Tronox LLC, Columbus

General Information

ID	Branch	SIC	County	Basin	Start	End
1696	Chemical	2491	Lowndes	Tombigbee River	10/27/1992	

Address

Physical Address (Primary)	Mailing Address
2300 14th Avenue North Columbus, MS 39701	PO Box 268859 Oklahoma City, OK 731268859

Telecommunications

Type	Address or Phone
Work phone number	(405) 775-5129

Alternate / Historic AI Identifiers

Alt ID	Alt Name	Alt Type	Start Date	End Date
2808700020	Tronox LLC, Columbus	Air-AIRS AFS	10/12/2000	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Construction	06/12/1998	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/06/1997	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/12/1998	06/01/2002
MSR220010	Kerr McGee Chemical Corporation, Columbus	GP-Wood Treating	10/27/1992	07/13/1997
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-EPA ID	10/12/2000	
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-TSD	06/11/2001	04/12/2006
MSD990866329	Tronox LLC, Columbus	Hazardous Waste-TSD	04/13/2006	05/31/2011
1696	Kerr McGee Chemical Corporation	Historic Site Name	10/27/1992	04/10/2006
1696	Tronox, LLC	Official Site Name	04/10/2006	
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/11/1994	10/10/1999
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	08/23/2000	07/31/2005
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/31/2005	04/12/2006
MSP090021	Tronox LLC, Columbus	Water-Pretreatment	04/13/2006	09/30/2010

Regulatory Programs

Program	SubProgram	Start Date	End Date
Air	NSPS Subpart Dc	09/12/1990	06/01/2002
Air	SM	06/06/1997	06/01/2002
Hazardous Waste	Large Quantity Generator	04/01/1997	
Hazardous Waste	TSD - Not Classified	06/11/2001	
Water	PT CIU	10/11/1994	09/01/2003
Water	PT CIU - Timber Products	10/11/1994	09/01/2003

	Processing (Subpart 429)		
Water	PT NCS	09/01/2003	
Water	PT SIU	10/11/1994	

Locational Data

Latitude	Longitude	Metadata	S / T / R	Map Links
33 ° 30 ' 38 .51 (033.510697)	88 ° 24 ' 34 .02 (088.409450)	**Point Desc:** PG - Plant entrance (General) Data collected by Louis Crawford on 7/11/00. PG - Plant Entrance (General) Data collected by Clift Jeter on 6/13/02. LAT 33deg 30min 36.6sec LON 88deg 24min 35.1sec **Method:** GPS Code (Psuedo Range) Differential **Datum:** NAD83 **Type:** MDEQ	Section: Township: Range:	SWIMS TerraServer Map It

10/13/2006 10:29:50 AM

Kerr McGee Chemical Corporation, Columbus

General Information

ID	Branch	SIC	County	Basin	Start	End
1696	Chemical	2491	Lowndes	Tombigbee River	10/27/1992	

Address

Physical Address (Primary)	Mailing Address
2300 14th Avenue North Columbus, MS 39701	2300 14th Avenue North Columbus, MS 39701

Telecommunications

Type	Address or Phone
Work phone number	(662) 328-7551

Alternate / Historic AI Identifiers

Alt ID	Alt Name	Alt Type	Start Date	End Date
08700020	Kerr McGee Chemical Corporation, Columbus	Air-AIRS AFS	10/12/2000	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Construction	06/12/1998	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/06/1997	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/12/1998	06/01/2002
MSR220010	Kerr McGee Chemical Corporation, Columbus	GP-Wood Treating	10/27/1992	07/13/1997
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-EPA ID	10/12/2000	
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-TSD	06/11/2001	05/31/2011
1696	Kerr McGee Chemical Corporation	Official Site Name	10/27/1992	
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/11/1994	10/10/1999
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	08/23/2000	07/31/2005

Regulatory Programs

Program	SubProgram
Air	SM

Hazardous Waste	TSD - Not Classified
Water	PT CIU
Water	PT CIU - Timber Products Processing (Subpart 429)
Water	PT SIU

