 (CERTIFIED MAIL: 7006 3450 0000 5965 0084) FOR JULY THROUGH DECEMBER.
5.A.5	5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))	YES	INTERMITTENT	THE PLANT'S CEMS MONITORS AND RECORDS INSTANCES OF OPACITY EXCURSIONS. SUCH INSTANCES ARE COMMUNICATED VIA CORRESPONDENCES AS DICTATED BY THE PLANT'S TVOP. THE PROBABLE CAUSES OF THE UPSETS AND THE REQUIRED CORRECTIVE ACTIONS ARE DOCUMENTED ON THE CORRESPONDENCE.
5.A.6	5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.	YES	CONTINUOUS	EMISSION SAMPLING WAS CONDUCTED PER THOSE DESCRIBED IN CFR 40, PART 60, APPENDIX A - METHODS 1 THROUGH 5. SUCH WAS REFLECTED IN THE OCTOBER 19, 2006 STACK TEST NOTIFICATION LETTER (CERTIFIED MAIL NO. 7002 0460 0003 7596 0904.)
5.A.7	5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.	YES	CONTINUOUS	SUCH RECORDS ARE MAINTAINED.

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.B.1	5.B.1 The permittee shall record the time and duration of any opacity excursions and the corrective actions taken.	YES	INTERMITTENT	THE PLANT'S CEMS MONITORS AND RECORDS INSTANCES OF OPACITY EXCURSIONS. SUCH INSTANCES ARE COMMUNICATED VIA CORRESPONDENCES AS DICTATED BY THE PLANT'S TVOP. THE PROBABLE CAUSES OF THE UPSETS AND THE REQUIRED CORRECTIVE ACTIONS ARE DOCUMENTED ON THE CORRESPONDENCE. THE TIME AND DURATION OF A GIVEN EXCURSION IS RECORDED BY THE CEMS AND RELAYED IN THE RESPECTIVE CORRESPONDENCE.
5.B.2	5.B.2 For Emission Point AA-003, Ref. No. 9, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records are required to be kept for the life of the source. (Ref.: 40 CFR 60.116b(a) & (b))	YES	CONTINUOUS	A TABLE IS MAINTAINED REFLECTING THE DIMENSIONS OF THE VESSELS REFERENCED IN THE TVOP.
5.B.3	5.B.3 The permittee shall keep a record of the wastewater feed rate and the office wastepaper as specified in 5.A.3.	YES	CONTINUOUS	PLANT RECORDS
5.C.1	5.C.1 For Emission Point AA-001, the permittee shall submit a report with the time and duration of any opacity excursions and the corrective actions taken as specified in 5.A.4.	YES	INTERMITTENT	THE PLANT'S CEMS MONITORS AND RECORDS INSTANCES OF OPACITY EXCURSIONS. SUCH INSTANCES ARE COMMUNICATED VIA CORRESPONDENCES AS DICTATED BY THE PLANT'S TVOP. THE PROBABLE CAUSES OF THE UPSETS AND THE REQUIRED CORRECTIVE ACTIONS ARE DOCUMENTED ON THE CORRESPONDENCE. THE TIME AND DURATION OF A GIVEN EXCURSION IS RECORDED BY THE CEMS AND RELAYED IN THE RESPECTIVE CORRESPONDENCE.

KOPPERS, INC.
 GRENADA, MS PLANT
 TITLE V OPERATING PERMIT
 COMPLIANCE CERTIFICATION 2007

ITEM	PERMIT CONDITION	COMPLIANCE STATUS (YES/NO)	COMPLIANCE TYPE (CONTINUOUS / INTERMITTENT)	METHOD OF DETERMINING COMPLIANCE
SECTION 5: MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS				
5.C.2	5.C.2 For Emission Point AA-002, the permittee shall submit a report certifying the fuel sulfur content of the fuel oil as specified in 5.A.4	N/A	INTERMITTENT	THE OIL FIRED BOILER HAS BEEN TAKEN OUT OF SERVICE. IT IS NO LONGER USED FOR THE SAKE OF STEAM GENERATION.

Vance R. Haskin
Plant Manager

RECEIVED KOPPERS

JAN 17 2008

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
HaskinVR@koppers.com
www.koppers.com

January 16, 2008

Mr. Azzam Abu-Mirshid, P.E.
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL: 7006 3450 0000 5965 0084

**Subject: Title V Operating Permit No. 0960-00012
Semi-Annual Air Report for July 2007 through December 2007
Koppers Inc. – Tie Plant, Mississippi**

Dear Mr. Abu-Mirshid:

Enclosed please find the semi-annual report of required monitoring for the period July through December 2007 for the Koppers Inc. facility located at 1 Koppers Drive in Tie Plant, Mississippi. This report contains information regarding opacity emissions. The facility uses a Continuous Emissions Monitoring System (CEMS) to monitor the emissions from its *Wellons* wood-fired boiler identified as emissions point AA-001. The following bullets summarize the events surrounding the episodes reflected on the attached "Episode List Reports".

- On July 23, 2007 at 8:24 PM a mechanical failure in the boiler's force-draft fan resulted in an upset. A single six-minute episode was logged by the CEMS. A correspondence relaying the details of this event was forwarded to you via certified mail (7006 0810 0004 3592 9992). A copy of this correspondence is attached for review.
- On October 26, 2007 two consecutive six-minute episodes occurred due to a failure in the boiler's fuel feed system. A correspondence relaying the details of this event was forwarded to you via certified mail (7002 0460 0003 7596 2212). A copy of this correspondence is attached for review.
- Other episodes reflected on October 1, October 22, and October 26 were associated with start-up activities per Section 3.A.1 (a) of the TVOP.
- Episodes reflected on September 5 and December 3 were associated with the CEMS vendor conducting audits of the system.

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.

Sincerely,

A handwritten signature in black ink that reads "Vance R. Haskin". The signature is written in a cursive style with a large, stylized "V" at the beginning.

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, KI-CSG

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 07/01/07 00:00 to 09/30/07 23:59
 Generated: 01/10/2008
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
07/23/07 20:24 -	07/23/07 20:29	1: OV	40.700	/	40.000	(1.75%)	Process Equipment Probs	Repaired Process E
09/05/07 09:24 -	09/05/07 09:29	1: OV	91.500	/	40.000	(128.75%)	Preventive Maintenance	No Action Needed
09/05/07 10:24 -	09/05/07 10:29	1: OV	40.400	/	40.000	(1.00%)	Preventive Maintenance	No Action Needed
09/05/07 10:36 -	09/05/07 10:41	1: OV	40.400	/	40.000	(1.00%)	Preventive Maintenance	No Action Needed
09/05/07 10:48 -	09/05/07 10:53	1: OV	40.900	/	40.000	(2.25%)	Preventive Maintenance	No Action Needed
09/05/07 11:00 -	09/05/07 11:05	1: OV	40.700	/	40.000	(1.75%)	Preventive Maintenance	No Action Needed
09/05/07 11:12 -	09/05/07 11:17	1: OV	40.400	/	40.000	(1.00%)	Preventive Maintenance	No Action Needed

Total Reported Time: 4416.0 hours

TOTAL DURATION = 0.70 hours

1: Over limit	=	0.70 hours
6: Process Equipment Probs	=	0.10 hours
15: Preventive Maintenance	=	0.60 hours

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 10/01/07 00:00 to 12/31/07 23:59
 Generated: 01/10/2008
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
10/01/07 07:42 -	10/01/07 07:47	1: OV	47.700	/	40.000	(19.25%)	Startup	No Action Needed
10/22/07 05:48 -	10/22/07 05:53	1: OV	42.000	/	40.000	(5.00%)	Startup	No Action Needed
10/26/07 03:06 -	10/26/07 03:11	1: OV	41.800	/	40.000	(4.50%)	Control Equip. Malfunction	Repaired Control E
10/26/07 03:12 -	10/26/07 03:17	1: OV	52.500	/	40.000	(31.25%)	Control Equip. Malfunction	Repaired Control E
10/26/07 03:54 -	10/26/07 03:59	1: OV	51.600	/	40.000	(29.00%)	Startup	No Action Needed
12/03/07 14:00 -	12/03/07 14:05	1: OV	57.000	/	40.000	(42.50%)	Preventive Maintenance	No Action Needed
12/03/07 14:06 -	12/03/07 14:11	1: OV	48.300	/	40.000	(20.75%)	Preventive Maintenance	No Action Needed

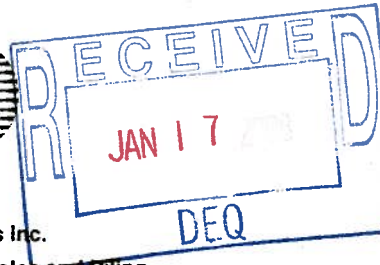
Total Reported Time: 2208.0 hours

TOTAL DURATION = 0.70 hours

1: Over limit	=	0.70 hours
2: Control Equip. Malfunction	=	0.20 hours
3: Startup	=	0.30 hours
15: Preventive Maintenance	=	0.20 hours

Vance R. Haskin
Plant Manager

KOPPERS



July 27, 2007

Mr. Azzam Abu-Mirshid, P.E.
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

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

CERTIFIED MAIL: 7006 0810 0004 3592 9992

Subject: CEMS Episodes
Title V Operating Permit #0960-00012
Koppers Inc. – Tie Plant, Mississippi

Dear Mr. Abu-Mirshid:

On the night of July 23, 2007 at 8:20 PM the plant's Continuous Emissions Monitoring System (CEMS) registered an episode. Review of operating records and interviews with the Boiler Operator and the maintenance staff revealed that the occurrence resulted from mechanical problems with the boiler's force draft fan. Specifically, the belts servicing the fan broke thus impeding the draft and combustion within the fire cells. Consequently, opacity increased. The average for the six minute episode was 40.7% versus a permit limit of 40%. The Boiler Operator and a mechanic were called to the plant to replace the belts subsequent to the occurrence. Once the belts were replaced the boiler was started up once again without incident. Per Section 1.24(a) of the plant's permit this would represent an upset. A copy of the corresponding "Episode List Report" generated by the CEMS is attached for review.

As corrective action the plant's maintenance staff will enhance the inspection and replacement frequency of the belts associated with the operations of the draft system on the boiler.

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.

Sincerely,

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, Koppers Inc.

Vance R. Haskin
Plant Manager



October 30, 2007

Mr. Azzam Abu-Mirshid, P.E.
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

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

~~CERTIFIED MAIL: 7006 3450 0000 5962 5891~~

**Subject: CEMS Episodes
Title V Operating Permit #0960-00012
Koppers Inc. – Tie Plant, Mississippi**

Dear Mr. Abu-Mirshid:

On the night of October 26, 2007 two consecutive six-minute episodes were registered by the plant's Continuous Emissions Monitoring System (CEMS). They occurred at 3:06 AM and 3:12 AM reflecting average opacity levels of 41.8% and 52.5%, respectively. A review of operating records and interviews with plant personnel revealed that the occurrence resulted from mechanical problems with the boiler's fuel feed system. Specifically, a component of the system became detached and blocked the fuel feed from one of the two silos servicing the boiler. The change in fuel mixture associated with this occurrence resulted in a spike in opacity. The CEMS alarm system initiated as the opacity level climbed prompting plant personnel to respond by discontinuing the fuel feed to the boiler and pulling the ash and dust from the fire cells. Per Section 1.24(a) of the plant's permit this would represent an upset. A copy of the corresponding "Episode List Report" generated by the CEMS is attached for review.

As corrective actions two contractors were called to the plant to aid in the initial trouble shooting of the occurrence and the manufacture of the system is being consulted to seek options for eliminating the risk of recurrence.

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.

Sincerely,

A handwritten signature in cursive script that reads "Vance R. Haskin".

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, Koppers Inc.

September 7, 2010

Koppers Inc
PO Box 160
Tie Plant, MS 38960

RE: RICE MACT, 40 CFR Part 63, Subpart ZZZZ--Initial Notification Information
Koppers Inc
Grenada County

Dear Environmental Contact:

On March 3, 2010, the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ, was modified to include requirements for existing compression ignition (CI) engines located at both area and major sources of hazardous air pollutants (HAPs). Section 63.6645(a) of the rule requires all sources subject to the rule to submit an initial notification of applicability within 120 days of the effective date of the rule. The effective date of the modified rule was May 3, 2010; therefore, the initial notifications for newly affected engines were due by August 31, 2010.

In an attempt to notify all potentially impacted facilities, since there could be newly affected engines at almost any type of facility, we are sending this letter to all sources with a Title V or Synthetic Minor Operating Permit. If you have an engine affected by the modified rule and have not submitted the required notification, please do so immediately. We have developed an applicability flowchart to assist you in determining which engines are subject to the revised rule and linked it on the Air Division's homepage of the MDEQ website <http://www.deq.state.ms.us>. EPA has also developed an applicability flowchart, a corresponding requirements table, and an example of an initial notification of applicability that can be accessed in the section titled "Implementation Information" found at <http://www.epa.gov/ttn/atw/rice/ricepg.html>.

Additionally, Subpart ZZZZ was modified again on August 20, 2010, to include requirements for existing spark ignition (SI) engines located at area sources of HAPs and existing SI engines with a site rating of less than or equal to 500 brake horsepower located at major sources of HAPs. Engines that are now subject to these requirements must submit an initial notification by February 16, 2011. Therefore, you should also begin evaluating the applicability of these additional requirements to engines located at your facility.

Please be advised that if you do not have an engine affected by these modifications, you are not required to do anything. A complete copy of both modified rules can be accessed in the section titled "Rule Information" on EPA's website linked above. If you have any questions or need additional information, please contact me at (601) 961-5556 or BJ Hailey at (601) 961-5783.

Sincerely,



Melissa Fortenberry, P.E.
Air Toxics Branch

mbf

Marcus C. Smith
Plant Manager



Grenada Co
Air

RECEIVED
MAY 21 2010

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
SmithMC@koppers.com
www.koppers.com

May 19, 2010

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7007 3020 0001 0626 5683

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

On the afternoon of May 16, 2010, at 4:36PM – 4:42PM an episode of opacity was recorded by the CEMS monitor during operation of the Wellons wood-fired boiler. The episode was a result of rainwater seeping through the seal of the Lighthawk opacity monitor eye, during a heavy rainfall, and blurring the reading surface. After the boiler operator reached the elevated platform, where the monitor is located, and wiped the eye's surface as dry as possible, opacity readings returned to normal levels. The following day, as a corrective measure, the gasket surrounding the eye was sealed with silicone. While conducting this repair the eye had to be opened briefly to apply the silicone gasket material. When opened, the CEMS recorded another false episode of opacity on May 17, 2010, at 4:00PM – 4:06PM.

The operator, who was present during both of the above mentioned time frames, and is certified to read visible emissions by MDEQ, did not observe opacity exceeding 40% during the above mentioned time frames. Per Section 1.24, this would represent an upset as the cause has been identified, the source was being properly operated, steps were taken correct the false readings and notice is given to the DEQ with this letter.

As an additional corrective measure, the contracted service company (GE Energy Management) will perform any needed corrections to the mechanism as appropriate during the next scheduled service visit.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized 'M' and 'S'.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 05/16/10 00:00 to 05/17/10 23:59
 Generated: 05/19/2010
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
05/16/10 16:36 - 05/16/10 16:41	16:41	1: OV	52.500	/	40.000	(31.25%)	Other/Known Excess Cause	Cleaned Control Eq
05/17/10 16:00 - 05/17/10 16:05	16:05	1: OV	53.000	/	40.000	(32.50%)	Other/Known Excess Cause	Repaired Control E

Total Reported Time: 48.0 hours

TOTAL DURATION = 0.20 hours

1: Over limit = 0.20 hours
 9: Other/Known Excess Cause = 0.20 hours

Marcus C. Smith
Plant Manager



RECEIVED
APR 29 2010
Dept of Environmental Quality
Office of Pollution Control

April 27, 2010

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

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

CERTIFIED MAIL: 7008 1140 0001 0773 4704

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

A startup was required of the Wellons boiler on the afternoon of April 23, 2010 following a brief shutdown. As a result of the startup, an episode of opacity was recorded where the average opacity exceeded 40% for 18 minutes. As a condition of our permit, 15 minutes of excess opacity is allowed for startup operations. Since the remaining 3 minutes represents only half of a six-minute averaging period used by the CEMS, and the average opacity reading for the following averaging period was below 40% opacity, Koppers believes that this does not constitute an exceedance of Permit Section 3.A.1(a). However, we are sending notification as a conservative measure.

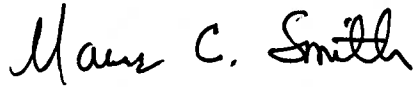
The cause for this episode was determined to arise from a startup after an electrical storm.

As a corrective measure training will be reinforced with operators to ensure startups of the boiler are conducted as quickly and as efficiently as possible.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized 'M' and 'S'.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 04/23/10 00:00 to 04/23/10 23:59
 Generated: 04/27/2010
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
04/23/10 16:30	- 04/23/10 16:35	1: OV	43.300	/	40.000	(8.25%)	Startup	No Action Needed
04/23/10 16:36	- 04/23/10 16:41	1: OV	47.800	/	40.000	(19.50%)	Startup Continued	No Action Needed
04/23/10 16:42	- 04/23/10 16:47	1: OV	53.000	/	40.000	(32.50%)	Startup Continued	No Action Needed

Total Reported Time: 24.0 hours

TOTAL DURATION = 0.30 hours

1: Over limit	= 0.30 hours	
3: Startup	=	0.10 hours
4: Startup Continued	=	0.20 hours

Marcus C. Smith
Plant Manager



AI 876
AIR - TVOP
GRENADA Co.
TMT

March 8, 2010

Mrs. Trayce Moore Thomas
Mississippi Department of Environmental Quality (DEQ)
Office of Pollution Control
Timber and Wood Products Branch – ECED
P.O. Box 2261
Jackson, MS 39225-2261

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 X11
Fax 662 226 4588
smithmc@koppers.com
www.koppers.com

RECEIVED

MAR - 9 2010

Dept of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL: 7008 1140 0001 0773 4544

**Subject: Title V Operating Permit - #0960-00012
Stack Test Results
Koppers Inc. – Tie Plant, Mississippi**

Dear Mrs. Moore-Thomas,

Enclosed are the results of a stack test performed on the Wellons wood-fired boiler, Emission Point AA-001 at the Koppers, Inc. facility on February 9, 2010, in response to permit condition 5.B.3.

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.

If you have any questions or comments regarding this notification, please do not hesitate to contact me at 662-226-4584, ext. 11.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive, flowing style.

Marcus C. Smith
Plant Manager

cc: Joyce Fankulewski, Koppers Inc.



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

February 24, 2010

Mr. Marcus Smith, Plant Manager
Koppers Inc
PO Box 160
Tie Plant, MS 38960

Dear Mr. Smith:

Re: Inspection Report
Koppers Inc
Tie Plant, Mississippi
Grenada County
Air-Title V Operating Permit No. 096000012
Water - Pretreatment Permit No. MSP090300

Enclosed is a copy of the Air- Title V and Water – Pretreatment inspection reports completed as a result of this office's inspection at Koppers Inc on December 16, 2009. The reports should be used by you as a guide for complying with requirements and limitations stated in your permits.

If you have any questions concerning this matter, please contact me at (601) 961-5793.

Sincerely,

Trayce Moore-Thomas
Timber and Wood Products Branch
Environmental Compliance and Enforcement Division

Agency Interest No. 876
INS20100001

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Ethan
Mayeu/ECED/OPC/DEQ
02/02/2010 03:21 PM

To "Simpson Blair R" <SimpsonBR@koppers.com>@INETDEQ
cc
bcc
Subject Re: Koppers Inc - Grenada, MS

FILE COPY

Mr. Simpson,

After review of the information provided below, it is our understanding that the suspect lead-based paint will remain intact on the structure and that no removal or abatement will take place. Additionally, the purpose of the demolition is solely to assist in producing pieces suitable for transportation to a metals recycler. Therefore, based on this information, no permits or authorizations are necessary from the Mississippi Department of Environmental Quality to conduct this activity. Additionally, there do not appear to be any restrictions or guidelines that would dictate or direct your choice in the use of either a cutting torch or hydraulic shear for this demolition.

However, it is our recommendation that should you anticipate significant amounts of loose paint to fall or chip during demolition, this material should be collected and properly handled. Furthermore, care should be exercised to prevent the migration of fugitive material from leaving the site and depositing on adjacent property. Lastly, and more importantly if a cutting torch is utilized for demolition, proper safety attire should be provided as may be necessary to minimize exposure to lead based paint/dust or fumes.

Should you have any further questions regarding this issue, please feel free to contact me at (601)961-5613.

Ethan Mayeu, P.E., BCEE
Solid Waste and Mining Branch
Environmental Compliance and Enforcement Division

"Simpson Blair R" <SimpsonBR@koppers.com>



"Simpson Blair R"
<SimpsonBR@koppers.com>

01/28/2010 04:14 PM

To <ethan_mayeu@deq.state.ms.us>
cc
Subject Koppers Inc - Grenada, MS

Koppers Inc
Grenada County
Air - Title V
096 000012

Mr. Mayeu,

Thank you for taking the time to speak with me today. As discussed Koppers - Grenada Plant plans to dismantle an existing steel water tower which is out of service. The tower is known to be coated with paint which contains lead based paint layer(s). The Company's intent is to dismantle the structure and send the steel to a metal recycler.

After proper notification is made to the State, on State provided forms, prior to beginning demolition, what are the Company's obligations for managing a demolished steel structure containing lead based paint? Also, what are the Company's obligations for managing chips of paint that may chip off the surface of the structure during demolition? In addition, is there a preferred method of dismantling the steel structure (cutting torch or hydraulic

shearing) with regard to disturbing lead based paint?

Thank you for your help,

Blair R. Simpson
SH&E Coordinator
Koppers, Inc
1 Koppers Drive
Tie Plant, MS 38960
662-614-6881

Marcus C. Smith
Plant Manager



Grenada

January 27, 2010

Mrs. Trayce Moore Thomas
Mississippi Department of Environmental Quality (DEQ)
Office of Pollution Control
Timber and Wood Products Branch – ECED
P.O. Box 2261
Jackson, MS 39225-2261

RECEIVED
JAN 29 2010
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 X11
Fax 662 226 4588
smithmc@koppers.com
www.koppers.com

CERTIFIED MAIL: 7008 1140 0001 0773 4483

Subject: Title V Operating Permit - #0960-00012
10 Day Notification of Stack Test
Koppers Inc. – Tie Plant, Mississippi

Dear Mrs. Moore-Thomas,

The Koppers Inc. facility, located at 1 Koppers Drive in Tie Plant, Grenada County, Mississippi, plans to conduct a permit required stack test on the Wellons wood-fired boiler (Emission Point AA-001) on February 9, 2010, in accordance with Sections 5.B and C of the Title V Operating Permit (TVOP) #0960-00012. Per Section 5.C of the TVOP, Koppers is submitting a written notification to the Mississippi Department of Environmental Quality (MDEQ) at least 10 days prior to the intended test date so that an observer may be afforded the opportunity to witness the test. Koppers previously submitted the written stack test protocol to the MDEQ on January 7, 2010 via Certified Mail No. 7008 1140 0001 0773 4438.

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.

If you have any questions or comments regarding this notification, please do not hesitate to contact me at 662-226-4584, ext. 11.

Sincerely,

Marcus C. Smith
Plant Manager

cc: Joyce Fankulewski, Koppers Inc.

Marcus C. Smith
Plant Manager



RECEIVED

JAN 20 2010

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
SmithMC@koppers.com
www.koppers.com

January 14, 2010

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4452

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

On the afternoon of January 11, 2010, at 4:06PM – 4:11PM an episode of opacity was recorded by the CEMS monitor. The episode was a result of unavoidable maintenance that occurred approximately within two hours after startup. A valve servicing the feedwater line to the Wellons Boiler deaerator tank began leaking water onto live electrical equipment below it, housed in the Wellons boiler building. During the repair the boiler automatically shut down via low water safety controls. As a result of the automatic shutdown, all fuel feed and forced draft and induced draft fans ceased operation per design. When this occurred, smoke from the combustion chambers became concentrated inside the exhaust stack and a 6-minute episode of excess opacity was recorded. The valve was replaced and the boiler was restarted without incident. The opacity readings immediately before and after the episode were recorded in the range of 5-7%. Per Section 1.24 [c] (1) this would represent a maintenance upset.

The valve's integrity was compromised during shutdown from the residual water in the valve at the time of abnormally low ambient temperatures experienced during and prior to this time frame. A natural gas space heater was being used in this area during and prior to this timeframe.

As a corrective measure this area's natural gas space heater will be upgraded to reduce the risk of reoccurrence during abnormally low temperatures.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in cursive script that reads "Marcus C. Smith". The signature is written in dark ink and is positioned above the printed name.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 01/11/10 00:00 to 01/11/10 23:59
 Generated: 01/14/2010
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit	(%dev)	Reason	Action
01/11/10 16:06	01/11/10 16:11	1: OV	40.900	/ 40.000	(2.25%)	Process Equipment Probs	Repaired Process E

Total Reported Time: 24.0 hours

TOTAL DURATION = 0.10 hours

1: Over limit = 0.10 hours
 6: Process Equipment Probs = 0.10 hours

Marcus C. Smith
Plant Manager



Grenada Co.

RECEIVED
JAN 11 2010

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
SmithMC@koppers.com
www.koppers.com

January 7, 2010

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4445

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

A startup was required of the Wellons boiler on the morning of January 6, 2010 following a brief shutdown. As a result of the startup, an episode of opacity was recorded where the average opacity exceeded 40% for 18 minutes. As a condition of our permit, 15 minutes of excess opacity is allowed for startup operations. Since the remaining 3 minutes represents only half of a six-minute averaging period used by the CEMS, and the average opacity reading for those three minutes plus the next three minutes was below 40% opacity, Koppers believes that this does not constitute an exceedance of Permit Section 3.A.1(a). However, we are sending notification as a conservative measure.

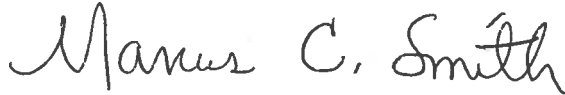
The cause for this episode was determined to arise from an attempted startup.

As a corrective measure training will be conducted with operators to ensure conditions are favorable to quickly start the boiler and restore opacity to normally low values.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in cursive script that reads "Marcus C. Smith". The signature is written in dark ink and is positioned above the printed name.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Deleted Release
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 01/06/10 00:00 to 01/07/10 11:27
 Generated: 01/07/2010
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
01/06/10 06:06 - 01/06/10 06:11		1: OV	68.200	/	40.000	(70.50%)	Startup	No Action Needed
01/06/10 06:12 - 01/06/10 06:17		1: OV	74.900	/	40.000	(87.25%)	Startup Continued	No Action Needed
01/06/10 06:18 - 01/06/10 06:23		1: OV	50.700	/	40.000	(26.75%)	Startup Continued	Other Corrective A

Total Reported Time: 48.0 hours

TOTAL DURATION = 0.30 hours

1: Over limit	= 0.30 hours	
3: Startup	=	0.10 hours
4: Startup Continued	=	0.20 hours

Marcus C. Smith
Plant Manager



January 7, 2010

Mrs. Trayce Moore-Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

RECEIVED
JAN 11 2010
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 X11
Fax 662 226 4588
smithmc@koppers.com
www.koppers.com

CERTIFIED MAIL: 7008 1140 0001 0773 4438

Subject: Title V Operating Permit No. 0960-00012
30 Day Notification of Stack Test
Koppers Inc. – Tie Plant, Mississippi

Dear Mrs. Moore-Thomas:

The Koppers Inc. facility located at 1 Koppers Drive in Tie Plant, MS plans to conduct its stack test per 5.B.3 of the TVOP issued on October 28, 2009. Stack testing will monitor particulate emissions, opacity, and fuel feed rates for the Wellons wood-fired boiler (Emission Point AA-001) on February 9, 2010 in accordance with Sections 5.B and C of its TVOP. Enclosed please find the written stack test protocol to be used during this event.

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.

Should you have any questions or comments regarding this notification please contact me at 662-226-4584 (ext. 11).

Sincerely,

Marcus C. Smith
Plant Manager

Enclosures

cc: Joyce Fankulewski, Koppers Inc.

KOPPERS INDUSTRIES – TIE PLANT, MISSISSIPPI

TEST PLAN

Environmental Monitoring Laboratories

January 5, 2010

1.0 SOURCE DESCRIPTION:

Section 1 - Source Description

Koppers, Inc. uses a Wellons wood waste boiler to provide steam for process and for a dry kiln. Fuel is untreated wood waste generated from the manufacture of crossties, switchties, bridge timbers, poles, and piling and purchased wood fuel from various suppliers. The Wellons boiler is equipped with a multiclone collector for flyash reduction.

The Wellons boiler is rated for a maximum capacity of 60 MMBtu/hr. However, based on the most recent stack test conducted on December 8, 2008, while operating at maximum capacity, the average heat input to the boiler was 31.76 MMBtu/hr. This value, derived from the most recent stack test, 31.76 MMBtu/hr, is Koppers proposed current maximum capacity of this boiler. Heat input to the boiler during the test will be measured using an F factor and continuously monitored oxygen content. A copy of the boiler's steam rate chart record will be provided in the Appendix of the test report. A site specific F-Factor will be determined from an analyzed fuel sample.

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

2.0 TEST METHODS:

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

Calibrations and quality assurance will be as described in the respective methods. Analyzer calibrations will be performed using Protocol 1 calibration gases.

3.0 TEST REPORT:

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

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

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

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

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

3.6 Nomenclature:

3.7 Calibration Procedures:

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

4.0 WORK SCHEDULE:

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

Marcus C. Smith
Plant Manager

RECEIVED
JAN - 7 2010
Dept of Environmental Quality
Office of Pollution Control



Grenada

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

January 5, 2010

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental
Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4421

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance -REVISED
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

In accordance with Title V Operating Permit #0960-00012, Section 1.24(c), this letter provides notification of a scheduled shutdown of the wood fired boiler (Source AA-001) at the Koppers Inc. facility in Grenada, Mississippi for maintenance purposes. Shutdown will occur on Thursday, January 14, 2010. We will commence maintenance activities on the morning of Friday, January 15, 2010 and will continue until these are complete. Startup is anticipated to occur on Tuesday, January 19, 2010. Although the boiler is currently being properly operated, we believe that the work performed on this boiler during the shutdown will improve the operating efficiency of the boiler.

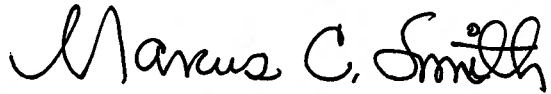
The maintenance to be performed on the boiler should include the removal of ash build up from around the tubes, combustion chamber, heat exchanger, and modi-cones. Emissions during and upon startup following the completion of these maintenance activities may exceed the permit limit for opacity. However, every possible measure will be taken to minimize excess emissions during and following the performance of these activities, and upon startup of the boiler.

If you have any questions or comments regarding the scheduled shutdown and maintenance of the boiler, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized 'M' and 'S'.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Marcus C. Smith
Plant Manager



Grenada Co
Air

RECEIVED
DEC 22 2009
Dept of Environmental Quality
Office of Pollution Control

December 21, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental
Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

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

CERTIFIED MAIL: 7008 1140 0001 0773 4407

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

In accordance with Title V Operating Permit #0960-00012, Section 1.24(c), this letter provides notification of a scheduled shutdown of the wood fired boiler (Source AA-001) at the Koppers Inc. facility in Grenada, Mississippi for maintenance purposes. Shutdown will occur on Thursday, January 7, 2010. We will commence maintenance activities on the morning of Friday, January 8, 2010 and will continue until these are complete. Startup is anticipated to occur on Monday, January 11, 2010. Although the boiler is currently being properly operated, we believe that the work performed on this boiler during the shutdown will improve the operating efficiency of the boiler.

The maintenance to be performed on the boiler should include the removal of ash build up from around the tubes, combustion chamber, heat exchanger, and modi-cones. Emissions during and upon startup following the completion of these maintenance activities may exceed the permit limit for opacity. However, every possible measure will be taken to minimize excess emissions during and following the performance of these activities, and upon startup of the boiler.

If you have any questions or comments regarding the scheduled shutdown and maintenance of the boiler, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The script is cursive and fluid, with the first name "Marcus" written in a larger, more prominent style than the last name "Smith".

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Marcus C. Smith
Plant Manager

KOPPERS

Grenada
Air

RECEIVED

NOV 16 2009

Dept of Environmental Quality
Office of Pollution Control

November 13, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

Koppers Inc.
Utility Poles and Piling
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Tel 662 226 4584
Fax 662 226 4588
SmithMC@koppers.com
www.koppers.com

CERTIFIED MAIL: 7008 1140 0001 0773 4353

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

On the morning of November 12, 2009 a six-minute average episode of opacity was recorded by our CEMS monitor. After investigation, we believe that the occurrence was due to a failed motor that drives the forced draft fan. This fan directly supplies combustion air to the wood fired boiler. As this caused disruption in the combustion air, opacity was generated that averaged 47.2% during this six-minute event. After the opacity alarm sounded, personnel responded by shutting the boiler down and removing the residual fuel from the combustion chambers thereby eliminating the source for additional opacity. After the motor was replaced the boiler was restarted without additional opacity episodes.

Prior to the episode and after restarting the boiler, opacity was recorded by the CEMS monitor with normal readings in the 4 - 7% range. Per Section 1.24(a) of the plant's permit, this would represent an upset. As corrective action the forced draft fan motor and its counterpart the induced draft fan motor will be placed on a scheduled preventive maintenance schedule.


A copy of the corresponding "Episode List Report" generated by the Continuous Emissions Monitoring System is attached for review. One item to note is that the report shows the time of the event to occur at 11:30:00AM - 11:35:59AM. This time is incorrect as the internal clock in the system did not automatically update to account for daylight savings time. The actual time of the event was 10:30:00AM-10:35:59AM. Since this event, the system has been updated to account for daylight savings time.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized 'M' and 'S'.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 11/12/09 00:00 to 11/12/09 23:59
 Generated: 11/13/2009
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit	(%dev)	Reason	Action
11/12/09 11:30 ~	11/12/09 11:35	1: OV	47.200	/	40.000 (18.00%)	Control Equip. Malfunction	Repaired Control E

Total Reported Time: 24.0 hours

TOTAL DURATION = 0.10 hours

1: Over limit = 0.10 hours
 2: Control Equip. Malfunction = 0.10 hours



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

November 2, 2009

CERTIFIED MAIL NO. – 7005-1160-0000-7008-9983

Ms. Joyce M. Fankulewski
Environmental Manager
Koppers Inc.
436 Seventh Avenue
Pittsburg, Pennsylvania 15219-1800

Dear Ms. Fankulewski:

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

Enclosed please find the above referenced Title V Operating Permit issued for the operation of air emissions equipment. Operation of the air emissions equipment at the facility shall be in accordance with the terms, conditions, and limitations of the permit. This Title V Operating Permit supersedes and replaces any previously held Operating Permit. Please note that, unless specified otherwise, each condition in this Title V Operating Permit is federally enforceable.

Permit condition 4.2 requires the annual submittal of a certification of compliance to both the Permit Board and the Administrator of EPA Region IV. The submittal to EPA Region IV should be addressed as follows:

U.S. EPA – Region 4
Air Compliance Section
Air, Pesticides and Toxics
Management Division
61 Forsyth Street
Atlanta, GA 30303

Except as provided by Regulation APC-S-6, Section IV.F. Operational Flexibility, modification of this process or facility is not allowed under this permit and it will be necessary to submit a new application for revision of this Title V Operating Permit. Also, it may be necessary to submit an application for a Construction Permit in accordance with the provisions of Regulation APC-S-2. This permit expires on [expiration date]. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

Any appeal of this permit action must be made within the 30-day period provided for in Miss. Code Ann. Section 49-17-29(4)(b) (Rev. 2003).

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

Sincerely,

Tommy Wall, P.E.
Environmental Permits Division

Enclosure

876 PER20080002

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Fw: EPA/MDEQ Title V enReview - Comments Resolved (Koppers Inc)

Thomas Kelly to: Tommy Wall

10/26/2009 08:57 AM

Sent by: **Thomas Kelly**

----- Forwarded by Thomas Kelly/EPD/OPC/DEQ on 10/26/2009 08:57 AM -----



adams.yolanda@epa.gov

10/22/2009 07:11 PM

Please respond to
adams.yolanda@epa.gov

To **Thomas_Kelly@deq.state.ms.us**

cc

Subject **EPA/MDEQ Title V enReview - Comments Resolved
(Koppers Inc)**

In reference to the draft/proposed Title V permit below received for review by EPA on 09/11/2009, comments submitted to MDEQ have been resolved. If you have any questions, please contact us at (404) 562-9214 or through e-mail at Adams.Yolanda@epamail.epa.gov or (404) 562-9124.

Facility Name: Koppers Inc

City: Tie Plant

County: Grenada

Permit Number: 0960-00012

Permit Type: Title V Renewal

EPA Review Start Date: 09/11/2009

Public Notice Start Date: 09/11/2009

Public Notice End Date: 10/11/2009

The draft/proposed Title V Permit and associated documentation can be viewed at the following link:
[Permit No. 0960-00012](#).

Additional information about this facility can be viewed at the following link: [Koppers Inc](#).

A complete listing of current draft/proposed Title V permits can be viewed at the following link: [EPA/MDEQ Title V enReview](#).

Recipients: adams.yolanda@epa.gov, lakeman.sean@epa.gov, purvis.james@epa.gov,
Bryan_Collins@deq.state.ms.us, Thomas_Kelly@deq.state.ms.us.

This email was electronically generated on Thu 22-Oct-2009 19:00:09.



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 25, 2009

Elizabeth Jones Library
PO Box 130
Grenada, MS 38901

Dear Librarian:

Re: **Koppers Inc**
Draft Permit Public Notice
Air Ref. No.0960-00012
Grenada County

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

Also, enclosed is a copy of information pertinent to the permits. This information should be kept on hand for review by the public until October 1, 2009, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

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

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

If you have any questions, please let me know at (601) 961-5193.

RECEIVED

AUG 31 2009

Dept of Environmental Quality
Office of Pollution Control

Sincerely,

Tommy Wall

Tommy Wall, P.E.
Timber and Wood Products Branch
Environmental Permits Division

Enclosure
Received and
Agreed to By:

Lynell M. Osborne

Title:

Director

Date:

8/28/09

876 PER20080002



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 25, 2009

Postmaster
Tie Plant, Mississippi 38960

FILE COPY

Dear Postmaster:

Re: Koppers Inc
Draft Permit Public Notice
Air Ref. No. 0960-00012
Grenada County

Please post the attached public notice in your post office on or before September 1, 2009.

If you are unable to do so, or if you have any questions, please contact me at (601) 961-5193.

Sincerely,

A handwritten signature in black ink that reads "Tommy Wall".

Tommy Wall, P.E.
Timber and Wood Products Branch
Environmental Permits Division

Enclosure

876 PER20080002

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 25, 2009

The Daily Sentinal Star
PO Box 907
Grenada, MS 38901

FILE COPY

Dear Sir/Madam:

Re: Koppers Inc
Draft Permit Public Notice
Air Ref. No.0960-00012
Grenada County

Enclosed herewith is a legal notice to be published in your newspaper on or before September 1, 2009. Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact twall of my staff at (601) 961-5193.

Sincerely,

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

for Harry M. Wilson III, P.E., DEE
Chief, Environmental Permits Division

Enclosure

cc: Ms. Linda Stanford, OPC

876 PER20080002



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 25, 2009

Elizabeth Jones Library
PO Box 130
Grenada, MS 38901

FILE COPY

Dear Librarian:

Re: Koppers Inc
Draft Permit Public Notice
Air Ref. No.0960-00012
Grenada County

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

Also, enclosed is a copy of information pertinent to the permits. This information should be kept on hand for review by the public until October 1, 2009, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

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

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

If you have any questions, please let me know at (601) 961-5193.

Sincerely,

Tommy Wall, P.E.
Timber and Wood Products Branch
Environmental Permits Division

Enclosure

Received and

Agreed to By: _____ Title: _____ Date: _____

876 PER20080002

OFFICE OF POLLUTION CONTROL

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AN EQUAL OPPORTUNITY EMPLOYER



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 25, 2009

Elizabeth Jones Library
PO Box 130
Grenada, MS 38901

FILE COPY

Dear Librarian:

Re: Koppers Inc
Draft Permit Public Notice
Air Ref. No.0960-00012
Grenada County

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

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If you have any questions, please let me know at (601) 961-5193.

Sincerely,

Tommy Wall, P.E.
Timber and Wood Products Branch
Environmental Permits Division

Enclosures

876 PER20080002

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 25, 2009

Grenada County Chancery Clerk
PO Drawer 1208
Grenada, MS 38902

FILE COPY

Dear Sir:

Re: Koppers Inc
Draft Permit Public Notice
Air Ref. No.0960-00012
Grenada County

Please post the enclosed public notice in your courthouse on or before September 1, 2009.

If you are unable to do so, or if you have any questions, please contact me at (601) 961-5193.

Sincerely,

A handwritten signature in black ink that reads "Tommy Wall".

Tommy Wall, P.E.
Timber and Wood Products Branch
Environmental Permits Division

Enclosure

876 PER20080002



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 25, 2009

Ms. Joyce Fankulewski
Environmental Manager
Koppers Inc
436 Seventh Avenue
Pittsburg, PA 15219-1800

FILE COPY

Dear Ms. Fankulewski:

Re: Koppers Inc
Draft Permit Public Notice
Air Ref. No.0960-00012
Grenada County

Enclosed are the public notice and draft permit for the above referenced permit. If you have not already done so, you are invited to submit written comments by no later than October 1, 2009. A decision regarding the proposed permit(s) will be made after all public comments have been duly considered.

If you have any questions, please contact me at (601) 961-5193.

Sincerely,

A handwritten signature in black ink that reads "Tommy Wall".

Tommy Wall, P.E.
Timber and Wood Products Branch
Environmental Permits Division

Enclosures

876 PER20080002

RAT

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER



"Fankulewski Joyce"
<FankulewskiJ@koppers.com>
>

08/14/2009 08:36 AM

To <Tommy_Wall@deq.state.ms.us>

cc "Simpson Blair R" <SimpsonBR@koppers.com>

bcc

Subject FW: Koppers Inc. Comments on Draft Permit

Tommy,

Koppers has reviewed the revised version of the draft permit. We have only the following minor comments:

Section 2:

- Original Comment - Prior versions of the permit included a list of individual equipment for Emission Point AA-003, while this draft does not. Koppers is requesting addition of the list of sources into the permit for completeness.