Locational Data

Latitude	Longitude	Method	Datum	S / T / R	Map Links
33° 30' 38.51 (033.510697)	88° 24' 34.2 (088.409450)	GPS Code (Psuedo Range) Differential	NAD83	Section: Township: Range:	SWIMS TerraServer Map It

Report Date: 1/28/2005 2:22:45 PM

Bobby

DWW

INSPECTION REPORT FORM - GENERAL

Facility Name: KERR MCGEE CHEMICAL CORP. Date: 3/12/96

Address: 230 14TH AVENUE AND 20TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551

Inspected By: STANLEY WATKINS AND RANDY BYARS, NRO

Person Contacted: CHUCK SWAN

Facility No: 120-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
( ) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
(X) Annual
( ) Follow-up

Current Permit Status: PERMIT EXPIRES: APRIL 1ST, 1997

Source Description: PRESSURE TREATING OF CROSS TIES WITH CREOSOTE.

Applicable Regulations:

( ) SIP
( ) PSD
(X) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

THERE WERE NO PROBLEMS OBSERVED.

INSPECTION REPORT FORM - MISCELLANEOUS PROCESSES

Facility Name: KERR MCGEE CHEMICAL Date: 3/12/96

Emission Point No./Name: ALL PROCESSES

Description of Process:

Raw Materials: MIXED HARDWOOD, PINE, AND CREOSOTE.

Processing Operations: PRESSURE TREATING OF CROSS-TIES WITH CREOSOTE.

Products/ByProducts: CREOSOTE TREATED CROSS-TIES/SAWDUST, CREOSOTE VAPORS.

Emissions & Control Devices: SAWDUST AND CREOSOTE VAPORS. TWO BOILERS, TWO CYCLONES AND ONE SCRUBBER.
(Complete Appropriate Control Device Sheets)

Permit conditions not being complied with and description of noncompliance:

INSPECTION REPORT FORM - 30[illegible]

Facility Name: KERR MCGEE CHEMICAL Date: 3/12/96

Emission Point No./Name: CLEAVER BROOKS

Rated Boiler Size: 44635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: _____ MMBTUH
OR
20,000 lbs steam/hr @ 125 psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
( ) Fuel Oil, No. _____ @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

THERE WERE NO VISIBLE EMISSIONS FROM THE BOILER STACK

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/12/96

Emission Point No./Name: HENRY VOGT

Rated Boiler Size: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Operating Rate @ Insp: _____ MMBTUH
OR
_____ lbs steam/hr @ _____ psig

Fuel(s) Being Used:
( ) Natural Gas @ _____ MCFH
( ) Fuel Oil, No. _____ @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: _____

For Solid Fuels, Describe Fuel Stoking Method: _____

_____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

THIS BOILER IS USED AS A BACK-UP AND WAS NOT IN OPERATION, AT THIS TIME.

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL CORP. **Date:** 3/12/96

Emission Point No./Name: NEW SCRUBBER

Scrubbing Liquid: (X) Water ( ) Solution ( ) Reactant Solution

Scrubber Type:

( ) Spray Tower/Wet Washer
( ) Sieve Tray/Bubbler Cap/Packed Column
( ) Orifice
(X) Venturi
( ) Other, Explain: _____

Demisting Method: ( ) Cyclone
(X) Vanes
( ) Pad
( ) No Demisting
( ) Other, Explain: _____

Operating Conditions: 120 gpm @ 19 psig
(NO GAUGE) _____ inches water gauge pressure drop
Rainout Occurring: ( ) Yes (X) No

Scrubbing Liquid: ( ) Once Through (X) Recycled

If recycled, 10 **gpm makeup rate**

If water, describe settling basin: 2400 GALLON METAL TANK

For solution/reactant systems:
Chemical makeup of liquid: _____
How is scrubber discharge handled/treated: _____

Emissions: ( ) Not Visible ( ) Visible, Dust Trail-off, _____ % Opacity (Do VEE)

Comments: THIS SCRUBBER CONTROLS THE EMISSIONS FROM THE FOUR CREOSOTE STORAGE TANKS AND THE TWO OIL AND WATER SEPARATORS.

THE SCRUBBER STACK HAD A SLIGHT STEAM PLUME, BUT NO OTHER VISIBLE EMISSIONS.

THIS NEW SCRUBBER WAS INSTALLED JAN. 1996, TO REPLACE THE OLD SCRUBBER.

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE Date: 3/12/96

Emission Point No./Name: LARGE CYCLONE

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL Date: 3/12/96

Emission Point No./Name: SMALL CYCLONE

Type particulate being handled: SAWDUST, CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have
( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have
( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of?

DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM-STORAGE VESSELS

FACILITY NAME KERR MCGEE CHEMICAL CORP. DATE 3/12/96

	EMISSION POINT NO.	TYPE TANK	CAPACITY (GALLONS)	PRODUCT STORED	QUAN. STORED	CHANGES YES/NO EXPLAIN
*	AA-003	FIXED ROOF	72,000	CREOSOTE	EMPTY	YES
	AA-004	FIXED ROOF	57,000	CREOSOTE	11,400	NO
	AA-005	FIXED ROOF	57,000	CREOSOTE	28,200	NO
	AA-006	FIXED ROOF	57,000	CREOSOTE	EMPTY	NO

COMMENTS: THE TANK LISTED AS AA-003 WAS AN ORIGINAL TANK THAT WAS ONLY VENTED TO THE SCRUBBER DURING JAN. 1996. THIS TANK IS NOT LISTED IN THE CURRENT PERMIT.

INSPECTION REPORT FORM - GENERAL

Facility Name: KERR MCGEE CHEMICAL CORP. Date: 3/16/95

Address: 230 14TH AVENUE AND 20TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551

DATA CODED

MAR 1995 RECEIVED

Inspected By: RANDY BYARS AND STANLEY WATKINS, NRO

Person Contacted: CHUCK SWAN, SUPERVISOR OF TREATMENT

Facility No: 120-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
( ) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
( ) Annual
( ) Follow-up

Current Permit Status: PERMIT EXPIRES: APRIL 1ST, 1997

Source Description: PRESSURE TREATING OF CROSS TIES WITH CREOSOTE.

DATA CODED

Applicable Regulations:

( ) SIP
( ) PSD
(X) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

INSPEC[illegible] REPORT FORM - MISC[illegible] PROCESSES

Facility Name: KERR MCGEE CHEMICAL Date: 3/16/95

Emission Point No./Name: ALL PROCESSES

Description of Process:

Raw Materials: MIXED HARDWOOD, PINE, AND CREOSOTE.

Processing Operations: PRESSURE TREATING OF CROSS-TIES WITH CREOSOTE.

Products/ByProducts: CREOSOTE TREATED CROSS-TIES/SAWDUST, CREOSOTE VAPORS.

Emissions & Control Devices: SAWDUST AND CREOSOTE VAPORS. TWO BOILERS, TWO CYCLONES AND ONE SCRUBBER.
(Complete Appropriate Control Device Sheets)

Permit conditions not being complied with and description of noncompliance:

INSPECTION REPORT FORM - BOI[illegible]

Facility Name: KERR MCGEE CHEMICAL Date: 3/16/95

Emission Point No./Name: CLEAVER BROOKS

Rated Boiler Size: 44635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: _____ MMBTUH
OR
UNKNOWN lbs steam/hr @ _____ psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity 0 % By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/16/95

Emission Point No./Name: HENRY VOGT

Rated Boiler Size: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Operating Rate @ Insp: _____ MMBTUH
OR
_____ lbs steam/hr @ _____ psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

THIS BOILER WAS NOT OPERATING AT THE TIME OF INSPECTION AND IS USED AS A STANDBY ONLY.