Comment on Revised Draft - The list of equipment for this source was not added in the revised draft permit, but it is acknowledged that the Department would do so in the letter.

Section 3:

- Original Comment - 3D - Koppers is requesting the reference to the regulation (40 CFR 63, Subpart QQQQQQ) be added for clarification.

Comment on Revised Draft - The reference has been added as requested, but there is a typo in the regulation reference. It should be Subpart QQQQQQ.

Section 5:

- Original Comment - Based on prior conversations with the Department, the renewed Title V permit was to include language that would supercede the need for the "voluntary restriction letter" regarding boiler operation submitted to the agency on December 9, 2004. Koppers believes the language included in permit condition 5.B.3 "Such testing shall be performed while the boiler is operating at maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved" is the clause that addresses this point. As such, we are interpreting compliance with this standard to mean that the boiler can be operated at a heat input that correlates with ranges obtained from stack test results.

Comment on Revised Draft - Koppers acknowledges how the Department has addressed this concern. However, the requirement to notify the Department regarding the boiler capacity within the Stack Test Notification letter is stated in your cover letter, but not within the permit condition. Could the Department add this language to the permit condition itself, to avoid any confusion in the future?

Much appreciated,

Joyce



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 5, 2009

Ms. Joyce Fankulewski
Environmental Manager
Koppers Inc
436 Seventh Avenue
Pittsburg, PA 15219-1800

FILE COPY

Dear Ms. Fankulewski:

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

Enclosed is the response to your e-mail dated July 31, 2009, as well as a copy of the proposed draft permit for the above referenced facility.

Revision of Section 1.24(c)1 and Section 1.2499(c)iii in Section 1 of the permit.

Response: These are general requirements that are quoted directly from APC-S-1, Section 10 of the Mississippi Air Regulations, therefore the language will remain as is. However allowances are made for opacity during start-ups as stated in the language of page 13 of the permit.

Revision of description of Emission Points in Section 2 of the Draft Permit.

Response: The draft permit for emission points 003, 004, 009, 010, and 011 in Section 2 of the draft permit will be revised as requested in the letter.

Revisions in Section 3 of the permit.

Responses:

- (1) The limit of 15,500 lb/hr for fuel input modified in the last Title V permit from the original construction permit issued in November 1994, will be removed since potentials are based upon a maximum of 13,333 lb/hr. Koppers will be required to maintain hourly fuel usage records, and maintain on-site for five years.
- (2) Requirement 3.B.1 will be modified to include an additional statement that untreated wood will be considered spent wood as listed in APC-S-1, Section 3.4(b).
- (3) Additional language will be added to Requirement 3.B.4 as requested in the letter.
- (4) The table under the section "Insignificant and Trivial Activity Emission Limitation & Standards" is complete as it is part of the boiler plate language for Title V. Koppers is responsible for meeting these standards for any insignificant or trivial activity.

876 PER20080002

Ms. Joyce Fankulewski
Koppers Inc
August 5, 2009
Page 2

- (5) Clarification will be made that the work practice standards in Section 3.D of the permit are a result of 40 CFR 63, Subpart QQQQQ

Revisions in Section 4 of the permit.

Response: Requirement 4.3 in Section 4 of the Compliance Schedule is part of the standard boiler plate language of the permit. However, this will be removed as Koppers is not subject to any compliance schedule.

Revisions in Section 5 of the permit.

Responses:

- (1) In Section 5.B.1 of the permit, language will be added for monitoring opacity using EPA Reference Method 9 while CEMs is down.
- (2) Stack testing shall be conducted based on the design of the boiler at maximum capacity. If the design capacity of the boiler can not be achieved, Koppers should propose an allowance for approval by the DEQ as part of the pre-test protocol as described in Condition 5.C.2 of this permit.
- (3) An hourly operating rate has been added for fuel usage for the purpose of tracking emissions.

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) 961-5193.

Sincerely,



Tommy Wall, P.E.
Environmental Permits Division



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

July 17, 2009

Ms. Joyce Fankulewski
Environmental Manager
Koppers Inc
436 Seventh Avenue
Pittsburg, PA 15219-1800

FILE COPY

Dear Ms. Fankulewski:

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

Enclosed please find a copy of the proposed draft permit for the above referenced facility. The enclosed draft permit contains conditions that we intend to incorporate as part of the final permit. If you have any comments concerning the contents of the draft permit, please notify this office in writing no later than 15 days from the transmittal date listed above. If you would like to contact me to discuss any of these concerns, please call me at (601) 961-5193.

Sincerely,

A handwritten signature in black ink that reads "Tommy Wall".

Tommy Wall, P.E.
Environmental Permits Division

876 PER20080002

Marcus C. Smith
Plant Manager

RECEIVED

APR - 6 2009

Dept of Environmental Quality
Office of Pollution Control

 KOPPERS

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

April 3, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4919

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

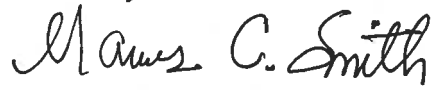
On the morning of April 1, 2009 a six-minute average episode of opacity was recorded by our CEMS monitor. After investigation, we believe that the occurrence was due to a temporary power surge/failure resulting in a temporary loss of control power at our wood-fired boiler which shut down the induced draft and forced draft fans and feed system. Without combustion fans operating a smoldering effect occurred inside the combustion chambers resulting in excess opacity inside the stack. Immediately prior to the episode and immediately after restarting the boiler, opacity was recorded by the CEMS monitor with normal readings in the 2-3% range. Per Section 1.24(a) of the plant's permit, this would represent an upset. A copy of the corresponding "Episode List Report" generated by the Continuous Emissions Monitoring System is attached for review.

The supplying power company has been notified and been made aware of this occurrence.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in cursive script that reads "Marcus C. Smith". The signature is written in dark ink and is positioned below the word "Sincerely,".

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 04/01/09 00:00 to 04/01/09 23:59
 Generated: 04/03/2009
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/ Limit	(%dev)	Reason	Action
04/01/09 04:36 -	04/01/09 04:41	1: OV	41.300	/	40.000 (3.25%)	Shutdown	Other Corrective A

Total Reported Time: 24.0 hours

TOTAL DURATION = 0.10 hours

1: Over limit = 0.10 hours
 5: Shutdown = 0.10 hours

Marcus C. Smith
Plant Manager



March 11, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

RECEIVED
MAR 13 2009
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
SmithMC@koppers.com
www.koppers.com

CERTIFIED MAIL: 7008 1140 0001 0773 4896

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

Maintenance activities were completed on the morning of March 10, 2009. Notification of this scheduled maintenance was sent to your office on February 5, 2009 and a revised notification was sent to your office in a letter dated March 2, 2009. Following these activities a startup was required of the Wellons wood-fired boiler.

During this startup an episode of opacity was recorded which exceeded 40% opacity for a duration of 18 consecutive minutes. As a condition of our permit, 15 minutes of excess opacity is allowed for startup operations. Since the remaining 3 minutes represents only half of a six-minute averaging period used by the CEMS, and the fans were not yet brought online (therefore the opacity at the stack would be less than that recorded by the CEMS), Koppers believes that this does not constitute an exceedance of Permit Section 3.A.1(a). However, we are sending notification as a conservative measure.

The cause for this episode was determined to be a low water level controller on the boiler steam drum being "stuck" in the low condition not allowing the induced draft and forced draft fans to engage. Without fan assistance, emissions exited the stack very slowly and were concentrated inside the stack. After discovering that the fans would not start, no additional fuel was added until such time that the level controller was repaired and fans started.

As a corrective measure training will be conducted with operators to ensure fans are operable prior to boiler startups.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,


Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Enertec NTDahs@
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 03/10/09 00:00 to 03/11/09 06:34
 Generated: 03/11/2009
 Types: ALL

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
03/10/09 08:36 - 03/10/09 08:41		1: OV	54.700	/	40.000	(36.75%)	Startup	No Action Taken
03/10/09 08:42 - 03/10/09 08:47		1: OV	46.100	/	40.000	(15.25%)	Startup	No Action Taken
03/10/09 08:48 - 03/10/09 08:53		1: OV	40.400	/	40.000	(1.00%)	Startup	No Action Taken

Total Reported Time: 48.0 hours

TOTAL DURATION = 0.30 hours

1: Over limit	= 0.30 hours	
3: Startup	=	0.30 hours

Marcus C. Smith
Plant Manager



RECEIVED

MAR 3 - 2009

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
SmithMC@koppers.com
www.koppers.com

March 2, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental
Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4865

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance -
Revision of Notification Letter dated February 5, 2009
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

In accordance with Title V Operating Permit #0960-00012, Section 1.24(c), this letter provides notification of a scheduled shutdown of the wood fired boiler (Source AA-001) at the Koppers Inc. facility in Grenada, Mississippi for maintenance purposes. Shutdown will occur on Thursday, March 5, 2009. We will commence maintenance activities on the morning of Friday, March 6th and will continue until these are complete. Startup is anticipated to occur on the evening of Monday, March 9th. Although the boiler is currently being properly operated, we believe that the work performed on this boiler during the shutdown will improve the operating efficiency of the boiler.

The maintenance to be performed on the boiler should include the removal of ash build up from around the tubes, combustion chamber, heat exchanger, and modi-cones. Emissions during and upon startup following the completion of these maintenance activities may exceed the permit limit for opacity. However, every possible measure will be taken to minimize excess emissions during and following the performance of these activities, and upon startup of the boiler.

If you have any questions or comments regarding the scheduled shutdown and maintenance of the boiler, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

Marcus C. Smith

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Marcus C. Smith
Plant Manager

RECEIVED
MAR 04 2009
Dept of Environmental Quality
Office of Pollution Control

KOPPERS

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

Air
Grenada
8960-00012

February 27, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4858

Subject: Reportable Release
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

On the morning of February 25, 2009 a visible wet spot was observed on the ground near the Plant's WWTP. Rain had not occurred since Saturday, February 21, 2009. That morning, plant management investigated possible sources. After discussion, it was suspected that the wetting could have possibly been from a rupture in the double-walled underground line servicing the WWTP, which delivers treated water from the final discharge tank to the City of Grenada's POTW sewer system. This double walled line was installed in 2007. The line was tested and the rupture was confirmed at 8:45AM. Notification to the NRC occurred at 8:57AM, followed with notifications to the local LEPC, and State Emergency Management Agency. Corporate notification occurred during this same time. MSDEQ was notified as well. The release was estimated as being approximately 500 gallons.

The release allowed a portion of treated wastewater to enter an onsite storm water detention pond, in which storm water was present prior to the release. After this determination, the valve allowing storm water to exit the detention pond was closed, preventing any release offsite. All visually impacted soils were excavated and managed as hazardous waste. All recoverable liquid was pumped to the Plant's WWTP.

The tops of concrete observation boxes were removed to allow inspection of the inner PVC pipe at several locations. The location of the leaking pipe was found approximately 500-600 feet north of the WWTP. Apparently, a slip joint coupling point had separated and began to leak. The treated wastewater began to flow backwards toward the WWTP thus finding a break in the outer shell, which pushed out and upwards toward the surface of the soil. The Plant has a program of inspecting the observation ports on a weekly basis per the Process Equipment Inspection forms in the Plant's Integrated Contingency Plan. A minimal amount of water was present during most inspections thought to come from condensation.

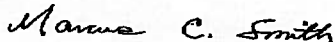
Willis Engineering Firm was contacted and arrived on Thursday, February 26, 2009 to help assess the potential causes and preventative actions. The break in the outer shell was

explained as being caused by the pipe being too close to the surface of the road and being placed over a drainage culvert which experiences high volume traffic of tractor trailer trucks and powered industrial trucks. The inner pipe separation could have resulted from installation errors by which all joints may have not been seated properly and from the combination of jarring and vibration of nearby truck and powered industrial truck traffic possibly compromising the seal.

Corrective actions provided by Willis engineering included either building the roadbed up where the line crosses traffic areas or burying the pipe approximately 5 ft below the surface in those same areas to avoid outer shell damage. Preventative actions to make certain the inner pipe has not failed will include ensuring all joints are sealed properly by inspecting regularly with dye and pressure testing with water pressure.

The following steps have been taken. Three concrete barriers have been placed in close proximity, where the outer steel pipe crosses over the drainage culvert thus limiting the traffic in that area. Crushed stone has also been applied to raise the roadbed where the line and culvert cross in the effort to further prevent damage to the pipe. After the repairs were made, the line was water pressure tested and placed back in service. Additionally, dye was added to the final treated wastewater tank and inspections were again made to confirm there were no leaks.

Sincerely,

A handwritten signature in cursive script that reads "Marcus C. Smith".

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Marcus C. Smith
Plant Manager

Grenada

February 20, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

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

CERTIFIED MAIL: 7008 1140 0001 0773 4841

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

On the evening of February 17, 2009, a component of our boiler feedwater system malfunctioned thereby creating a low water condition in the deareator tank (the main water feed tank to the boiler). Because of this condition, safety controls shut down the boiler fuel feed and fans. After investigation, we believe that the raw fuel that was last fed into the boiler prior to shutdown created an episode of opacity through a smoldering effect. By the time personnel manually supplied water to the deareator tank and restarted the boiler a six-minute episode of opacity had been recorded on our CEMS monitor. Per Section 1.24(a) of the plant's permit, this would represent an upset. The opacity readings immediately before and immediately after the episode were in the normal opacity range. A copy of the corresponding "Episode List Report" generated by the Continuous Emissions Monitoring System is attached for review.

As a corrective action we are investigating a means of installing an automatic system to bypass the normal feedwater process, which will supply water to the deareator tank should the normal feedwater system fail to meet water level demand. In the interim, designated employees will physically inspect feedwater systems at regular intervals to prevent low water conditions.

If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

Marcus C. Smith

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Marcus C. Smith
Plant Manager

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FEB 23 2009

Dept of Environmental Quality
Office of Pollution Control



Grenada

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

February 20, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4841

Subject: CEMS Episode
Title V Operating Permit - #0960-00012
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

On the evening of February 17, 2009, a component of our boiler feedwater system malfunctioned thereby creating a low water condition in the deareator tank (the main water feed tank to the boiler). Because of this condition, safety controls shut down the boiler fuel feed and fans. After investigation, we believe that the raw fuel that was last fed into the boiler prior to shutdown created an episode of opacity through a smoldering effect. By the time personnel manually supplied water to the deareator tank and restarted the boiler a six-minute episode of opacity had been recorded on our CEMS monitor. Per Section 1.24(a) of the plant's permit, this would represent an upset. The opacity readings immediately before and immediately after the episode were in the normal opacity range. A copy of the corresponding "Episode List Report" generated by the Continuous Emissions Monitoring System is attached for review.

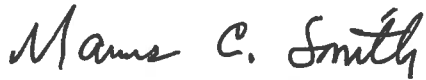
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If you have any questions or comments regarding this episode please do not hesitate to contact me at 662-226-4584.

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and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized 'M' and 'S'.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Enclosure

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 02/16/09 00:00 to 02/18/09 23:59
 Generated: 02/20/2009
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
02/17/09 19:30 -	02/17/09 19:35	1: OV	58.800	/	40.000	(47.00%)	Control Equip. Malfunction	Other Mechanical C

Total Reported Time: 72.0 hours

TOTAL DURATION = 0.10 hours

1: Over limit = 0.10 hours
 2: Control Equip. Malfunction = 0.10 hours

Marcus C. Smith
Plant Manager

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FEB - 9 2009
Dept of Environmental Quality
Office of Pollution Control



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

February 5, 2009

Mrs. Trayce Moore - Thomas
Mississippi Department of Environmental
Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4773

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance
Koppers Inc. - Grenada, Mississippi

Dear Mrs. Thomas:

In accordance with Title V Operating Permit #0960-00012, Section 1.24(c), this letter provides notification of a scheduled shutdown of the wood fired boiler (Source AA-001) at the Koppers Inc. facility in Grenada, Mississippi for maintenance purposes. Shutdown will occur on Friday, March 6, 2009. We will commence maintenance activities on the morning of Saturday, March 7th and will continue until these are complete. Startup is anticipated to occur on the evening of Monday, December 9th. Although the boiler is currently being properly operated, we believe that the work performed on this boiler during the shutdown will improve the operating efficiency of the boiler.

The maintenance to be performed on the boiler should include the removal of ash build up from around the tubes, combustion chamber, heat exchanger, and modi-cones. Emissions during and upon startup following the completion of these maintenance activities may exceed the permit limit for opacity. However, every possible measure will be taken to minimize excess emissions during and following the performance of these activities, and upon startup of the boiler.

If you have any questions or comments regarding the scheduled shutdown and maintenance of the boiler, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive style with a large, stylized 'M' and 'S'.

Marcus C. Smith

CC: Joyce Fankulewski – KI CSG

Marcus C. Smith
Plant Manager

RECEIVED



0960-00012

Grenada
#876

FEB -9 '2009

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 X11

Fax 662 226 4588

SmithMC@koppers.com

www.koppers.com

February 4, 2009

Mr. Scott Hodges
Mississippi Department of Environmental Quality
Timber & Wood Production
OPC/Environmental Permitting

P.O. Box 2249
Jackson, MS 39225

CERTIFIED MAIL: 7008 1140 0001 0773 4636

**Subject: Koppers Inc. – Grenada Plant
New Facility Contact**

Dear Mr. Hodges:

On February 2, 2009 Mr. Blair Simpson was assigned the position of SH&E Supervisor for the Koppers Inc. – Grenada Plant. While I will continue to represent the authorized representative responsible for signing all applicable environmental documents for the site, Mr. Simpson now represents the primary contact stationed at the facility for questions concerning environmental issues. Mr. Kevin B. Coker previously held this position however has since been assigned other duties.

Sincerely,

A handwritten signature in black ink that reads "Marcus C. Smith". The signature is written in a cursive, flowing style.

Marcus C. Smith

cc: Mrs. Trayce Moore – Thomas, MDEQ
Ms. Joyce Fankulewski, Koppers Inc.

Marcus C. Smith
Plant Manager

Grenada Co.
KOPPERS
RECEIVED

JAN 22 2009

Dept of Environmental Quality
Office of Pollution Control

January 20, 2009

Mr. Phillip LaBarre
Mississippi Department of Environmental Quality
Timber and Wood Products Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 X11
Fax 662 226 4588
SmithMC@koppers.com
www.koppers.com



CERTIFIED MAIL: 7008 1140 0001 0773 4230

Subject: Bi-Annual Stack Test (Test Results)
Title V Operating Permit #0960-00042
Koppers Inc. – Tie Plant, Mississippi

Dear Mr. LaBarre:

Enclosed are the Particulate and Visible Emissions Test results performed on Emission Point AA-001 at the Koppers Inc. facility located in Tie Plant, MS. Environmental Monitoring Laboratories, Inc. of Ridgeland, MS performed the test. The calculated wood fuel usage rate during the test was an average 4,088 lbs per hour.

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,

Sincerely,

Marcus C. Smith
Marcus C. Smith

Enclosure

CC: Joyce Fankulewski – KI-CSG



FILE COPY

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

January 20, 2009

Ms. Joyce Fankulewski, Environmental Manager
Koppers Inc
436 Seventh Avenue
Pittsburg, PA 15219-1800

Dear Ms. Fankulewski:

Re: Koppers Inc
Grenada County
Air Application
Ref. No.0960-00012 (Additional Data 3)

This letter is to acknowledge receipt of your application on January 20, 2009. 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 Tommy Wall at (601) 961-5171.

Sincerely,

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

Teresa Dennington
Environmental Permits Division

876 PER20080002

Joyce M. Fankulewski
Environmental Manager



RECEIVED

JAN 20 2009

Dept of Environmental Quality
Office of Pollution Control

January 12, 2009

Mr. Tommy Wall
Timber and Woods Branch
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225-2261

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

Subject: Koppers Inc Response to Requested Information (Revised)
Ref. No. 0960-00012
Grenada County

Certified Mail: 7001 1140 0000 0205 4324

Dear Mr. Wall:

As discussed during our conversation of January 5, 2009, this letter provides a more conservative approach to address information requested during your recent visit to the Koppers Grenada facility. Please disregard the response submitted on December 29, 2008. Enclosed is the calculation rationale and revised Emission Summary, Manufacturing Processes Forms and Cyclone Forms for Source AA-004.

It is my understanding that the storage tank information you previously requested is no longer needed, based on your phone conversation with Mr. Kevin Coker. We trust that this information satisfies your request. However, should you have any additional questions or comments please feel free to contact me.

Sincerely,

Joyce M. Fankulewski

Enclosure(s)

CC: M. Smith/Koppers Grenada
K. Coker/Koppers Grenada

Inquiry from MSDEQ on PM Emissions from Tie Cutting Operations

In the Title V Renewal Permit Application submitted to MSDEQ in 2008, the PM emissions for Source AA-004 were based on the PTE assumption that the total production volume (5,858,250 ft³ of crossties and switchties) were double end-cut to the required length. These operations were assumed to be controlled by a cyclone operating at a 50% control efficiency. The total PM emissions for these operations included in permit application were 8.76 tons PM/year.

As an even more conservative PTE assumption, Koppers Inc. has decided to revise the PM emissions estimate to assume that the cyclone has 0% control efficiency. This will increase the PM emissions for Source AA-004 to 17.52 tons PM/year and the plant-wide total PM emissions (point and fugitive) to a total of 253.19 tons PM/year. This increase has no impact on the classification of the plant as a Major Source of PM emission under the Title V program.

The combined PTE assumptions of maximum tie production and 0% control efficiency of the cyclone are very conservative. The endcutting saws do not generate appreciable quantities of small diameter PM; the usual products of these types of saws are large, heavy chips and cuttings which fall directly to the work surface and conveyor belt. These chips are collected with the other wood cuttings from the operations and are used for fuel in the wood fired boiler (Source AA-001). Very little of the saw cutting material is small diameter "sawdust" that is capable of being transported off-site. The tie cutting operations do not include high stacks, elevated stack temperatures or close proximity to the site boundaries. There is little opportunity for the small quantity of transportable PM to be carried to the site boundary from this fugitive source. While the PTE assumptions used here result in an estimated PM emission of 17.52 tons/year, a "best estimate" PM emission estimate for the PTE tie production would be less than 2 tons/year.

**POTENTIAL-TO-EMIT EMISSION SUMMARY
KOPPERS INC. GRENADA, MS
TITLE V PERMIT APPLICATION**

Source AA-001 BOILER, WOOD FIRED

	tn/yr	Sulfur	Chlorine	(ton/hr):
Total Wood Burned:	58,399	0.06%		6.67
Removal Efficiency (1):		70.00%		60 mmbtu/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	5.3	lb/ton	AP-42	154.76	35.33
SO ₂	0.36	lb/tn	Mass Calc.	10.51	2.40
NO _X	1.5	lb/tn	AP-42	43.80	10.00
CO	6.6	lb/tn	AP-42	192.72	44.00
VOC	0.18	lb/tn	AP-42	5.26	1.20
Arsenic	8.8E-05	lb/tn	AP-42	2.57E-03	5.87E-04
Cadmium	1.7E-05	lb/tn	AP-42	4.96E-04	1.13E-04
Chromium	1.3E-04	lb/tn	AP-42	3.80E-03	8.67E-04
Lead	3.1E-04	lb/tn	AP-42	9.05E-03	2.07E-03
Manganese	8.9E-03	lb/tn	AP-42	2.60E-01	0.06
Nickel	5.6E-04	lb/tn	AP-42	1.64E-02	3.73E-03
Selenium	1.8E-05	lb/tn	AP-42	5.26E-04	1.20E-04
Mercury	6.5E-06	lb/tn	AP-42	1.90E-04	4.33E-05
Total HAP Metals				0.293	0.067

(1) Removal efficiencies based on Grenada stack test of 2/96.

(2) CO factor based on AP-42

(3) NO_x factor of 3.3 based on Grn stack test for treated wood.**Source AA-002 BOILER, NATURAL GAS**

	Fuel Use Rate(MCF/hr):	10.5
Gas Burned (MCF/yr)	91980	Sulfur Content: 0.000 %

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	7.60E-03	lb/MCF	AP-42	0.35	0.08
SO ₂	6.00E-04	lb/MCF	AP-42	0.03	0.01
NO _X	1.00E-01	lb/MCF	AP-42	4.60	1.05
CO	8.40E-02	lb/MCF	AP-42	3.86	0.88
VOC	5.50E-03	lb/MCF	AP-42	0.25	0.06

Number of days boiler assumed to operate is 365

Title V Emissions

Source AA-003 WOOD PRESERVING PROCESSES

Creosote Ties	5,858,250	C. F.
Creosote Poles	0	C. F.
Total Creosote Wood	5,858,250	C. F.
Oil/Penta Poles	3,500,000	C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hrjave)
Creosote (VOC)	1.313E-03	lb/cf	Form R	3.85	0.88
HAPs contained in creosote:					
Naphthalene	7.644E-04	lb/cf	Calculation	2.24	0.51
Quinoline	2.816E-05	lb/cf	Calculation	0.08	0.02
Biphenyl	1.529E-05	lb/cf	Calculation	0.04	0.01
Dibenzofuran	1.297E-06	lb/cf	Calculation	0.00	0.00
TOTAL CREO. HAP				2.37	0.54
Pentachlorophenol (VOC)					
Pentachlorophenol	1.42E-06	lb/cf	Form R	2.48E-03	5.65E-04
#2 Oil (VOC)	7.86E-03	lb/cf	Engr. Est.	13.76	3.14
TOTAL VOC				17.60	4.01

Source AA-008 PRESERVATIVE TREATED WOOD STORAGE FUGITIVES

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hrjave)
Creosote Ties					
Creosote (VOC)	2.44E-03	lb/cf	FR Test & Calc	7.16	1.63
Naphthalene	1.47E-03	lb/cf	FR Test & Calc	4.31	0.98
Quinoline	4.28E-05	lb/cf	FR Test & Calc	0.13	0.03
Biphenyl	1.33E-05	lb/cf	FR Test & Calc	0.04	0.01
Dibenzofuran	1.30E-06	lb/cf	FR Test & Calc	0.00	0.00
Creosote Poles					
Creosote (VOC)	2.82E-03	lb/cf	FR Test & Calc	0.00	0.00
Naphthalene	1.70E-03	lb/cf	FR Test & Calc	0.00	0.00
Quinoline	1.14E-06	lb/cf	FR Test & Calc	0.00	0.00
Biphenyl	4.94E-05	lb/cf	FR Test & Calc	0.00	0.00
Dibenzofuran	1.53E-05	lb/cf	FR Test & Calc	0.00	0.00
Penta Poles					
Oil (VOC, est. as creo)	3.77E-02	lb/cf	FR Test & Calc	66.01	15.05
Pentachlorophenol	8.22E-07	lb/cf	Engr Calc.	1.44E-03	3.28E-04
Fugitive Totals Creosote & PCP					
VOC				73.17	16.68
Naphthalene				4.31	0.98
Quinoline				0.13	0.03
Biphenyl				0.04	0.01
Dibenzofuran				0.00	0.00
Pentachlorophenol				1.44E-03	3.28E-04
HAP Organics (Total)				4.48	1.02

Source AA-004 CROSS TIE SORTER, SWITCH TIE MILL & BRIDGE LUMBER MILL

Number of Cyclones:	1
Total Hours/Year	8760

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	17.52	4

Notes:

1. Assumes all ties (5,858,250 ft3) are processed
2. Assumes 0% control efficiency of cyclone

Title V Emissions

Source AA-009 DRYING KILN

Poles Dried

1600000 C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr-ave)
VOC	0.04	lb/cf	AP-42/Engr. Est.	32.00	7.31

Source AA-010 POLE PEELER (Fugitive)

Annual Throughput =

1,600,000 ft3

Pole Density=

45 lb/ft3

Pole Volume (40-4)

21.2 ft3

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate Material (PM)	0.35	lb/ton	AP-42	6.30
PM-10	0.1925	lb/ton	AP-42, MI, NC	3.47

Source AA-011 WOOD FUEL PREPARATION & HANDLING (Fugitive)

Wood Fuel Processed

58,399 Tn/Yr

15 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	0.25	lb/tn	AP-42/Engr. Est.	7.30	3.75

SMALL COMBUSTION SOURCES, NATURAL GAS FUEL

Source	BTU/Hr	BTU/CF	CF/Hr
AA-005 Boiler House Htr #1	300000	1000	300
AA-005 Boiler House Htr #2	300000	1000	300
AA-015 Standby Boiler Room	100000	1000	100
AA-006 Steam Cleaner	440000	1000	440
TOTAL	1140000		1140
Hours of Operation (hr/yr) =	8760		

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate	0.18	lb/MMCF	AP-42	0.001
PM-10	0.18	lb/MMCF	AP-42	0.001
SO2	0.6	lb/MMCF	AP-42	0.003
NOX	94	lb/MMCF	AP-42	0.469
CO	40	lb/MMCF	AP-42	0.200
VOC	11	lb/MMCF	AP-42	0.055

NOTE: Emissions are total for all 4 sources operating 8760 hrs/yr.

YARD ROADS FUGITIVE PARTICULATES (PM10)

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

k=particle size factor (PM10)=

0.36

s=silt content (%) of road=

10 %

S=mean vehicle speed=

15 mph

W=mean vehicle weight=

15 tons

w=mean no. of wheels=

4 wheels

p=no. wet days/year=

110 days

VMT=Veh. Mi. Traveled=

70200 VMT

6 =No. vehicles driving

15 =Typ. miles/hr driving

2.5 =Typ. hrs driving/day

6 =Typ. d/wk driving

1 =Trtnng volume factor

70200 =Ann veh mi. traveled

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)(1)
Particulate (PM10)	1.91	lb/VMT	AP-42	66.96	46

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

Title V Emissions

TOTAL PLANT EMISSIONS

Pollutant [1]	Estimated Emissions	
	(tn/yr)	(lb/hr)
PM (less fugitives)	155.11	35.41
PM (including fugitives)	253.19	57.80
SO2	10.54	2.41
NOX	48.87	11.16
CO	196.78	44.93
VOC(less fugitive)[2]	55.17	12.59
VOC (including fugitive)[2]	128.33	29.30
HAPs(Organics/VOC)	6.85	1.56
Naphthalene	6.55	1.50
HAP Metals	0.29	0.07
Total HAPs	7.15	1.63

All emissions include fugitives unless otherwise specified.

All particulate matter emissions are assumed to be PM10

[1] Assumes Wellons boiler, standby boiler and misc. combustion sources operating simultaneously for 8760 hours/year

[2] VOC amounts include organic HAPs.

SECTION C

EMISSIONS SUMMARY for the ENTIRE FACILITY

List below the total emissions for each pollutant from the entire facility in accordance with Operating Permit Application Requirements, pp. 3-5. For stack emissions, use the maximum annual allowable (potential) emissions. For fugitive emissions, use the annual emissions calculated using the maximum operating conditions.

POLLUTANT Footnote 1	ANNUAL EMISSION RATE	
	lb/hr	tons/yr
Particulate (Including Fugitive)		253.19
SO2		10.54
NOx		48.87
CO		196.78
VOC (Less Fugitive)		55.17
VOC (Including Fugitive)		128.33
HAPs (Organics/VOC)		6.85
Naphthalene		6.55
HAP Metals		0.29
HCL		0.00
Total HAPS		7.15
See PTE Tables on the Attached Pages		

1. All regulated air pollutants, including hazardous air pollutants emitted from the entire facility should be listed. A list of regulated air pollutants has been provided in Section A.

With the exception of the emissions resulting from insignificant activities and emissions as defined in Regulation APC-S6, Section VII, the pollutants listed above are all regulated air pollutants reasonably expected to be emitted from the facility.

SIGNATURE (must match signature on page 17)

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./ Name: **AA-004, Ref. No 42, Cross Tie Sorter, Switch Tie Mill & Bridge Lumber Mill**

2. Process Description: Untreated wood milling and cutting, includes the following equipment:

Tie Sorter: End Trim Saws (2)

Switch Tie Mill: Cross Cut Saw (1)

Lumber Mill: Planer No.1 (Large Dimension Lumber), Planer No. 2 (Small Dimension Lumber), Cross Cut Saw (1), Drills (2), Dapping Saw (1)

3. Was this unit constructed or modified after August 7, 1977? _____ yes ____X____no If yes please give date and explain.

4. Capacity (tons/hr):

5. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Rough cut wood products			2,000,000 cf

PRODUCT or BY- PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Trimmed and shaped untreated wood products			2,000,000 cf

7. Stack Data:

A. Height NA

B. Inside Diameter NA

C. Exit Gas Velocity NA

D. Exit Gas Temperature NA

8. UTM Coordinates: A. Zone B. North C. East

13. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-004	Particulate	Yes							17.52

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed in accordance with Operating Permit Application Requirements, pp. 3-5. A list of regulated air pollutants has been provided in Section A. Provide emission rate in units of applicable emission standard, e.g. lb/MMbtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

* If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

CYCLONES

SECTION L2

1. Emission Point No. / Name: **AA-004 Cyclone for Wood Milling**
2. Manufacturers Name and Model No.: **Unknown**
3. Date of construction for existing sources or date of anticipated start-up for new sources: **Unknown**

4. Cyclone Data:

- a) Cyclone type (if more than 1, put total number) :

<input checked="" type="checkbox"/> Simple	<input type="checkbox"/> Potbellied
<input type="checkbox"/> High Efficiency	<input type="checkbox"/> Multiclone
- b) Efficiency: %
- c) Pollutant viscosity: poise
- d) Flow Rate: acfm
- e) Pollutant size entering cyclone: microns
- f) Pressure drop: inches H2O
- g) Baffles or Louvers (specify):
- h) Cyclone dimensions:

Inlet:	0.83 ft
Outlet:	0.83 ft
Body diameter:	4.0 ft
Body height:	3.0 ft
Cone height:	4.5 ft
- i) Wet spray: Yes No ☒

1. No. of Nozzles:
2. Type of liquid used:
3. Flow rate: gpm
4. Make-up rate: gpm
5. % recycled: %

j) Fan location:

1. Downstream:

<input type="checkbox"/> Direct emission
<input type="checkbox"/> Auxiliary Stack
2. Upstream:

<input type="checkbox"/> No cap (vertical emissions)
<input type="checkbox"/> Fixed cap (diffuse emissions)
<input type="checkbox"/> Wind respondent cap (horizontal emissions)

5. Which process(es) does the cyclone(s) control emissions from? **Lumber Mill Equipment**

6. Attach a diagram of the cyclone(s) used.



FILE COPY

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

January 5, 2009

Ms. Joyce Fankulewski, Environmental Manager
Koppers Inc
436 Seventh Avenue
Pittsburg, PA 15219-1800

Dear Ms. Fankulewski:

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

This letter is to acknowledge receipt of your application on January 5, 2009. 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 Tommy Wall at (601) 961-5171.

Sincerely,

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

Teresa Dennington
Environmental Permits Division

876 PER20080002

Marcus C. Smith
Plant Manager



876
Grenada

December 4, 2008

Mr. Scott Hodges
Mississippi Department of Environmental Quality
Environmental Permits Division
P.O. Box 10385
Jackson, MS 39289-0385

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 X11
Fax 662 226 4588
SmithMC@koppers.com
www.koppers.com

CERTIFIED MAIL: 7008 1140 0001 0773 4124

**Subject: Title V Operating Permit - #0960-00012
Plant Management Change - Authorization To Sign
Koppers Inc. - Tie Plant, Mississippi**

Dear Mr. Hodges:

Per applicable regulatory guidelines an updated RCRA Subtitle C Identification Form and a letter issued by the Company authorizing me to sign documents related to the facility's Title V Operating Permit are enclosed. If you have any questions please call.

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.

Sincerely,

Marcus C. Smith
Plant Manager

Enclosures

cc: Ms. Joyce Fankulewski, Koppers Inc.
Mr. Wayne B. Anderson, MDEQ

Leslie S. Hyde
Vice President, Safety & Environmental Affairs



Koppers Inc.
436 Seventh Avenue
Suite 1800
Pittsburgh, PA 15219
T 412 227 2237
F 412 227 2434
HydeLS@koppers.com
www.koppers.com

May 12, 2008

To Whom It May Concern:

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

Sincerely,


Leslie Hyde

Vance R. Haskin
Plant Manager



A1-876
Grenada Co.

RECEIVED

OCT 16 2008

Dept of Environmental Quality
Office of Pollution Control

October 10, 2008

Mr. Phillip LaBarre
Mississippi Department of Environmental Quality
Timber and Wood Products Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 X38
Fax 662 226 4588
Haskinvr@koppers.com
www.koppers.com

CERTIFIED MAIL: 7007 3020 0001 0626 5669

Subject: Title V Operating Permit No. 0960-00012
30 Day Notification of Stack Test
Koppers Inc. – Tie Plant, Mississippi

Dear Mr. LaBarre:

The Koppers Inc. facility located at 1 Koppers Drive in Tie Plant, MS plans to conduct its biennial stack test to monitor particulate emissions and opacity for the Wellons wood-fired boiler (Emission Point AA-001) on December 8, 2008 in accordance with Sections 5.B and C of its TVOP. Enclosed please find the written stack test protocol to be used during this event.

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.

Should you have any questions or comments regarding this notification please contact me at 662-226-4584 (ext. 11).

Sincerely,

A handwritten signature in black ink that reads "Vance R. Haskin". The signature is written in a cursive, flowing style.

Vance R. Haskin
Plant Manager

Enclosures

cc: Ms. Joyce Fankulewski, Koppers Inc.

KOPPERS INDUSTRIES – TIE PLANT, MISSISSIPPI

TEST PLAN

Environmental Monitoring Laboratories

October 10, 2008

1.0 SOURCE DESCRIPTION:

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

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

2.0 TEST METHODS:

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

Calibrations and quality assurance will be as described in the respective methods. Analyzer calibrations will be performed using Protocol 1 calibration gases.

3.0 TEST REPORT:

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

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

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

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

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

3.6 Nomenclature:

3.7 Calibration Procedures:

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

4.0 WORK SCHEDULE:

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

Joyce M. Fankulewski
Environmental Manager



RECEIVED
SEP 11 2008

Dept of Environmental Quality
Office of Pollution Control

September 8, 2008

Mr. Tommy Wall
Timber and Woods Branch
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225-2261

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

Subject: Koppers Inc. Response to Air Application Deficiency
Ref. No. 0960-00012
Grenada County

Via Certified Mail No 7008 1300 0001 3325 7321

Dear Mr. Wall:

Enclosed is the requested clarification regarding the emission factors used for Sources AA-003 and AA-008.

In addition, upon Koppers review of the data, a couple of minor errors were detected due to a link within the spreadsheets. A revised copy of the Emissions Summary is also attached. Please replace the summary in the renewal application package with this revised version.

Please see the revised:

- Emission Factors for Source AA-008 - Creosote ties (Dibenzofuran)
- Emission Factors for Source AA-008 - Creosote poles (Creosote VOC, Naphthalene, Quinoline, Biphenyl, Dibenzofuran)
- Total Plant Emissions – PM (including fugitives)

As you can see, the only effect of these revisions is the reduction of PM emissions. We trust that this submittal will satisfy your request. Should you have any additional questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joyce M. Fankulewski".

Joyce M. Fankulewski

Response to MSDEQ Request for Information 23 August 2008

General Approach

To calculate the emissions associated with the wood treating operations and the treated wood storage operations for the Title V renewal application, Koppers Inc. used software developed by the American Wood Preservers Institute (AWPI) in 1995 for creosote treating and yard storage of creosote treated products. That software was based on EPA-developed software such as TANKS and WATER, on available industry test data for emissions from creosote treating operations, on physical and chemical properties of industry average creosote and on basic physical chemistry and chemical engineering fundamentals for topics such as vapor-liquid equilibrium. This basic software was first developed by AWPI for use in SARA/Form R emission estimates. For Title V permit applications, however, the software is adapted by use of Potential-to-Emit (PTE) assumptions regarding equipment and materials.

For the emissions calculations associated with pentachlorophenol treating operations and yard storage of pentachlorophenol treated products, Koppers Inc. adapted the software developed for creosote operations to reflect the differences between the physical chemical properties of pentachlorophenol treating solutions.

Creosote Treating Emission Factors

Since 1995, Koppers Inc. has used and updated the AWPI software to reflect Koppers-specific equipment sizes, materials and operations. It included updates to software components such as TANKS and WATER, as well as more recently available information on the chemical composition and physical properties of creosote. Also, Koppers Inc. continued to use assumptions that increased the PTE emissions for creosote operations.

This software provides emission estimates for the treating system on a system-wide basis. The hardware and equipment, including work tanks, storage tanks, treating cylinders (or retorts), pumps, valves and other fittings, vacuum systems and any air pollution control devices are included in the AWPI model capability. The emission estimates are based on the quantity of wood to be processed, the quantity of creosote materials needed for the processing, the physical dimensions of the wood articles and the physical chemical properties of the creosote materials. The software has the capability to model a number of different treating cycles to accommodate the differences in treating operations for the different types of articles to be produced.

The AWPI software computes the fugitive creosote emissions for pumps, valves and fittings using correlations such as the SOCM and USEPA emission tests and factors. Emission estimates for the treating cycles are based on field measurements taken at operating wood treating plants. These measurements have been made by EPA, State agencies and industry.

PTE assumptions are used regarding equipment and production parameters. For example, it is assumed that the maximum quantity of wood to be treated is placed in each of the treating cylinders for each treating cycle. Further, it is assumed that the treating cylinders are operated for the full 8760 hours/year with no allowance made for downtime due to equipment turnaround, maintenance or outage for equipment malfunction.

For the creosote wood treating operations, the AWPI software computes the PTE creosote VOC point and fugitive emissions for all of the equipment and operations. The total PTE creosote VOC from the treating operations is summed from these individual calculations.

Based on maximum treating cylinder capacities, the PTE production volume is 5,858,250 ft³ of creosote treated ties per year. Any production of creosote treated poles decreases the PTE production volume since the cylinder capacity for poles is lower than that of ties and because it takes a longer treating cycle time to treat poles than it does for ties.

For the Title V permit renewal application, the annual PTE creosote VOC emissions for the creosote treating operations are:

Point Emissions	=	5071.3 lb creosote VOC
Fugitive Emissions	=	<u>2621.0 lb creosote VOC</u>
Total Emissions	=	7692.3 lb creosote VOC = 3.846 tons creosote VOC

Using the PTE production capacity and the PTE creosote VOC emission values, the emission factor for the creosote treating operations can be calculated as:

$$EF_{\text{CREO TREATING}} = \frac{7692.3 \text{ lb creosote VOC}}{5,858,250 \text{ ft}^3 \text{ wood treated}} = 1.313 \times 10^{-3} \text{ lb VOC/ft}^3$$

The emissions of the four individual HAPs (naphthalene, quinoline, biphenyl and dibenzofuran) included in the Title V permit renewal application are calculated from the creosote VOC emission estimates. Using basic physical chemical and chemical engineering principles, the composition the four HAPs in the creosote VOC can be calculated. The emission factors for the four individual HAPs are computed from the creosote VOC emission factor and the mass fraction of each of the HAPs in the vapor phase.

$$\begin{aligned} EF_{\text{Naphthalene}} &= 7.644 \times 10^{-4} \text{ lb/ft}^3 \\ EF_{\text{Quinoline}} &= 2.816 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Biphenyl}} &= 1.529 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Dibenzofuran}} &= 1.297 \times 10^{-6} \text{ lb/ft}^3 \end{aligned}$$

These emission factors are used to calculate the PTE emissions for creosote treating.

Yard Storage Emissions of Creosote Treated Products

To compute the creosote VOC and HAP emissions associated with the storage of the treated wood products, a slightly different approach is used in the AWPI software. The storage emissions depend on the physical dimensions of the treated wood product, the stacking arrangement used during storage, the properties of the creosote, the duration of the storage and the ambient temperature in the storage location.

The storage yard emissions for creosote treated wood are based on field emission tests on creosote treated wood. The tests were made at a former Koppers Inc. plant at Feather River, CA. The tests were made at the request of the California ARB under the air toxic emission program. The tests were made for the emissions of several of the components of creosote VOC rather than for a total VOC measurement. The AWPI software is based on a correlation of naphthalene emissions as a function of the time that the treated wood product has been in storage. From this correlation, a total, integrated naphthalene emission quantity is computed. This integrated total depends on the geometry of the treated wood product, the geometric arrangement during the storage period, the length of the storage period and the ambient temperature at the storage site. Because of this dependence on the geometry of the treated wood product and the geometrical

arrangement of the stacking during storage, creosote treated ties and creosote treated poles have different emission factors.

As is the case with the emissions from the treating operations, the AWPI software uses an approach based on Raoult's Law to calculate the emissions of individual HAPs and creosote VOC from the naphthalene emissions. This approach calculates the composition of the creosote vapor at the yard storage temperature reference temperature. The AWPI selected 80° F as the reference temperature since that was the ambient temperature during the field tests that produced the data upon which the AWPI naphthalene correlation was based. At these nominal ambient temperatures, there is very little variation in the composition of the creosote vapor phase. By scaling the emission factor for naphthalene for the composition of the creosote vapor at the reference temperature, the emission factors for the individual HAPs of interest and for creosote VOC are obtained.

For the renewal permit application, a uniform monthly production rate is assumed. This approach is a consequence of the PTE assumption of maximum capacity production for the full 8760 hours/year discussed in creosote treating operations (above). This approach maximizes the VOC emissions from the production equipment and sets the number of treated ties that can be moved into yard storage. A further PTE assumption is that all treated products are stored on site for 120 days prior to shipment to the customer.

For the renewal permit application, the annual yard storage VOC emissions are computed as:

$$EF_{\text{Yard Naphthalene}} = \frac{8623.5 \text{ lb naphthalene}}{5,858,250 \text{ ft}^3} = 1.472 \times 10^{-3} \text{ lb naphthalene/ft}^3$$

The HAP emissions are computed from the calculated vapor phase composition of the creosote vapor using the same approach discussed for the treating process HAP emissions.

$$\begin{aligned} EF_{\text{VOC}} &= 2.44 \times 10^{-3} \text{ lb/ft}^3 \\ EF_{\text{Quinoline}} &= 4.28 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Biphenyl}} &= 1.33 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Dibenzofuran}} &= 1.95 \times 10^{-13} \text{ lb/ft}^3 \end{aligned}$$

Pentachlorophenol Treating Emission Factors

The emissions associated with pentachlorophenol treating operations are calculated by an approach very similar to that used with creosote treating. The AWPI based creosote software was modified to reflect the physical chemical properties of pentachlorophenol and the pentachlorophenol treating solutions. At normal ambient temperatures, pentachlorophenol is a very low vapor pressure solid. To treat wood, the pentachlorophenol is dissolved in a hydrocarbon based solvent. Typically, the solution is 7%-10% pentachlorophenol and the balance is the solvent.

The software includes all of the same equipment and operations that the creosote treating software does. The same PTE approach, for production capacity and other parameters, is used in pentachlorophenol treating emission calculations. The PTE production capacity, 3,500,000 ft³, was adopted several years ago in prior Title V permit applications. It is used in this renewal application for continuity, but is extremely conservative. It is extremely unlikely that this production capacity can be approached in actual operations.

The software computes the emissions for both point and fugitive sources in the pentachlorophenol treating system. These are summed to yield the total emissions and are used to compute the emission factors for the VOC and pentachlorophenol. It can be seen that the VOC emission factor is greater than that for creosote VOC. This is because the hydrocarbon based solvent has a greater vapor pressure than does creosote. The emission factor for pentachlorophenol is much lower than that of naphthalene, the principal HAP for creosote treating. This is because pentachlorophenol has a much lower vapor pressure than does naphthalene.

For the Title V permit renewal application, the annual PTE VOC emissions for the pentachlorophenol treating operations are:

$$\begin{aligned} \text{Point Emissions} &= 23,481 \text{ lb VOC} \\ \text{Fugitive Emissions} &= \underline{4,030 \text{ lb VOC}} \\ \text{Total Emissions} &= 27,511 \text{ lb VOC} = 13.76 \text{ tons VOC} \end{aligned}$$

Using the PTE production capacity and the PTE VOC emission values, the emission factor for the creosote treating operations can be calculated as:

$$EF_{\text{PENTA TREATING}} = \frac{27,511 \text{ lb VOC}}{3,500,000 \text{ ft}^3 \text{ wood treated}} = 7.860 \times 10^{-3} \text{ lb VOC/ft}^3$$

The annual pentachlorophenol PTE emissions for the pentachlorophenol treating operations are:

$$\begin{aligned} \text{Point Emissions} &= 4.80 \text{ lb Penta} \\ \text{Fugitive Emissions} &= \underline{0.15 \text{ lb Penta}} \\ \text{Total Emissions} &= 4.95 \text{ lb Penta} = 2.48 \times 10^{-3} \text{ tons penta} \end{aligned}$$

Using the PTE production capacity and the PTE VOC emission values, the emission factor for the pentachlorophenol treating operations can be calculated as:

$$EF_{\text{PENTA TREATING}} = \frac{4.95 \text{ lb Penta}}{3,500,000 \text{ ft}^3 \text{ wood treated}} = 1.414 \times 10^{-6} \text{ lb Penta/ft}^3$$

Yard Storage of Pentachlorophenol Treated Products

To compute the emissions of VOC and pentachlorophenol associated with yard storage of pentachlorophenol treated wood products, some changes in the software that is used for creosote treated wood storage are made. As discussed above, the AWPI software for yard storage of creosote treated products is based on field test data for naphthalene emissions on treated wood products. There are no similar data available for pentachlorophenol treated wood products.

The first step in the approach is to compute the emissions as if the products were treated with creosote. The second step is to convert the naphthalene emissions to pentachlorophenol emissions and the creosote VOC emissions to pentachlorophenol treating solution VOC emissions. This is done using the ratio of vapor pressures.

Physical parameters for the pentachlorophenol treated poles are used in the first step. The storage time interval and the physical arrangement of the pentachlorophenol treated poles are also input to the computation. The ambient temperature information for the site is the same for both creosote and pentachlorophenol treated products. The results of the first step of the computation are creosote emissions and creosote VOC emissions.

The second step is to convert the creosote related emissions using the ratio of vapor pressures. The reference temperature for the vapor pressure ratios was taken to be 70°F. For the Grenada plant, the treating solution is 8.5% (w/w) pentachlorophenol in No. 2 fuel oil. The creosote properties used in the calculation are the same as those used in the creosote treating emission computations.

Material	Vapor Pressure at 70°F (psia)
Pentachlorophenol	1.13×10^{-6}
Penta Treating Solution	8.66×10^{-3}
Naphthalene	3.86×10^{-3}
Creosote	1.07×10^{-3}

Using these data, the vapor pressure ratios of interest are:

$$\begin{aligned} \text{Pentachlorophenol / Naphthalene} &= 2.924 \times 10^{-2} \\ \text{Pentachlorophenol Treating Solution / Creosote} &= 8.082 \end{aligned}$$

For the Title V renewal permit application, Step 1 of the calculations are:

$$\begin{aligned} \text{Naphthalene} &9,843 \text{ lb/yr} \\ \text{Creosote VOC} &16,335 \text{ lb/yr.} \end{aligned}$$

Using the appropriate vapor pressure ratio, Step 2 of the calculations are:

$$\begin{aligned} \text{Pentachlorophenol} &2.88 \text{ lb/yr} \\ \text{Penta Treating Solution} &132,022 \text{ lb/yr.} \end{aligned}$$

With the PTE production level at 3,500,000 ft³/yr, the emission factors are:

$$\begin{aligned} \text{EF}_{\text{PENTACHLOROPHENOL}} &= 8.22 \times 10^{-7} \text{ lb/ft}^3 \\ \text{EF}_{\text{PENTA VOC}} &= 3.77 \times 10^{-2} \text{ lb/ft}^3. \end{aligned}$$

POTENTIAL-TO-EMIT EMISSION SUMMARY, REV. 1
KOPPERS INC. GRENADA, MS
TITLE V PERMIT APPLICATION REVISED SEPTEMBER 2008

	tn/yr	Sulfur	Chlorine	(ton/hr):
Total Wood Burned:	58,399	0.06%		6.67
Removal Efficiency (1):		70.00%		60 mmbtu/hr

- (1) Removal efficiencies based on Grenada stack test of 2/96.
- (2) CO factor based on AP-42
- (3) NOx factor of 3.3 based on Grn stack test for treated wood.

Number of days boiler assumed to operate is	365
---	-----

Source AA-003 WOOD PRESERVING PROCESSES

Creosote Ties	5,858,250	C. F.
Creosote Poles	0	C. F.
Total Creosote Wood	5,858,250	C. F.
Oil/Penta Poles	3,500,000	C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr ave)
Creosote (VOC)	1.313E-03	lb/cf	Form R	3.85	0.88
HAPs contained in creosote:					
Naphthalene	7.644E-04	lb/cf	Calculation	2.24	0.51
Quinoline	2.816E-05	lb/cf	Calculation	0.08	0.02
Biphenyl	1.529E-05	lb/cf	Calculation	0.04	0.01
Dibenzofuran	1.297E-06	lb/cf	Calculation	0.00	0.00
TOTAL CREO. HAP				2.37	0.54
Pentachlorophenol (VOC)					
Pentachlorophenol	1.42E-06	lb/cf	Form R	2.48E-03	5.65E-04
#2 Oil (VOC)	7.86E-03	lb/cf	Engr. Est.	13.76	3.14
TOTAL VOC				17.60	4.01

Source AA-008 PRESERVATIVE TREATED WOOD STORAGE FUGITIVES

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr ave)
Creosote Ties					
Creosote (VOC)	2.44E-03	lb/cf	FR Test & Calc	7.16	1.63
Naphthalene	1.47E-03	lb/cf	FR Test & Calc	4.31	0.98
Quinoline	4.28E-05	lb/cf	FR Test & Calc	0.13	0.03
Biphenyl	1.33E-05	lb/cf	FR Test & Calc	0.04	0.01
Dibenzofuran	1.30E-06	lb/cf	FR Test & Calc	0.00	0.00
Creosote Poles					
Creosote (VOC)	2.82E-03	lb/cf	FR Test & Calc	0.00	0.00
Naphthalene	1.70E-03	lb/cf	FR Test & Calc	0.00	0.00
Quinoline	1.14E-06	lb/cf	FR Test & Calc	0.00	0.00
Biphenyl	4.94E-05	lb/cf	FR Test & Calc	0.00	0.00
Dibenzofuran	1.53E-05	lb/cf	FR Test & Calc	0.00	0.00
Penta Poles					
Oil (VOC, est. as creo)	3.77E-02	lb/cf	FR Test & Calc	66.01	15.05
Pentachlorophenol	8.22E-07	lb/cf	Engr Calc.	1.44E-03	3.28E-04
Fugitive Totals Creosote & PCP					
VOC				73.17	16.68
Naphthalene				4.31	0.98
Quinoline				0.13	0.03
Biphenyl				0.04	0.01
Dibenzofuran				0.00	0.00
Pentachlorophenol				1.44E-03	3.28E-04
HAP Organics (Total)				4.48	1.02

Source AA-004 TIE MILL & LUMBER MILL

Number of Cyclones:	1
Total Hours/Year	8760

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	8.76	2

Title V Emissions

Source AA-009 DRYING KILN

Poles Dried 1600000 C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr-ave)
VOC	0.04	lb/cf	AP-42/Engr. Est.	32.00	7.31

Source AA-010 POLE PEELER (Fugitive)

Annual Throughput = 1,600,000 ft3
Pole Density= 45 lb/ft3
Pole Volume (40-4) 21.2 ft3

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate Material (PM)	0.35	lb/ton	AP-42	6.30
PM-10	0.1925	lb/ton	AP-42, MI, NC	3.47

Source AA-011 WOOD FUEL PREPARATION & HANDLING (Fugitive)

Wood Fuel Processed 58,399 Tn/Yr 15 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	0.25	lb/tn	AP-42/Engr. Est.	7.30	3.75

SMALL COMBUSTION SOURCES, NATURAL GAS FUEL

Source	BTU/Hr	BTU/CF	CF/Hr
AA-005 Boiler House Htr #1	300000	1000	300
AA-005 Boiler House Htr #2	300000	1000	300
AA-015 Standby Boiler Room	100000	1000	100
AA-006 Steam Cleaner	440000	1000	440
TOTAL	1140000		1140
Hours of Operation (hr/yr) =	8760		

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate	0.18	lb/MMCF	AP-42	0.001
PM-10	0.18	lb/MMCF	AP-42	0.001
SO2	0.6	lb/MMCF	AP-42	0.003
NOX	94	lb/MMCF	AP-42	0.469
CO	40	lb/MMCF	AP-42	0.200
VOC	11	lb/MMCF	AP-42	0.055

NOTE: Emissions are total for all 4 sources operating 8760 hrs/yr.

YARD ROADS FUGITIVE PARTICULATES (PM10)

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

k=particle size factor (PM10)= 0.36
s=silt content (%) of road= 10 %
S=mean vehicle speed= 15 mph
W=mean vehicle weight= 15 tons
w=mean no. of wheels= 4 wheels
p=no. wet days/year= 110 days
VMT=Veh. Mi. Traveled= 70200 VMT

6 =No. vehicles driving
15 =Typ. miles/hr driving
2.5 =Typ. hrs driving/day
6 =Typ. d/wk driving
1 =Trtnng volume factor
70200 =Ann veh mi. traveled

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)(1)
Particulate (PM10)	1.91	lb/VMT	AP-42	66.96	46

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

Title V Emissions

TOTAL PLANT EMISSIONS

Pollutant [1]	Estimated Emissions	
	(tn/yr)	(lb/hr)
PM (less fugitives)	163.87	37.41
PM (including fugitives)	244.43	55.80
SO2	10.54	2.41
NOX	48.87	11.16
CO	196.78	44.93
VOC(less fugitive)[2]	55.17	12.59
VOC (including fugitive)[2]	128.33	29.30
HAPs(Organics/VOC)	6.85	1.56
Naphthalene	6.55	1.50
HAP Metals	0.29	0.07
Total HAPs	7.15	1.63

All emissions include fugitives unless otherwise specified.

All particulate matter emissions are assumed to be PM10

[1] Assumes Wellons boiler, standby boiler and misc. combustion sources operating simultaneously for 8760 hours/year

[2] VOC amounts include organic HAPs.



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 23, 2008

Ms. Joyce Fankulewski
Environmental Manager
Koppers Inc
436 Seventh Avenue
Pittsburg, PA 15219-1800

FILE COPY

Dear Ms. Fankulewski:

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

Based upon review of the above referenced application received from Koppers, Inc. on July 1, 2008, the following was noted:

In the emission calculations for Sources AA-003 and AA-008, an emission factor was listed, but it is unclear on what this factor is based upon, as in the basis column; Form R, calculation, Engr. Est., FR Test & Calc, and Engr. Calc. were listed.

Please provide documentation or clarification as to how the emission factors for these two sources were determined by September 19, 2008. Upon receipt of this information, the Environmental Permits Division will continue the permitting process for your facility.

If you have any questions, please contact me at (601) 961-5193.

Sincerely,

Tommy Wall, P.E.
Timber and Woods Branch
Environmental Permits Division

876 PER20080002

Vance R. Haskin
Plant Manager



July 25, 2008

Mr. Philip LaBarre
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

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

AI 876
Grenada
ASK

CERTIFIED MAIL: 7007 3020 0001 0626 5591

Subject: Boiler Maintenance
Title V Operating Permit #0960-00012
Koppers Inc. – Tie Plant, Mississippi

Dear Mr. LaBarre:

On the night of July 22, 2008 the plant's Continuous Emissions Monitoring System (CEMS) logged three (3 ea.) six minute opacity episodes.

As referenced in the correspondence mailed to your attention on March 25, 2008 via Certified Mail No. 7099 3400 0002 5200 9851, new boiler controls were inevitably purchased and installed. While the hardware associated with this project has been installed and some software programming finalized, additional programming modifications are pending.

The occurrence of these episodes was associated with the activation of the boiler's low water shut off safety mechanism and uncommon to past operations. Investigation of their root cause has involved consultations with the manufacture of the boiler as well as activation of the low water shut off to simulate the event.

Simulation of the event revealed that the fuel feed system to the fire cells did not shut down along with the balance of the boiler controls when the low water limit switch was activated. Consequently, the fire cells were smothered yielding an increase in opacity. This represents an error in the programming that the manufacture of the new controls shall modify. Per Section 1.24(a) of the plant's permit this would represent an upset. A copy of the corresponding "Episode List Report" generated by the Continuous Emissions Monitoring System is attached for review.

Corrective actions shall include the referenced programming modification, training of the plant's operators to manually shut the fuel feed system down in the event of a low water alarm pending these modifications, and modification of the valve system feeding water to the system.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Vance R. Haskin".

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, Koppers Inc.

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 07/22/08 00:00 to 07/25/08 16:09
 Generated: 07/25/2008
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
07/22/08 22:30 - 07/22/08 22:35		1: OV	60.200	/	40.000	(50.50%)	Control Equip. Malfunction	Other Corrective A
07/22/08 22:36 - 07/22/08 22:41		1: OV	57.700	/	40.000	(44.25%)	Control Equip. Malfunction	Other Corrective A
07/23/08 03:18 - 07/23/08 03:23		1: OV	55.100	/	40.000	(37.75%)	Control Equip. Malfunction	Other Corrective A

Total Reported Time: 96.0 hours

TOTAL DURATION = 0.30 hours

1: Over limit = 0.30 hours
 2: Control Equip. Malfunction = 0.30 hours

Vance R. Haskin
Plant Manager

Episode List Report
Koppers Industries
Tie Plant Road
Tie Plant, Miss. 38960
00:00 to 07/14/08 11:46
07/14/2008

July 21, 2008

Mr. Philip LaBarre
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
JUL 23 2008
Dept of Environmental Quality
Office of Pollution Control

KOPPERS

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

CERTIFIED MAIL: 7007 3020 0001 0626 5584

Subject: **Boiler Maintenance**
Title V Operating Permit #0960-00012
Koppers Inc. - Tie Plant, Mississippi

Dear Mr. Labarre:

On June 20, 2008 a correspondence was forwarded to you concerning scheduled maintenance activities on the Facility's boiler via Certified Mail No. 7007 3020 0001 0626 5546. These activities were conducted as scheduled. Various internal components of the boiler including the tubes, combustion chamber, heat exchanger and modi-cones were cleaned. In the process of these cleaning activities there were three episodes registered by the Continuous Emissions Monitoring System (CEMS). Incidentally, these episodes occurred at instances when the boiler's induced draft fan was not operating. The cleaning activities occurring in the boiler resulted in ash forming around the CEMS's monitoring eye thus resulting in the episodes. A copy of the Episode List Report associated with these occurrences is attached.

New operational and environmental controls have been installed at this writing. Additional programming associated with the operation of these controls is pending. Per conversations with the vendor the programming should be completed by month's end.

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.

Sincerely,

Vance R. Haskin

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, Koppers Inc.



FILE COPY

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

July 8, 2008

Ms. Joyce Fankulewski, Environmental Manager
Koppers Inc
436 Seventh Avenue
Pittsburg, PA 15219-1800

Dear Ms. Fankulewski:

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

This letter is to acknowledge receipt of your application on July 1, 2008. 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 Tommy Wall at (601) 961-5171.

Sincerely,

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

Teresa Dennington
Environmental Permits Division

876 PER20080002

Joyce M. Fankulewski
Environmental Manager



8746
Grenada
CO

June 25, 2008

Mr. Philip LeBarre
State of Mississippi Department of
Environmental Quality
Office of Pollution Control
Air Division
P.O. Box 2261
Jackson, Mississippi 39225-2261

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

RECEIVED

JUL 1 - 2008

Mississippi Department of Environmental Quality
Office of Pollution Control

**Subject: Title V Operating Permit #0960-00012
Koppers Inc – Grenada Mississippi
Renewal Application**

Dear Mr. LeBarre:

Enclosed is the renewal application for our existing Title V Operating Permit No. 0960-00012. The enclosed document addresses all requirements of the renewal application. Should you have any questions or concerns, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joyce M. Fankulewski".

Joyce M. Fankulewski



FILE COPY

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

May 5, 2008

Mr. Vance R. Haskin, Plant Manager
Koppers Inc
PO Box 160
Tie Plant, Mississippi 38960

Dear Mr. Haskins:

Re: Inspection Report
Koppers Inc
Tie Plant, Grenada County
Air-Title V Operating Permit No. 096000012
Water - Pretreatment Permit No. MSP090300

Enclosed is a copy of the Air Title V and Water Pretreatment inspection reports completed as a result of this office's inspections at Koppers Inc on March 25, 2008. The reports should be used by you as a guide for complying with requirements and limitations stated in your permits. There were no apparent violations noted during the inspections.

Thank you for the cooperation extended to MDEQ during this site visit. Please note that MDEQ site investigations by definition do not take into consideration all aspects of a facility's compliance with environmental regulations. Additional credible information, such as emissions monitoring reports or a more detailed inspection of the facility, may indicate the existence of violations not documented during this visit. Site investigations should be regarded as one important element of MDEQ's compliance assurance program but not as a definitive statement of facility compliance with all environmental permit requirements, environmental laws, regulations, and/or statutes, especially those not specifically discussed herein.

If you have any questions concerning this matter, please contact me at (601) 961-5090.

Sincerely,

J. Dewayne Headrick
Timber and Wood Products Branch
Environmental Compliance and Enforcement Division

Agency Interest No. 876
INS20080003

Vance R. Haskin
Plant Manager

RECEIVED
MAR 31 2008
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 X38
Fax 662 226 4588
Haskinvr@koppers.com
www.koppers.com

March 25, 2008

Mr. Philip LaBarre
Mississippi Department of Environmental Quality
Timber and Wood Production
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL: 7099 3400 0002 5200 9851

**Subject: Title V Operating Permit No. 0960-00012
Notification of Boiler Control Installation
Koppers Inc. – Tie Plant, Mississippi**

Dear Mr. LaBarre:

This letter is being submitted per Section I, Condition 1.17 of the Koppers, Inc. Title V Permit.

On October 2, 2007, a correspondence was submitted by Koppers Inc. requesting approval for the installation of new controls on the plant's boiler and a modification of the permitted stack testing schedule. The request was acknowledged and approved by the MDEQ in a correspondence dated November 13, 2007. We submit the following update to this original proposal for your consideration.

- Subsequent to additional investigations and dialogue with the manufacturer of the boiler, Koppers will install controls that will use steam flow to calculate fuel consumption as opposed to a belt scale device as originally proposed. The controls will yield comparable results.
- It was our initial intent to perform stack testing in the 1st or 2nd quarter of 2008. It is unlikely that Koppers will meet that timeframe. However, Koppers will ensure the stack testing is performed in accordance with the plant's Title V Operating Permit requirements.

Koppers believes that the proposal will not result in a change in emissions, require a change to the facility's TVOP, or require a change in the conditions of the existing permit, as concluded in the November 13, 2007 correspondence.

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 gathered 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 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.

Should you have any questions please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Vance R. Haskin". The signature is written in a cursive style with a large initial "V".

Vance R. Haskin

cc: Ms. Joyce Fankulewski, KI - CSG

Vance R. Haskin
Plant Manager



AI 876
GRENADA W.
AIR

RECEIVED
MAR 18 2008
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
HaskingVR@koppers.com
www.koppers.com

March 12, 2008

Mr. Azzam Abu-Mirshid, P.E.
Mississippi Department of Environmental
Quality
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

CERTIFIED MAIL: 7099 3400 0002 5200 9912

Subject: Title V Operating Permit - #0960-00012
Notification of Boiler (Source AA-001) Shutdown and Maintenance
Koppers Inc. - Grenada, Mississippi

Dear Mr. Abu-Mirshid::

In accordance with Title V Operating Permit #0960-00012, Section 1.24(c), this letter provides notification of a scheduled shutdown of the wood fired boiler (Source AA-001) at the Koppers Inc. facility in Grenada, Mississippi for maintenance purposes. Shutdown will occur on March 21, 2008. We will commence maintenance activities on the morning of Monday, March 24, 2008 and will continue until these are complete. Startup is anticipated to occur on March 25 2008. Although the boiler is currently being properly operated, we believe that the work performed on this boiler during the shutdown will improve the operating efficiency of the boiler.

The maintenance to be performed on the boiler will include the removal of ash build up from around the tubes, combustion chamber, heat exchanger, and modi-cones. Emissions during and upon startup following the completion of these maintenance activities may exceed the permit limit for opacity. However, every possible measure will be taken to minimize excess emissions during and following the performance of these activities, and upon startup of the boiler.

If you have any questions or comments regarding the scheduled shutdown and maintenance of the boiler, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Vance R. Haskin". The signature is written in a cursive style with a large initial "V".

Vance R. Haskin

CC: Joyce Fankulewski – KI CSG

Vance R. Haskin
Plant Manager



AI 876
GRENADA Co.
AIR

RECEIVED
MAR 17 2008
Dept of Environmental Quality
Office of Pollution Control

March 11, 2008

Mr. Azzam Abu-Mirshid, P.E.
Mississippi Department of Environmental Quality
Timber and Wood Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

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

CERTIFIED MAIL: 7099 3400 0002 5200 9943

Subject: CEMS Episodes
Title V Operating Permit #0960-00012
Koppers Inc. - Tie Plant, Mississippi

Dear Mr. Abu-Mirshid:

On the night of March 8, 2008 around 1:55 AM a component of the wood fuel feed system transferring fuel from storage silos to the boiler's fire cells failed. This component, a timing mechanism, works in conjunction with sonar and paddle-wheel operated fuel-bin level indicators and serves to control the timing and thus rate at which the fuel feed system engages to transfer wood fuel to fuel bins and thus the fire cells. Once it failed the volume of wood fuel being transferred to the fire cells slowed significantly and the combustion rates in them dropped. Subsequent slugs of fuel fed to the cells due to the erratic operation of the timer served to generate a smothering effect thus resulting in a rise in opacity. Per Section 1.24(a) of the plant's permit this would represent an upset. A copy of the corresponding "Episode List Report" generated by the Continuous Emissions Monitoring System is attached for review.

The Boiler Operator and Maintenance Supervisor were called to the site to troubleshoot and correct the occurrence. Inevitably the failing of the timer was identified as the key factor. The Maintenance Supervisor replaced the timer with a spare unit maintained at the site and adjusted the sonar bin-level indicator. The excess wood fuel was pulled from the fire cells and the boiler was restarted. Upon evaluation it was determined that the weather stripping around the door of the control cabinet housing the timer was worn. Dust entering the panel around the door edges may have contributed to the timer failing. Consequently, the weather stripping is being replaced.

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.

Sincerely,

Vance R. Haskin

Vance R. Haskin
Plant Manager

CC: Ms. Joyce Fankulewski, Koppers Inc.

Enertec NTDahs®
 Episode List Report
 Koppers Industries
 Tie Plant Road
 Tie Plant, Miss. 38960
 from 03/08/08 00:00 to 03/08/08 23:59
 Generated: 03/11/2008
 Types: OVER

POLLUTANT: Opac EPISODE: Excess_Opacity

Incident Start	Incident End	Type	Value	/	Limit	(%dev)	Reason	Action
03/08/08 01:54 -	03/08/08 01:59	1: OV	40.300	/	40.000	(0.75%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:00 -	03/08/08 02:05	1: OV	62.800	/	40.000	(57.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:06 -	03/08/08 02:11	1: OV	41.500	/	40.000	(3.75%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:18 -	03/08/08 02:23	1: OV	59.600	/	40.000	(49.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:24 -	03/08/08 02:29	1: OV	54.000	/	40.000	(35.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:30 -	03/08/08 02:35	1: OV	43.600	/	40.000	(9.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:36 -	03/08/08 02:41	1: OV	62.400	/	40.000	(56.00%)	Control Equip. Malfunction	Repaired Control E
03/08/08 02:54 -	03/08/08 02:59	1: OV	44.600	/	40.000	(11.50%)	Control Equip. Malfunction	Repaired Control E
03/08/08 03:36 -	03/08/08 03:41	1: OV	43.300	/	40.000	(8.25%)	Startup	No Action Needed
03/08/08 03:42 -	03/08/08 03:47	1: OV	64.600	/	40.000	(61.50%)	Startup Continued	No Action Needed
03/08/08 03:48 -	03/08/08 03:53	1: OV	45.500	/	40.000	(13.75%)	Startup Continued	No Action Needed

Total Reported Time: 24.0 hours

TOTAL DURATION = 1.10 hours

1: Over limit	= 1.10 hours	
2: Control Equip. Malfunction	=	0.80 hours
3: Startup	=	0.10 hours
4: Startup Continued	=	0.20 hours

KOPPERS

Date: AUGUST 17 2010

626854

Amount
\$1,827.72

ONE THOUSAND EIGHT HUNDRED TWENTY SEVEN AND 72/100 ONLY

Pay To The Order Of:

MISSISSIPPI ST DEPT ENV RONMEN
OFFICE POLLUTION CON
PO BOX 2339
JACKSON MS 39225-2339

Squand & Ronchey De Kle

National City, Ashland, OH

KOPPERS INC.

⑈626854⑈ ⑆041203895⑆

KOPPERS INC. PITTSBURGH PA

626854

SP	CD	VENDOR	DIV	OUR AUDIT	YOUR INVOICE NBR	INV MO/DA	INV AMOUNT	DISC	NET AMT PAYABLE
7	940505023	477	02400080610	AP-0006552	0701	1827.72	0.00	***1827.72	

0960-00012

RECEIVED

AUG 20 2010

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE

TITLE V AIR PERMIT FEES

() Quarter Payment () Full Payment () Other

() Title V Air Permit Fees 3479 - 41670 - 4044 - 0

() Penalty on Failure to Pay 3479 - 42350 - 4044 - 0

Signature

Date



FILE COPY

STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

June 23, 2010

Mr. Marcus Smith
Plant Manager
Koppers Inc
P.O. Box 160
Tie Plant, MS 38960

Dear Mr. Smith:

Re: Koppers Inc
502(b)(10) Change
Ref. No.0960-00012
Grenada County

We acknowledge receipt on June 22, 2010 of your request for a 502(b)(10) change or operational flexibility change to your facility's Title V Operating Permit (TVOP) pursuant to Regulation, APC-S-6, Section IV.F. The acknowledged change consists of replacing the No. 19 Press Feed Tank (4,552 gallon capacity) with a new tank (8,864 gallon capacity). Additionally we understand the dedication of the existing concrete oil/water separator No. 48B tank (34,703 gallon capacity) will be change to utilizing the tank as secondary containment to the new tank addressed above. We understand that your statement that there will be no emissions increase or change is based on the fact that there will be a decrease in the capacity to store onsite generated wastewater. Even though there are no applicable VOC emission requirements, we suggest that for this change and any future requests that you show, via calculations, any emission changes which will occur as result of the requested change. A copy of your request will be attached to our file copy of the facility's TVOP, and it is recommended that you attach a copy of that request to your copy of the TVOP.

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

If you have any questions or concerns, please contact Scott Hodges, EPD Timber Branch Manager, at (601) 961-5672 or me at (601) 961-5162.

Sincerely,

Dan N. McLeod
Environmental Administrator
Environmental Permits Division

cc: Chief of Air Permits Section
Air Planning Branch
U.S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

OFFICE OF POLLUTION CONTROL

876 PER20080002

POST OFFICE BOX 2261 JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Marcus C. Smith
Plant Manager



#876

RECEIVED
JUN 22 2010

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
SmithMC@koppers.com
www.koppers.com

June 21, 2010

MDEQ
Environmental Permits Division
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0735 5879

**Subject: Request for 502 (b) (10) Change
Koppers Inc. - Grenada, Mississippi
Title V Operating Permit - #0960-00012
Removal and Installation of Tanks**

To whom it may concern:

The Koppers Inc., facility located in Grenada, Mississippi plans to make the following modification on or about July 14, 2010, pursuant to Operational Flexibility Regulations 502(b)(10) and APC-S-6, Section IV.F:

The modification will include the removal of one (1) non-pressurized filter press feed tank No. 19 (4,552 gallon capacity) and the installation of a new tank (8,864 gallon capacity) to take the place of tank No. 19. In relation to this change, an existing concrete oil/water separator (tank No. 48B, 34,703 gallon capacity) will no longer be used for the separation of oil and water but will serve as secondary containment for the new tank described above following this modification.

In effect, the modification will decrease the onsite capacity of waste water storage and processing by approximately 30,391 gallons.

Since there is a net decrease in waste water capacity, this modification will not cause emissions that are allowable under the existing Title V Permit to be exceeded and no new pollutants will be emitted due to the modification.

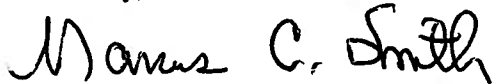
All permit terms and conditions will remain applicable as written in the Title V Permit without change.

These modifications do not constitute a Title I modification and do not exceed allowable emission rates for VOC constituents. These modifications do not violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring, recordkeeping, reporting, or compliance certification requirements. Further, we understand that a permit shield will not be extended to this modification.

If you have any questions or comments regarding the modification, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,



Marcus C. Smith

CC:

Chief of Air Permits Section
Air Planning Branch
US EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Certified Mail: 7008 1140 0001 0735 5862

Cc:

Joyce Fankulewski – KI CSG



FILE COPY

STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

May 3, 2010

Mr. Marcus Smith
Plant Manager
Koppers Inc
PO Box 160
Tie Plant, MS 38960

Dear Mr. Smith:

Re: Koppers Inc
502(b)(10) Change
Ref. No. 0960-00012
Grenada County

We acknowledge receipt on April 28, 2010 of your request for a 502(b)(10) change or operational flexibility change to your facility's Title V Operating Permit (TVOP) pursuant to Regulation, APC-S-6, Section IV.F. The acknowledged change consists of replacing two (2) existing pentachlorophenol process mixing tanks (Tank 32 and Tank 33; 9,166 gallon, and 5,060 gallon, respectively) with an on-site existing tank (Tank No. 34; 10,513 gallon) and added a new tank 7,500 gallon tank. We understand there will be no change in air emissions (actual or potential) and this change will not trigger any new applicable standards. A copy of the request will be attached to our file copy of the facility's TVOP, and it is recommended that you attach a copy of that request to your copy of the TVOP.

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

Additionally in making future permit modification request, please address all correspondence to the Environment Permit Division of MDEQ.

If you have any questions or concerns, please contact Scott Hodges at (601) 961-5672 or me at (601) 961-5162.

Sincerely,

Dan N. McLeod
Environmental Administrator
Environmental Permits Division

cc: Chief of Air Permits Section
Air Planning Branch
U.S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

OFFICE OF POLLUTION CONTROL

876 PER20080002
POST OFFICE BOX 2261 JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Marcus C. Smith
Plant Manager



876

RECEIVED

APR 28 2010

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
SmithMC@koppers.com
www.koppers.com

April 26, 2010

Mrs. Trayce Moore - Thomas
MDEQ
Timber and Wood Products Branch - ECED
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261

CERTIFIED MAIL: 7008 1140 0001 0773 4674

**Subject: Request for 502 (b) (10) Change
Koppers Inc. - Grenada, Mississippi
Title V Operating Permit - #0960-00012
Removal and Installation of Product Tanks**

Dear Mrs. Thomas:

The Koppers Inc., facility located in Grenada, Mississippi plans to make the following modification on or about May 17, 2010, pursuant to Operational Flexibility Regulations 502(b)(10) and APC-S-6, Section IV.F:

The modification will include the removal of two (2) non-pressurized pentachlorophenol mixing process tanks No. 32 (9,166 gallon capacity) and No. 33 (5,060 gallon capacity). An existing tank No. 34 (10,513 gallon capacity) will take the place of tanks No. 32 and 33. In addition to the removal of tanks No. 32 and 33, a 7,500 gallon capacity tank will be installed.

In effect, the modification will decrease the onsite capacity of mixing pentachlorophenol solution from approximately 14,226 gallons to approximately 10,513 gallons. A net decrease in storage capacity of approximately 3,713 gallons. Also, the storage capacity of pentachlorophenol concentrate will decrease in volume from approximately 10,513 gallons to 7,500 gallons. A net decrease of 3,013 gallons.

Since there is a net decrease in mixing capacity as well as concentrate storage capacity, this modification will not cause emissions that are allowable under the existing Title V Permit to be exceeded and no new pollutants will be emitted due to the modification.

All permit terms and conditions will remain applicable as written in the Title V Permit without change.

These modifications do not constitute a Title I modification and do not exceed allowable emission rates for VOC constituents. These modifications do not violate applicable requirements or contravene federally enforceable permit terms and conditions that are

monitoring, recordkeeping, reporting, or compliance certification requirements. Further, we understand that a permit shield will not be extended to this modification.

If you have any questions or comments regarding the modification, please do not hesitate to contact me at 662-226-4584.

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.

Sincerely,



Marcus C. Smith

CC:

Chief of Air Permits Section
Air Planning Branch
US EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Cc:

Joyce Fankulewski – KI CSG

Permit Action Form **NOV 10 2000**
Koppers Inc
1 Koppers Drive
Grenada County
Tie Plant, MS 38960

Branch Manager: Scott Hodges
SIC: 2491

Recommendations

Folder No. – Activity Type
PER20080002 - RA-Air-Title V

Permit No.
0960-00012

DEQ Contact
Tommy Wall

Action: ☐ Issue
☐ Modification
☐ Transfer
☐ Revoke

☒ Reissue
☐ Name Change
☐ Deny

By: ☒ Division Chief
☐ Permit Board
☐ Terminate

Programs:

Master File

Program	Sub Program	Start Date	End Date	Delete
Hazardous Waste	TSD - Not Classified	06/28/1988		<input type="checkbox"/>
Water	PT CIU	11/14/1995		<input type="checkbox"/>
Water	PT SIU	11/14/1995		<input type="checkbox"/>
Hazardous Waste	Large Quantity Generator	08/27/1999		<input type="checkbox"/>
Air	Title V - major	03/11/1997		<input type="checkbox"/>
Water	PT CIU - Timber Products Processing (Subpart 429)	11/14/1995		<input type="checkbox"/>

Marked subprograms should be deleted from the master file by the Master File Administrator

Permit Application

Program	Sub Program	Start Date	End Date
Hazardous Waste	TSD - Not Classified	06/28/1988	
Water	PT CIU	11/14/1995	
Water	PT SIU	11/14/1995	
Air	Title V - major	3/11/1997	
Water	PT CIU - Timber Products Processing (Subpart 429)	11/14/1995	

Air Use Only:

☒ Emissions data entered in enSite
☐ Emissions data prepared using Lotus 1-2-3 (Attached)

Basis: Air Permit 0960-00012 will be reissued under the Title V Air Permit program.

Coordination

Comments:

Relationships

People

Name	Address	City	State	Zip	Relationship
Elliott Bickerstaff	PO Box 2261	Jackson	MS	39225	Is Title V Internal MDEQ Contact
Timothy Basilone	436 Seventh Avenue, Koppers Building	Pittsburgh	PA	152191800	Is Contact For
Timothy Basilone	436 Seventh Avenue, Koppers Building	Pittsburgh	PA	152191800	Is Title V Fee Assessment Contact For
Randall Collins	436 Seventh Avenue	Pittsburg	PA	15219	Is Application Signatory for
M. Claire Schaming	PO Box 160	Tie Plant	MS	38960	Is Application Signatory for
Kevin Coker	PO Box 160	Tie Plant	MS	38960	Is Contact For
Leslie Hyde	436 Seventh Avenue	Pittsburg	PA	15219	Is Application Signatory for
Leslie Hyde	436 Seventh Avenue	Pittsburg	PA	15219	is DMR recipient for
Steven Lacy	436 Seventh Avenue	Pittsburg	PA	152191800	Is Application Signatory for
Michael Bollinger	One Oxford Centre, Suite 3000	Pittsburgh	PA	15219	Is Hazardous Waste Permit Contact For
Joyce Fankulewski	436 Seventh Avenue	Pittsburg	PA	152191800	Is Air Permit Contact For
Joyce Fankulewski	436 Seventh Avenue	Pittsburg	PA	152191800	Is Contact For
Marcus Smith	PO Box 160	Tie Plant	MS	38960	Is Water Permit Contact For
Marcus Smith	PO Box 160	Tie Plant	MS	38960	Is Contact For
Marcus Smith	PO Box 160	Tie Plant	MS	38960	Is General Permit Contact For
Marcus Smith	PO Box 160	Tie Plant	MS	38960	Is Application Signatory for
Marcus Smith	PO Box 160	Tie Plant	MS	38960	Is Hazardous

Name	Address	City	State	Zip	Relationship Waste EPA ID Contact
------	---------	------	-------	-----	---

Organizations

Name	Address	City	State	Zip	Relationship
Koppers, Inc.	436 Seventh Avenue	Pittsburgh	PA	15219	Is Title V Fee Billing Party For

Administrative Tasks

Task	Scheduled Date	Completed Date
Application Received	7/8/2008 3:03:51 PM	7/1/2008 3:26:46 PM
Letter Acknowledging Receipt of Application Issued	7/3/2008	7/8/2008 3:26:51 PM
Early Public Notice of Application Complete	8/1/2008	7/22/2008 11:07:35 AM
Administrative Completeness Determined/ Administrative Completeness Letter Sent if Needed	8/15/2008	8/15/2008 4:16:01 PM
NOD(s) to Applicant Issued	8/15/2008	8/22/2008 3:16:05 PM
Additional Data Received and Processed		9/11/2008 3:09:51 PM
Letter Acknowledging Receipt of Additional Data Issued		9/11/2008 3:10:17 PM
Inspection Conducted	9/29/2008	9/29/2008 4:15:11 PM
Additional Data Received and Processed		1/5/2009 2:43:07 PM
Letter Acknowledging Receipt of Additional Data Issued		1/5/2009 2:43:30 PM
Additional Data 3 Received and Processed	1/23/2009	1/20/2009 2:59:28 PM
Letter Acknowledging Receipt of Additional Data 3 Issued	1/23/2009	1/20/2009 2:59:54 PM
Draft Permit and Rationale Prepared	3/3/2009	1/22/2009 4:16:13 PM
Complete Application Received	8/30/2008	2/1/2009 4:15:34 PM
Draft Permit Sent to ECED	2/7/2009	2/2/2009 11:06:33 AM
Draft Permit Sent to Supervisor	1/24/2009	2/3/2009 4:16:25 PM
Draft Permit Sent to Facility	2/7/2009	7/17/2009 11:06:50 AM
Public Notice Publication Verified		8/25/2009 10:38:39 AM
Public Notice Issued	2/5/2009	9/11/2009 9:44:19 AM
Public Notice Completed	10/11/2009	10/11/2009 9:44:59 AM
EPA enReview Complete	2/5/2009	10/22/2009
Public Comments Processed	10/21/2009	10/26/2009 3:31:07 PM
Final Permit/Decision and Supporting Documents Prepared	10/29/2009	10/26/2009 3:31:20 PM
Issue Permit	10/31/2009	OCT 28 2009
Transmittal of Final Permit		11/02/09
Permit Expiration Date		9/30/2014

Existing Permits

Permit Number	Description
GP-Wood Treating	MSR220005
GARD	876 001
Air-AIRS AFS	2804300012
Water - Pretreatment	MSP090300
Air-Title V Fee Customer	096000012
Air-Notification	876
Hazardous Waste-EPA ID	MSD007027543

Requirement Profiles:

Category	ID	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6	Level 7	Level 8
AI	876	Compliance Use Only	Permits	Air	Title V				

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

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

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

Permit Issued: OCT 28 2009

FILE COPY

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: SEP 30 2014

Permit No.: 0960-00012

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS.....	3
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES.....	12
SECTION 3. EMISSION LIMITATIONS & STANDARDS	13
SECTION 4. COMPLIANCE SCHEDULE.....	18
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS	19
SECTION 6. ALTERNATIVE OPERATING SCENARIOS	24
SECTION 7. TITLE VI REQUIREMENTS.....	25

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B 40 CFR 82 - PROTECTION OF STRATOSPHERIC OZONE

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual

emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)
- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)

- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)
- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
 - (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)
- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in

Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)

1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

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

- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
 - (c) The affirmative defense of emergency shall be demonstrated through properly signed

contemporaneous operating logs, or other relevant evidence that include information as follows:

- (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.

- (a) Upsets (as defined by APC-S-1, Section 2.34)
- (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and

- (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	The 60 MMBTU/Hr Untreated Woodwaste Boiler with Multiclone Collector.
AA-003	The wood preserving processes for treatment of poles with Pentachlorophenol and cresote, and crossties with Creosote.
AA-004	The sawing operations that include an operation for cutting crossties to length, a planing operation with cyclone for planing of bridge timbers, and a sawing operation to cut switchties and bridge timbers to length.
AA-008	The treated wood products (crossties and poles) storage area.
AA-009	The kiln for the drying of wood prior to wood treatment.
AA-010	The pole peeler for debarking.
AA-011	The wood fuel preparation processes for use as fuel in the woodwaste boiler that include a chipper, a hogger, shredder and conveyor.
AA-026	The 10.5 MMBTU/Hr Natural Gas Boiler used as a back-up.

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001	State Regulation APC-S-1, Section 3.4(b)	3.B.1	PM	0.30 grains/dry standard cubic foot
AA-026	State Regulation APC-S-1, Section 3.4(a)(2)	3.B.2	PM	$E = 0.8808 * I^{-0.1667}$
AA-001 AA-026	State Regulation APC-S-1, Section 4.1(a)	3.B.3	Sulfur Dioxide	4.8 pounds (measured as sulfur dioxide) per million BTU heat input
AA-001	Permit to Construct issued November 8, 1994 and modified via Title V Permit issued on January 13, 2004	3.B.5	Type and origin of materials burned.	The permittee may burn untreated wood and office waste paper in the boiler. The office waste paper shall be limited to waste paper generated on-site by Koppers' office operations and shall contain no plastic or non-combustibles.
	Permit to Construct issued November 8, 1994	3.B.5	% office waste paper to be burned.	Office waste paper shall be limited to less than 1% by mass of the total feed to the boiler.
AA-001 AA-026	State Regulation APC-S-1, Section 3.1	3.A.1	Opacity	40% opacity
AA-004 AA-010 AA-011	APC-S-1 Section 3.6(a)	3.B.4	PM	$E = 4.1p^{0.67}$

- 3.B.1 Fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-product sludge, may be allowed at emission rates up to 0.30 grains per standard dry cubic feet. (State Regulation APC-S-1, Section 3.4(b)) Untreated wood will be classified as spent wood.
- 3.B.2 Emissions from installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour, heat input shall not exceed an emission rate as determined by the relationship
- $$E = 0.8808 * I^{-0.1667}$$
- where E is the emission rate in pounds per million BTU per hour input and I is the heat input in millions of BTU per hour. (State Regulation APC-S-1, Section 3.4(a)(2))
- 3.B.3 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (State Regulation APC-S-1, Section 4.1(a))

- 3.B.4 For Emission Points AA-004, AA -010, and AA-011, except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship $E = 4.1p^{0.67}$ where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour (State Regulation APC-S-1 Section 3.6(a)).

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

- 3.B.5 For Emission Point AA-001, the permittee shall comply with the standards with the Permit to Construct issued November 8, 1994, and Modified thereafter.

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1 & 1.19	PM	0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions
APC-S-1, Section 4.1(a)	3.C.2 & 1.19	SO ₂	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

D. Work Practice Standards per 40 CFR 63, Subpart QQQQQQ

- 3.D.1 The permittee shall minimize preservative usage (40CFR 63.11430). The permittee shall maintain records on the type treatment and types and amounts of wood preservatives used at the facility (40CFR 63.11430).
- 3.D.2 The permittee for the pressure treatment process shall maintain charge records identifying pressure reading(s) inside the retorts (or similarly enclosed vessels) (40CFR 63.11430).
- 3.D.3 The permittee shall store treated wood product on drip pads or in a primary containment area to convey preservative drippage to a collection system until drippage has ceased (40CFR 63.11430).
- 3.D.4 The permittee shall fully drain the retort to the extent practicable, prior to opening the retort door (40CFR 63.11430).
- 3.D.5 The permittee shall promptly collect any spills (40CFR 63.11430).
- 3.D.6 The permittee shall perform relevant corrective actions or preventative measures in the event of a malfunction before resuming operations (40CFR 63.11430).

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))
- 5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001	Opacity	CEMs monitoring, calibration	5.B.1	APC-S-6, Section III.A.3
AA-001	Office Waste Paper burned	Office Paper usage as fuel	5.B.2	Construction Permit issued November 8, 1994
AA-001	PM	Stack test	5.B.3	APC-S-6, Section III.A.3
AA-001	PM	Fuel Usage	5.B.4	APC-S-6, Section III.A.3
AA-026	Opacity	Visual observation	5.B.5	APC-S-6, Section III.A.3
AA-026	Fuel	Fuel usage	5.B.6	40 CFR Section 60.48c(g)2 and (i.)

- 5.B.1 The permittee shall perform Continuous Emission Monitoring (CEMS) for opacity. The permittee shall record the time and duration of any opacity excursion, the cause, and the corrective action. As part of CEMs, the permittee shall perform a quarterly calibration. Calibration records shall be maintained for three years on-site for inspection by Department of Environmental Quality (DEQ) officials. In the event CEMs is not operable the permittee shall perform an EPA Reference Method 9 within the first hour and daily inspections thereafter until CEMs has been calibrated. Records should be kept for three years for corrective action taken for CEMs and the EPA Method 9 observations associated with the CEMs occurrence. (Ref.: APC-S-6, Section III.A.3)
- 5.B.2 The permittee shall monitor and record the date, the quantity in pounds, and the % by weight of office waste paper burned in the boiler in a log book. These records shall be maintained for three years on-site for inspection by DEQ officials. (Ref.: Construction Permit issued November 8, 1994)
- 5.B.3 For Emission Point AA-001, the permittee shall stack test in accordance with EPA Methods 1-5 for particulate matter emissions within 180 days of reissuance and biennially thereafter. Such testing shall be performed while the boiler is operating at

maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved. If the design capacity of the boiler can not be achieved, Koppers shall propose an allowance for approval by the DEQ as part of the pre-test protocol as described in Condition 5.C.2 of this permit. Woodwaste feed rates to the boiler and opacity through CEMs shall be monitored during stack testing. Opacity and the feed rate shall be part of the stack test record as well as all standards for stack testing of particulate matter. (Ref.: APC-S-6, Section III.A.3)

- 5.B.4 For Emission Point AA-001, the permittee shall monitor fuel usage hourly. From this monitoring, the permittee shall record daily in log form the maximum hourly fuel usage (LBS/HR) feed and the corresponding BTU value of the boiler (MMBTU/HR). These records shall be maintained on site for five years. (Ref.: APC-S-6, Section III.A.3)
- 5.B.5 For Emission Point AA-026, the permittee shall assure compliance with opacity limitations by performing weekly observations for a period of six consecutive minutes. If visible emissions are observed, the permittee shall perform a visible emission evaluation (VEE) utilizing EPA Reference Method 9. The permittee shall maintain records for five years of all monitoring. The permittee shall submit a summary report of the required monitoring. The summary report should include any exceedances within the reporting period, the nature of the problem that caused the exceedance, and the action taken to correct the exceedance. The report shall be semi-annual and shall be submitted in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3)
- 5.B.6 For Emission Point AA-026, the permittee shall record and maintain records of the natural gas combusted during each calendar month in cubic feet of natural gas burned per month. Records shall be maintained for a period of two years following the date of such record. (Ref.: 40 CFR Section 60.48c(g)2 and (i))
- 5.B.7 For the Work Practice Standards in Section 3.D of this permit, the permittee shall maintain records for five years on-site from the date of the each occurrence, measurement, maintenance, corrective action, report or record. (Ref.: 40CFR 63.10(b))

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-001 AA-026	Opacity	Opacity Excursions	5.C.1	APC-S-6, Section III.A.3(a)).
AA-001	PM, Opacity	Stack Test Notification	5.C.2	APC-S-6, Section III.A.3(c)).
AA-001	PM, Opacity	Stack Test Reporting	5.C.3	APC-S-6, Section III.A.3(c)).

- 5.C.1 The permittee shall submit summary report of the required monitoring for opacity for Condition 5.B.1 and 5.B.5 of the permit. The summary report should include any exceedances within the reporting period, the nature of the problem that caused the exceedance, action taken to correct the exceedance as well as any downtime with respect to CEMs for Emission Point AA-001. The report shall be semi-annual and shall be submitted in accordance with Condition 5.A.4.
- 5.C.2 The permittee shall submit a written test protocol at least (30) days prior to the intended test date(s) to ensure methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) that an observer may be afforded the opportunity to witness the test.
- 5.C.3 The permittee shall submit a test report of the results of the stack test(s) required within forty-five (45) days of the test.

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit.

- 7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
- (a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.
 - (b) The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - (c) The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - (d) No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - (b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - (d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)
 - (e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

- (f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

- 7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

APPENDIX A

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 Φ m in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

40 CFR 82

PROTECTION OF STRATOSPHERIC OZONE

INFORMATION RELATIVE TO THE DRAFT TITLE V OPERATING PERMIT

February 2, 2009

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

FACILITY DESCRIPTION

Koppers, Inc. is a wood treating facility that treats poles with both pentachlorophenol and creosote and crossties with creosote. The facility has applied for the reissuance of their Title V Permit. There are minor changes from the last permit with the most significant being the replacement of a 28.5 MMBTU/Hr oil fired boiler with a 10.5 MMBTU/Hr natural gas fired boiler. Second 60 CFR Subpart Kb has been removed since Pentachlorophenol and creosote as well as other constituents do not fall under the applicability for Kb for volatile organic liquid storage tanks. The facility is not PSD since there are no emissions of criteria pollutants that exceed 250 tons/yr.

TITLE V PROGRAM APPLICABILITY BASIS

The facility is Title V for carbon monoxide, particulate mater, and VOCs.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (APC-S-6), and applicable requirements effective upon the date of permit issuance. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

1. any standard or other requirement set forth in the State Implementation Plan (SIP) approved or promulgated by EPA through rulemaking under Title I of the Federal Clean Air Act (Federal Act) including the following:
 - a. most of the State of Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (APC-S-1)
 - b. the State of Mississippi Regulations for the Prevention of Air Pollution Emergency Episodes (APC-S-3),
 - c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (APC-S-5), and 40 CFR Part 52.21 by reference, and

- d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (APC-S-2), relating to construction permits and synthetic minor operating permits;
2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;
3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of APC-S-1;
4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of APC-S-1 and 40 CFR Parts 61, 63, and 68;
5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (APC-S-7) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;
6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act;
7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act;
8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;
9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;
10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;
11. any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Act;
12. any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Federal Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of APC-S-6 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

CAM APPLICABILITY

CAM is not applicable since there is no control equipment for any emission point that has emissions that exceed 100 tons/yr.

MACT APPLICABILITY

The facility is subject to the area source MACT for Wood Preserving, 40 CFR Part 63, Subpart QQQQQQ. HAP emissions do not exceed the major source thresholds for this facility.

SPECIFIC APPLICABLE REQUIREMENTS

NSPS D_c is not applicable for AA-001 since the boiler was not constructed or modified after June 9, 1989. NSPS D_c is applicable for AA-026, but there are no requirements for a 10.5 MMBTU/hr natural gas fired boiler other than recording fuel usage.

Emission Point No.	Pollutant	EMISSION LIMITS	
		Draft Permit Emission Limits	Monitoring Requirements
AA-001	PM	0.3 grains per standard dry cubic foot	Stack test
AA-001 AA-026	SO ₂	4.8 lb/MMBTU	No monitoring, as calculations show SO ₂ only .01% of allowable limit for NG and .5% for woodwaste
AA-026	PM	$E=0.8808I^{-0.1667}$	No monitoring, as calculations show PM only 1.2% of the allowables.
AA-001 AA-026	Opacity	40%	CEM for AA-001, VE for AA-026
AA-004 AA-010 AA-011	PM	$E=4.1 p^{0.67}$	None, operation does minor cutting as wood treater. Potential emissions for three points is 30 tons per year which is only about 20% of the allowable PM based upon the process wt equation of 151 tons/year PM

Allowable SO₂ is 4.8 lb/MMBTU

(1) SO₂ for Natural Gas, 2000 grains per million standard cubic feet of Sulfur in NG (100% conversion to SO₂)
NG 1000 BTU / ft³

$$\frac{(2000/7000) \times 64/32 \text{ lbs SO}_2}{(1,000,000) (1000 \text{ BTU})/1,000,000} = .00057 \text{ lb SO}_2/\text{MMBTU}$$

$$.00057/4.8 = .01 \% \text{ of allowable limit}$$

(2) SO₂ for Woodwaste:

Emission Factor for Wood fired boilers .025 lb SO₂ /MMBTU
.025/4.8 = .5% of allowable limit

(3) PM for natural gas with 10.5 MMBTU/HR Natural gas boiler

$$E = 0.8808 I^{-0.1667} = .8808 (10.5)^{-0.1667} = 0.595 \text{ lbs/MMBTU-hr}$$

I = heat input in MMBTU/hr

$$\text{Allowable PM} = E * \text{unit capacity} = .595 * 10.5 = 6.24 \text{ lb/hr}$$

Calculated PM using AP-42 Factor at .0075lb/ MMBTU

$$\text{PM} = .0075 \text{lb/ MMBTU} * 10.5 \text{ MMBTU/HR} = 0.0785 \text{ lbs PM/hr}$$

$$\text{Therefore } .0785/6.24 = 1.2\% \text{ of allowable PM}$$

(4) $E = 4.1 p^{0.67}$

Where p is raw material input in tons per hour, and E is emissions of PM in lbs/hr

$$E = 4.1 (24)^{.67} = 34.5 \text{ lb/hr}$$

$$34.5 \text{ lb/hr} \times 8760 \text{ hrs} \times 1/2000 = 151 \text{ ton / year allowable}$$

OTHER LIMITS:

None

**Mississippi Department of Environmental Quality
Office of Pollution Control
Environmental Permits Division**

Project Awareness Checklist

The primary purpose of this checklist is to allow early identification of "big picture" items that could affect EPD's permitting decisions. The checklist will be filled out by the permit manager, with input from the permit applicant as needed. Many of the questions will be answered after the pre-application meeting. The applicable portions of the checklist should be filled out prior to developing the draft permit. The checklist should be attached to the permit action form (PAF).

This checklist does not establish or affect legal rights or obligations. This checklist does not establish or affect procedural requirements for the development or issuance of permits. MDEQ is under no obligation to complete any or all of this checklist.

References to web sites or other sources external to MDEQ are intended for informational purposes only and do not imply any official MDEQ endorsement of, or responsibility for, the opinions, ideas, reliability, data or products presented at those locations, or guarantee the validity of the information provided.

Name of facility

Koppers Inc

AI #

876

Permit type

- | | |
|---|---|
| <input type="checkbox"/> Issuance | <input type="checkbox"/> Modification |
| <input checked="" type="checkbox"/> Reissuance without Modification | <input type="checkbox"/> Reissuance with Modification |
| <input type="checkbox"/> Routine <input type="checkbox"/> Priority | |

Critical path

- | | | | |
|---|--------------------------------|--|--------------------------------------|
| <input checked="" type="checkbox"/> Air | <input type="checkbox"/> Water | <input type="checkbox"/> Hazardous Waste | <input type="checkbox"/> Solid Waste |
|---|--------------------------------|--|--------------------------------------|

Notes/Comments

A. Air**Section Not Applicable ☐**

- | Yes | No | Not Applicable | |
|-------------------------------------|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A1. Is the facility located in an area that may become a non-attainment area when the new NAAQS are implemented? <u>PM2.5</u> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A2. Is this facility a significant minor source as defined by <u>APC-S-2, Section 1.B.21</u> ? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A3. Will this facility generate dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof, such as to cause a nuisance to property from which it originated? (<u>APC-S-1, Section 3.3</u>) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A4. Is this project subject to any of the following regulations? <ul style="list-style-type: none">■ New Source Performance Standards (NSPS) (<u>40 CFR Part 60</u>)■ National Emission Standards for Hazardous Air Pollutants (NESHAP) (<u>40 CFR Parts 61 and 63</u>)■ Compliance Assurance Monitoring (CAM) (<u>40 CFR Part 64</u>)■ Prevention of Significant Deterioration (PSD) (<u>40 CFR Part 52</u>)■ Acid Rain Program (<u>40 CFR Part 72</u>)■ Chemical Accident Prevention Provisions (<u>40 CFR Part 68</u>) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A5. Does this facility fall into one of the 28 listed source categories? (<u>40 CFR 52</u>) |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | A6. Is this facility located within 200 km of any <u>Class I</u> area? (<u>40 CFR 52</u>) <ul style="list-style-type: none">■ Will there be construction or air emissions near a <u>national</u>/state forest or <u>national</u>/state park or other recreational area? <input type="checkbox"/>Yes / <input type="checkbox"/>No / <input type="checkbox"/>NA |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A7. Will any air discharges have an impact on water quality? |

B. Hazardous Waste**Section Not Applicable ☒**

- | | | | |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | B1. Is this a hazardous waste TSD project? <ul style="list-style-type: none">■ Typically these projects have opposition.■ Is there off-site contamination? <input type="checkbox"/>Yes / <input type="checkbox"/>No / <input type="checkbox"/>NA■ Are "bad boy" and financial capability reviews necessary?
<input type="checkbox"/>Yes / <input type="checkbox"/>No / <input type="checkbox"/>NA |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | B2. Is the site a brownfield site? <ul style="list-style-type: none">■ Check with Hazardous Waste Division – Brownfields Branch.■ Check with Hazardous Waste Division – Uncontrolled Sites Branch. |

- ☐ ☐ ☐ B3. Are there universal waste considerations? (Examples: used oil, car batteries, fluorescent tubes.)

C. Solid Waste

Section Not Applicable ☒

- ☐ ☐ ☐ C1. Is this a new or existing solid waste management facility?
- These projects may have opposition.
 - Does the existing facility (or other facilities owned or operated by the applicant) have a history of non-compliance? ☐ Yes / ☐ No / ☐ NA
 - Has a disclosure statement been filed? ☐ Yes / ☐ No / ☐ NA
 - Is the application a result of enforcement action by ECED?
☐ Yes / ☐ No / ☐ NA
- ☐ ☐ ☐ C2. Will solid waste be sent to a third-party landfill?
- Contact the landfill owner to verify that the landfill can and will accept the waste.
 - Does the County Solid Waste Management Plan need to be modified?
☐ Yes / ☐ No / ☐ NA

D. Water

Section Not Applicable ☒

- ☐ ☐ ☐ D1. Will the facility discharge wastewater to a third-party wastewater treatment plant (WWTP)?
- Is the WWTP willing and able to accept the discharge?
☐ Yes / ☐ No / ☐ NA
 - Is a pretreatment permit needed? ☐ Yes / ☐ No / ☐ NA
- ☐ ☐ ☐ D2. Review Permit Board Policy on Suitable Points to Discharge Treated Wastewaters, January 2002 for acceptable locations of new discharges. (The document is located in the Knowledge Center.)
- Specific locations where wastewater discharges are prohibited or are strongly discouraged include:
 - Ross Barnett Reservoir and surrounding drainage basin
 - Old Run Tombigbee River north of Fulton
 - Pickwick Lake
 - Mississippi Sound (including the coastal waters)
 - Okatoma Creek
 - Wolf Creek
 - Red Creek
 - Black Creek (located south of Hattiesburg)
 - Typically, lakes, reservoirs, bayous, ponds or other confined, low flushing waterbodies, and drainage ways leading to them, are not suitable points of discharge.

- Has the permit manager or the Regional Office done an inspection to determine whether the discharge location is suitable to receive discharged wastewater? ☐ Yes / ☐ No / ☐ NA
 - Contact Surface Water Division if unsuitable locations are proposed.
- ☐ ☐ ☐ D3. Is the water body on the 303(d) list for parameters of concern?
- Check with the Water Quality Assessment Branch for 303(d) listing.
 - Consider alternative receiving streams/locations or no-discharge systems.
 - Refer to NPDES Permit Issuance Process for Facilities Discharging to 303(d) Listed Waters, January 1999
- ☐ ☐ ☐ D4. Has a TMDL been developed for the receiving stream?
- See [http://www.deq.state.ms.us/newweb/swhome.nsf/pages/WDivision/\\$file/tmd3.html](http://www.deq.state.ms.us/newweb/swhome.nsf/pages/WDivision/$file/tmd3.html), or check with the Water Quality Assessment Branch.
 - Does the TMDL propose limitations on the discharge?
☐ Yes / ☐ No / ☐ NA
- ☐ ☐ ☐ D5. Will the project impact wetlands or other waters of the United States?
- Check with WQMB for requirements for 404 permit or 401 Water Quality Certification
 - Are there any issues with the Surface Water Division?
☐ Yes / ☐ No / ☐ NA
- ☐ ☐ ☐ D6. Is an antidegradation package required?
- For POTWs, required for new major discharges (≥ 1 mgd) or for increases in discharges from majors. (This may change when WQMB issues guidance in the future.)
 - For industrial, follow the "Antidegradation Policy Review Checklist." (The document is located in the Knowledge Center.)
 - The package must be sent to EPA along with the draft permit.
- ☐ ☐ ☐ D7. Is the stream classified for shellfish harvesting, drinking water supply, or recreation?
- See State of Mississippi Water Quality Criteria for Intrastate, Interstate and Coastal Waters, November 16, 1995 for a list, or check with WQAB/Standards. (The document is located in the Knowledge Center.)
 - Discharge is discouraged. Consider alternative receiving streams/locations or no-discharge systems.
 - Have water supply intake distances been evaluated?
☐ Yes / ☐ No / ☐ NA
- ☐ ☐ ☐ D8. Is the stream actually used for recreation, even if the classification is fish and wildlife?

- Check with WQAB/Standards, Regional Offices, Mississippi Department of Wildlife, Fisheries, and Parks, and Mississippi Forestry Commission.
 - Discharge is discouraged. Consider alternative receiving streams/locations or no-discharge systems.
 - Have distances of actual water contact activity been evaluated?
☐Yes / ☐No / ☐NA
- ☐ ☐ ☐ D9. Is the receiving stream classified as an ephemeral stream?
- Check with WQAB/Standards
 - Alternate discharge points or no-discharge systems must be investigated before this stream is considered.
- ☐ ☐ ☐ D10. Will the project violate water buffer zone requirements?
- How is the surrounding area zoned?
 - Will there be a discharge near a state forest or park or other recreational area? ☐Yes / ☐No / ☐NA
- ☐ ☐ ☐ D11. Has the stream been proposed for inclusion in the State Scenic Streams Stewardship Program (Section 51-4 et seq., Mississippi Code)?
- As of March 12, 2003, the streams include
 - Chunky Creek in Newton County from the confluence of Chunky Creek and Tallasher Creek.
 - Chunky River in Newton, Lauderdale and Clarke Counties to the junction with the Chickasawhay River in Clarke County.
 - Magee's Creek in Walthall County from the confluence of Varnell Creek to the Bogue Chitto River.
 - Tangipahoa River in Pike County beginning at U.S. Highway 51 and extending to the Mississippi-Louisiana state line.
 - Wolf River in Pearl River, Hancock, Stone and Harrison Counties from Highway 26 in Pearl River County to the Bay of St. Louis in Harrison County.
 - Discharge is discouraged. Consider alternative receiving streams/locations or no-discharge systems.
- ☐ ☐ ☐ D12. Will the facility obtain water from an existing Public Water System (PWS)?
- Does the PWS have adequate capacity? ☐Yes / ☐No / ☐NA
 Contact MSDH/Division of Water Supply if needed.
 - Check with OLWR if the water use will be $\geq 300,000$ gpd or if the PWS will need a permit modification.
- ☐ ☐ ☐ D13. Will the facility use surface water or build a dam?
- Check with OLWR for permit requirements.
 - Check with WQMB for requirements regarding intake structures or wetlands issues.

- ☐ ☐ ☐ D14. Will the facility use groundwater?
☒ Check with OLWR for permit requirements.

E. SARA Title III (EPCRA) Reporting

Section Not Applicable ☒

- ☐ ☐ ☐ E1. Will the facility meet the reporting criteria of EPCRA Section 313 by man-hour requirement, SIC code or reportable quantity over a certain threshold?
- ☐ ☐ ☐ E2. In response to the requirements of EPCRA Section 304 has the facility determined if there are "Extremely Hazardous Substances (EHS)" or CERCLA Substances onsite in excess of their respective reportable quantities?
- ☐ ☐ ☐ E3. Does the facility store onsite an EHS in excess of its respective "Threshold Planning Quantity?" If so then the reporting requirements of EPCRA Section 311 and 312 must be followed.

F. Other

Section Not Applicable ☐

- ☒ ☐ ☐ F1. List all existing permits and their expiration dates:

Permit Number	Description	Expiration
Air-AIRS AFS	04300012	
Hazardous Waste-EPA ID	MSD00702754 3	
Hazardous Waste-TSD	HW8854301	9/30/09
Water-Pretreatment	MSP090300	2/28/12

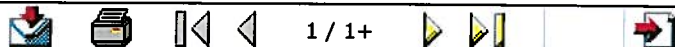
- ☒ Are permit applications in-house for all permits that have expired or will expire in ≤ 180 days? ☒ Yes / ☐ No / ☐ NA
 If no, will the current permitting action proceed?
☐ Yes / ☐ No / ☐ NA

Permit Activity	Last Permit Expired Task	Last App Received Task
Air-Title V	3/26/07	7/1/08

- ☒ ☐ ☐ F2. Are all fees (e.g., Title V), fines, and/or compliance with CEQ orders current?
☒ Check enSite for actions on or after October 1, 2001. Check with ECED for earlier actions.

- Check with Mona Varner for fees.
- ☐ ☐ ☒ F3. Check complaints database and compliance history.
- Check enSite for actions on or after October 1, 2001. Check with ECED for earlier actions.
 - What is the nature of the historical compliance problems (if applicable)?
 - Are there any pending agreed orders? ☐Yes / ☐No / ☐NA
- ☐ ☒ ☐ F4. Are there EJ considerations?
- Review demographic maps and per capita income information.
 - Does the area around the site appear to be a low-income or minority area?
☐Yes / ☐No / ☐NA
 - Is there a significant amount of industrial activity? ☐Yes / ☐No / ☐NA
 - Are there indications that there is a significant population of non-English-speaking people near the site? ☐Yes / ☐No / ☐NA
 - Are we aware of any variances or violations in local zoning?
☐Yes / ☐No / ☐NA
 - Are there quality of life issues? ☐Yes / ☐No / ☐NA
 - Contact the EJ coordinator if there appear to be EJ concerns.
 - Determine what kind of additional public information activities need to be done.
- ☐ ☐ ☒ F5. Has it been determined that there is public interest in this project?
- Is there organized public opposition? ☐Yes / ☐No / ☐NA
 - Who is the opposition?
 - Has there been media coverage or the possibility of media coverage?
☐Yes / ☐No / ☐NA
 - Are there regulation changes on the horizon that would result in more stringent requirements for the project? ☐Yes / ☐No / ☐NA
 - Are there actual, potential, or alleged human health or environmental impacts? ☐Yes / ☐No / ☐NA
If yes, explain.
- ☐ ☒ ☐ F6. Are there cumulative impact issues?
- Is there a concentration of emissions in the area?
☐Yes / ☐No / ☐NA
 - Research by reviewing files, etc. for effects of past projects, the effects of current projects, and the effects of probable future projects. It includes the effects of other projects which interact with this project and, together, are considerable.

- Is GIS information available? ☐ Yes / ☐ No / ☐ NA
Has it been used? ☐ Yes / ☐ No / ☐ NA
- ☐ ☒ ☐ F7. Is the Mississippi Development Authority (MDA) interested?
- Is the proposed project in an economically underdeveloped area of the state? ☐ Yes / ☐ No / ☐ NA
- Is the project receiving CDBG (Community Development Block Grant) funding? ☐ Yes / ☐ No / ☐ NA
CDBG funding is given for projects in low-to-moderate income areas and thus indicates the possibility of EJ considerations.
- ☐ ☒ ☐ F8. Will this project have the potential to impact threatened and endangered species? Pesticide limitations for endangered species link. NPDES link.
- Contact WQAB for a list of species.
- ☐ ☒ ☐ F9. Will this project have the potential to impact archeological and cultural resources?
- Has the Mississippi Department of Archives and History been contacted? ☐ Yes / ☐ No / ☐ NA
- ☐ ☒ ☐ F10. Is this facility located in a politically sensitive area?
- ☐ ☒ ☐ F11. Will this facility have a significant economic impact on the area?
- ☐ ☒ ☐ F12. Does this project involve other state or federal agencies, and if so, in what way?
- ☐ ☒ ☐ F13. Is the project (or company or location, etc.) listed in the Heightened Awareness Projects database (located in Lotus Notes)?
☐ Yes / ☐ No / ☐ NA
If yes, get in touch with the listed contact person.
- ☐ ☐ ☒ F14. Review "Enclosure B: EPA/State Review and Oversight Tools for NPDES Permits" to determine if any additional information needs to be gathered. (The document is located in the Knowledge Center.)
- ☐ ☒ ☐ F15. Is there *anything else* that might slow down the permitting decision or change any permit conditions? (Industrial Sector Notebooks) If yes, describe.

**Ensearch - 6D - AI PARAMETER TOTALS**

AI 876 Koppers Inc
 DOCUMENT 482,158 0960-00012 RA
 PHYSICAL ADDRESS 1 Koppers Drive
 Tie Plant, MS 38960
 AFS MASTER 2804300012 Air-AIRS AFS
 AFS DOCUMENT 2804300012 Air-AIRS AFS

CAPS - CRITERIA AIR POLLUTANTS

		-----INCLUDED-----		-----NOT INCLUDE	
CASN	POLLUTANT DESC	TPY	PPH	TPY	P
POTENTIAL EMISSIONS					
630-08-0	Carbon Monoxide	196.6000	44.9000	-	
	Nitrogen oxides	48.4000	11.0000	-	
PM	Particulate Matter (10 microns or less)	183.0000	39.8000	-	
	Particulate Matter	185.8000	40.4000	67.0000	
2025884	Sulfur Dioxide	10.5000	2.4000	-	
	VOC	128.0000	29.2000	-	

NOT CAPS and NOT HAPS

Please verify the pollutants listed below are correct

You may have selected the parameter setup for water which has no HAP flag and may have no CASN

If you believe a pollutant listed below is a HAP, send an email with the CASN to Elliott Bickerstaff

Please verify the units listed below are correct

CASN	POLLUTANT DESC	UNIT DESC	-----INCLUDED-----		-----NOT INCLUDE	
CASN	POLLUTANT DESC	TPY	PPH	TPY	P	

POTENTIAL EMISSIONS**ACTUAL EMISSIONS**

Mississippi Environmental Quality
Permit Board
P. O. Box 2261
Jackson, Mississippi 39225
Telephone No. (601) 961-5171

Public Notice Start Date:
September 11, 2009
MDEQ Contact: Tommy Wall
Deadline for Comment: October
11, 2009

Koppers, Inc located at 1 Koppers Drive in Tie Plant, Mississippi has applied to the Mississippi Department of Environmental Quality for the reissuance of Air Title V Operating Permit 0960-00012. The applicant's operations fall within SIC Code 2491 for wood preserving in which poles and crossies are treated with wood preservatives. Koppers is required to hold a Title V Operating Permit as emissions of carbon monoxide, volatile organic compounds (VOCs), and particulate matter exceed the 100 tons/year threshold. These emissions are a result of activities involved in the drying of logs due to the boilers for supplying heat, and VOCs from the logs themselves. The facility is not considered PSD major since there are no emissions of criteria pollutants that exceed 250 tons/year threshold.

The staff of the Permit Board has developed this draft permit based on information submitted to the Permit Board by the applicant, appropriate State and Federal agencies and other interested parties. The staff of the Permit Board is soliciting all relative information pertaining to the proposed activity, including public comment, to ensure that the final staff recommendation on the draft permit complies with all State and Federal regulations. Public review and comment on the draft permit and supporting documentation is an important element in the staff evaluation and resulting recommendation to the Permit Board. The draft permit conditions have been developed to ensure

compliance with all State and Federal regulations but are subject to change based on information received as a result of public participation.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Tommy Wall at the Permit Board's address shown above, no later than October 11, 2009. All comments received by this date will be considered in the formulation of final determinations regarding the application(s). A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit(s). The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them. After receipt of public comments and thorough consideration of all comments, the staff will formulate its recommendations for permit issuance and a proposed permit if

mit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law. The Title V permit is a Federally-enforceable permit as well as a State permit. Therefore, the U.S. Environmental Protection Agency (EPA) will also be allowed an opportunity to review the application, proposed permit, and all comments received during the public comment period prior to Permit Board action on the application.

EPA has agreed to treat this draft permit as a proposed permit and to perform its 45-day review provided by the law and regulations concurrently with the public notice period, as long as no public com-

ments are received within the 30-day public notice period. If comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Mississippi Department of Environmental Quality that comments have been received and resolved. Whether EPA's 45-day review period is performed concurrently with the public comment period or after the public comment period has ended, the deadline for citizen's petitions to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address: <http://www.epa.gov/Region4/air/pemits/Mississippi.htm>.

Additional details about the application(s), including a copy of the draft permit(s), are available by writing or calling Ms Edna Banks at the above Permit Board address and telephone number. For those with Internet access, a copy of the proposed draft permit(s) may be found on the Mississippi Department of Environmental Quality's website at: <http://opcc.deq.state.ms.us/public-notice.aspx>. This information is also available for review at the following location(s) during normal business hours:

Mississippi Department of
Environmental Quality
Elizabeth Jones Library
Office of Pollution Control

PO Box 130
515 E. Amite Street G
Grenada, MS 38901

Jackson, Mississippi 39201

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

Publisp: 9/11/2009

The Daily Star

FILE COPY

Proof of Publication

**STATE OF MISSISSIPPI
COUNTY OF GRENADA**

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

Kristy Prewitt

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

Classified Rep.

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

Vol. 155 No. 51 on the 11 day of Sept 2009

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

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

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

Vol. No. on the day of 20

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

Vol No on the day of 20

Sworn to and subscribed before me, this ... th ... day of

September 20, 09

Stephanie J. Oels

My Commission Expires August 17, 2011

(SEAL)

AT:876

Kopper The
Greene Co.
0560-00012

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 2261
Jackson, Mississippi 39225
Telephone No. (601) 961-5171

Public Notice Start Date: August 31, 2009
Deadline for Comment: September 30, 2009

MDEQ Contact: Tommy Wall

Koppers, Inc located at 1 Koppers Drive in Tie Plant, Mississippi has applied to the Mississippi Department of Environmental Quality for the reissuance of Air Title V Operating Permit 0960-00012. The applicant's operations fall within SIC Code 2491 for wood preserving in which poles and crossties are treated with wood preservatives. Koppers is required to hold a Title V Operating Permit as emissions of carbon monoxide, volatile organic compounds (VOCs), and particulate matter exceed the 100 tons/year threshold. These emissions are a result of activities involved in the drying of logs due to the boilers for supplying heat, and VOCs from the logs themselves. The facility is not considered PSD major since there are no emissions of criteria pollutants that exceed 250 tons/year threshold.

The staff of the Permit Board has developed this draft permit based on information submitted to the Permit Board by the applicant, appropriate State and Federal agencies and other interested parties. The staff of the Permit Board is soliciting all relative information pertaining to the proposed activity, including public comment, to ensure that the final staff recommendation on the draft permit complies with all State and Federal regulations. Public review and comment on the draft permit and supporting documentation is an important element in the staff evaluation and resulting recommendation to the Permit Board. The draft permit conditions have been developed to ensure compliance with all State and Federal regulations but are subject to change based on information received as a result of public participation.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Tommy Wall at the Permit Board's address shown above, no later than September 30, 2009. All comments received by this date will be considered in the formulation of final determinations regarding the application(s). A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit(s). The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

After receipt of public comments and thorough consideration of all comments, the staff will formulate its recommendations for permit issuance and a proposed permit if that is the recommendation. The Title V Permit to Operate is a permit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law. The Title V permit is a Federally-enforceable permit as well as a State permit. Therefore, the U.S. Environmental Protection Agency (EPA) will also be allowed an opportunity to review the application, proposed permit, and all comments received during the public comment period prior to Permit Board action on the application.

EPA has agreed to treat this draft permit as a proposed permit and to perform its 45-day review provided by the law and regulations concurrently with the public notice period, as long as no public comments are received within the 30-day public notice period. If comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Mississippi Department of Environmental Quality that comments have been received and resolved. Whether EPA's 45-day review period is performed concurrently with the public comment period or after the public comment period has ended, the deadline for citizen's petitions to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended.

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Elizabeth Jones Library
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Grenada, MS 38901

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Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 2261
Jackson, Mississippi 39225
Telephone No. (601) 961-5171

Public Notice Start Date: August 31, 2009
Deadline for Comment: September 30, 2009

MDEQ Contact: Tommy Wall

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AFS FACILITY COMPLIANCE DATASHEET

PLEASE USE THIS AS THE FRONT PAGE FOR SUBMITTAL TO THE AFS ENTRY PERSON

Facility Name: Koppers Inc
County: Grenada
AFS ID: 2804300012
Permit Number: 0960-00012
NAICS: 321114
SIC: 2491

Physical Address: 1 Koppers Drive
<NO DATA FOUND>
<NO DATA FOUND>
Tie Plant, MS, 38960
Phone: (662) 226-4584, Ext. 11
Mailing Address: PO Box 160
Tie Plant, Mississippi 38960

Ownership: 0 (0=Private, 1=Federal Government, 2=State, 3=County, 4=Municipality)
APPLICABILITY
Title V - major

STATUS
0

Air Program Codes:
0=SP
6=PSD
8=NESHAP-40 CFR 61 standards
9=NSPS
TV=Title V

Status Codes:
O=Operating
T=temporarily closed
X=permanently closed
C=under construction
P=planned

Pollutant Class Codes:
A=actual/potential > major threshold
B=actual/potential < major threshold
SM=restricted emissions < major threshold
Major Threshold=100 tpy for criteria pollutants, 10 tpy individual HAPs, 25 tpy total HAPs

Note: If you have a pollutant that is not described by the following list of abbreviations, please use the Pollutant Code column and supply the CAS number in lieu of the abbreviation.

AA=Phosphoric Acid Manufacturing Plants	GLYET= glycol ethers	PBC= lead compounds
AGC= silver compounds	HC= total hydrocarbons	PM2.5= particulate matter < 2.5 um
AL-PT= aluminum (tsp)	HCCH= lindane	POM= polycyclic organic matter
ALC= aluminum compounds	HCL= hydrogen chloride	PRPYL= propylene
ALDHY= aldehydes	HC36= methyl ethyl ketone	PX= pollutant
AROM= aromatics	HC53= tetrachloroethylene (perchloroethylene)	PXYL= p-xylene aka-1,4-dimethylbenzene
BZ= benzene	HC81= xylene(s)	RD= radionuclides
CCC=Steel Pickling-HCL process & HCL Reg Plants	HGC= mercury compounds	ROC= reactive organic compound
CD= cadmium	HNO3= nitric acid	RSC= reduced silver compounds
CDC= cadmium compounds	HSO4P= sulfuric acid	SB-PT= antimony (tsp)
CE= coke oven emissions	H2S= hydrogen sulfide	SBC= antimony compounds
CFC= chlorofluorocarbons	ISPBS= isopropylbenzene aka-cumene	SEC= selenium compounds
CHDIF= chlorodifluoromethane	KETON= ketones	SO3= sulfur trioxide
CL= chlorine	MC= methylene chloride	SO4= sulfates
CLD= chlorinated dioxin	MN-PT= manganese	STYR= styrene aka-ethenylbenzene
CLD&F= chlor. dioxin & furans 2,3,7,8 congeners	MNC= manganese compounds	TCA=1,1,1-trichloroethane
CLPH= chlorophenols	HF= hydrofluoric acid	TCDF= tetrachlorodibenzofuran,2,3,7,8
CNC= cyanide compounds	HG= mercury	THAP= total hap pollutant
COC= cobalt compounds	MXYL= m-xylene aka-1,3-dimethylbenzene	TI-PT= titanium (tsp)
CRC= chromium compounds	NH3= ammonia	TNMOC= total non-methane organic compounds
CR6PT= chromium vi	NI-PM= nickel powder	TOLU= toluene aka-methylbenzene
CU-PT= copper (tsp)	NI=PT= nickel	TS= total reduced sulphur-sulfide
CUC= copper compounds	NIC= nickel compounds	TSP= total suspended particulate
DOC=4,6-dinitro-o-cresol including salts	NO2= nitrogen dioxide	VC= vinyl chloride
EBENZ= ethylbenzene aka-phenylethane	NVOC= non-volatile organic compounds	VE= visible emissions
EO= ethylene oxide	OACID= organic acids	ZN= zinc
ETHYL= ethylene aka-ethene	OD= odors	ZNC= zinc compounds
FACIL= facility-wide permit requirements	OLEF= olefins	124TB=1,2,4-trimethylbenzene aka-pseudoc
FD= fugitive dust	OT= other emissions other than road based	2,4-D=2,4-dichlorophenoxyacetic acid
FE= fugitive emissions	OXYL= o-xylene aka-1,2-dimethylbenzene	24XYL= xyleneol
FL= fluorides	PAH6= anthracene	3CLET= trichloroethylene
FMF= fine mineral fibers	PARAF= paraffins (alkanes)	43516= trans-crotonaldehyde
FORM= formaldehyde	PB= lead	43520= cis-crotonaldehyde
FURAN= furan	PBB= polybrom. biphenyls	95166= hydrazine monohydrate

Public Notice

Mississippi Environmental Quality
Permit Board
P. O. Box 2261
Jackson, Mississippi 39225
Telephone No. (601) 961-5171

Public Notice Start Date:
September 11, 2009
MDEQ Contact: Tommy Wall
Deadline for Comment: October
11, 2009

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Publish: 9/11/2009

The Daily Star

FILE COPY

Proof of Publication

STATE OF MISSISSIPPI COUNTY OF GRENADA

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

Brusty Prewitt

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

Classified Rep.

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

Vol. 155 No. 51 on the 11 day of Sept 2009

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

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

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

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

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

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

Sworn to and subscribed before me, this 11th day of

September 2009
Stephanie J. Dees

My Commission Expires August 17, 2011

(SEAL)

AI:876

Koppers Inc
Grenada Co.
0960-00012

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P. O. Box 2261
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Public Notice Start Date: August 31, 2009
Deadline for Comment: September 30, 2009

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The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address: <http://www.epa.gov/Region4/air/permits/Mississippi.htm>.

Additional details about the application(s), including a copy of the draft permit(s), are available by writing or calling Ms Edna Banks at the above Permit Board address and telephone number. For those with Internet access, a copy of the proposed draft permit(s) may be found on the Mississippi Department of Environmental Quality's website at: <http://opc.deq.state.ms.us/publicnotice.aspx>. This information is also available for review at the following location(s) during normal business hours:

Mississippi Department of Environmental Quality
Office of Pollution Control
515 E. Amite Street
Jackson, Mississippi 39201

Elizabeth Jones Library
PO Box 130
Grenada, MS 38901

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

AFS FACILITY COMPLIANCE DATASHEET

POLLUTANT	CASRN	Pollutant Code	CLASS	SIP	Title V - major
Opacity				X	
VOC			A	x	X
Particulate Matter			A	x	S
Nitrogen oxides			B	x	
Naphthalene	91-20-3		B	x	
Carbon Monoxide	630-08-0		A	x	X
Lead	7439-92-1		B	x	
HAP, Other (VOC)			B	x	
HAP, Other (NON VOC)			B	x	
Sulfur Dioxide	2025884		B	x	
Particulate Matter (10 microns or less)			A	x	S

X- indicates the pollutant is covered by the program

S - indicates the pollutant is covered by the program and the permit requires stack testing for the pollutant

Blank indicates that the pollutant is not covered by the program

AFS FACILITY COMPLIANCE DATASHEET

PLEASE USE THIS AS THE FRONT PAGE FOR SUBMITTAL TO THE AFS ENTRY PERSON

Facility Name: Koppers Inc County: Grenada AFS ID: 2804300012 Permit Number: 0960-00012 NAICS: 321114 SIC: 2491	Physical Address: 1 Koppers Drive <NO DATA FOUND> <NO DATA FOUND> Tie Plant, MS, 38960 Phone: (662) 226-4584, Ext. 11 Mailing Address: PO Box 160 Tie Plant, Mississippi 38960
Ownership: 0 (0=Private, 1=Federal Government, 2=State, 3=County, 4=Municipality)	

APPLICABILITY	STATUS
Title V - major	O

Air Program Codes: 0=SIP 6=PSD 8=NESHAP-40 CFR 61 standards 9=NSPS TV=Title V	Status Codes: O=Operating T=temporarily closed X=permanently closed C=under construction P=planned	Pollutant Class Codes: A=actual/potential>major threshold B=actual/potential<major threshold SM=restricted emissions<major threshold Major Threshold=100 tpy for criteria pollutants, 10 tpy individual HAPs, 25 tpy total HAPs
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Note: If you have a pollutant that is not described by the following list of abbreviations, please use the Pollutant Code column and supply the CAS number in lieu of the abbreviation.

AA=Phosphoric Acid Manufacturing Plants	GLYET= glycol ethers	PBC= lead compounds
AGC= silver compounds	HC= total hydrocarbons	PM2.5= particulate matter < 2.5 um
AL-PT= aluminum (tsp)	HCH= lindane	POM= polycyclic organic matter
ALC= aluminum compounds	HCL= hydrogen chloride	PRPYL= propylene
ALDHY= aldehydes	HC36= methyl ethyl ketone	PX= pollutant
AROM= aromatics	HC53= tetrachloroethylene (perchloroethylene)	PXYL= p-xylene aka-1,4-dimethylbenzene
BZ= benzene	HC81= xylene(s)	RD= radionuclides
CCC=Steel Pickling-HCL process & HCl Reg Plants	HGC= mercury compounds	ROC= reactive organic compound
CD= cadmium	HNO3= nitric acid	RSC= reduced silver compounds
CDC= cadmium compounds	HSO4P= sulfuric acid	SB-PT= antimony (tsp)
CE= coke oven emissions	H2S= hydrogen sulfide	SBC= antimony compounds
CFC= chlorofluorocarbons	ISPBZ= isopropylbenzene aka-cumene	SEC= selenium compounds
CHDIF= chlorodifluoromethane	KETON= ketones	SO3= sulfur trioxide
CL= chlorine	MC= methylene chloride	SO4= sulfates
CLD= chlorinated dioxin	MN-PT= manganese	STYR= styrene aka-ethenylbenzene
CLD&F= chlor. dioxin & furans 2,3,7,8 congeners	MNC= manganese compounds	TCA=1,1,1-trichloroethane
CLPH= chlorophenols	HF= hydrofluoric acid	TCDF= tetrachlorodibenzofuran,2,3,7,8
CNC= cyanide compounds	HG= mercury	THAP= total hap pollutant
COC= cobalt compounds	MXYL= m-xylene aka-1,3-dimethylbenzene	TI-PT= titanium (tsp)
CRC= chromium compounds	NH3= ammonia	TNMOC= total non-methane organic compounds
CR6PT= chromium vi	NI-PM= nickel powder	TOLU= toluene aka-methylbenzene
CU-PT= copper (tsp)	NI-PT= nickel	TS= total reduced sulphur-sulfide
CUC= copper compounds	NIC= nickel compounds	TSP= total suspended particulate
DOC+=4,6-dinitro-o-cresol including salts	NO2= nitrogen dioxide	VC= vinyl chloride
EBENZ= ethylbenzene aka-phenylethane	NVOC= non-volatile organic compounds	VE= visible emissions
EO= ethylene oxide	OACID= organic acids	ZN= zinc
ETHYL= ethylene aka-ethene	OD= odors	ZNC= zinc compounds
FACIL= facility-wide permit requirements	OLEF= olefins	124TB=1,2,4-trimethylbenzene aka-pseudoc
FD= fugitive dust	OT= other emissions other than road based	2,4-D=2,4-dichlorophenoxyacetic acid
FE= fugitive emissions	OXYL= o-xylene aka-1,2-dimethylbenzene	24XYL= xyleneol
FL= fluorides	PAH6= anthracene	3CLET= trichloroethylene
FMF= fine mineral fibers	PARAF= paraffins (alkanes)	43516= trans-crotonaldehyde
FORM= formaldehyde	PB= lead	43520= cis-crotonaldehyde
FURAN= furan	PBB= polybrom. biphenyls	95166= hydrazine monohydrate

INFORMATION RELATIVE TO THE DRAFT TITLE V OPERATING PERMIT

February 2, 2009

FOR:

Koppers Inc
1 Koppers Drive
Tie Plant, MS 38960

FACILITY DESCRIPTION

Koppers, Inc. is a wood treating facility that treats poles with both pentachlorophenol and creosote and crossties with creosote. The facility has applied for the reissuance of their Title V Permit. There are minor changes from the last permit with the most significant being the replacement of a 28.5 MMBTU/Hr oil fired boiler with a 10.5 MMBTU/Hr natural gas fired boiler. Second, 60 CFR Subpart Kb has been removed since Pentachlorophenol and creosote as well as other constituents do not fall under the applicability for Kb for volatile organic liquid storage tanks. The facility is not PSD since there are no emissions of criteria pollutants that exceed 250 tons/yr.

TITLE V PROGRAM APPLICABILITY BASIS

The facility is Title V for carbon monoxide, particulate mater, and VOCs.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (APC-S-6), and applicable requirements effective upon the date of permit issuance. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

1. any standard or other requirement set forth in the State Implementation Plan (SIP) approved or promulgated by EPA through rulemaking under Title I of the Federal Clean Air Act (Federal Act) including the following:
 - a. most of the State of Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (APC-S-1)
 - b. the State of Mississippi Regulations for the Prevention of Air Pollution Emergency Episodes (APC-S-3),
 - c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (APC-S-5), and 40 CFR Part 52.21 by reference, and

- d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (APC-S-2), relating to construction permits and synthetic minor operating permits;
2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;
3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of APC-S-1;
4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of APC-S-1 and 40 CFR Parts 61, 63, and 68;
5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (APC-S-7) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;
6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act;
7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act;
8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;
9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;
10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;
11. any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Act;
12. any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Federal Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of APC-S-6 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

CAM APPLICABILITY

CAM is not applicable since there is no control equipment for any emission point that has emissions that exceed 100 tons/yr.

MACT APPLICABILITY

The facility is subject to the area source MACT for Wood Preserving, 40 CFR Part 63, Subpart QQQQQQ. HAP emissions do not exceed the major source thresholds for this facility.

SPECIFIC APPLICABLE REQUIREMENTS

NSPS D_c is not applicable for AA-001 since the boiler was not constructed or modified after June 9, 1989. NSPS D_c is applicable for AA-026, but there are no requirements for a 10.5 MMBTU/hr natural gas fired boiler other than recording fuel usage.

Emission Point No.	Pollutant	Draft Permit Emission Limits	EMISSION LIMITS
			Monitoring Requirements
AA-001	PM	0.3 grains per standard dry cubic foot	Stack test
AA-001 AA-026	SO ₂	4.8 lb/MMBTU	None, due to large margin of compliance
AA-026	PM	$E=0.88081^{-0.1667}$	None, due to large margin of compliance
AA-001 AA-026	Opacity	40%	CEM for AA-001, VE for AA-026
AA-004 AA-010 AA-011	PM	$E=4.1 p^{0.67}$	None, due to large margin of compliance.

OTHER LIMITS:

None

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- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
- (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
- (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
- (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ, and

- (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.

- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.

- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	The 60 MMBTU/Hr Untreated Woodwaste Boiler with Multiclone Collector.
AA-003	The wood preserving processes for treatment of poles with Pentachlorophenol and Creosote.
AA-004	The sawing operations that include an operation for cutting crossies to length, a planing operation with cyclone for planing of bridge timbers, and a sawing operation to cut switchties to length.
AA-008	The treated wood products (crossies and poles) storage area.
AA-009	The kiln for the drying of Southern Pine poles prior to wood treatment.
AA-010	The pole peeler (Debarking of Southern Pine logs).
AA-011	The wood fuel preparation processes for use as fuel in the woodwaste boiler that include a chipper, a hogger, and a shredder.
AA-026	The 10.5 MMBTU/Hr Natural Gas Boiler used as a back-up.

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SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

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- 3.B.1 Fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-product sludge, may be allowed at emission rates up to 0.30 grains per standard dry cubic feet. (State Regulation APC-S-1, Section 3.4(b))
- 3.B.2 Emissions from installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour, heat input shall not exceed an emission rate as determined by the relationship
- $$E = 0.8808 * I^{-0.1667}$$
- where E is the emission rate in pounds per million BTU per hour input and I is the heat input in millions of BTU per hour. (State Regulation APC-S-1, Section 3.4(a)(2))
- 3.B.3 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001	State Regulation APC-S-1, Section 3.4(b)	3.B.1	PM	0.30 grains/dry standard cubic foot
AA-026	State Regulation APC-S-1, Section 3.4(a)(2)	3.B.2	PM	$E = 0.8808 * I^{-0.1667}$
AA-001	State Regulation APC-S-1, Section 4.1(a)	3.B.3	Sulfur Dioxide	4.8 pounds (measured as sulfur dioxide) per million BTU heat input
AA-001	Permit to Construct issued November 8, 1994 and modified via Title V Permit issued on January 13, 2004	3.B.5	Type and origin of materials burned.	The permittee may burn untreated wood and office waste paper in the boiler. The office waste paper shall be limited to waste paper generated on-site by Koppers' office operations and shall contain no plastic or non-combustibles.
AA-001	Permit to Construct issued November 8, 1994	3.B.5	% office waste paper to be burned.	Office waste paper shall be limited to less than 1% by mass of the total feed to the boiler.
AA-001	State Regulation APC-S-1, Section 3.1	3.A.1	Opacity	40% opacity
AA-004 AA-010 AA-011	APC-S-1 Section 3.6(a)	3.B.4	PM	$E = 4.1p^{0.67}$

B. Emission Point Specific Emission Limitations & Standards

exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (State Regulation APC-S-1, Section 4.1(a))

3.B.4 For Emission Points AA-004, AA-010, and AA-011, except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship $E = 4.1p^{0.67}$ where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour (State Regulation APC-S-1 Section 3.6(a)).

3.B.5 For Emission Point AA-001, the permittee shall comply with the standards with the Permit to Construct issued November 8, 1994, and Modified thereafter.

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- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

Applicable Requirement	Condition Number(s)	Pollutant Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1 & 1.19	PM	0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions
APC-S-1, Section 4.1(a)	3.C.2 & 1.19	SO ₂	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions

C. Insignificant and Trivial Activity Emission Limitations & Standards

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- D. Work Practice Standards
- 3.D.1 The permittee shall minimize preservative usage (40CFR 63.11430). The permittee shall maintain records on the type treatment and types and amounts of wood preservatives used at the facility (40CFR 63.11430).
- 3.D.2 The permittee for the pressure treatment process shall maintain charge records identifying pressure reading(s) inside the retorts (or similarly enclosed vessels) (40CFR 63.11430).
- 3.D.3 The permittee shall store treated wood product on drip pads or in a primary containment area to convey preservative drip to a collection system until drip has ceased (40CFR 63.11430).
- 3.D.4 The permittee shall fully drain the retort to the extent practicable, prior to opening the retort door (40CFR 63.11430).
- 3.D.5 The permittee shall promptly collect any spills (40CFR 63.11430).
- 3.D.6 The permittee shall perform relevant corrective actions or preventative measures in the event of a malfunction before resuming operations (40CFR 63.11430).

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

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

- (b) the compliance status;
- (c) whether compliance was continuous or intermittent;
- (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
- (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

4.3 The permittee shall submit progress reports consistent with an applicable schedule of compliance and Section II.C.8. of Regulation APC-S-6 semiannually, or at such other frequency as is specified in an applicable requirement or by the Permit Board. Such progress reports shall contain the following:

- (a) dates for achieving the activities, milestone(s), or compliance required in the schedule of compliance, and dates when such activities, milestone(s) or compliance were achieved; and

- (b) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) the date, place as defined in the permit, and time of sampling or measurements;
- (b) the date(s) analyses were performed;
- (c) the company or entity that performed the analyses;
- (d) the analytical techniques or methods used;
- (e) the results of such analyses; and
- (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))

5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section

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III.A.3.c.(2))

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001	Opacity	CEMs monitoring, calibration	5.B.1	APC-S-1, Section 3.1
AA-001	Office Waste Paper	Office Paper usage	5.B.2	Construction Permit issued November 8, 1994
AA-001	PM	Stack test	5.B.3 5.B.4	APC-S-1, Section 3.4(b))
AA-026	Opacity	Visual observation	5.B.5	APC-S-1, Section 3.1
AA-026	Fuel	Fuel usage	5.B.6	40 CFR Section 60.48c(g)2 and (i).)

5.B.1 The permittee shall perform Continuous Emission Monitoring (CEMS) for opacity. The permittee shall record the time and duration of any opacity excursion, the cause, and the corrective action. As part of CEMs, the permittee shall perform a quarterly calibration. Calibration records shall be maintained for three years on-site for inspection by Department of Environmental Quality (DEQ) officials.

5.B.2 The permittee shall monitor and record the date, the quantity in pounds, and the % by weight of office waste paper burned in the boiler in a log book. These records shall be

maintained for three years on-site for inspection by DEQ officials.

- 5.B.3 For Emission Point AA-001, the permittee shall stack test in accordance with EPA Methods 1-5 for particulate matter emissions within 180 days of reissuance and biennially thereafter. Such testing shall be performed while the boiler is operating at maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved. Woodwaste feed rates to the boiler and opacity through CEMs shall be monitored during stack testing. Opacity and the feed rate shall be part of the stack test record as well as all standards for stack testing of particulate matter.
- 5.B.4 For Emission Point AA-001, the permittee shall monitor fuel usage hourly. From this monitoring, the permittee shall record daily in log form the maximum hourly fuel usage (LBS/HR) feed and the corresponding BTU value of the boiler (MMBTU/HR). These records shall be maintained on site for five years.

- 5.B.5 For Emission Point AA-026, the permittee shall assure compliance with opacity limitations by performing weekly observations for a period of six consecutive minutes. If visible emissions are observed, the permittee shall perform a visible emission evaluation (VEE) utilizing EPA Reference Method 9. The permittee shall maintain records for five years of all monitoring. The permittee shall submit a summary report of the required monitoring. The summary report should include any exceedances within the reporting period, the nature of the problem that caused the exceedance, and the action taken to correct the exceedance. The report shall be semi-annual and shall be submitted in accordance with Condition 5.A.4 (Ref.: APC-S-1 Section 3.1).

- 5.B.6 For Emission Point AA-026, the permittee shall record and maintain records of the natural gas combusted during each calendar month in cubic feet of natural gas burned per month. Records shall be maintained for a period of two years following the date of such record. (40 CFR Section 60.48c(g)2 and (i).)

- 5.B.7 For the Work Practice Standards in Section 3.D of this permit, the permittee shall maintain records for five years on-site from the date of the each occurrence, measurement, maintenance, corrective action, report or record.(40CFR 63.10(b))

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C. Specific Reporting Requirements

Page 22 of 25
Permit No. 0960-00012

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-001 AA-026	Opacity	Opacity Excursions	5.C.1	APC-S-6, Section III.A.3(a).
AA-001	PM, Opacity	Stack Test Notification	5.C.2	APC-S-6, Section III.A.3(c).
AA-001	PM, Opacity	Stack Test Reporting	5.C.3	APC-S-6, Section III.A.3(c).

- 5.C.1 The permittee shall submit summary report of the required monitoring for opacity for Condition 5.B.1 and 5.B.5 of the permit. The summary report should include any exceedances within the reporting period, the nature of the problem that caused the exceedance, and the action taken to correct the exceedance. The report shall be semi-annual and shall be submitted in accordance with Condition 5.A.4.
- 5.C.2 The permittee shall submit a written test protocol at least (30) days prior to the intended test date(s) to ensure methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) that an observer may be afforded the opportunity to witness the test.
- 5.C.3 The permittee shall submit a test report of the results of the stack test(s) required within forty-five (45) days of the test.

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6.1 None permitted.

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit.

7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

(a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.

(b) The placement of the required warning statement must comply with the requirements pursuant to § 82.108.

(c) The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.

(d) No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

(d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)

(e) Persons owning commercial or industrial process refrigeration equipment must

comply with the leak repair requirements pursuant to § 82.156.

- (f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

APPENDIX A

1

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or
NMVOG	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 μ m in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

Draft/Proposed

PROTECTION OF STRATOSPHERIC OZONE

40 CFR 82

APPENDIX B

OT nemada

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



Date: SEPTEMBER 08 2009

Amount
\$2,454.84

Pay To The Order Of: MISSISSIPPI ST DEPT ENVIRONMEN
TWO THOUSAND FOUR HUNDRED FIFTY FOUR AND 84/100 ONLY

MISSISSIPPI ST DEPT ENVIRONMEN
OFFICE POLLUTION CON
PO BOX 2339

JACKSON MS 39225-2339

KOPPERS INC.

National CI Ashland, OH

619257 041203895

KOPPERS INC. PITTSBURGH PA

SP
CD VENDOR DIV OUR AUDIT YOUR INVOICE NBR MO/DA AMOUNT DISC PAYABLE
NET AMT

619257

7 940505023 477 02409070626 AP00006148 0722 2454.84 0.00 ***2454.84

090-00012

TITLE V AIR PERMIT FEES

() Quarter Payment () Full Payment () Other

() Title V Air Permit Fees 3479 - 41670 - 4044 - 0

() Penalty on Failure to Pay 3479 - 42350 - 4044 - 0

Signature

Date

Joyce M. Fankulowski
Environmental Manager



RECEIVED
JAN 20 2009
Dept of Environmental Quality
Office of Pollution Control

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

Mr. Tommy Wall
Timber and Woods Branch
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225-2261

Subject: Koppers Inc Response to Requested Information (Revised)
Ref. No. 0960-00012
Grenada County

Certified Mail: 7001 1140 0000 0205 4324

Dear Mr. Wall:

As discussed during our conversation of January 5, 2009, this letter provides a more conservative approach to address information requested during your recent visit to the Koppers Grenada facility. Please disregard the response submitted on December 29, 2008. Enclosed is the calculation rationale and revised Emission Summary, Manufacturing Processes Forms and Cyclone Forms for Source AA-004.

It is my understanding that the storage tank information you previously requested is no longer needed, based on your phone conversation with Mr. Kevin Coker. We trust that this information satisfies your request. However, should you have any additional questions or comments please feel free to contact me.

Sincerely,

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

Joyce M. Fankulowski

Enclosure(s)

CC: M. Smith/Koppers Grenada
K. Coker/Koppers Grenada

Inquiry from MSDEQ on PM Emissions from Tie Cutting Operations

In the Title V Renewal Permit Application submitted to MSDEQ in 2008, the PM emissions for Source AA-004 were based on the PTE assumption that the total production volume (5,858,250 ft³ of cross-ties and switch-ties) were double end-cut to the required length. These operations were assumed to be controlled by a cyclone operating at a 50% control efficiency. The total PM emissions for these operations included in permit application were 8.76 tons PM/year.

As an even more conservative PTE assumption, Koppers Inc. has decided to revise the PM emissions estimate to assume that the cyclone has 0% control efficiency. This will increase the PM emissions for Source AA-004 to 17.52 tons PM/year and the plant-wide total PM emissions (point and fugitive) to a total of 253.19 tons PM/year. This increase has no impact on the classification of the plant as a Major Source of PM emission under the Title V program.

The combined PTE assumptions of maximum tie production and 0% control efficiency of the cyclone are very conservative. The endcutting saws do not generate appreciable quantities of small diameter PM; the usual products of these types of saws are large, heavy chips and cuttings which fall directly to the work surface and conveyor belt. These chips are collected with the other wood cuttings from the operations and are used for fuel in the wood fired boiler (Source AA-001). Very little of the saw cutting material is small diameter "sawdust" that is capable of being transported off-site. The tie cutting operations do not include high stacks, elevated stack temperatures or close proximity to the site boundaries. There is little opportunity for the small quantity of transportable PM to be carried to the site boundary from this fugitive source. While the PTE assumptions used here result in an estimated PM emission of 17.52 tons/year, a "best estimate" PM emission estimate for the PTE tie production would be less than 2 tons/year.

POTENTIAL-TO-EMIT EMISSION SUMMARY
KOPPERS INC. GRENADA, MS
TITLE V PERMIT APPLICATION

Source AA-001 BOILER, WOOD FIRED

Total Wood Burned:

58,399	0.06%	Chlorine
		Sulfur
	70.00%	

60 mmbtu/hr

(ton/hr):

6.67

Removal Efficiency (1):

Pollutant	Emission Factor	Units	Basis	Estimated Emissions (lb/hr)
PM	5.3	lb/ton	AP-42	154.76
SO ₂	0.36	lb/tn	Mass Calc.	10.51
NOX	1.5	lb/tn	AP-42	43.80
CO	6.6	lb/tn	AP-42	192.72
VOC	0.18	lb/tn	AP-42	5.26
Arsenic	8.8E-05	lb/tn	AP-42	5.87E-04
Cadmium	1.7E-05	lb/tn	AP-42	1.13E-04
Chromium	1.3E-04	lb/tn	AP-42	8.67E-04
Lead	3.1E-04	lb/tn	AP-42	2.07E-03
Manganese	8.9E-03	lb/tn	AP-42	2.60E-01
Nickel	5.6E-04	lb/tn	AP-42	3.73E-03
Selenium	1.8E-05	lb/tn	AP-42	1.20E-04
Mercury	6.5E-06	lb/tn	AP-42	4.33E-05
Total HAP Metals				0.293

- (1) Removal efficiencies based on Grenada stack test of 2/96.
(2) CO factor based on AP-42
(3) NOX factor of 3.3 based on Grn stack test for treated wood.

Source AA-002 BOILER, NATURAL GAS

Gas Burned (MCF/yr)

91980

Sulfur Content:

0.000 %

Fuel Use Rate(MCF/hr):

10.5

Pollutant	Emission Factor	Units	Basis	Estimated Emissions (lb/hr)
PM	7.60E-03	lb/MCF	AP-42	0.35
SO ₂	6.00E-04	lb/MCF	AP-42	0.03
NOX	1.00E-01	lb/MCF	AP-42	4.60
CO	8.40E-02	lb/MCF	AP-42	3.86
VOC	5.50E-03	lb/MCF	AP-42	0.25

Number of days boiler assumed to operate is

365

Source AA-003 WOOD PRESERVING PROCESSES

Creosote Ties	5,858,250	C. F.
Creosote Poles	0	C. F.
Total Creosote Wood	5,858,250	C. F.
Oil/Penta Poles	3,500,000	C. F.

Pollutant	Emission Factor	Units	Basis	Estimated Emissions
Creosote (VOC)	1.313E-03	lb/cf	Form R	3.85
HAPs contained in creosote:				
Naphthalene	7.644E-04	lb/cf	Calculation	2.24
Quinoline	2.816E-05	lb/cf	Calculation	0.08
Biphenyl	1.529E-05	lb/cf	Calculation	0.04
Dibenzofuran	1.297E-06	lb/cf	Calculation	0.00
TOTAL CREO, HAP				2.37
Pentachlorophenol (VOC)				
Pentachlorophenol	1.42E-06	lb/cf	Form R	2.48E-03
#2 Oil (VOC)	7.86E-03	lb/cf	Engr. Est.	13.76
TOTAL VOC				17.60

Source AA-008 PRESERVATIVE TREATED WOOD STORAGE FUGITIVES

Pollutant	Emission Factor	Units	Basis	Estimated Emissions
Creosote Ties	2.44E-03	lb/cf	FR Test & Calc	7.16
Creosote (VOC)	1.47E-03	lb/cf	FR Test & Calc	4.31
Naphthalene	4.28E-05	lb/cf	FR Test & Calc	0.13
Quinoline	1.33E-05	lb/cf	FR Test & Calc	0.04
Biphenyl	1.30E-06	lb/cf	FR Test & Calc	0.00
Dibenzofuran	1.30E-06	lb/cf	FR Test & Calc	0.00
Creosote Poles				
Creosote (VOC)	2.82E-03	lb/cf	FR Test & Calc	0.00
Naphthalene	1.70E-03	lb/cf	FR Test & Calc	0.00
Quinoline	1.14E-06	lb/cf	FR Test & Calc	0.00
Biphenyl	4.94E-05	lb/cf	FR Test & Calc	0.00
Dibenzofuran	1.53E-05	lb/cf	FR Test & Calc	0.00
Penta Poles				
Oil (VOC, est. as creo)	3.77E-02	lb/cf	FR Test & Calc	66.01
Pentachlorophenol	8.22E-07	lb/cf	Engr Calc.	1.44E-03
Fugitive Totals Creosote & PCP				73.17
VOC				4.31
Naphthalene				0.13
Quinoline				0.04
Biphenyl				0.00
Dibenzofuran				0.00
Pentachlorophenol				1.44E-03
HAP Organics (Total)				4.48

Source AA-004 CROSS TIE SORTER, SWITCH TIE MILL & BRIDGE LUMBER MILL

Number of Cyclones:		1		
Total Hours/Year		8760		
Pollutant	Emission Factor	Units	Basis	Estimated Emissions
	(lb/hr)			
Particulate		2 lb/hr	AP-42	17.52
4				

Notes:

- Assumes all ties (5,858,250 ft³) are processed
- Assumes 0% control efficiency of cyclone

Source AA-009 DRYING KILN

Poles Dried	1600000	C. F.
Pollutant	Emission	Factor
VOC	0.04	lb/cf
	32.00	
	7.31	
	AP-42/Eng. Est.	
	Basis	
	(tn/yr)	
	(lb/hr-ave)	

Source AA-010 POLE PEELER (Fugitive)

Annual Throughput = 1,600,000 #3
Pole Density = 45 lb/#3
Pole Volume (40-4) = 21.2 #3

Pollutant	Emission	Factor
Particulate Material (PM)	0.35	lb/ton
PM-10	0.1925	lb/ton
	6.30	
	3.47	
	AP-42	
	AP-42, MI, NC	
	Emissions	
	(tpy)	

Source AA-011 WOOD FUEL PREPARATION & HANDLING (Fugitive)

Wood Fuel Processed	58,399	Tn/Yr
	15	tn/hr
Pollutant	Emission	Factor
PM	0.25	lb/tn
	7.30	
	3.75	
	AP-42/Eng. Est.	
	Basis	
	(tn/yr)	
	(lb/hr)	

SMALL COMBUSTION SOURCES, NATURAL GAS FUEL

Source	BTU/Hr	BTU/CF	CF/Hr
AA-005 Boiler House Htr #1	300000	1000	300
AA-005 Boiler House Htr #2	300000	1000	300
AA-015 Standby Boiler Room	100000	1000	100
AA-006 Steam Cleaner	440000	1000	440
TOTAL	1140000		1140
Hours of Operation (hr/yr) =	8760		

NOTE: Emissions are total for all 4 sources operating 8760 hrs/yr.

Pollutant	Emission	Factor
Particulate	0.18	lb/MMCF
PM-10	0.18	lb/MMCF
SO2	0.6	lb/MMCF
NOX	94	lb/MMCF
CO	40	lb/MMCF
VOC	11	lb/MMCF
	0.055	
	AP-42	
	Basis	
	Emissions	
	(tpy)	

YARD ROADS FUGITIVE PARTICULATES (PM10)

$E = k(5.9)(s/12)(S/30)(W/3)^{0.7}(w/4)^{0.5}(365-p)/365$ lb/MMT
 $k = \text{particle size factor (PM10)} = 0.36$
 $s = \text{silt content (\% of road)} = 10$
 $W = \text{mean vehicle speed} = 15$ mph
 $W = \text{mean vehicle weight} = 15$ tons
 $w = \text{mean no. of wheels} = 4$ wheels
 $p = \text{no. wet days/year} = 110$ days
 $VMT = \text{Veh. MI. Traveled} = 70200$ VMT

6	No. vehicles driving
15	=Typ. miles/hr driving
2.5	=Typ. hrs driving/day
6	=Typ. d/wk driving
1	=Trng volume factor
70200	=Ann veh mi. traveled

Pollutant	Emission	Factor
Particulate (PM10)	1.91	lb/VMT
	66.96	
	46	
	AP-42	
	Basis	
	(tn/yr)	
	(lb/hr)(1)	

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

TOTAL PLANT EMISSIONS

Pollutant [1]	Estimated Emissions	
	(tn/yr)	(lb/hr)
PM (less fugitives)	.	35.41
PM (including fugitives)	.	57.80
SO ₂	.	2.41
NO _X	.	11.16
CO	.	44.93
VOC(less fugitive)[2]	.	12.59
VOC (including fugitive)[2]	.	29.30
HAPs(Organics/VOC)	.	1.56
Naphthalene	.	1.50
HAP Metals	.	0.07
Total HAPs	.	1.63

All emissions include fugitives unless otherwise specified.

[1] Assumes Wellons boiler, standby boiler and misc. combustion sources operating simultaneously for 8760 hours/year

[2] VOC amounts include organic HAPs.

SECTION C

EMISSIONS SUMMARY for the ENTIRE FACILITY

List below the total emissions for each pollutant from the entire facility in accordance with Operating Permit Application Requirements, pp. 3-5. For stack emissions, use the maximum annual allowable (potential) emissions. For fugitive emissions, use the annual emissions calculated using the maximum operating conditions.

POLLUTANT	Footnote 1	
	lb/hr	tons/yr
ANNUAL EMISSION RATE		
Particulate (Including Fugitive)		253.19
SO2		10.54
NOx		48.87
CO		196.78
VOC (Less Fugitive)		55.17
VOC (Including Fugitive)		128.33
HAPs (Organics/VOC)		6.85
Naphthalene		6.55
HAP Metals		0.29
HCL		0.00
Total HAPS		7.15
See PTE Tables on the Attached Pages		

1. All regulated air pollutants,including hazardous air pollutants emitted from the entire facility should be listed. A list of regulated air pollutants has been provided in Section A.

With the exception of the emissions resulting from insignificant activities and emissions as defined in Regulation APC-S6, Section VII, the pollutants listed above are all regulated air pollutants reasonably expected to be emitted from the facility.

SIGNATURE (must match signature on page 17)

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./Name: AA-004, Ref. No 42, Cross Tie Sorter, Switch Tie Mill & Bridge Lumber Mill
2. Process Description: Untreated wood milling and cutting, includes the following equipment:
The Sorter: End Trim Saws (2)
Switch Tie Mill: Cross Cut Saw (1)
Lumber Mill: Planer No. 1 (Large Dimension Lumber), Planer No. 2 (Small Dimension Lumber), Cross Cut Saw (1), Drills (2), Dapping Saw (1)
3. Was this unit constructed or modified after August 7, 1977? _____ yes _____ no ☒ If yes please give date and explain.
4. Capacity (tons/hr): _____
5. Raw Material Input: _____

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Rough cut wood products			2,000,000 cf

PRODUCT or BY-PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Trimmed and shaped untreated wood products			2,000,000 cf

7. Stack Data:

A. Height NA
B. Inside Diameter NA
C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates: A. Zone B. North C. East

(22)

pp. 3-5

* If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

CYCLONES

SECTION 1.2

1. Emission Point No. / Name: AA-004 Cyclone for Wood Milling
2. Manufacturers Name and Model No.: Unknown
3. Date of construction for existing sources or date of anticipated start-up for new sources: Unknown

4. Cyclone Data:

- a) Cyclone type (if more than 1, put total number) : Potbellied Multiclone

b) Efficiency: %

c) Pollutant viscosity: poise

d) Flow Rate: acfm

e) Pollutant size entering cyclone: microns

f) Pressure drop: inches H₂O

g) Baffles or Louvers (specify):

h) Cyclone dimensions:

Inlet: 0.83 ft

Outlet: 0.83 ft

Body diameter: 4.0 ft

Body height: 3.0 ft

Cone height: 4.5 ft

i) Wet spray: Yes No X

1. No. of Nozzles:

2. Type of liquid used:

3. Flow rate: gpm

4. Make-up rate: gpm

5. % recycled: %

j) Fan location:

1. Downstream: Direct emission

Auxiliary Stack

2. Upstream:

No cap (vertical emissions)

Fixed cap (diffuse emissions)

Wind respondent cap (horizontal emissions)

5. Which process(es) does the cyclone(s) control emissions from? Lumber Mill Equipment

6. Attach a diagram of the cyclone(s) used.

Joyce M. Fankulowski
Environmental Manager



874

December 29, 2008

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

Mr. Tommy Wall
Timber and Woods Branch
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225-2261

Subject: Koppers Inc Response to Requested Information
Ref. No. 0960-00012
Grenada County

Certified Mail: 7007 2560 0002 6787 2832

Dear Mr. Wall:

This letter provides the information requested during your recent visit to the Koppers Grenada facility. The enclosed Emission Summary, Manufacturing Processes Form and Cyclone Form have been updated to include the circular saw as an emission point within Source AA-004. Please note that the PTE emissions calculated for this source were grouped based on a conservative assumption that the cyclone was being fed by some combination of wood cutting/shaping machinery for 8760 hours per year. We also assumed that the cyclone produced PM emissions at the rate of 2 lb/hr, regardless of which machinery was feeding the unit. In this way, we provide a very conservative estimate of PM emissions from all machinery associated with this source. As such, we have added the requested equipment, yet the emission estimate for the source remains unchanged.

It is my understanding that the storage tank information you previously requested is no longer needed, based on your phone conversation with Mr. Kevin Coker. We trust that this information satisfies your request. However, should you have any additional questions or comments please feel free to contact me.

Sincerely,

Joyce M. Fankulowski

Enclosure(s)

CC: M. Smith/Koppers Grenada
K. Coker/Koppers Grenada

Title V Emissions

58,399	0.06%	
tn/yr	Sulfur	Chlorine
Total Wood Burned:		

6.67
(ton/hr)

	Sulfur	58.399	0.06%	70.00%	
	Chlorine				
(ton/hr.):					
6.67					60 mmbtu/hr

- (1) Removal efficiencies based on Grenada stack test of 2/96.
- (2) CO factor based on AP-42
- (3) NOx factor of 3.3 based on Gm stack test for treated wood.

Source AA-002 BOILER, NATURAL GAS	Fuel Use Rate(MCF/hr):	10.5
Gas Burned (MCF/yr)	Sulfur Content:	91980
	%	0.000

Pollutant	Emission Factor	Units	Basis	Estimated Emissions (lb/hr)	Estimated Emissions (lb/hr)
PM	7.60E-03	lb/MCF	AP-42	0.35	0.08
SO ₂	6.00E-04	lb/MCF	AP-42	0.03	0.01
NO _X	1.00E-01	lb/MCF	AP-42	4.60	1.05
CO	8.40E-02	lb/MCF	AP-42	3.86	0.88
VOC	5.50E-03	lb/MCF	AP-42	0.25	0.06
Number of days boiler assumed to operate is 365					

Title V Emissions

Source AA-008 PRESERVATIVE TREATED WOOD STORAGE FUGITIVES

Source AA-004 TIE MILL & LUMBER MILL WITH CYCLONE INCLUDING CIRCULAR SAW

Number of Cyclones: Total Hours/Year		Emission	Pollutant	Factor	Units	Basis	Estimated (in/yr)	Emissions (lb/hr)
	1	8760						
		2 lb/hr	AP-42	8.76	2			

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

TOTAL PLANT EMISSIONS

Pollutant [1]	Estimated Emissions	
	(tn/yr)	(lb/hr)
PM (less fugitives)	163.87	37.41
PM (including fugitives)	244.43	55.80
SO2	10.54	2.41
NOX	48.87	11.16
CO	196.78	44.93
VOC(less fugitive)[2]	55.17	12.59
VOC (including fugitive)[2]	128.33	29.30
HAPs(Organics/VOC)	6.85	1.56
Naphthalene	6.55	1.50
HAP Metals	0.29	0.07
Total HAPs	7.15	1.63

All emissions include fugitives unless otherwise specified.

[1] Assumes Wellons boiler, standby boiler and misc. combustion sources operating simultaneously for 8760 hours/year

[2] VOC amounts include organic HAPs.

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./ Name: AA-004, Ref. No 42, Tie Mill/Lumber Mill/Switch Tie Mill with cyclone
(including circular saw)
2. Process Description: Untreated wood milling and cutting
3. Was this unit constructed or modified after August 7, 1977? _____ yes _____ X _____ no If yes please give
date and explain.
4. Capacity (tons/hr):
5. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Rough cut wood products			2,000,000 cf

6. Product Output:

PRODUCT or BY-PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Trimmed and shaped untreated wood products			2,000,000 cf

7. Stack Data:

- A. Height NA
B. Inside Diameter NA
C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates: A. Zone B. North C. East

13. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements pp. 3-5.

[illegible]

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed in accordance with Operating Permit Application Requirements, pp. 3-5. A list of regulated air pollutants has been provided in Section A.

Provide emission rate in units of applicable emission standard, e.g. lb/Mmbtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

CYCLONES SECTION 1.2

1. Emission Point No. / Name: AA-004 Cyclone for Wood Milling
2. Manufacturers Name and Model No.: Unknown
3. Date of construction for existing sources or date of anticipated start-up for new sources: Unknown

4. Cyclone Data:

- a) Cyclone type (if more than 1, put total number) :
 - X Simple
 - Potbellied
 - Multiclone

- b) Efficiency: %
- c) Pollutant viscosity: poise
- d) Flow Rate: acfm
- e) Pollutant size entering cyclone: microns
- f) Pressure drop: inches H₂O

- h) Cyclone dimensions:
 - Inlet: 0.83 ft
 - Outlet: 0.83 ft
 - Body diameter: 4.0 ft
 - Body height: 3.0 ft
 - Cone height: 4.5 ft

- i) Wet spray: Yes No X

1. No. of Nozzles:
2. Type of liquid used:
3. Flow rate: gpm
4. Make-up rate: gpm
5. % recycled: %

j) Fan location:

1. Downstream: Direct emission Auxiliary Stack
2. Upstream:

- No cap (vertical emissions)
- Fixed cap (diffuse emissions)
- Wind respondent cap (horizontal emissions)

5. Which process(es) does the cyclone(s) control emissions from? Tie/Lumber/Switch Mill/Circular Saw
6. Attach a diagram of the cyclone(s) used.

Marcus C. Smith
Plant Manager

RECEIVED
DEC 8 2008

Dept of Environmental Quality
Office of Pollution Control



#876

December 4, 2008

Mr. Scott Hodges
Mississippi Department of Environmental Quality
Environmental Permits Division
P.O. Box 10385
Jackson, MS 39289-0385

Koppers Inc.
Utility Poles and Piling
P. O. Box 160
Tie Plant, MS 38960
Tel 662 226 4584 X11
Fax 662 226 4588
SmithMC@koppers.com
www.koppers.com

CERTIFIED MAIL: 7008 1140 0001 0773 4124

Subject: Title V Operating Permit - #0960-00012
Plant Management Change - Authorization To Sign
Koppers Inc. - Tie Plant, Mississippi

Dear Mr. Hodges:

Greene County

Per applicable regulatory guidelines an updated RCRA Subtitle C Identification Form and a letter issued by the Company authorizing me to sign documents related to the facility's Title V Operating Permit are enclosed. If you have any questions please call.

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.

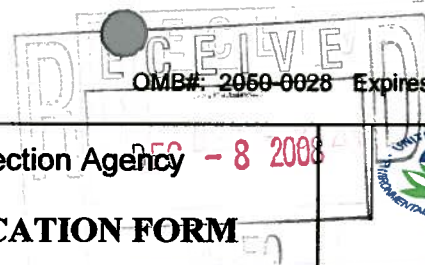
Sincerely,

Marcus C. Smith

Marcus C. Smith
Plant Manager

Enclosures

cc: Ms. Joyce Fankulewski, Koppers Inc.
Mr. Wayne B. Anderson, MDEQ



SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal (See instructions on page 13.) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input checked="" type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report		
2. Site EPA ID Number (page 14)	EPA ID Number M S D 0 0 7 0 2 7 5 4 3		
3. Site Name (page 14)	Name: Koppers Inc.		
4. Site Location Information (page 14)	Street Address: One Koppers Drive		
	City, Town, or Village: Tie Plant	State: MS	
	County Name: Grenada	Zip Code: 38960	
5. Site Land Type (page 14)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)	A. 3 2 1 1 1 4	B. 	
	C. 	D. 	
7. Site Mailing Address (page 15)	Street or P. O. Box: 160		
	City, Town, or Village: Tie Plant		
	State: MS		
	Country: Grenada	Zip Code: 38960	
8. Site Contact Person (page 15)	First Name: Marcus	MI: C	Last Name: Smith
	Phone Number: 662-226-4584	Extension: 11 Email address: Smithmc@Koppers.com	
9. Operator and Legal Owner of the Site (pages 15 and 16)	A. Name of Site's Operator: Koppers Inc.		Date Became Operator (mm/dd/yyyy): 12/28/1988
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: Koppers Inc.		Date Became Owner (mm/dd/yyyy): 12/28/1988
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

9. Legal Owner (Continued) Address	Street or P. O. Box: 436 Seventh Avenue	
	City, Town, or Village: Pittsburgh	
	State: PA	
	Country: Allegheny	Zip Code: 15219

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

- ☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) Generator**Y ☐ N ☒ 2. Transporter of Hazardous Waste**

Y ☒ N ☐ 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.

Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your site)**Y ☐ N ☒ 5. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark each that applies.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining

Y ☐ N ☒ 6. Underground Injection Control**B. Universal Waste Activities****Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste mark all boxes that apply:**Manage

- a. Batteries ☐
- b. Pesticides ☐
- c. Mercury containing equipment ☐
- d. Lamps ☐
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☐ N ☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter
If "Yes", mark each that applies.

- ☐ a. Transporter
- ☐ b. Transfer Facility

Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner
If "Yes", mark each that applies.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒ 3. Off-Specification Used Oil Burner**Y ☐ N ☒ 4. Used Oil Fuel Marketer**

If "Yes", mark each that applies.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

F032	F034	K001	D001	D003	U188	D002
D009						

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

13. Certification. 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.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11).

(See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
<i>Marcus C. Smith</i>	Marcus C. Smith / Plant Manager	12/04/08

Leslie S. Hyde
Vice President, Safety & Environmental Affairs



Koppers Inc.
436 Seventh Avenue
Suite 1800
Pittsburgh, PA 15219
T 412 227 2237
F 412 227 2434
HydeLS@koppers.com
www.koppers.com

May 12, 2008

To Whom It May Concern:

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Leslie Hyde".

Leslie Hyde

Joyce M. Fankulewski
Environmental Manager



RECEIVED
SEP 11 2008
Dept of Environmental Quality
Office of Pollution Control

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

September 8, 2008

Mr. Tommy Wall
Timber and Woods Branch
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225-2261

Subject: Koppers Inc. Response to Air Application Deficiency
Ref. No. 0960-00012
Grenada County

Via Certified Mail No 7008 1300 0001 3325 7321

Dear Mr. Wall:

Enclosed is the requested clarification regarding the emission factors used for Sources AA-003 and AA-008.

In addition, upon Koppers review of the data, a couple of minor errors were detected due to a link within the spreadsheets. A revised copy of the Emissions Summary is also attached. Please replace the summary in the renewal application package with this revised version.

Please see the revised:

- Emission Factors for Source AA-008 - Creosote ties (Dibenzofuran)
- Emission Factors for Source AA-008 - Creosote poles (Creosote VOC, Naphthalene, Quinoline, Biphenyl, Dibenzofuran)
- Total Plant Emissions – PM (including fugitives)

As you can see, the only effect of these revisions is the reduction of PM emissions. We trust that this submittal will satisfy your request. Should you have any additional questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joyce M. Fankulewski".

Joyce M. Fankulewski

Response to MSDEQ Request for Information 23 August 2008

General Approach

To calculate the emissions associated with the wood treating operations and the treated wood storage operations for the Title V renewal application, Koppers Inc. used software developed by the American Wood Preservers Institute (AWPI) in 1995 for creosote treating and yard storage of creosote treated products. That software was based on EPA-developed software such as TANKS and WATER, on available industry test data for emissions from creosote treating operations, on physical and chemical properties of industry average creosote and on basic physical chemistry and chemical engineering fundamentals for topics such as vapor-liquid equilibrium. This basic software was first developed by AWPI for use in SARA/Form R emission estimates. For Title V permit applications, however, the software is adapted by use of Potential-to-Emit (PTE) assumptions regarding equipment and materials.

For the emissions calculations associated with pentachlorophenol treating operations and yard storage of pentachlorophenol treated products, Koppers Inc. adapted the software developed for creosote operations to reflect the differences between the physical chemical properties of pentachlorophenol treating solutions.

Creosote Treating Emission Factors

Since 1995, Koppers Inc. has used and updated the AWPI software to reflect Koppers-specific equipment sizes, materials and operations. It included updates to software components such as TANKS and WATER, as well as more recently available information on the chemical composition and physical properties of creosote. Also, Koppers Inc. continued to use assumptions that increased the PTE emissions for creosote operations.

This software provides emission estimates for the treating system on a system-wide basis. The hardware and equipment, including work tanks, storage tanks, treating cylinders (or retorts), pumps, valves and other fittings, vacuum systems and any air pollution control devices are included in the AWPI model capability. The emission estimates are based on the quantity of wood to be processed, the quantity of creosote materials needed for the processing, the physical dimensions of the wood articles and the physical chemical properties of the creosote materials. The software has the capability to model a number of different treating cycles to accommodate the differences in treating operations for the different types of articles to be produced.

The AWPI software computes the fugitive creosote emissions for pumps, valves and fittings using correlations such as the SOCFI and USEPA emission tests and factors. Emission estimates for the treating cycles are based on field measurements taken at operating wood treating plants. These measurements have been made by EPA, State agencies and industry.

PTE assumptions are used regarding equipment and production parameters. For example, it is assumed that the maximum quantity of wood to be treated is placed in each of the treating cylinders for each treating cycle. Further, it is assumed that the treating cylinders are operated for the full 8760 hours/year with no allowance made for downtime due to equipment turnaround, maintenance or outage for equipment malfunction.

For the creosote wood treating operations, the AWPI software computes the PTE creosote VOC point and fugitive emissions for all of the equipment and operations. The total PTE creosote VOC from the treating operations is summed from these individual calculations.

Based on maximum treating cylinder capacities, the PTE production volume is 5,858,250 ft³ of creosote treated ties per year. Any production of creosote treated poles decreases the PTE production volume since the cylinder capacity for poles is lower than that of ties and because it takes a longer treating cycle time to treat poles than it does for ties.

For the Title V permit renewal application, the annual PTE creosote VOC emissions for the creosote treating operations are:

$$\begin{aligned} \text{Point Emissions} &= 5071.3 \text{ lb creosote VOC} \\ \text{Fugitive Emissions} &= \underline{2621.0 \text{ lb creosote VOC}} \\ \text{Total Emissions} &= 7692.3 \text{ lb creosote VOC} = 3.846 \text{ tons creosote VOC} \end{aligned}$$

Using the PTE production capacity and the PTE creosote VOC emission values, the emission factor for the creosote treating operations can be calculated as:

$$EF_{\text{CREO TREATING}} = \frac{7692.3 \text{ lb creosote VOC}}{5,858,250 \text{ ft}^3 \text{ wood treated}} = 1.313 \times 10^{-3} \text{ lb VOC/ft}^3$$

The emissions of the four individual HAPs (naphthalene, quinoline, biphenyl and dibenzofuran) included in the Title V permit renewal application are calculated from the creosote VOC emission estimates. Using basic physical chemical and chemical engineering principles, the composition the four HAPs in the creosote VOC can be calculated. The emission factors for the four individual HAPs are computed from the creosote VOC emission factor and the mass fraction of each of the HAPs in the vapor phase.

$$\begin{aligned} EF_{\text{Naphthalene}} &= 7.644 \times 10^{-4} \text{ lb/ft}^3 \\ EF_{\text{Quinoline}} &= 2.816 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Biphenyl}} &= 1.529 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Dibenzofuran}} &= 1.297 \times 10^{-6} \text{ lb/ft}^3 \end{aligned}$$

These emission factors are used to calculate the PTE emissions for creosote treating.

Yard Storage Emissions of Creosote Treated Products

To compute the creosote VOC and HAP emissions associated with the storage of the treated wood products, a slightly different approach is used in the AWPI software. The storage emissions depend on the physical dimensions of the treated wood product, the stacking arrangement used during storage, the properties of the creosote, the duration of the storage and the ambient temperature in the storage location.

The storage yard emissions for creosote treated wood are based on field emission tests on creosote treated wood. The tests were made at a former Koppers Inc. plant at Feather River, CA. The tests were made at the request of the California ARB under the air toxic emission program. The tests were made for the emissions of several of the components of creosote VOC rather than for a total VOC measurement. The AWPI software is based on a correlation of naphthalene emissions as a function of the time that the treated wood product has been in storage. From this correlation, a total, integrated naphthalene emission quantity is computed. This integrated total depends on the geometry of the treated wood product, the geometric arrangement during the storage period, the length of the storage period and the ambient temperature at the storage site. Because of this dependence on the geometry of the treated wood product and the geometrical

arrangement of the stacking during storage, creosote treated ties and creosote treated poles have different emission factors.

As is the case with the emissions from the treating operations, the AWPI software uses an approach based on Raoult's Law to calculate the emissions of individual HAPs and creosote VOC from the naphthalene emissions. This approach calculates the composition of the creosote vapor at the yard storage temperature reference temperature. The AWPI selected 80° F as the reference temperature since that was the ambient temperature during the field tests that produced the data upon which the AWPI naphthalene correlation was based. At these nominal ambient temperatures, there is very little variation in the composition of the creosote vapor phase. By scaling the emission factor for naphthalene for the composition of the creosote vapor at the reference temperature, the emission factors for the individual HAPs of interest and for creosote VOC are obtained.

For the renewal permit application, a uniform monthly production rate is assumed. This approach is a consequence of the PTE assumption of maximum capacity production for the full 8760 hours/year discussed in creosote treating operations (above). This approach maximizes the VOC emissions from the production equipment and sets the number of treated ties that can be moved into yard storage. A further PTE assumption is that all treated products are stored on site for 120 days prior to shipment to the customer.

For the renewal permit application, the annual yard storage VOC emissions are computed as:

$$EF_{\text{Yard Naphthalene}} = \frac{8623.5 \text{ lb naphthalene}}{5,858,250 \text{ ft}^3} = 1.472 \times 10^{-3} \text{ lb naphthalene/ft}^3$$

The HAP emissions are computed from the calculated vapor phase composition of the creosote vapor using the same approach discussed for the treating process HAP emissions.

$$\begin{aligned} EF_{\text{VOC}} &= 2.44 \times 10^{-3} \text{ lb/ft}^3 \\ EF_{\text{Quinoline}} &= 4.28 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Biphenyl}} &= 1.33 \times 10^{-5} \text{ lb/ft}^3 \\ EF_{\text{Dibenzofuran}} &= 1.95 \times 10^{-13} \text{ lb/ft}^3 \end{aligned}$$

Pentachlorophenol Treating Emission Factors

The emissions associated with pentachlorophenol treating operations are calculated by an approach very similar to that used with creosote treating. The AWPI based creosote software was modified to reflect the physical chemical properties of pentachlorophenol and the pentachlorophenol treating solutions. At normal ambient temperatures, pentachlorophenol is a very low vapor pressure solid. To treat wood, the pentachlorophenol is dissolved in a hydrocarbon based solvent. Typically, the solution is 7%-10% pentachlorophenol and the balance is the solvent.

The software includes all of the same equipment and operations that the creosote treating software does. The same PTE approach, for production capacity and other parameters, is used in pentachlorophenol treating emission calculations. The PTE production capacity, 3,500,000 ft³, was adopted several years ago in prior Title V permit applications. It is used in this renewal application for continuity, but is extremely conservative. It is extremely unlikely that this production capacity can be approached in actual operations.

The software computes the emissions for both point and fugitive sources in the pentachlorophenol treating system. These are summed to yield the total emissions and are used to compute the emission factors for the VOC and pentachlorophenol. It can be seen that the VOC emission factor is greater than that for creosote VOC. This is because the hydrocarbon based solvent has a greater vapor pressure than does creosote. The emission factor for pentachlorophenol is much lower than that of naphthalene, the principal HAP for creosote treating. This is because pentachlorophenol has a much lower vapor pressure than does naphthalene.

For the Title V permit renewal application, the annual PTE VOC emissions for the pentachlorophenol treating operations are:

$$\begin{array}{rcl} \text{Point Emissions} & = & 23,481 \text{ lb VOC} \\ \text{Fugitive Emissions} & = & \underline{4,030 \text{ lb VOC}} \\ \text{Total Emissions} & = & 27,511 \text{ lb VOC} = 13.76 \text{ tons VOC} \end{array}$$

Using the PTE production capacity and the PTE VOC emission values, the emission factor for the creosote treating operations can be calculated as:

$$EF_{\text{PENTA TREATING}} = \frac{27,511 \text{ lb VOC}}{3,500,000 \text{ ft}^3 \text{ wood treated}} = 7.860 \times 10^{-3} \text{ lb VOC/ft}^3$$

The annual pentachlorophenol PTE emissions for the pentachlorophenol treating operations are:

$$\begin{array}{rcl} \text{Point Emissions} & = & 4.80 \text{ lb Penta} \\ \text{Fugitive Emissions} & = & \underline{0.15 \text{ lb Penta}} \\ \text{Total Emissions} & = & 4.95 \text{ lb Penta} = 2.48 \times 10^{-3} \text{ tons penta} \end{array}$$

Using the PTE production capacity and the PTE VOC emission values, the emission factor for the pentachlorophenol treating operations can be calculated as:

$$EF_{\text{PENTA TREATING}} = \frac{4.95 \text{ lb Penta}}{3,500,000 \text{ ft}^3 \text{ wood treated}} = 1.414 \times 10^{-6} \text{ lb Penta/ft}^3$$

Yard Storage of Pentachlorophenol Treated Products

To compute the emissions of VOC and pentachlorophenol associated with yard storage of pentachlorophenol treated wood products, some changes in the software that is used for creosote treated wood storage are made. As discussed above, the AWPI software for yard storage of creosote treated products is based on field test data for naphthalene emissions on treated wood products. There are no similar data available for pentachlorophenol treated wood products.

The first step in the approach is to compute the emissions as if the products were treated with creosote. The second step is to convert the naphthalene emissions to pentachlorophenol emissions and the creosote VOC emissions to pentachlorophenol treating solution VOC emissions. This is done using the ratio of vapor pressures.

Physical parameters for the pentachlorophenol treated poles are used in the first step. The storage time interval and the physical arrangement of the pentachlorophenol treated poles are also input to the computation. The ambient temperature information for the site is the same for both creosote and pentachlorophenol treated products. The results of the first step of the computation are creosote emissions and creosote VOC emissions.

The second step is to convert the creosote related emissions using the ratio of vapor pressures. The reference temperature for the vapor pressure ratios was taken to be 70°F. For the Grenada plant, the treating solution is 8.5% (w/w) pentachlorophenol in No. 2 fuel oil. The creosote properties used in the calculation are the same as those used in the creosote treating emission computations.

Material	Vapor Pressure at 70°F (psia)
Pentachlorophenol	1.13×10^{-6}
Penta Treating Solution	8.66×10^{-3}
Naphthalene	3.86×10^{-3}
Creosote	1.07×10^{-3}

Using these data, the vapor pressure ratios of interest are:

$$\text{Pentachlorophenol / Naphthalene} = 2.924 \times 10^{-2}$$

$$\text{Pentachlorophenol Treating Solution / Creosote} = 8.082$$

For the Title V renewal permit application, Step 1 of the calculations are:

$$\begin{aligned} \text{Naphthalene} & 9,843 \text{ lb/yr} \\ \text{Creosote VOC} & 16,335 \text{ lb/yr.} \end{aligned}$$

Using the appropriate vapor pressure ratio, Step 2 of the calculations are:

$$\begin{aligned} \text{Pentachlorophenol} & 2.88 \text{ lb/yr} \\ \text{Penta Treating Solution} & 132,022 \text{ lb/yr.} \end{aligned}$$

With the PTE production level at 3,500,000 ft³/yr, the emission factors are:

$$\begin{aligned} \text{EF}_{\text{PENTACHLOROPHENOL}} &= 8.22 \times 10^{-7} \text{ lb/ft}^3 \\ \text{EF}_{\text{PENTA VOC}} &= 3.77 \times 10^{-2} \text{ lb/ft}^3. \end{aligned}$$

Title V Emissions

POTENTIAL-TO-EMIT EMISSION SUMMARY, REV. 1 KOPPERS INC. GRENADA, MS TITLE V PERMIT APPLICATION REVISED SEPTEMBER 2008

Source AA-001 BOILER, WOOD FIRED

	tn/yr	Sulfur	Chlorine	(ton/hr):
Total Wood Burned:	58,399	0.06%		6.67
Removal Efficiency (1):		70.00%		60 mmbtu/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	5.3	lb/ton	AP-42	154.76	35.33
SO2	0.36	lb/tn	Mass Calc.	10.51	2.40
NOX	1.5	lb/tn	AP-42	43.80	10.00
CO	6.6	lb/tn	AP-42	192.72	44.00
VOC	0.18	lb/tn	AP-42	5.26	1.20
Arsenic	8.8E-05	lb/tn	AP-42	2.57E-03	5.87E-04
Cadmium	1.7E-05	lb/tn	AP-42	4.96E-04	1.13E-04
Chromium	1.3E-04	lb/tn	AP-42	3.80E-03	8.67E-04
Lead	3.1E-04	lb/tn	AP-42	9.05E-03	2.07E-03
Manganese	8.9E-03	lb/tn	AP-42	2.60E-01	0.06
Nickel	5.6E-04	lb/tn	AP-42	1.64E-02	3.73E-03
Selenium	1.8E-05	lb/tn	AP-42	5.26E-04	1.20E-04
Mercury	6.5E-06	lb/tn	AP-42	1.90E-04	4.33E-05
Total HAP Metals				0.293	0.067

(1) Removal efficiencies based on Grenada stack test of 2/96.

(2) CO factor based on AP-42

(3) NOx factor of 3.3 based on Grn stack test for treated wood.

Source AA-002 BOILER, NATURAL GAS

Fuel Use Rate(MCF/hr): 10.5

Gas Burned (MCF/yr)	91980	Sulfur Content:	0.000	%	
Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	7.60E-03	lb/MCF	AP-42	0.35	0.08
SO2	6.00E-04	lb/MCF	AP-42	0.03	0.01
NOX	1.00E-01	lb/MCF	AP-42	4.60	1.05
CO	8.40E-02	lb/MCF	AP-42	3.86	0.88
VOC	5.50E-03	lb/MCF	AP-42	0.25	0.06

Number of days boiler assumed to operate is 365

Source AA-003 WOOD PRESERVING PROCESSES

Creosote Ties	5,858,250	C. F.
Creosote Poles	0	C. F.
Total Creosote Wood	5,858,250	C. F.
Oil/Penta Poles	3,500,000	C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr ave)
Creosote (VOC)	1.313E-03	lb/cf	Form R	3.85	0.88
HAPs contained in creosote:					
Naphthalene	7.644E-04	lb/cf	Calculation	2.24	0.51
Quinoline	2.816E-05	lb/cf	Calculation	0.08	0.02
Biphenyl	1.529E-05	lb/cf	Calculation	0.04	0.01
Dibenzofuran	1.297E-06	lb/cf	Calculation	0.00	0.00
TOTAL CREO. HAP				2.37	0.54
Pentachlorophenol (VOC)					
Pentachlorophenol	1.42E-06	lb/cf	Form R	2.48E-03	5.65E-04
#2 Oil (VOC)	7.86E-03	lb/cf	Engr. Est.	13.76	3.14
TOTAL VOC				17.60	4.01

Source AA-008 PRESERVATIVE TREATED WOOD STORAGE FUGITIVES

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr ave)
Creosote Ties					
Creosote (VOC)	2.44E-03	lb/cf	FR Test & Calc	7.16	1.63
Naphthalene	1.47E-03	lb/cf	FR Test & Calc	4.31	0.98
Quinoline	4.28E-05	lb/cf	FR Test & Calc	0.13	0.03
Biphenyl	1.33E-05	lb/cf	FR Test & Calc	0.04	0.01
Dibenzofuran	1.30E-06	lb/cf	FR Test & Calc	0.00	0.00
Creosote Poles					
Creosote (VOC)	2.82E-03	lb/cf	FR Test & Calc	0.00	0.00
Naphthalene	1.70E-03	lb/cf	FR Test & Calc	0.00	0.00
Quinoline	1.14E-06	lb/cf	FR Test & Calc	0.00	0.00
Biphenyl	4.94E-05	lb/cf	FR Test & Calc	0.00	0.00
Dibenzofuran	1.53E-05	lb/cf	FR Test & Calc	0.00	0.00
Penta Poles					
Oil (VOC, est. as creosote)	3.77E-02	lb/cf	FR Test & Calc	66.01	15.05
Pentachlorophenol	8.22E-07	lb/cf	Engr Calc.	1.44E-03	3.28E-04
Fugitive Totals Creosote & PCP					
VOC				73.17	16.68
Naphthalene				4.31	0.98
Quinoline				0.13	0.03
Biphenyl				0.04	0.01
Dibenzofuran				0.00	0.00
Pentachlorophenol				1.44E-03	3.28E-04
HAP Organics (Total)				4.48	1.02

Source AA-004 TIE MILL & LUMBER MILL

Number of Cyclones:	1
Total Hours/Year	8760

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	8.76	2

Title V Emissions

Source AA-009 DRYING KILN

Poles Dried 1600000 C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr-ave)
VOC	0.04	lb/cf	AP-42/Engr. Est.	32.00	7.31

Source AA-010 POLE PEELER (Fugitive)

Annual Throughput = 1,600,000 ft3
Pole Density= 45 lb/ft3
Pole Volume (40-4) 21.2 ft3

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate Material (PM)	0.35	lb/ton	AP-42	6.30
PM-10	0.1925	lb/ton	AP-42, MI, NC	3.47

Source AA-011 WOOD FUEL PREPARATION & HANDLING (Fugitive)

Wood Fuel Processed 58,399 Tn/Yr 15 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	0.25	lb/tn	AP-42/Engr. Est.	7.30	3.75

SMALL COMBUSTION SOURCES, NATURAL GAS FUEL

Source	BTU/Hr	BTU/CF	CF/Hr
AA-005 Boiler House Htr #1	300000	1000	300
AA-005 Boiler House Htr #2	300000	1000	300
AA-015 Standby Boiler Room	100000	1000	100
AA-006 Steam Cleaner	440000	1000	440
TOTAL	1140000		1140
Hours of Operation (hr/yr) =	8760		

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate	0.18	lb/MMCF	AP-42	0.001
PM-10	0.18	lb/MMCF	AP-42	0.001
SO2	0.6	lb/MMCF	AP-42	0.003
NOX	94	lb/MMCF	AP-42	0.469
CO	40	lb/MMCF	AP-42	0.200
VOC	11	lb/MMCF	AP-42	0.055

NOTE: Emissions are total for all 4 sources operating 8760 hrs/yr.

YARD ROADS FUGITIVE PARTICULATES (PM10)

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

k=particle size factor (PM10)=

0.36

s=silt content (%) of road=

10 %

S=mean vehicle speed=

15 mph

W=mean vehicle weight=

15 tons

w=mean no. of wheels=

4 wheels

p=no. wet days/year=

110 days

VMT=Veh. Mi. Traveled=

70200 VMT

6 =No. vehicles driving

15 =Typ. miles/hr driving

2.5 =Typ. hrs driving/day

6 =Typ. d/wk driving

1 =Trtng volume factor

70200 =Ann veh mi. traveled

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)(1)
Particulate (PM10)	1.91	lb/VMT	AP-42	66.96	46

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

TOTAL PLANT EMISSIONS

Pollutant [1]	Estimated Emissions	
	(tn/yr)	(lb/hr)
PM (less fugitives)	163.87	37.41
PM (including fugitives)	244.43	55.80
SO2	10.54	2.41
NOX	48.87	11.16
CO	196.78	44.93
VOC(less fugitive)[2]	55.17	12.59
VOC (including fugitive)[2]	128.33	29.30
HAPs(Organics/VOC)	6.85	1.56
Naphthalene	6.55	1.50
HAP Metals	0.29	0.07
Total HAPs	7.15	1.63

All emissions include fugitives unless otherwise specified.

All particulate matter emissions are assumed to be PM10

[1] Assumes Wellons boiler, standby boiler and misc. combustion sources operating simultaneously for 8760 hours/year

[2] VOC amounts include organic HAPs.



Date. SEPTEMBER 6 2008

609824

56-389
412

Pay To The Order Of: MISSISSIPPI ST DEPT ENVIRONMEN
NO THOUSAND ONE HUNDRED TWENTY ONE AND 48/100 ONLY

Amount
\$2,121.48

MISSISSIPPI ST DEPT ENVIRONMEN
OFFICE POLLUTION CON
PO BOX 2339
JACKSON MS 39225-2339

National City, Ashland, OH

KOPPERS INC.

⑈609824⑈ ⑆041203895⑆ 0198467⑈

KOPPERS INDUSTRIES, INC. PITTSBURGH PA

609824

*****				INV	INV	DISC	NET AMT
*****				MO/DA	AMOUNT		PAYABLE
P	VENDOR	DIV	OUR AUDIT	YOUR INVOICE NBR			
940505023	477	02408080662	AP-0005957	0728	2121.48	0.00	***2121.48

0960-00012

RECEIVED

SEP 22 2008

DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE

Zrenada

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
P.O. BOX 2339
JACKSON, MS 39225

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

KOPPERS, INC.
436 SEVENTH AVENUE

INVOICE #: AP-00005957
DATE: 07-28-2008

PITTSBURGH, PA 15219
KOPPERS INDUSTRIES INC

FINANCIAL:
MONA VARNER - (601) 961-5572
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

CUSTOMER # 0960-00012

Date Due: 09-01-08

ENGINEERING:
ELLIOTT BICKERSTAFF - (601) 961-5176
ELLIOTT.BICKERSTAFF@DEQ.STATE.MS.US

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	FEE PER TON
Carbon Monoxide	40.12	ACT. TONS	0.00
Particulate Matter	27.98	ACT. TONS	36.00
Lead	0	ACT. TONS	36.00
Nitrogen oxides	7.74	ACT. TONS	36.00
Sulfur Dioxide	1.09	ACT. TONS	36.00
VOC	22.07	ACT. TONS	36.00
Other	0	ACT. TONS	36.00
Total reduced sulfur compounds	0	ACT. TONS	36.00
HAP, Total (VOC)	3.97	ACT. TONS	0.00
HAP, Total (NON VOC)	0.05	ACT. TONS	36.00
CFC/HCFC, Total	0	ACT. TONS	0.00
TOTAL AMOUNT DUE			\$2,121.48

As per Section 49-17-30 of the MS Code, a minimum fee of \$250 shall be assessed to and collected from the owner or operator of each facility that is required to hold a Title V permit. Also, the maximum emission rate used for calculation of fees for any pollutant is 4,000 tons, with total fees not to exceed \$250,000 per facility. You were billed for actual or allowable emissions based upon the option which you previously indicated.

As specified in Section 49-17-32 of the MS Code, if any part of the Air Operating Permit fee imposed is not paid within 30 days after the due date, a penalty of 10% of the amount due shall at once accrue. If the fee is not paid in full, including any penalty within 60 days the permit may be revoked.

Full payment can be made by September 1st, however, the law does allow quarterly payments if paid as follows: \$530.37 due by 09-01-2008, \$530.37 due by 12-01-2008, \$530.37 due by 03-01-2009, \$530.37 due by 06-01-2009.

Renewal Application
Title V Operating Permit
No. 0960-00012
Koppers Inc
Tie Plant, MS 38960

Table of Contents

1.0	Introduction
2.0	Changes in Plant Equipment and C
3.0	Exempt and Insignificant Activities
4.0	Alternate Operating Scenario
5.0	Monitoring, Recordkeeping & Reporting
6.0	MSDEQ Application Forms

SENDER COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Article Addressed to:</p> <p>MR HAEELY BIDDY ENVIRONMENTAL SUPERVISOR KOPPERS INC PO BOX 160 TIE PLANT, MS 38960</p>		<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> Agent</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Addressed to</p> <p><i>DOOTHY ALLEN</i> 7-7-08</p>	
<p>2. Article Number: <i>SC EPO 712103 JB</i></p> <p>7004 1350 0001 1490 8401</p> <p>PS Form 3811, February 2004 Domestic Return Receipt Grenada County 102595-02-M-1540</p>		<p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>		<p>AIR TITLE V OPERATING</p>	

Section 1.0 - Introduction

On March 11, 1997, Koppers Inc. was issued the Title V Operating Permit No. 0960-00012 for its wood treating plant at Tie Plant MS. The mostly recently renewed permit was issued on January 13, 2004. Since that time, several changes were made at the facility, some of which will affect air emissions described in this application for renewal, submitted within 180 days of expiration, in conformance with MDSEQ requirements.

During the years that the Title V permit has been in effect, the plant has operated in compliance with the requirements of the permit. In addition, several changes have taken place. Some sources have been retired from service and some new sources have been added. Some equipment originally used for one purpose has been switched to a different type of service. For some equipment, the Reference Numbers have been changed to provide consistency with other site permit and programmatic requirements.

The plant continues to operate using only untreated wood fuel and intends to do so in the future. The plant remains a Major Source for purposes of the Title V Operating permit program.

The basic operations at the plant are unchanged. The plant continues to produce treated wood products such as railroad ties, utility poles and other timber products. During the past 5 years some of these operations have become more streamlined. Others have been replaced for eliminated. Several operations have undergone change in response to KI's pollution prevention efforts.

The remaining sections of this permit application document include all of the changes relevant to the plant. In addition, the various MSDEQ forms required for this renewal application are included.

Section 2.0 Changes in Plant Equipment and Operations

Since the prior Title V Permit was put into effect, there have been several changes in equipment and operations at the plant. Some of these changes have been discussed previously with the MSDEQ, others correspond to exempt and/or insignificant changes. All of these are summarized below.

Section 2.1 Changes in Equipment and/or Reference Numbers

Emission Point	Proposed Description	Proposed Ref. No.	Comments
AA-002	Title V, Ref No. 41, the 28.5 MMBTUH fuel oil fired Murray Boiler	41	Source no longer exists. Replaced with AA-026.
AA-003	Title V, Ref No. 1 36,000 gallon treatment cylinder containing Penta in oil	1	Formerly listed as 34,000 gallon
	Title V, Ref No. 2 29,250 gallon treatment cylinder containing creosote	2	Formerly listed as 27,000 gallon
	Title V, Ref No. 3 28,865 gallon treatment cylinder containing creosote	3	Formerly listed as 27,000 gallon
	Title V, Ref No. 4 28,970 gallon treatment cylinder containing Creosote	4	Formerly listed as 27,000 gallon

	Title V, Ref No. 5 28,760 gallon treatment cylinder containing Penta	5	Formerly listed as 27,000 gallon
	Title V, Ref No. 6, 35,180 gallon #1 Work Tank containing Penta in Oil	6	Formerly listed as 29,286 gallon
	Title V, Ref No. 7, 35,882 gallon #2 Work Tank containing Creosote	7	Formerly listed as 29,786 gallon
	Title V, Ref No. 8, 30,084 gallon #3 Work Tank containing Creosote	8	Formerly listed as 29,786 gallon
	Title V, Ref No. 9, 30,983 gallon #4 Work Tank containing Creosote	9	Formerly listed as 29,786 gallon
	Title V, Ref No. 10, 35,882 gallon #5 Work Tank containing Pentachlorophenol	10	Formerly listed as 29,786 gallon. Formerly stored creosote/water.
	Title V, Ref No. 12 112,248 gallon Surge Tank containing process and storm wastewater	12	Formerly listed as 100,000 gallon. Formerly stormwater only
	Title V, Ref No. 13 112,248 gallon Surge Tank containing process and storm wastewater	13	Formerly listed as 100,000 gallon. Formerly process water only
	Title V, Ref No. 14 112,248 gallon Oil Storage Tank containing Diesel Fuel	14	Formerly listed as 100,000 gallon.
	Title V, Ref No. 15, 105,000 gallon Creosote Storage Tank containing Creosote 60/40	15	Empty – to be removed from service
	Title V Ref No. 16 303,301 gallon Surge Tank containing Process and Storm Wastewater	16	Formerly listed as 300,000 gallon. Formerly process water only
	Title V Ref No. 17 259,875 gallon Surge Tank containing Process and Storm Wastewater	17	Formerly listed as 250,000 gallon. Formerly stormwater only
	Title V Ref No. 18 1,540 gallon Coagulant Tank containing polymer additive	18	Formerly listed as 1500 gallon
	Title V Ref No 19 4,552 gallon Decant tank containing creosote/oil/water	19	Formerly listed as 4500 gallon
	Title V Ref No 20 8,269 gallon Creosote Blowdown tank containing creosote/water	20	Formerly listed as 8000 gallon
	Title V Ref No 22 2994 gallon Process wastewater vacuum vent tank	22	New Tank Not Formerly Listed
	Title V Ref No 23 8269 gallon Penta Blowdown tank containing water/penta/oil	23	Formerly listed as 8000 gallon
	Title V Ref No 26 17,202 gallon Discharge tank containing wastewater	26	Formerly listed as Tank No. 28. Formerly listed as 15,000 gallon.
	Title V Ref No 27 30,582 gallon Clarifier Tank containing wastewater	27	Formerly listed as 25000 gallon

	Title V Ref No 28 169,664 gallon Aeration tank containing wastewater	28	Formerly listed as Tank No. 26. Formerly listed as 150,000 gallon.
	Title V Ref No 30 10415 gallon N. Penta Equalization Tank containing water/oil/penta	30	Formerly listed as 14000 gallon
	Title V Ref No 31 10415 gallon S. Penta Equalization Tank containing water/oil/penta	31	Formerly listed as 14000 gallon
	Title V Ref No 32 9166 gallon Penta Mix Tank containing Oil/Penta	32	Formerly listed as 11,500 gallon
	Title V Ref No 33 5060 gallon Penta Mix Tank containing Oil/Penta	33	Formerly listed as 5000 gallon
	Title V Ref No 34 10513 gallon Penta Concentrate Storage Tank containing Penta Concentrate	34	Formerly listed as 10500 gallon
AA-005	Boiler House Natural Gas Fired Space heater rated at 0.2 MMBTUH	43	Insignificant Activity per APC-S-6.IV, Two space heaters each rated at 0.2 MMBTUH
AA-012	Ref. No. 50, Two Parts Cleaners/Degreasers	NA	Source no longer exists. Replaced with non-VOC parts cleaner.
AA-026	10.5 MMBTUH Natural Gas Fired Backup Boiler	71	New Source. Replaced AA-002

A site layout and a detailed map of the numbered tanks are included for your reference.

Section 2.2 Sensitivity Studies

Historically, the Grenada Title V applications have included production levels for both creosote treated ties and poles. As a result of several production sensitivity studies performed on a similar Koppers plant in 2006 and 2007 for its Title V renewal application, it was demonstrated that the production level which resulted in the highest PTE emissions for the treating and storage of creosote treated products is for "All Tie" production. This production level is determined by assuming that every charge in the cylinders is made with the maximum capacity of air dried ties. This maximizes the throughput of wood and minimizes the time for each charge. This is coupled with the PTE assumption of 100% availability of all creosote treating equipment for the full 8760 hours/year. The yard storage emissions are also highest for the all tie case, largely because for each cubic foot of wood treated, the ties have greater surface area than do poles.

An abbreviated version of the sensitivity studies were carried out for the Grenada plant. For Grenada, the "All Tie" case was evaluated using the full capacity of all 3 cylinders to treat air dried ties. Following treatment, the ties were stacked into yard bundles of 208 ties and stored in the yard for 120 days prior to shipment. For the case of treating both ties and poles, it was assumed that two creosote cylinders were dedicated to tie production and one cylinder was dedicated to pole production. It was assumed that all ties were air dried and all poles were kiln dried prior to treatment. Following treatment, both the ties and poles were stored for 120 days. A summary of the relevant emissions is given in the Table below.

	Units	All Tie Production	Mixed Production
Ties	ft ³	5,858,250	4,380,000
Poles	ft ³	0	492,750
Total	ft ³	5,858,250	4,872,750
Treating Emissions Estimate			
Creo VOC	tons/yr	3.85	3.32
Naphthalene	tons/yr	2.24	1.93
Total HAP	tons/yr	2.37	2.04
Yard Storage Emissions Estimate			
Creo VOC	tons/yr	7.16	5.36
Naphthalene	tons/yr	3.89	3.23
Total HAP	tons/yr	4.48	4.04
Total Treating + Storage Emissions Estimate			
Creo VOC	tons/yr	10.95	8.68
Naphthalene	tons/yr	6.13	5.82
Total HAP	tons/yr	6.85	6.08

The analysis verifies that the "All Tie" production case has higher estimated emissions than does the mixed production case. Also, it is obvious that neither case challenges the Title V thresholds for classification of the facility as a Major Source of HAP emissions.

Due to these results, this permit request is based on the treatment of creosote treated wood; no distinction or limitation between the treatment of railroad ties versus utility poles is required in the permit. In actuality, the plant will produce both ties and poles. The production volume of both products will be tracked for commercial purposes as well as to estimate the actual emissions from each type of product for emission reporting purposes. However, there is no need to specify an assumed mix of tie and pole production for the PTE case in this permit application or in the resulting permit because the "All-Tie" product case provides an umbrella under which all other production combinations fall.

Section 3 Exempt and Insignificant Activities

Exempt and insignificant activities are listed within the MSDEQ Application Forms in Section C and the associated Tank Summary.

Section 4 Alternate Operating Scenario

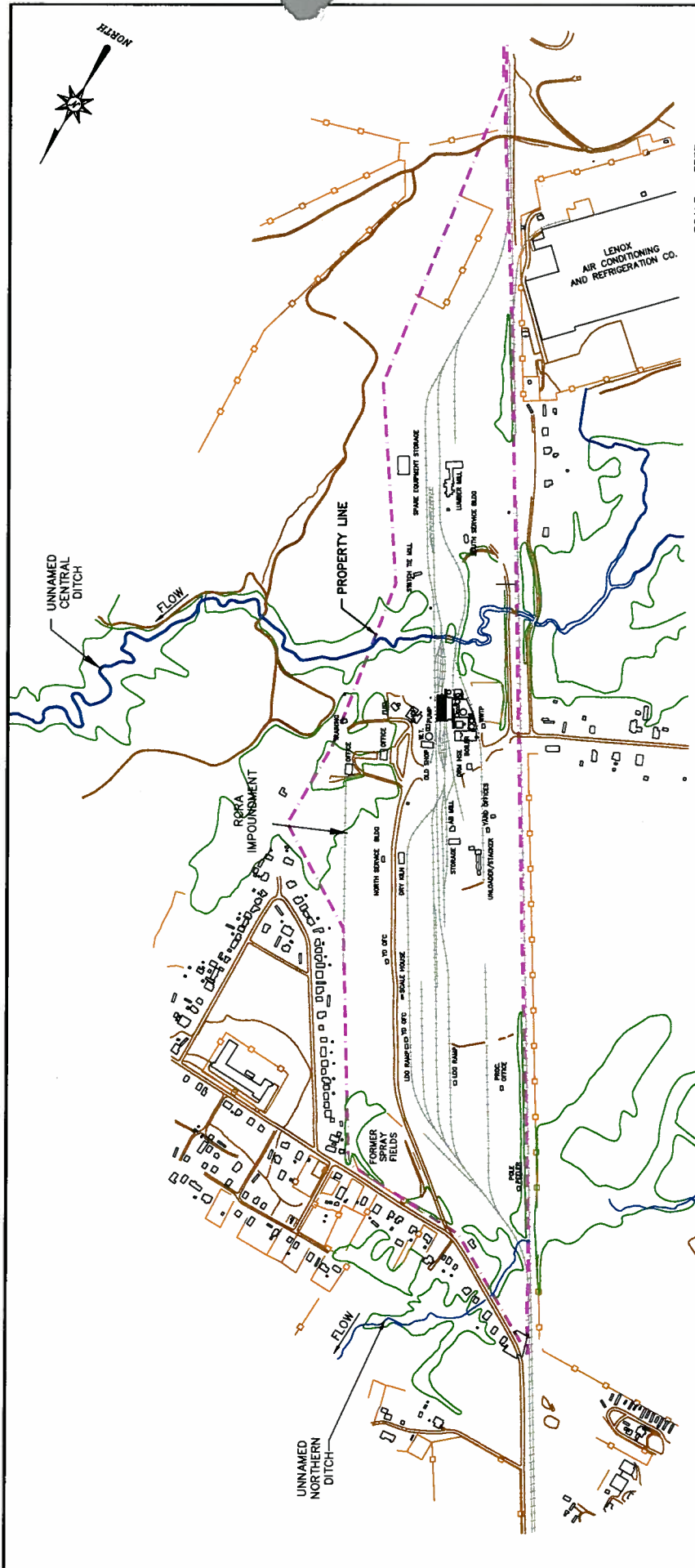
The operation of the Wellons wood-fired boiler, Emission Point AA-001, was originally baselined using a mixture of used, treated wood and untreated wood as fuel. The emissions for the baseline operation were included in the original (1996) permit application. However, this baseline operation was changed in 2001, when Koppers began using only untreated wood fuel. Koppers has continued burning only untreated wood in the wood fired boiler. Therefore the operation of the wood fired boiler represented in this application is based on the use of untreated wood fuel only, and no alternate operating scenario is presented. Note that this operating scenario in no way affects the quantities or mix of treated wood products manufactured at the plant.

Section 5 Monitoring, Recordkeeping & Reporting

Section 5 of the existing Title V Permit contains several monitoring, recordkeeping and reporting (MRKR) requirements. No changes are requested per this permit renewal application.

Section 6 MSDEQ Application Forms

Completed MSDEQ Application Forms are attached.



LEGEND

- ROADWAYS
- APPROXIMATE PROPERTY
- RAIL
- DRAINAGE DITCHES
- STREAM/WATERWAYS
- FENCE

SCALE - FEET
0 600 1200 1800

REVISION DATE DESCRIPTION

FIGURE 2 FACILITY LAYOUT

GRENADA FACILITY
KOPPERS INC.

PREPARED FOR
KOPPERS INC.

PITTSBURGH, PENNSYLVANIA

APPROVED: XDC MM/20/TTTT
CHECKED: XDC MM/20/TTTT
DRAWN: RLB 02/07/2007
PROJECT NO. RL000346R01P
DRAWING NUMBER
06054B002



KU RESOURCES, INC.
22 SOUTH LINDEN STREET
DUQUESNE, PA 15110
(412) 485-4331
FAC (412) 485-0030
www.kuresources.com

SPCC-REGULATED BULK OIL STORAGE CONTAINER AREAS

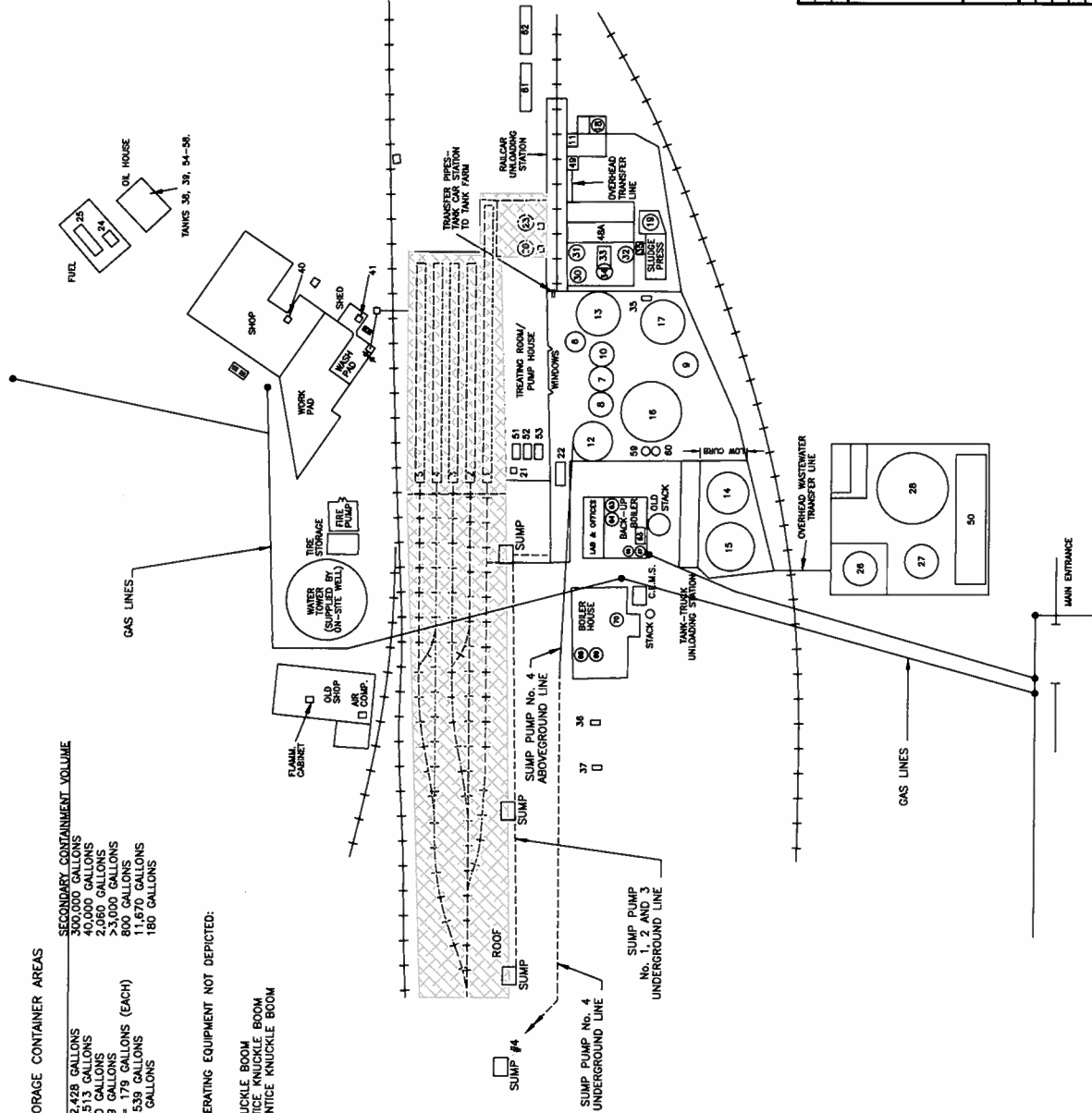
AREA	SECONDARY CONTAINMENT VOLUME
MAIN TANK FARM	35,000 GALLONS
PENTA MIX AREA	112,428 GALLONS
WASH PAD AREA	TANK 14 = 10,513 GALLONS
SHOP	TANK 34 = 280 GALLONS
OIL HOUSE	TANK 41 = 179 GALLONS
WASH PAD AREA	TANKS 38/39 = 179 GALLONS (EACH)
LUMBER MILL	TANK 25 = 10,539 GALLONS
	TANK 43 = 73 GALLONS

HYDRAULIC OIL RESERVOIRS FOR OPERATING EQUIPMENT NOT DEPICTED:

- 42A-42C - SWITCH TIE MILL
- 44A-44B - TIE STACKER
- 45 - TIE SORTER PRENTICE KNUCKLE BOOM
- 46 - A48 MILL IN-FEED PRENTICE KNUCKLE BOOM
- 47 - A48 MILL OUT-FEED PRENTICE KNUCKLE BOOM

OIL STORAGE TANK NOT DEPICTED:

- 43 - LUMBER MILL



LEGEND

- ROOF
- GAS METER

SCALE - FEET



REVISION DATE DESCRIPTION

FIGURE 4
DETAILED FACILITY
AREAS LAYOUT
GRENADA FACILITY
KOPPERS INC.

PREPARED FOR
KOPPERS INC.
PITTSBURGH, PENNSYLVANIA
APPROVED 000 MM/00/0000
CHECKED 000 MM/00/0000
DRAWN 000 MM/00/0000
PROJECT NO. 0000000000
DRAWING NUMBER
06054B004

KU RESOURCES, INC.
2000 LUMBER STREET
SUITE 100
PITTSBURGH, PA 15110
(412) 488-8331
FAX (412) 488-8338
www.kuresources.com

FOR MODIFICATION : MINOR

**STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
AIR DIVISION
P.O. BOX 2261
JACKSON, MS. 39225-2261
PHONE NO.: (601) 961 - 5171**

**APPLICATION FOR TITLE V
AIR POLLUTION CONTROL PERMIT
TO OPERATE AIR EMISSIONS EQUIPMENT**

PERMITTING ACTIVITY:

_____ INITIAL APPLICATION
_____ MODIFICATION
_____X_____ RENEWAL OF OPERATING PERMIT

NAME: _____Koppers Inc_____

CITY: _____Tie Plant_____

COUNTY: _____Grenada_____

FACILITY No. (if known): _____0960-00012_____

**APPLICATION FOR TITLE V PERMIT TO
OPERATE AIR EMISSIONS EQUIPMENT**

CONTENTS

<u>DESCRIPTION</u>	<u>SECTION</u>
Application Requirements.....	A
Owners Information.....	B
Emissions Summary / Facility Summary.....	C
Emission Point Data:	
Fuel Burning Equipment	D
Manufacturing Processes	E
Coating, Solvent Usage and/or Degreasing Operations	F
Printing Operations	G
Tank Summary	H
Solid Waste Incinerators	I
Asphalt Plants	J
Concrete Plants	K
Control Equipment	L
Compliance Demonstration.....	M
Current Emissions Status	N
Compliance Certification	O

Owners Information

Section B

1. Name, Address & Contact for the Owner/Applicant

A. Company Name: Koppers Inc

B. Mailing Address:

1. Street Address or PO Box: 436 Seventh Avenue
2. City: Pittsburgh
3. State: Pennsylvania
4. Zip Code: 15219-1800
5. Telephone No: (412)227-2114

C. Contact:

1. Name: Joyce Fankulewski
2. Title: Environmental Manager

2. Name, Address, Location and Contact for the Facility:

A. Name: Koppers Inc

B. Mailing Address:

1. Street Address or PO Box: PO Box 160
2. City: Tie Plant
3. State: Mississippi
4. Zip Code: 38960
5. Telephone No: (662)226-4584

C. Site Location:

1. Street Address or PO Box: 1 Koppers Drive
2. City: Tie Plant
3. State: Mississippi
4. Zip Code: 38960
5. Telephone No: (662)226-4584

Note: If the facility is located outside of the City limits, please attach a sketch or description to this application showing the approximate location of the site.

D. Contact:

1. Name: Vance Haskin
2. Title: Plant Manager

3. SIC Code(s)(including any associated with alternate operating scenarios) 2491 _____

4. Number of Employees: ____ 60 _____

5. Principal Product(s): Utility Poles and Railroad Ties _____

6. Principal Raw Materials: Wood poles, crossties, lumber, creosote, pentachlorophenol, diesel fuel

7. Principal Process(es): Wood preserving _____

8. Maximum amount of principal product produced or raw material consumed per day: ____ 26,000 cubic feet

9. Facility Operating Schedule (Optional):

A. Specify maximum hours per day the operation will occur: 24 hours _____

B. Specify maximum days per week the operation will occur: 7 days _____

C. Specify maximum weeks per year the operation will occur: 52 weeks _____

D. Specify the months the operation will occur: ____ All _____

10. Is this facility a small business as defined by the Small Business Act? (Optional) No

11. EACH APPLICATION MUST BE SIGNED BY THE APPLICANT.

The application must be signed by a responsible official as defined in Regulation APC-S-6, Section I.A.26.

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

Printed Name of Responsible Official Vance Haskin

Title: Plant Manager

Date Application Signed 06-27-08

Signature of Applicants Responsible Official Vance R Haskin

SECTION C

EMISSIONS SUMMARY for the ENTIRE FACILITY

List below the total emissions for each pollutant from the entire facility in accordance with Operating Permit Application Requirements, pp. 3-5. For stack emissions, use the maximum annual allowable (potential) emissions. For fugitive emissions, use the annual emissions calculated using the maximum operating conditions.

POLLUTANT Footnote 1	ANNUAL EMISSION RATE	
	lb/hr	tons/yr
Particulate (Less Fugitive)		163.87
SO ₂		10.54
NO _x		48.87
CO		196.78
VOC (Less Fugitive)		55.17
VOC (Including Fugitive)		128.33
HAPs (Organics/VOC)		6.85
Naphthalene		6.55
HAP Metals		0.29
HCL		0.00
Total HAPS		7.14
See PTE Tables on the Attached Pages		

1. All regulated air pollutants, including hazardous air pollutants emitted from the entire facility should be listed. A list of regulated air pollutants has been provided in Section A.

With the exception of the emissions resulting from insignificant activities and emissions as defined in Regulation APC-S6, Section VII, the pollutants listed above are all regulated air pollutants reasonably expected to be emitted from the facility.



SIGNATURE (must match signature on page 17)

Title V Emissions

POTENTIAL-TO-EMIT EMISSION SUMMARY KOPPERS INC. GRENADA, MS TITLE V PERMIT APPLICATION JUNE 2008

Source AA-001 BOILER, WOOD FIRED

	tn/yr	Sulfur	Chlorine	(ton/hr):
Total Wood Burned:	58,399	0.06%		6.67
Removal Efficiency (1):		70.00%		60 mmbtu/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	5.3	lb/ton	AP-42	154.76	35.33
SO2	0.36	lb/tn	Mass Calc.	10.51	2.40
NOX	1.5	lb/tn	AP-42	43.80	10.00
CO	6.6	lb/tn	AP-42	192.72	44.00
VOC	0.18	lb/tn	AP-42	5.26	1.20
Arsenic	8.8E-05	lb/tn	AP-42	2.57E-03	5.87E-04
Cadmium	1.7E-05	lb/tn	AP-42	4.96E-04	1.13E-04
Chromium	1.3E-04	lb/tn	AP-42	3.80E-03	8.67E-04
Lead	3.1E-04	lb/tn	AP-42	9.05E-03	2.07E-03
Manganese	8.9E-03	lb/tn	AP-42	2.60E-01	0.06
Nickel	5.6E-04	lb/tn	AP-42	1.64E-02	3.73E-03
Selenium	1.8E-05	lb/tn	AP-42	5.26E-04	1.20E-04
Mercury	6.5E-06	lb/tn	AP-42	1.90E-04	4.33E-05
Total HAP Metals				0.293	0.067

- (1) Removal efficiencies based on Grenada stack test of 2/96.
(2) CO factor based on AP-42
(3) NOx factor of 3.3 based on Grn stack test for treated wood.

Source AA-026 BOILER, NATURAL GAS

Source AA-026 BOILER, NATURAL GAS				Fuel Use Rate(MCF/hr):	10.5
Gas Burned (MCF/yr)	91980	Sulfur Content:		0.000	%
Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	7.60E-03	lb/MCF	AP-42	0.35	0.08
SO2	6.00E-04	lb/MCF	AP-42	0.03	0.01
NOX	1.00E-01	lb/MCF	AP-42	4.60	1.05
CO	8.40E-02	lb/MCF	AP-42	3.86	0.88
VOC	5.50E-03	lb/MCF	AP-42	0.25	0.06
Number of days boiler assumed to operate is		365			

Title V Emissions

Source AA-003 WOOD PRESERVING PROCESSES

Creosote Ties	5,858,250	C. F.
Creosote Poles	0	C. F.
Total Creosote Wood	5,858,250	C. F.
Oil/Penta Poles	3,500,000	C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr ave)
Creosote (VOC)	1.313E-03	lb/cf	Form R	3.85	0.88
HAPs contained in creosote:					
Naphthalene	7.644E-04	lb/cf	Calculation	2.24	0.51
Quinoline	2.816E-05	lb/cf	Calculation	0.08	0.02
Biphenyl	1.529E-05	lb/cf	Calculation	0.04	0.01
Dibenzofuran	1.297E-06	lb/cf	Calculation	0.00	0.00
TOTAL CREO. HAP				2.37	0.54
Pentachlorophenol (VOC)					
Pentachlorophenol	1.42E-06	lb/cf	Form R	2.48E-03	5.65E-04
#2 Oil (VOC)	7.86E-03	lb/cf	Engr. Est.	13.76	3.14
TOTAL VOC				17.60	4.01

Source AA-008 PRESERVATIVE TREATED WOOD STORAGE FUGITIVES

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr ave)
Creosote Ties					
Creosote (VOC)	2.44E-03	lb/cf	FR Test & Calc	7.16	1.63
Naphthalene	1.47E-03	lb/cf	FR Test & Calc	4.31	0.98
Quinoline	4.28E-05	lb/cf	FR Test & Calc	0.13	0.03
Biphenyl	1.33E-05	lb/cf	FR Test & Calc	0.04	0.01
Dibenzofuran	2.08E-13	lb/cf	FR Test & Calc	0.00	0.00
Creosote Poles					
Creosote (VOC)	3.01E-03	lb/cf	FR Test & Calc	0.00	0.00
Naphthalene	1.43E+04	lb/cf	FR Test & Calc	0.00	0.00
Quinoline	0.00E+00	lb/cf	FR Test & Calc	0.00	0.00
Biphenyl	4.96E+02	lb/cf	FR Test & Calc	0.00	0.00
Dibenzofuran	1.05E+04	lb/cf	FR Test & Calc	0.00	0.00
Penta Poles					
Oil (VOC, est. as creo)	3.77E-02	lb/cf	FR Test & Calc	66.01	15.05
Pentachlorophenol	8.22E-07	lb/cf	Engr Calc.	1.44E-03	3.28E-04
Fugitive Totals Creosote & PCP					
VOC				73.17	16.68
Naphthalene				4.31	0.98
Quinoline				0.13	0.03
Biphenyl				0.04	0.01
Dibenzofuran				0.00	0.00
Pentachlorophenol				1.44E-03	3.28E-04
HAP Organics (Total)				4.48	1.02

Source AA-004 TIE MILL & LUMBER MILL

Number of Cyclones:	1
Total Hours/Year	8760

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
Particulate	2	lb/hr	AP-42	8.76	2

Title V Emissions

Source AA-009 DRYING KILN

Poles Dried

1600000 C. F.

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr-ave)
VOC	0.04	lb/cf	AP-42/Engr. Est.	32.00	7.31

Source AA-010 POLE PEELER (Fugitive)

Annual Throughput = 1,600,000 ft3
Pole Density= 45 lb/ft3
Pole Volume (40-4) 21.2 ft3

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate Material (PM)	0.35	lb/ton	AP-42	6.30
PM-10	0.1925	lb/ton	AP-42, MI, NC	3.47

Source AA-011 WOOD FUEL PREPARATION & HANDLING (Fugitive)

Wood Fuel Processed 58,399 Tn/Yr 15 tn/hr

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)
PM	0.25	lb/tn	AP-42/Engr. Est.	7.30	3.75

SMALL COMBUSTION SOURCES, NATURAL GAS FUEL

Source	BTU/Hr	BTU/CF	CF/Hr
AA-005 Boiler House Htr #1	300000	1000	300
AA-005 Boiler House Htr #2	300000	1000	300
AA-015 Standby Boiler Room	100000	1000	100
AA-006 Steam Cleaner	440000	1000	440
TOTAL	1140000		1140
Hours of Operation (hr/yr) =	8760		

Pollutant	Emission Factor	Units	Basis	Emissions (tpy)
Particulate	0.18	lb/MMCF	AP-42	0.001
PM-10	0.18	lb/MMCF	AP-42	0.001
SO2	0.6	lb/MMCF	AP-42	0.003
NOX	94	lb/MMCF	AP-42	0.469
CO	40	lb/MMCF	AP-42	0.200
VOC	11	lb/MMCF	AP-42	0.055

NOTE: Emissions are total for all 4 sources operating 8760 hrs/yr.

YARD ROADS FUGITIVE PARTICULATES (PM10)

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

k=particle size factor (PM10)=

0.36

s=silt content (%) of road=

10 %

S=mean vehicle speed=

15 mph

W=mean vehicle weight=

15 tons

w=mean no. of wheels=

4 wheels

p=no. wet days/year=

110 days

VMT=Veh. Mi. Traveled=

70200 VMT

6 =No. vehicles driving

15 =Typ. miles/hr driving

2.5 =Typ. hrs driving/day

6 =Typ. d/wk driving

1 =Trtnng volume factor

70200 =Ann veh mi. traveled

Pollutant	Emission Factor	Units	Basis	Estimated (tn/yr)	Emissions (lb/hr)(1)
Particulate (PM10)	1.91	lb/VMT	AP-42	66.96	46

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

Title V Emissions

TOTAL PLANT EMISSIONS

Pollutant [1]		Estimated Emissions	
		(tn/yr)	(lb/hr)
PM (less fugitives)	.	163.87	37.41
PM (including fugitives)	.	251.73	57.47
SO2	.	10.54	2.41
NOX	.	48.87	11.16
CO	.	196.78	44.93
VOC(less fugitive)[2]	.	55.17	12.59
VOC (including fugitive)[2]	.	128.33	29.30
HAPs(Organics/VOC)	.	6.85	1.56
Naphthalene	.	6.55	1.50
HAP Metals	.	0.29	0.07
Total HAPs	.	7.14	1.63

All emissions include fugitives unless otherwise specified.

All particulate matter emissions are assumed to be PM10

[1] Assumes Wellons boiler, standby boiler and misc. combustion sources operating simultaneously for 8760 hours/year

[2] VOC amounts include organic HAPs.

SECTION C

For the sections listed below indicate the number that have been completed for each section as part of this application.

Section B __1__	Section L1 __0__	Section M1 __1__
Section C __1__	Section L2 __2__	Section M2 __0__
Section D __5__	Section L3 __0__	Section M3 __5__
Section E __6__	Section L4 __0__	Section M4 __0__
Section F __0__	Section L5 __0__	Section M5 __1__
Section G __0__	Section L6 __0__	Section M6 __4__
Section H __1__	Section L7 __0__	Section M7 __0__
Section I __0__		Section M8 __0__
Section J __0__		Section N __1__
Section K __0__		Section O __1__

As a minimum, sections B, C, M, N and O must be completed for the application to be considered complete.

Please list below all insignificant activities required by APC-S-6, Section VII.B that apply to your facility.

AA-005	Natural Gas Fired Space Heaters (2)	APC-S-6.VI.B.2.a
AA-006	Natural Gas Fired Steam Cleaner	APC-S-6.VI.B.2.a
AA-013	Tank No 24, 1,050 Gallon Gasoline Storage Tank	APC-S-6.VI.B.7
AA-014	Tank No. 25, 10,539 Gallon Diesel Fuel Tank	APC-S-6.VI.B.7
AA-015	Standby Boiler Room Natural Gas Fired Space Heater	APC-S-6.VI.B.2.a

Please see the Attached Tank List. Tanks No. 11, 35-70 represent insignificant activities. Required details of each tank are included in the list.

SECTION C

RISK MANAGEMENT PLANS

If the source is required to develop and register a risk management plan pursuant to Section 112(r) of the Title III of the Clean Air Act, the permittee need only specify that it will comply with the requirement to register such a plan. The content of the risk management plan need not itself be incorporated as a permit term.

Please answer the following questions:

- I. Are you required to develop and register a risk management plan pursuant to Section 112(r)?

Yes

No

Only if "yes", answer questions II., III., and/or IV.

- II. Have you submitted the risk management plan to the appropriate agency (i.e. Mississippi Emergency Management Agency (MEMA), Federal Emergency Management Agency (FEMA), etc.)?

Yes

No

- III. If yes, give agency name and date submitted.

- IV. If no, provide a schedule for developing and submitting the risk management plan to the appropriate agency and providing our agency with certification that this submittal was made.

FUEL BURNING EQUIPMENT (page 1 of 2)**SECTION D**

- 1 Emission Point No. / Name: AA-001 Ref. No. 40 Wood Fired Boiler
2 Equipment Description: Wellons 2 Cell Combustion System, Boiler, and Cogeneration Power Unit
3 Was this unit constructed or modified after August 7, 1977? Yes No

If yes please give date and explain.

4. Capacity: 60.0 MMBTU/hr 5. Type of burner: Fuel Cell
6. Usage Type (i.e. Space Heat, Process, etc.): Process
7. Complete the following table, identifying each type of fuel and the amount used. Specify the units for heat content, hourly usage, and yearly usage.
8. Please list any fuel components that are hazardous air pollutants and the percentage in the fuel.
9. Operating Schedule: 24 hours/day 7 days/week
52 weeks/year
(Optional) _____

FUEL TYPE	HEAT CONTENT	% SULFUR	% ASH	MAXIMUM HOURLY USAGE	ACTUAL YEARLY USAGE
Untreated Wood and Bark Residue	4000 BTU/LB	0.01	0.5	8760 hrs/yr	

10. Stack Data:
A. Height: 80 ft C. Exit gas velocity: 70 ft/sec
B. Inside diameter: 3 ft D. Exit gas temperature: 471 F
11. UTM Coordinates:
A. Zone B. North C. East

FUEL BURNING EQUIPMENT (page 2 of 2)

SECTION D

12. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-001	Particulate	Yes					0.3 GR/DSCF	35.33	154.76
	SO2	No						2.40	10.51
	NOX	No						10.00	43.80
	CO	No						44.00	192.72
	VOC	No						1.20	5.26
	HCL	No						0.00	0.00
	Total HAP Metals	No						0.07	0.29

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed. A list of regulated air pollutants has been provided in Section A.

Provide emission rate in units of applicable emission standard, e.g. lb/MMbtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

FUEL BURNING EQUIPMENT (page 1 of 2)**SECTION D**

1. Emission Point No. / Name: AA-026, Ref No. 71 Natural Gas Fired Boiler
2. Equipment Description: Backup Service Boiler
3. Was this unit constructed or modified after August 7, 1977? Yes
If yes please give date and explain. Installed in 2004 as a replacement to the #2 Fuel Oil Boiler

4. Capacity: 10.5 MMBTU/hr 5. Type of burner: Natural Gas
6. Usage Type (i.e. Space Heat, Process, etc.) : Process
7. Complete the following table, identifying each type of fuel and the amount used. Specify the units for heat content, hourly usage, and yearly usage.

FUEL TYPE	HEAT CONTENT	% SULFUR	% ASH	MAXIMUM HOURLY USAGE	ACTUAL YEARLY USAGE
Natural Gas	1000 BTU/CF	0	0	8760 hrs/yr	

8. Please list any fuel components that are hazardous air pollutants and the percentage in the fuel.
None

9. Operating Schedule: (Optional)
24 hours/day 7 days/week
52 weeks/year

10. Stack Data:
A. Height:
C. Exit gas velocity:
B. Inside diameter:
D. Exit gas temperature:

11. UTM Coordinates:
A. Zone
B. North
C. East

FUEL BURNING EQUIPMENT (page 2 of 2) SECTION D

2. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-026 (See Note Below)	Particulate	No						0.08	0.35
	SO2	No						0.01	0.03
	NOX	No						1.05	4.60
	CO	No						0.88	3.86
	VOC	No						0.06	0.25

NOTE: THIS BOILER WILL NOT OPERATE AT THE SAME TIME AS SOURCE AA-001 (WOOD FIRED BOILER). THIS BOILER IS FOR BACKUP SERVICE ONLY.

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed. A list of regulated air pollutants has been provided in Section A.

Provide emission rate in units of applicable emission standard, e.g. lb/MMBtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

FUEL BURNING EQUIPMENT (page 1 of 2)**SECTION D**

1. Emission Point No. / Name: **AA-005, Ref. No 43, Natural Gas Fired Space Heaters (2)**

2. Equipment Description: **Space Heaters Used in Plant Buildings**

3. Was this unit constructed or modified after August 7, 1977? **No**

If yes please give date and explain.

4. Capacity: **0.20** MMBTU/hr 5. Type of burner: **Natural Gas**

6. Usage Type (i.e. Space Heat, Process, etc.): **Space Heat**

8. Complete the following table, identifying each type of fuel and the amount used. Specify the units for heat content, hourly usage, and yearly usage.

FUEL TYPE	HEAT CONTENT	% SULFUR	% ASH	MAXIMUM HOURLY USAGE	ACTUAL YEARLY USAGE
Natural Gas	1000 BTU/CF			8760 hrs/yr	

8. Please list any fuel components that are hazardous air pollutants and the percentage in the fuel.
None

9. Operating Schedule: (Optional)

24 hours/day **7** days/week
52 weeks/year

10. Stack Data:

A. Height: **NA**

C. Exit gas velocity: **NA**

B. Inside diameter: **NA**

D. Exit gas temperature: **NA**

11. UTM Coordinates:

A. Zone

B. North

C. East

FUEL BURNING EQUIPMENT (page 2 of 2) SECTION D

12. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-005	Particulate	No							See Emissions Table
	SO2	No							
	NOX	No							
	CO	No							
	VOC	No							

1. All regulated air pollutants including hazardous air pollutants emitted from this source should be listed. A list of regulated air pollutants has been provided in Section A.
2. Provide emission rate in units of applicable emission standard, e.g. lb/MMBtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

* If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

FUEL BURNING EQUIPMENT (page 1 of 2)**SECTION D**

1. Emission Point No. / Name: AA-006, Natural Fired Steam Cleaner
2. Equipment Description: Water Heater for Steam Cleaner Used for Equipment Cleaning
3. Was this unit constructed or modified after August 7, 1977? Yes
If yes please give date and explain. 1992

4. Capacity: 0.44 MMBTU/hr 5. Type of burner: Natural Gas
6. Usage Type (i.e. Space Heat, Process, etc.): Process
3. Complete the following table, identifying each type of fuel and the amount used. Specify the units for heat content, hourly usage, and yearly usage.

FUEL TYPE	HEAT CONTENT	% SULFUR	% ASH	MAXIMUM HOURLY USAGE	ACTUAL YEARLY USAGE
Natural Gas	1000 BTU/CF	0.0	0.0	8760 hrs/yr	

8. Please list any fuel components that are hazardous air pollutants and the percentage in the fuel.
None

9. Operating Schedule: (Optional)
24 hours/day 7 days/week
52 weeks/year

10. Stack Data:
A. Height: NA
C. Exit gas velocity: NA
B. Inside diameter: NA
D. Exit gas temperature: NA

11. UTM Coordinates:
A. Zone
B. North
C. East

FUEL BURNING EQUIPMENT (page 2 of 2) SECTION D

2. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-006	Particulate	No							See Emissions Table
	SO2	No							
	NOX	No							
	CO	No							
	VOC	No							

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed. A list of regulated air pollutants as been provided in Section A.

Provide emission rate in units of applicable emission standard, e.g. lb/MMbtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

FUEL BURNING EQUIPMENT (page 1 of 2)**SECTION D**

1. Emission Point No. / Name: AA-015 Boiler Room Natural Gas Fired Space Heater
2. Equipment Description: Space Heater Used in Plant Building
3. Was this unit constructed or modified after August 7, 1977? No
- If yes please give date and explain.

4. Capacity: 0.1 MMBTU/hr 5. Type of burner: Natural Gas
6. Usage Type (i.e. Space Heat, Process, etc.): Space Heat
7. Complete the following table, identifying each type of fuel and the amount used. Specify the units for heat content, hourly usage, and yearly usage.

FUEL TYPE	HEAT CONTENT	% SULFUR	% ASH	MAXIMUM HOURLY USAGE	ACTUAL YEARLY USAGE
Natural Gas	1000 BTU/CF	0.0	0.0	8760 hrs/yr	

8. Please list any fuel components that are hazardous air pollutants and the percentage in the fuel.
None

9. Operating Schedule: (Optional)
24 hours/day 7 days/week
52 weeks/year

10. Stack Data:
- A. Height: NA
 - C. Exit gas velocity: NA
 - B. Inside diameter: NA
 - D. Exit gas temperature: NA

11. UTM Coordinates:
- A. Zone
 - B. North
 - C. East

FUEL BURNING EQUIPMENT (page 2 of 2) SECTION D

2. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application requirements, pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-015	Particulate	No							See Emissions Table
	SO2	No							
	NOX	No							
	CO	No							
	VOC	No							

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed. A list of regulated air pollutants as been provided in Section A.

Provide emission rate in units of applicable emission standard, e.g. lb/MMbtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./ Name: **AA-003, Ref. No 9, Wood Preserving Process**

2. Process Description: Pressure treatment of utility poles with pentachlorophenol or creosote and railroad ties with creosote.

3. Was this unit constructed or modified after August 7, 1977? _____ yes ____X____ no If yes please give date and explain.

4. Capacity (tons/hr): 9,400,000 CF Wood Products Per Year

5. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Wood		1068 CF	Up to 9,400,000 CF

6. Product Output:

PRODUCT or BY- PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Treated Wood		1068 CF	Up to 9,400,000 CF

7. Stack Data:

A. Height NA
B. Inside Diameter NA

C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates:

A. Zone

B. North

C. East

13. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirement pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-003	VOC	No						4.01	17.60
	Naphthalene	No						0.51	2.24
	Quinoline	No						0.02	0.08
	Biphenyl	No						0.01	0.04
	Dibenzofuran	No						0.00	0.00
	Pentachlorophenol	No						0.0006	0.002

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed in accordance with Operating Permit Application Requirements, pp. 3-5. A list of regulated air pollutants has been provided in Section A.

Provide emission rate in units of applicable emission standard, e.g. lb/MMbtu, gr/dscf, etc. This may not apply to every emission point or very pollutant from an emission point.

* If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./ Name: **AA-004, Ref. No 42, Tie Mill/Lumber Mill/Switch Tie Mill**
2. Process Description: **Untreated wood milling and cutting**
3. Was this unit constructed or modified after August 7, 1977? _____ yes ____ **X** ____ no If yes please give date and explain.
4. Capacity (tons/hr):
5. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Rough cut wood products			2,000,000 cf

6. Product Output:

PRODUCT or BY- PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Trimmed and shaped untreated wood products			2,000,000 cf

7. Stack Data:

A. Height NA
B. Inside Diameter NA

C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates: A. Zone B. North C. East

13. POLLUTANT EMISSIONS:

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirement pp. 3-5.

EMISSION POINT NO.	POLLUTANT (note 1)	CONTROL EQUIPMENT		ACTUAL EMISSION RATE (in accordance with Operating Permit Application Requirements, pp. 3-5)			PROPOSED ALLOWABLE EMISSION RATE (Optional)		
		yes/no *	effic.	note 2	lb/hr	tn/yr	note 2	lb/hr	tn/yr
AA-004	Particulate	Yes							8.76

All regulated air pollutants including hazardous air pollutants emitted from this source should be listed in accordance with Operating Permit Application Requirements, pp. 3-5. A list of regulated air pollutants has been provided in Section A.

Provide emission rate in units of applicable emission standard, e.g. lb/MMbtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.

* If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

(page 1 of 2) SECTION E

1. Emission Point No./ Name: **AA-008, Ref. No 46, Treated Wood Storage**

2. Process Description: **Storage and Handling of Treated Wood Products Following Treatment and Prior to Shipment**

3. Was this unit constructed or modified after August 7, 1977? _____ yes ____X____ no If yes please give date and explain.

4. Capacity (tons/hr): **NA**

5. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR

6. Product Output:

PRODUCT or BY- PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Treated Poles			Up to 3,500,000 cf
Treated Ties			Up to 5,858,250 cf
Total Treated Wood			Up to 9,400,000 cf

7. Stack Data:

A. Height NA
B. Inside Diameter NA

C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates:

A. Zone
B. North
C. East

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

[illegible]

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./ Name: **AA-009, Ref No 47, Pole Kiln**

2. Process Description: **Dry Wood Poles Prior to Treatment**

3. Was this unit constructed or modified after August 7, 1977? _____ yes ____X____ no If yes please give date and explain.

4. Capacity (tons/hr): **13,000 cf Per Batch**

5. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Green Wood Poles			1,600,000 CF

6. Product Output:

PRODUCT or BY- PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Dry Wood Poles			1,600,000 CF

7. Stack Data:

A. Height NA
B. Inside Diameter NA

C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates:

A. Zone
B. North
C. East

SECTION E

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./ Name: **AA-010, Ref. No 48, Pole Peeler**

2. Process Description: **Remove Bark and Cambium Layer from Pine Logs to Produce White Poles**

3. Was this unit constructed or modified after August 7, 1977? _____ yes ____X____ no If yes please give date and explain.

4. Capacity (tons/hr): 9.9

5. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Barked Logs			1,600,000 CF

5. Product Output:

PRODUCT or BY- PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
White Poles, Barked and Wood Chips			1,600,000 CF

7. Stack Data:

A. Height NA
B. Inside Diameter NA

C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates:

A. Zone
B. North
C. East

SECTION E

Example emission rate calculations, monitoring data, or stack test data must be attached in accordance with Operating Permit Application Requirements, pp. 3-5.

1. All regulated air pollutants including hazardous air pollutants emitted from this source should be listed in accordance with Operating Permit Application Requirements, pp. 3-5. A list of regulated air pollutants has been provided in Section A.
 2. Provide emission rate in units of applicable emission standard, e.g. lb/MMbtu, gr/dscf, etc. This may not apply to every emission point or every pollutant from an emission point.
- * If yes, attach appropriate Air Pollution Control Data Sheet from Section L or manufacturers specifications if other.

MANUFACTURING PROCESSES (page 1 of 2) SECTION E

1. Emission Point No./ Name: **AA-011, Ref. No 49, Wood Fuel Preparation and Handling**

2. Process Description: **Preparation of Wood Fuel for Boiler, Including Grinding, Handling, and Loading into Silo on Conveyors**

3. Was this unit constructed or modified after August 7, 1977? _____ yes ____X____ no If yes please give date and explain.

4. Capacity (tons/hr): **12**

4. Raw Material Input:

MATERIAL	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Wood Residue	8 Tons	12 Tons	58,403 Tons

5. Product Output:

PRODUCT or BY- PRODUCT	QUANTITY/HR AVERAGE	QUANTITY/HR MAXIMUM	QUANTITY/YEAR
Wood Chips and Sawdust	8 Tons	12 Tons	58403 Tons

7. Stack Data:

A. Height NA
B. Inside Diameter NA

C. Exit Gas Velocity NA
D. Exit Gas Temperature NA

8. UTM Coordinates:

A. Zone
B. North
C. East

TANK SUMMARY (page 1 of 2) SECTION H

1. Emission Point No./Name: **All Related Tank Data Included in Tank Summary Data Spreadsheet Attached**

2. Was this tank constructed or modified after August 7, 1977? _____ yes _____ no
 If yes please give date and explain. _____

3. Product Stored: If more than one product is stored, provide the information in 4.A-E for each product.

4. Tank Data:

A. True Vapor Pressure at storage temperature:	psi/F
B. Reid Vapor Pressure at storage temperature:	psi/F
C. Density of product at storage temperature:	lb/gal
D. Molecular Weight of product vapor at storage temperature:	lb/lbmol
E. Throughput for most recent calendar year:	gal/yr
F. Tank Capacity:	gal
G. Tank Diameter:	feet
H. Tank Height / Length:	feet
I. Average Vapor Space Height:	feet
J. Tank Orientation:	Vertical or Horizontal
K. Type of Roof:	Dome or Cone

L. Is the Tank Equipped with a Vapor Recovery System? Yes No
 If yes, describe on separate sheet of paper and attach. Indicate efficiency

M. Check the Type of Tank:

Fixed Roof	External Floating Roof	
Pressure	Internal Floating Roof	
Variable Vapor Space		
Other, describe:		

N. Check the Closest City:

Jackson, MS	Birmingham, AL
Memphis, TN	Montgomery, AL
New Orleans, LA	Baton Rouge, LA

O. Check the Tank Paint Color:

Aluminum Specular	Gray Light
Aluminum Diffuse	Gray Medium
Red	White
Other: Describe	

P. Tank Paint Condition: Good or Poor

Q. Check Type of Tank Loading

1. Trucks and Rail Cars
 - Submerged Loading of clean cargo tank
 - Submerged Loading : Dedicated Normal Service
 - Submerged Loading : Dedicated Vapor Balance Service
 - Splash Loading of clean cargo tank
 - Splash Loading : Dedicated Normal Service
 - Splash Loading : Dedicated Vapor Balance Service
2. Marine Vessels
 - Submerged Loading: Ships
 - Submerged Loading: Barges

TANK SUMMARY (page 2 of 2) SECTION H

1

R. For External Floating Roof Tanks

1. Check the Type of Tank Seal:

Mechanical Shoe

Primary Seal Only

With Shoe-Mounted Secondary Seal

With Rim-Mounted Secondary Seal

Liquid Mounted Resilient Seal

Primary Seal Only

With Shoe-Mounted Secondary Seal

With Rim-Mounted Secondary Seal

Vapor Mounted Resilient Seal

Primary Seal Only

With Shoe-Mounted Secondary Seal

With Rim-Mounted Secondary Seal

2. Type of External Floating Roof:

Pontoon

Double-Deck

S. For Internal Floating Roof Tanks

1. Check the Type of Tank Seal:

Liquid Mounted Resilient Seal

Primary Seal Only

With Rim-Mounted Secondary Seal

Vapor Mounted Resilient Seal

Primary Seal Only

With Rim-Mounted Secondary Seal

2. Number of Roof Columns:

3. Length of Deck Seam

4. Area of Deck:

5. Effective Column Diameter:

6. Check the Type of Tank:

Bolted with Column Supported Roof

Welded with Column Supported Roof

Bolted with Self-Supported Roof

Welded with Self-Supported Roof

5. Emissions Summary

1. Breathing Loss:

lb/hr

TPY

2. Working Loss:

lb/hr

TPY

3. Total Emissions:

lb/hr

TPY

6. UTM Coordinates:

A. Zone

B. North

C. East

TANK VOLUME CALCULATIONS - GRENADA PLANT										CONTENTS
Tank No.	Orientation (Horizontal / Vehicle)	Length (ft.)	Width (ft.)	Height (ft.)	Diameter (ft.)	Circumfrance (ft.)	Volume (cbf)	Volume (gal)	Tank No.	
1	Horizontal	170.000	-	-	6.000	-	4,815.000	36,016.20	1	
2	Horizontal	137.000	-	-	6.000	-	3,967.000	29,250.17	2	
3	Horizontal	135.000	-	-	6.000	-	3,859.000	28,865.32	3	
4	Horizontal	135.000	-	-	6.000	-	3,873.000	28,970.04	4	
5	Horizontal	135.000	-	-	6.000	-	3,845.000	28,760.60	5	
6	Vehicle	-	-	31.667	13.667	-	4,703.600	35,182.93	6	
7	Vehicle	-	-	30.583	13.667	-	4,797.100	35,862.31	7	
8	Vehicle	-	-	31.917	12.667	-	4,021.917	30,063.94	8	
9	Vehicle	-	-	30.000	13.000	-	4,142.150	30,983.28	9	
10	Vehicle	-	-	30.583	13.667	-	4,797.100	35,862.31	10	
11	Vehicle	1,249 liters					44.116	329.99	11	
12	Vehicle	-	-	24.083	28.167	-	15,006.465	112,248.36	12	
13	Vehicle	-	-	24.083	28.167	-	15,006.465	112,248.36	13	
14	Vehicle	-	-	24.083	28.167	-	15,006.465	112,248.36	14	
15	Vehicle	-	-	19.208	30.000	-	13,577.603	101,560.47	15	
16	Vehicle	-	-	32.000	40.167	-	40,548.282	303,301.15	16	
17	Vehicle	-	-	36.000	-	110.125	34,742.692	259,875.33	17	
18	Vehicle	-	-	9.000	-	17.000	206.981	1,548.21	18	
19	Vehicle	-	-	11.917	-	25.333	608.595	4,552.29	19	
20	Vehicle	-	-	14.000	-	31.500	1,105.448	8,268.75	20	
21	Vehicle					7.917	25.700	192.236	21	
22	Horizontal					18.833	400.300	2,994.244	22	
23	Vehicle	-	-	14.000	-	31.500	1,105.448	8,268.75	23	
24	Horizontal	12.167	-	-	3.833	-	140.416	1,050.31	24	
25	Horizontal				7.250		1,409.000	10,539.32	25	
26	Vehicle	-	-	9.000	-	56.667	2,299.784	17,202.38	26	
27	Vehicle	-	-	16.000	-	56.667	4,088.504	30,582.01	27	
28	Vehicle	-	-	20.000	38.000	-	22,662.352	169,663.99	28	
									Penta	
									Creo	
									Creo	
									Creo	
									Penta	
									Creo	
									Creo	
									Creo	
									Creo	
									Penta	
									acid	
									process water/creo/penta/storm water	
									process water/creo/penta/storm water	
									Diesel	
									Creo	
									process water/creo/penta/storm water	
									process water/creo/penta/storm water	
									WWTS Chemical	
									process water/KOO1 Sludge	
									Creo Process Water	
									Oil/Lubricant for Hydraulic Tanks (T68 Oil)	
									process water/creo/penta	
									Penta Process Water	
									Gasoline	
									Diesel	
									treated Effluent Water / Biological Solids	
									treated Effluent Water / Biological Solids	
									Aeration Tank / Biological Solids / Treated Effluent Water	

Note: All tank emissions are included in the Plant Summary Table of the application

29	Verticle	-	-	3.667	2.083	-	12.499	93.49	29	acid	
30	Verticle	-	-	17.542	-	31.583	1,392.438	10,415.44	30	Penta / Process Water	
31	Verticle	-	-	17.542	-	31.583	1,392.438	10,415.44	31	Penta / Process Water	
32	Verticle	-	-	16.000	9.875	-	1,225.420	9,166.14	32	Penta Concentrate / Diesel	
33	Horizontal	13.458	-	-	8.000	-	676.491	5,060.15	33	Penta Concentrate / Diesel	
34	Verticle	-	-	17.896	10.000	-	1,405.539	10,513.43	34	Penta Concentrate	
35	Verticle	4.063	4.083	8.083	-	-	134.091	1,003.00	35	Filter Press Filtrate	
36	Verticle	3.000	2.000	1.667	-	-	10.000	74.80	36	Hydraulic Oil	
37	Verticle	3.167	1.083	2.167	-	-	7.433	55.60	37	Hydraulic Oil	
38	Verticle	3.833	2.500	2.500	-	-	23.958	179.21	38	Hydraulic Oil	
39	Verticle	3.833	2.500	2.500	-	-	23.958	179.21	39	Hydraulic Oil	
40	Verticle	3.833	2.500	2.500	-	-	23.958	179.21	40	Motor Oil	
41	Horizontal	5.500	-	-	3.000	-	38.877	290.80	41	Used Oil	
42A	Horizontal	2.000	1.521	4.396	-	-	13.371	100.01	42A	Hydraulic Oil	
42B	Horizontal	1.417	1.063	2.396	-	-	3.606	26.97	42B	Hydraulic Oil	
42C	Horizontal	1.000	2.042	1.875	-	-	3.828	28.63	42C	Hydraulic Oil	
43	Verticle	-	-	2.000	2.500	-	9.818	73.43	43	Hydraulic Oil	
44A	Horizontal	3.042	1.542	2.000	-	-	9.378	70.15	44A	Hydraulic Oil	
44B	Verticle	-	-	1.000	1.000	-	0.785	5.87	44B	Hydraulic Oil	
45	Prentice E210 - Stationary Unit							42.00	45	Hydraulic Oil	
46	Prentice E180 - Stationary Unit							71.00	46	Hydraulic Oil	
47	Prentice E180 - Stationary Unit							71.00	47	Hydraulic Oil	
48A	Horizontal	See Tab Tank No. 48A							35,039.92	48A	Process Water / KOO1 Sludge
48B	Horizontal	See Tab Tank No. 48B							34,703.32	48B	Process Water / KOO1 Sludge
49	Horizontal	7.000	8.000	3.417	-	-	191.333	1,431.17	49	Process Water / KOO1 Sludge	
50	Horizontal	See Tab Tank No. 50					9.479	82.160	48,227.30	50	Process Water / KOO1 Sludge
51	Horizontal					9.479	82.160	614.56	51	Process Water / Penta / Creosote	
52	Horizontal					9.479	82.160	614.56	52	Process Water / Penta / Creosote	
53	Horizontal					9.438	78.600	587.93	53	Process Water / Penta / Creosote	
54	Horizontal	-	-	3.333	1.875	-	9.204	68.85	54	Motor Oil	
55	Horizontal	-	-	3.333	1.875	-	9.204	68.85	55	Transmission Oil	
56	Horizontal	-	-	3.333	1.875	-	9.204	68.85	56	Motor Oil	
57	Horizontal	-	-	3.333	1.875	-	9.204	68.85	57	Motor Oil	
58	Horizontal	-	-	3.333	1.875	-	9.204	68.85	58	Gear Oil	
59	Verticle	-	-	8.583	-	12.580	108.091	808.52	59	Boiler Blowdown Water	
60	Verticle	-	-	8.583	-	12.580	108.091	808.52	60	Boiler Blowdown Water	
61	Horizontal	68.333	-	-	8.000	-	3,434.799	25,692.30	61	Air Receiver	
62	Horizontal	27.333	-	-	8.000	-	1,373.910	10,276.84	62	Air Receiver	
63								1,650	63	Condensate return wastewater	
64								1,000	64	Boiler reverse osmosis equipment, makeup water, clean water	
65								300	65	Boiler reverse osmosis equipment discharge water	
66								50	66	Boiler reverse osmosis equipment chemical tank (Hypersperse MDC 150)	

Note: All tank emissions are included in the Plant Summary Table of the application

67										50	67	Boiler reverse osmosis equipment chemical tank (Control IS104)
68										400	68	Boiler chemicals, Optisperse CL370
69										550	69	Boiler chemicals, Steammate NA9658
70										119	70	Boiler chemicals, Control OSS300

Note: All tank emissions are included in the Plant Summary Table of the application

SECTION L2

1. Emission Point No. / Name: AA-001 Multiclone

2. Manufacturers Name and Model No.: Wellons Multiclone Collector

3. Date of construction for existing sources or date of anticipated start-up for new sources: 1972

4. Cyclone Data:

a) Cyclone type (if more than 1, put total number) :
 Simple Potbellied High Efficiency
 Multiclone X

b) Efficiency: Up to 80 %

c) Pollutant viscosity: poise

d) Flow Rate: 25,450 acfm

e) Pollutant size entering cyclone: _____ microns

f) Pressure drop:

g) Baffles or Louvers (specify):

h) Cyclone dimensions:	Inlet:	2.0 ft
	Outlet:	0.5 ft
	Body diameter:	6.0 ft
	Body height:	15.0 ft
	Cone height:	8.0 ft

i) Wet spray: Yes No **X**

1. No. of Nozzles:

2. Type of liquid used:

3. Flow rate: gpm

4. Make-up rate: gpm

5. % recycled: %

j) Fan location:

1. Downstream:	Direct emission	Auxiliary Stack
2. Upstream:		
3. Total:		

2. Upstream:

- X No cap (vertical emissions)
- Fixed cap (diffuse emissions)
- Wind respondant cap (horizontal emissions)

5. Which process(es) does the cyclone(s) control emissions from? **Wood Fired Boiler Source AA-001**

6. Attach a diagram of the cyclone(s) used.

CYCLONES SECTION L2

1. Emission Point No. / Name: **AA-004 Cyclone for Wood Milling**
2. Manufacturers Name and Model No.: **Unknown**
3. Date of construction for existing sources or date of anticipated start-up for new sources: **Unknown**

4. Cyclone Data:

- a) Cyclone type (if more than 1, put total number) :
- | | |
|--|------------|
| <input checked="" type="checkbox"/> Simple | Potbellied |
| High Efficiency | Multiclone |
- b) Efficiency: %
- c) Pollutant viscosity: poise
- d) Flow Rate: acfm
- e) Pollutant size entering cyclone: microns
- f) Pressure drop: inches H2O
- g) Baffles or Louvers (specify):
- h) Cyclone dimensions:
- | | |
|----------------|---------|
| Inlet: | 0.83 ft |
| Outlet: | 0.83 ft |
| Body diameter: | 4.0 ft |
| Body height: | 3.0 ft |
| Cone height: | 4.5 ft |
- i) Wet spray: Yes No ☒

1. No. of Nozzles:
2. Type of liquid used:

4. Make-up rate: gpm
5. % recycled: %

j) Fan location:

1. Downstream: Direct emission
Auxiliary Stack
2. Upstream: No cap (vertical emissions)
Fixed cap (diffuse emissions)
Wind respondent cap (horizontal emissions)

5. Which process(es) does the cyclone(s) control emissions from? **Lumber Mill**
6. Attach a diagram of the cyclone(s) used.

COMPLIANCE DEMONSTRATION (page 1 of 2) SECTION M

Completion of Section M is not required for a complete application. It is presented to merely reflect what may be required by the Enhanced Monitoring and/or the Periodic Monitoring Regulations. Upon promulgation of those regulations, this section will be revised to reflect the actual requirements. Until then, the information in this section should be utilized for planning purposes.

Choose the type of monitoring that is suggested for your source in the "Enhanced Monitoring Guideline". Fill out the appropriate form and attach to the corresponding emission point description pages.

A. Compliance Demonstration by Continuous Emissions Monitoring (CEM).

Sulfur Dioxide(SO ₂)	Nitrogen Oxides (NO _x)	Oxygen (O ₂)
Carbon Dioxide (CO ₂)	Total Reduced Sulfur (TRS)	Opacity
Hydrogen Chloride (HCl)	Carbon Monoxide (CO)	Flow
Hydrogen Sulfide (H ₂ S)	Volatile Organic Compound (VOC)	

B. Compliance Demonstration by Periodic Emission Monitoring using Portable Monitors.

SO ₂	NO _x	O ₂	CO ₂	CO	HCl	H ₂ S	VOC	Flow	Moisture
Combustibles		Combustion Efficiency							

C. Compliance Demonstration by Monitoring Control System Parameters or Operating Parameters of a Process.

Baghouse	Pressure drop across baghouse, Broken bag detector, Opacity.
Mechanical Collectors	Pressure drop across collector, Hopper full detector, Opacity.
Electrostatic Precipitators	Primary and secondary voltage, Primary and secondary currents, Spark Rate, Broken wire detector, Rap cycle frequency, Resistivity measurement, Inlet water flow, Total solids, Opacity.
Thermal Incinerator	Firebox temperature.
Catalytic Incinerator	Catalyst bed temperature.
Flare	Pilot light detector, Temperature after flame zone.
Particulate Scrubber	Pressure drop across scrubber and demister, Scrubber fluid recirculation rate, Pump discharge pressure, Pump motor current.
Absorber for Gases	pH of fluid, Fluid recirculation rate, Air flow, Pressure drop across absorber and demister, Fluid temperature.
Carbon Absorber	Steam mass flow rate per regeneration cycle, Carbon bed temperature.
Condenser	Condenser exit temperature, Amount of solvent recovered daily, Charging rate, Production rate, Hours of operation, Secondary chamber temperature, Kiln or dryer exit temperature, Burner combustion efficiency, Power consumption, Static pressure, Fuel usage rate, water injection rate.

COMPLIANCE DEMONSTRATION (page 2 of 2) SECTION M

D. Compliance Demonstration by Monitoring Maintenance Procedures.

Water quality testing	VOC leak testing
Sludge solids testing	Soot blowing frequency
Electrostatic precipitator cleaning frequency	Fugitive dust control measures
Blacklight inspection of baghouses	Control equipment inspection frequency
Sludge mercury testing	Reid vapor pressure testing
Periodic inspection of process operating parameters	

E. Compliance Demonstration by Stack Testing.

EPA Method 1 & 2 :	Flow (S-type pilot tubes, Hot-wire anemometer)
EPA Method 3 :	CO ₂ , O ₂ , CO (Orsat, Fyrite)
EPA Method 3A :	CO ₂ , O ₂ , (Analyzers)
EPA Method 4 :	Moisture (Wet bulb-Dry bulb, Impingers)
EPA Method 5 :	PM
EPA Method 6 :	SO ₂ (Impingers)
EPA Method 6B :	SO ₂ (24 hour average)
EPA Method 6C :	SO ₂ (Analyzer)
EPA Method 7E :	NO _x (Analyzer)
EPA Method 9 :	Opacity (Visible emissions reader)
EPA Method 10 :	CO (Analyzer)
EPA Method 16 :	TRS (Gas Chromatograph)
EPA Method 16A :	TRS (Impingers)
EPA Method 16B:	TRS (Gas Chromatograph)
EPA Method 18 :	VOC (Gas Chromatograph)
EPA Method 21 :	VOC Leaks (Analyzer)
EPA Method 25A:	VOC (Analyzer with FID)
EPA Method 25B :	VOC (NDIR Analyzer)

F. Compliance Demonstration by Fuel Sampling and Analysis (FSA).

Coal Sampling	Coke sampling	Tire derived fuel sampling
Waste oil sampling	Sewage sludge sampling	Paper sludge sampling
Refuse derived fuel sampling	Landfill gas sampling	

G. Compliance Demonstration by Recordkeeping.

Testing and monitoring records	Records of malfunction
Compliance schedule records	As-applied coating & ink records,
Process hours of operation records	Transfer efficiency records
Fuel usage records	Production records
As-applied coating & ink composition records	

COMPLIANCE DEMONSTRATION BY CONTINUOUS EMISSIONS MONITORING (CEM) SECTION M1

An installation plan for each new (i.e. proposed) Continuous Emission Monitoring (CEM) System shall be submitted with the permit application for approval. Fill out one (1) sheet per analyzer.

- 1 Emission Point No./Name : **AA-001 Wood Fired Boiler**
2 Continuous Emission Monitoring Data:

- A. Name of Manufacturer: **Horiba**
- B. Model number: **CMA-321**
- C. Serial Number: **566220011**
- D. Date of installation of CEM: **1992**
- E. Which does the CEM monitor:
- | | Pollutant
Flow | Diluent
Opacity X |
|--|--|---|
| F. Pollutant / Diluent / Flow being monitored: | | |
| G. Type of analyzer: | In situ
Dilution
CO ₂ | Extractive X
O ₂
Thermal
Differential Pressure
Other (specify) : |
| H. Type of analyzer description: | Magnetopneumatic | |
- I. Backup system (attach other compliance demonstration forms if needed):
- J. Opacity CEM:
- | How measured: | X Monitor | Visible Emission Evaluation |
|--|-----------|-----------------------------|
| K. If CEM is not previously certified, then it shall be submitted for certification within 60 days of startup of the CEM system. | | |
- L. State the operating principles of the analyzer: **See Attached**
- M. Attach a schematic of the CEM system showing the sample acquisition point and location of the monitor and explain any deviations from the siting criteria in Performance Specifications 1, 2, 3, 4, 5, 6 and 7 in 40 CFR Part 60, Appendix B.

1. OVERVIEW

1.1. THEORY OF OPERATION

The SNIFFER system is designed to measure the concentration of CO, CO₂, and O₂ components in stack gas emitted from a stationary source. The system uses a magnetopneumatic analyzer to measure O₂ and infra-red analyzers (NDIR method) to measure CO and CO₂. During the operation of the magnetopneumatic analyzer, oxygen molecules are drawn into a non-homogenous magnetic field and attracted to a higher magnetic field, resulting in a pressure increase. A pressure increase is produced outside of the magnetic field using nitrogen gas. This differential pressure is measured using a condenser type microphone, which produces an electrical signal. A stable signal is then produced and transmitted by exciting the magnet intermittently and processing the alternating signal. The output signal is directly linear to the oxygen concentration.

The principle of the non-dispersive infra-red analyzer involves a dual beam method with an opto-pneumatic double layer detector. The infra-red source emits infra-red radiation, which is modulated by a rotating chopper wheel. After passing through the sample cell, the radiation is detected by the double layer detector. A window that is permeable to the infra-red radiation divides the detector chamber into two gas chambers or layers, which are linked together by a capillary that contains a microflow sensor. The center part of the absorption curve is absorbed by the first detector level while the edges are absorbed by the second detector level, resulting in a pressure differential between the two detector levels. The gas flow that results from the pressure differential is detected by the microflow sensor. This detected output signal is then processed by the microprocessor into a linear output signal.

The SNIFFER system also incorporates other components that allow the Analyzers to be calibrated, and the data from them to be recorded.

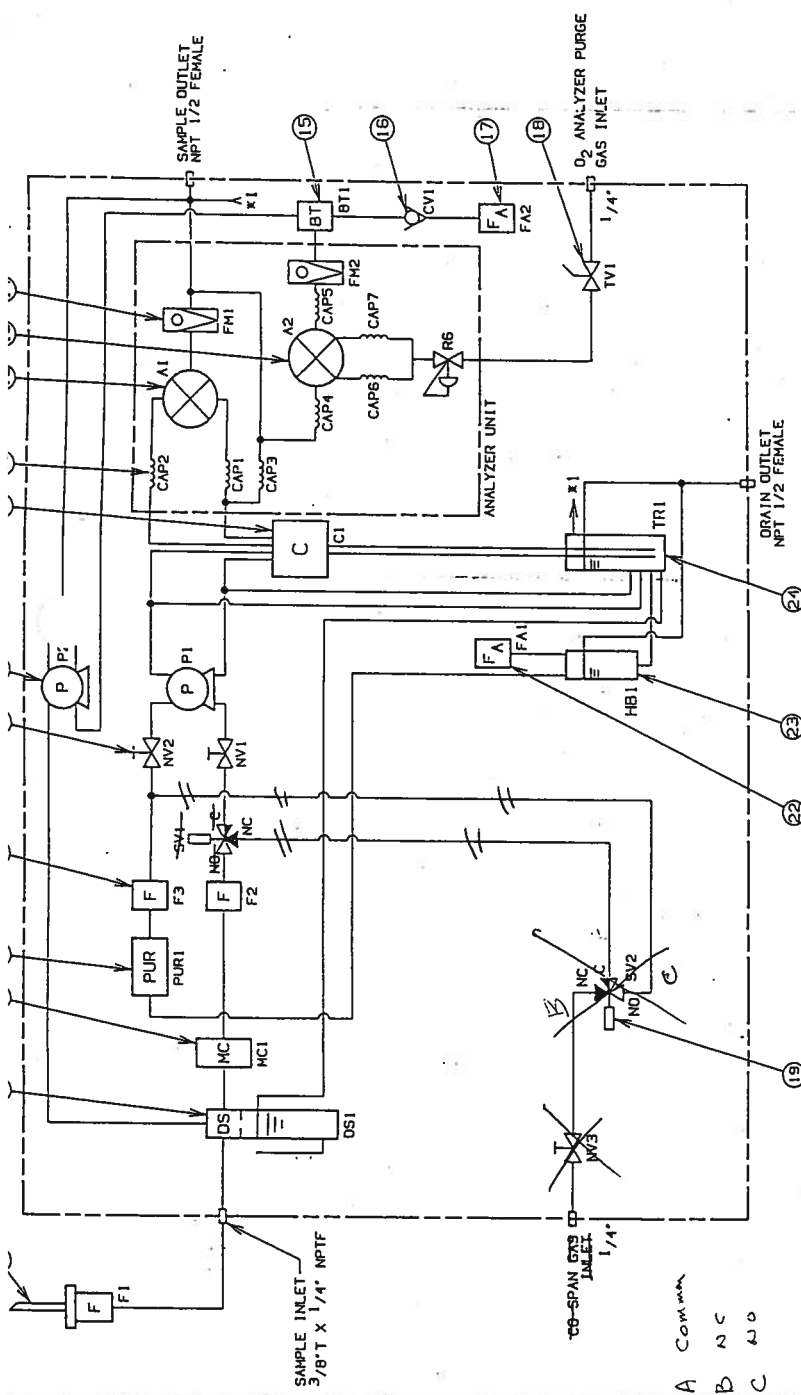
1.2 COMPONENTS

The SNIFFER system incorporates a Sample Conditioner, Analyzer, Calibration Unit, Opacity Monitors, and Strip Chart Recorder. Figure 1-1 shows how the components are configured in the system cabinet.

1.2.1 Sample Conditioner

The Sample Conditioner takes sample gas from the stack port and supplies a steady flow of clean sample gas to the Analyzer.

2	DRAIN SEPARATOR	PVC
3	MIST CATCHER	MC-050
4	ZERO GAS PUR	PUR-01
5		
6	FILTER	
7		
8	NEEDLE VALVE	PVC
9	PUMP	GP-2201
10	THERMO-ELECTRIC DEHYDRIFIER	DH-107H
11	CAPILLARY	CFA-C0
12	ANALYZER	MFA-D2
13	ANALYZER	PVC
14	FLOW METER	0.3
15	BUCKET TANK	
16	CHECK VALVE	
17	AIR FILTER	
18	TOGGLE VALVE	
19	SOLENOID VALVE	SVC-301-7HA
20		
21		
22	AIR FILTER	3
23	MODIFIER	PVC
24	PRESSURE TRAP	PVC



- NOTES: UNLESS OTHERWISE SPECIFIED
1. AFTER MEASUREMENT DISCHARGE THE SAMPLE GAS FROM SAMPLE OUTLET TO AN AREA AT ATMOSPHERIC PRESSURE IN COMPLIANCE WITH ENVIRONMENTAL SAFETY REGULATIONS.
 2. INTERNAL RACK PLUMBING IS MADE OF TEFLON OR SOFT PVC.
 3. SAMPLE LINE SUPPLIED BY OTHERS.

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CHECKED J.C.		DATE 4/29/92	
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COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS SECTION M3

The monitoring of a control system parameter or a process parameter may be acceptable provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. At least three sets of stack test data, that bracket the emission limit if possible, shall be used to define the emission curve. This data shall constitute the certification of the system and must be attached for approval. If it is not attached, it shall be submitted within 60 days from the date of startup of the system or the date of application, which ever is later.

- 1 **Emission Point No./Name : AA-026 Stand by Natural Gas Boiler**
- 2 **Method of monitoring description: Monitoring by Measurement of Gas Consumption**

Attach separate sheets if needed.

3. Backup system (attach other compliance demonstration forms if needed):
4. The monitoring system shall be subject to appropriate performance specifications, calibration requirements, and quality assurance procedures.
5. If a quality assurance / quality control plan is not attached with the application for approval, it shall be submitted within 60 days from the date of startup of the monitoring program or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS SECTION M3

The monitoring of a control system parameter or a process parameter may be acceptable provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. At least three sets of stack test data, that bracket the emission limit if possible, shall be used to define the emission curve. This data shall constitute the certification of the system and must be attached for approval. If it is not attached, it shall be submitted within 60 days from the date of startup of the system or the date of application, which ever is later.

1. Emission Point No./Name : **AA-003 Wood Preserving Process**
2. Method of monitoring description: **Monitoring by Measurement of Cubic Feet of Product**

Attach separate sheets if needed.

3. Backup system (attach other compliance demonstration forms if needed):
4. The monitoring system shall be subject to appropriate performance specifications, calibration requirements, and quality assurance procedures.
5. If a quality assurance / quality control plan is not attached with the application for approval, it shall be submitted within 60 days from the date of startup of the monitoring program or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS SECTION M3

The monitoring of a control system parameter or a process parameter may be acceptable provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. At least three sets of stack test data, that bracket the emission limit if possible, shall be used to define the emission curve. This data shall constitute the certification of the system and must be attached for approval. If it is not attached, it shall be submitted within 60 days from the date of startup of the system or the date of application, which ever is later.

1. Emission Point No./Name : **AA-005, Natural Gas Space Heaters (2)**
2. Method of monitoring description: **Monitoring by Measurement of Gas Consumption**

Attach separate sheets if needed.

3. Backup system (attach other compliance demonstration forms if needed):
4. The monitoring system shall be subject to appropriate performance specifications, calibration requirements, and quality assurance procedures.
5. If a quality assurance / quality control plan is not attached with the application for approval, it shall be submitted within 60 days from the date of startup of the monitoring program or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS SECTION M3

The monitoring of a control system parameter or a process parameter may be acceptable provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. At least three sets of stack test data, that bracket the emission limit if possible, shall be used to define the emission curve. This data shall constitute the certification of the system and must be attached for approval. If it is not attached, it shall be submitted within 60 days from the date of startup of the system or the date of application, which ever is later.

1. Emission Point No./Name : **AA-006, Natural Gas Fired Steam Cleaner**
2. Method of monitoring description: **Monitoring by Measurement of Gas Consumption**

Attach separate sheets if needed.

3. Backup system (attach other compliance demonstration forms if needed):
4. The monitoring system shall be subject to appropriate performance specifications, calibration requirements, and quality assurance procedures.
5. If a quality assurance / quality control plan is not attached with the application for approval, it shall be submitted within 60 days from the date of startup of the monitoring program or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS SECTION M3

The monitoring of a control system parameter or a process parameter may be acceptable provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. At least three sets of stack test data, that bracket the emission limit if possible, shall be used to define the emission curve. This data shall constitute the certification of the system and must be attached for approval. If it is not attached, it shall be submitted within 60 days from the date of startup of the system or the date of application, which ever is later.

1. Emission Point No./Name : **AA-015, Standby Boiler Room Natural Gas Fired Space Heater**
2. Method of monitoring description: **Monitoring by Measurement of Gas Consumption**

Attach separate sheets if needed.

3. Backup system (attach other compliance demonstration forms if needed):
4. The monitoring system shall be subject to appropriate performance specifications, calibration requirements, and quality assurance procedures.
5. If a quality assurance / quality control plan is not attached with the application for approval, it shall be submitted within 60 days from the date of startup of the monitoring program or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY STACK TESTING SECTION M5

Compliance demonstration by stack testing will be carried out in accordance with EPA approved reference methods and the stack test report must be attached.

- 1 Emission Point No./Name : **AA-001, Wood Fired Boiler**
- 2 Pollutant being tested for: **Particulate and Visible Emissions**
- 3 Test Method:
- 4 Compliance shall be demonstrated: Weekly Monthly Other(specify): **Biennial**

5. Any measured emission rate that exceeds an emission limit established by the permit must be reported as an excess emission.
6. Is this an existing method of demonstrating compliance: **Yes**
7. Backup system (attach other compliance demonstration forms if needed):

ENVIRONMENTAL MONITORING LABORATORIES, INC.

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

phone: 601/856-3092
fax : 601/853-2151

December 27, 2006

Subject: Koppers Industries - Grenada, Mississippi
Wood Waste Boiler - Stack Emissions Test
Facility No. 0960-00012

On November 14, 2006, Environmental Monitoring Laboratories performed air emissions testing for Koppers Industries in the Tie Plant community near Grenada, Mississippi. Testing was done to measure particulate and visible emissions from the wood waste boiler in accordance with requirements of the Mississippi Department of Environmental Quality.

Results of emissions testing are shown below.

PARTICULATE EMISSIONS			VISIBLE EMISSIONS
#/hr	gr/dscf	#/MM Btu	Highest Six Minute Average (SMA), % opacity
21.04	0.106	0.615	7.08

Mr. Kevin Coker of Koppers coordinated the testing project. Otis Rayburn of Environmental Monitoring Laboratories was responsible for collection and deliver of particulate samples.

Following is a report of the test.

REPORT OF PARTICULATE EMISSIONS TEST
FOR KOPPERS INDUSTRIES, INC.
GRENADA PLANT
WOOD WASTE BOILER

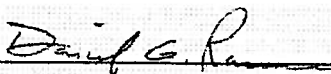
Grenada, Mississippi
November 14, 2006

CONTENTS

1.0	TEST RESULTS	page 1
2.0	SOURCE DESCRIPTION	2
3.0	TEST PROCEDURES	2
4.0	DATA REDUCTION	3
5.0	NOMENCLATURE	6
6.0	CALIBRATION	7
7.0	APPENDICES:	8
A.	Field and Laboratory Data	
B.	Calibrations	
C.	O2 and CO2 Data	
D.	Visible Emissions Record and Reader Certification	
E.	Boiler Steam Chart (Koppers)	

REPORT CERTIFICATION

I certify that I have examined the information submitted herein,
and based upon inquiries of those responsible for obtaining the
data or upon my direct acquisition of data, I believe the
submitted information is true, accurate and complete.

Signed 
Daniel G. Russell

1.0 TEST RESULTS:

The following table is a summary of test results for air emissions testing done on November 14, 2006, for the Wellons wood fired boiler (EP AA-001) at Koppers Industries in Grenada, Mississippi.

Run No.		1	2	3	AVG.
Date		11/14/06	11/14/06	11/14/06	---
Time Start		1222	1334	1445	---
Time End		1323	1436	1546	---
PARTICULATE EMISSIONS	#/hr	22.97	23.59	16.56	21.04
PARTICULATE EMISSIONS	gr/dscf	0.115	0.120	0.082	0.106
PARTICULATE EMISSIONS	#/MM Btu	0.640	0.704	0.500	0.615
VISIBLE EMISSIONS	high SMA, %	7.08	6.88	6.46	7.08
HEAT INPUT	MM Btu/hr	35.91	33.51	33.13	34.18
VOLUMETRIC FLOWRATE	acfm	34927	35645	36191	35588
VOLUMETRIC FLOWRATE	dscfm	23307	22839	23518	23221
VELOCITY	ft./sec.	89.7	91.5	92.9	91.4
STACK TEMPERATURE	°F	288	294	291	291
MOISTURE	%	4.6	7.7	6.8	6.4
SAMPLE RATE	% isokinetic	100	97	98	98

* The highest six minute average is reported here.

2.0 SOURCE DESCRIPTION:

Koppers Industries, Inc. operates a 30,000 pound per hour Wellons wood waste boiler at their wood preserving facility in Grenada, Mississippi. The boiler provides steam for the timber treating cylinders and kilns. Fuel is wood waste generated from the manufacture of wood poles and cross ties.

Heat input as calculated from the test data and an F-Factor was an average 34.18 MM Btu/hr. The steam rate during testing is representative of the current maximum capacity of the plant to utilize steam. A co-generator has been removed from service. During testing, all equipment using steam was operating in a manner representative of maximum conditions and where possible, steam was vented to simulate more than maximum steam usage.

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

3.0 TEST PROCEDURES:

Test procedures used are those described in the Code of Federal Regulations, Title 40, Part 60, Appendix A. Specifically, Method 1 was used to determine the number of sample points and Method 5 to determine flow rates, moisture content, and particulate emissions. The sampling train was identical to that described in Method 5 except that the cyclone was omitted. Visible emissions were read in accordance with Method 9 concurrently with the emissions test. The visible emissions reader's certification is provided in Appendix C.

Heat input to the boilers was determined by continuously monitoring oxygen content of the flue gas as described in Method 3A and calculating heat input using an F-factor of 10029 scf per million Btu of heat input for the wood waste fuel. (From historical fuel analysis)

Filters were recovered by rinsing the front half of the filter holder into the probe wash and securing the filters in glass petri dishes. Part of the sample filter often adheres to the filter gasket, and some of the adhering material is recovered into the probe wash. Therefore some of the filter weight is attributed to the probe wash weight.

Filters were heated in an oven for 2 hours at 105° C, desiccated at least 24 hours and weighed to constant weight. Probe wash samples in acetone were evaporated to dryness over low heat in tared beakers, desiccated for at least 24 hours and weighed to constant weight. Weighings are made at 6 hour or greater intervals (samples stored in desiccator). Final weights were considered valid and were recorded if there was no more than 0.5 milligrams difference from the previous weighing.

COMPLIANCE DEMONSTRATION BY FUEL SAMPLING AND ANALYSIS SECTION M6

An installation plan for each Fuel Sampling Analysis (FSA) System must be submitted with the permit application for approval. Fill out one (1) sheet per analyzer.

1. Emission Point No./Name : **AA-026, Natural Gas Standby Boiler**
2. Date of construction if for existing sources or date of anticipated start-up for new sources: **2004**
3. List the ASTM fuel sample collecting and analyzing methods used: **AP-42 Emission Estimates**
4. Fuel being sampled:
5. How will samples be taken: Automated Manual
6. Fuel Sampling Data:
 - A. Name of Manufacturer:
 - B. Model number:
 - C. Serial Number:
 - D. Is this an existing FSA system: YES No
 - E. How will samples be taken: Automated Manual
 - F. Backup system (attach other compliance demonstration forms if needed):
 - G. State the method of operating of the sampler:
 - H. Attach a schematic of the FSA system showing the sample acquisition point and location of the machine.
 - I. Compliance shall be demonstrated:
Daily Weekly Monthly Quarterly
7. Any composite sample over the emission rate will be reported as an excess emission.
8. If the FSA system certification is not attached for approval, it must be submitted within 60 days from startup of the FSA system or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY FUEL SAMPLING AND ANALYSIS SECTION M6

An installation plan for each Fuel Sampling Analysis (FSA) System must be submitted with the permit application for approval. Fill out one (1) sheet per analyzer.

1. Emission Point No./Name : **AA-005, Natural Gas Space Heaters (2)**
2. Date of construction if for existing sources or date of anticipated start-up for new sources:
1. List the ASTM fuel sample collecting and analyzing methods used: **AP-42 Emission Estimates**
2. Fuel being sampled:
3. How will samples be taken: Automated Manual
6. Fuel Sampling Data:
 - A. Name of Manufacturer:
 - B. Model number:
 - C. Serial Number:
 - D. Is this an existing FSA system: YES No
 - E. How will samples be taken: Automated Manual
 - F. Backup system (attach other compliance demonstration forms if needed):
 - G. State the method of operating of the sampler:
 - H. Attach a schematic of the FSA system showing the sample acquisition point and location of the machine.
 - I. Compliance shall be demonstrated:

Daily	Weekly	Monthly	Quarterly
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7. Any composite sample over the emission rate will be reported as an excess emission.
6. If the FSA system certification is not attached for approval, it must be submitted within 60 days from startup of the FSA system or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY FUEL SAMPLING AND ANALYSIS SECTION M6

An installation plan for each Fuel Sampling Analysis (FSA) System must be submitted with the permit application for approval. Fill out one (1) sheet per analyzer.

1. Emission Point No./Name : **AA-006, Natural Gas Fired Steam Cleaner**
2. Date of construction if for existing sources or date of anticipated start-up for new sources: **1992**
3. List the ASTM fuel sample collecting and analyzing methods used: **AP-42 Emission Estimates**
4. Fuel being sampled:
5. How will samples be taken: Automated Manual

6. Fuel Sampling Data:
 - A. Name of Manufacturer:
 - B. Model number:
 - C. Serial Number:
 - D. Is this an existing FSA system: YES No
 - E. How will samples be taken: Automated Manual
 - F. Backup system (attach other compliance demonstration forms if needed):
 - G. State the method of operating of the sampler:

 - H. Attach a schematic of the FSA system showing the sample acquisition point and location of the machine.
 - I. Compliance shall be demonstrated:

Daily	Weekly	Monthly	Quarterly
-------	--------	---------	-----------
7. Any composite sample over the emission rate will be reported as an excess emission.
8. If the FSA system certification is not attached for approval, it must be submitted within 60 days from startup of the FSA system or the date of application, which ever is later.

COMPLIANCE DEMONSTRATION BY FUEL SAMPLING AND ANALYSIS SECTION M6

An installation plan for each Fuel Sampling Analysis (FSA) System must be submitted with the permit application for approval. Fill out one (1) sheet per analyzer.

1. Emission Point No./Name : **AA-015 Natural Gas Fired Space Heaters**
2. Date of construction if for existing sources or date of anticipated start-up for new sources:
3. List the ASTM fuel sample collecting and analyzing methods used: **AP-42 Emission Estimates**
4. Fuel being sampled:
5. How will samples be taken:

Automated Manual
6. Fuel Sampling Data:
 - A. Name of Manufacturer:
 - B. Model number:
 - C. Serial Number:
 - D. Is this an existing FSA system: YES No
 - E. How will samples be taken: Automated Manual
 - F. Backup system (attach other compliance demonstration forms if needed):
 - G. State the method of operating of the sampler:
 - H. Attach a schematic of the FSA system showing the sample acquisition point and location of the machine.
 - I. Compliance shall be demonstrated:

Daily Weekly Monthly Quarterly
7. Any composite sample over the emission rate will be reported as an excess emission.
8. If the FSA system certification is not attached for approval, it must be submitted within 60 days from startup of the FSA system or the date of application, which ever is later.

Current Applicable Requirements and Status (page 1 of 2) SECTION N

List applicable state and federal regulations and applicable test methods for determining compliance with each applicable requirement. Clearly identify federal regulations from state requirements. Provide the compliance status as of the day the application is signed.

Emission Point No.	Applicable Requirement	Pollutant	Test Method	Limits	Compliance Status IN / OUT
1A-001	APC-S-1, SEC.3.4(B)	PM	Method 5	0.3 gr/dscr	In
1A-001	APC-S-1, SEC.3.1	Opacity	CEM	40%	In
1A-001	APC-S-1, SEC.4.1(A)	SO2	Stack Test/Eng. Calcs	4.8 lb/mmmbtu	In
1A-026	APC-S-1, SEC.4(A)2	PM	AP-42	$E = 0.8808I^{-0.1667}$	In
1A-026	APC-S-1, SEC.3.1	Opacity		40%	In
1A-026	APC-S-1, SEC.4.1(A)	SO2	AP-42	4.8 lb/mmmbtu	In
1A-004 1A-008 1A-009 1A-010 1A-011	APC-S-1, SEC.3.6(A)	PM	AP-42	$E = 4.1P^{0.67}$	In

COMPLIANCE CERTIFICATION SECTION O

1. Emission Point No./Name : AA-001 Wood Fired Boiler

2. Indicate the source compliance status:

- A. **X** Where this source is currently in compliance, we will continue to operate and maintain this source to assure compliance for the duration of the permit.
- B. The Current Emissions Requirements and Status form (previous page) includes new requirements that apply or will apply to this source during the term of the permit. We will meet such requirements on a timely basis.
- C. This source is not in compliance. The following statement of corrective action is submitted to describe action which we will take to achieve compliance.
1. Attached is a brief description of the problem and the proposed solution.
 2. We will achieve compliance according to the following schedule.

Progress reports will be submitted:

Starting date:

and every six (6) months thereafter

[illegible]

COMPLIANCE CERTIFICATION SECTION 0

1. Emission Point No./Name : All Points Except AA-001

2. Indicate the source compliance status:

- A. **X** Where this source is currently in compliance, we will continue to operate and maintain this source to assure compliance for the duration of the permit.
- B. The Current Emissions Requirements and Status form (previous page) includes new requirements that apply or will apply to this source during the term of the permit. We will meet such requirements on a timely basis.
- C. This source is not in compliance. The following statement of corrective action is submitted to describe action which we will take to achieve compliance.
1. Attached is a brief description of the problem and the proposed solution.
 2. We will achieve compliance according to the following schedule.

Progress reports will be submitted:

Starting date:

and every six (6) months thereafter

[illegible]