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/16/95

Emission Point No./Name: PARK TOWER

Scrubbing Liquid: (X) Water ( ) Solution ( ) Reactant Solution

Scrubber Type:

(X) Spray Tower/Wet Washer
( ) Sieve Tray/Bubbler Cap/Packed Column
( ) Orifice
( ) Venturi
( ) Other, Explain: _____

Demisting Method: ( ) Cyclone
( ) Vanes
( ) Pad
( ) No Demisting
( ) Other, Explain: _____

Operating Conditions: 50 gpm @ 12 psig
18 inches water gauge pressure drop
Rainout Occurring: ( ) Yes (X) No

Scrubbing Liquid: (X) Once Through ( ) Recycled

If recycled, _____ gpm makeup rate

If water, describe settling basin: _____

For solution/reactant systems:
Chemical makeup of liquid: _____
How is scrubber discharge handled/treated: _____

Emissions: ( ) Not Visible ( ) Visible, Dust Trail-off, _____% Opacity (Do VEE)

Comments: _____

NOT OPERATING AT THE TIME OF INSPECTION.

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE Date: 3/16/95

Emission Point No./Name: LARGE CYCLONE

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: (X) Yes ( ) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL Date: 3/16/95

Emission Point No./Name: SMALL CYCLONE

Type particulate being handled: SAWDUST, CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have
( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have
( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of?

DUMPED INTO TRUCK AND HAULED OFF.

Comments:

Lowndes

INSPECTION REPORT FORM - GENERAL

Facility Name: KERR MCGEE CHEMICAL CORP. Date: 3/24/93

Address: 230 14TH AVENUE AND 20TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551

Inspected By: RANDY BYARS AND STANLEY WATKINS

Person Contacted: TONY HELMS, MANAGER

Facility No: 120-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
( ) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
(X) Annual
( ) Follow-up

Current Permit Status: PTO EXPIRED BUT NEW APPLICATION HAS BEEN FILED

Source Description: PRESSURE TREATING OF CROSSTIES WITH CREOSOTE

Applicable Regulations:

( ) SIP
( ) PSD
(X) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

NO PROBLEMS FOUND.

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/24/93

Emission Point No./Name: CLEAVER BROOKS

Rated Boiler Size: 44635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: UNKNOWN MMBTUH
OR
UNKNOWN lbs steam/hr @ 110 psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____ % ash; _____ % sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

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

Complete Appropriate Control Device Sheets

Stack Emissions: Opacity 0 % By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/24/93

Emission Point No./Name: _____

Rated Boiler Size: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Operating Rate @ Insp: _____ MMBTUH
OR
_____ lbs steam/hr @ _____ psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

_____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

NOT OPERATING

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL Date: _____

Emission Point No./Name: PACK TOWER

Scrubbing Liquid: (X) Water ( ) Solution ( ) Reactant Solution

Scrubber Type:

(X) Spray Tower/Wet Washer
( ) Sieve Tray/Bubbler Cap/Packed Column
( ) Orifice
( ) Venturi
( ) Other, Explain: _____

Demisting Method: ( ) Cyclone
( ) Vanes
( ) Pad
( ) No Demisting
( ) Other, Explain: _____

Operating Conditions: 50 gpm @ UNKNOWN psig
UNKNOWN inches water gauge pressure drop
Rainout Occurring: ( ) Yes (X) No

Scrubbing Liquid: (X) Once Through ( ) Recycled

If recycled, _____ gpm makeup rate

If water, describe settling basin: _____

For solution/reactant systems:
Chemical makeup of liquid: _____
How is scrubber discharge handled/treated: _____

Emissions: (X) Not Visible ( ) Visible, Dust Trail-off, _____% Opacity (Do VEE)

Comments: PRESSURE DROP GAUGE WAS BROKEN

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE Date: 3/24/93

Emission Point No./Name: LARGE CYCLONE

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap
(Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL Date: 3/24/93

Emission Point No./Name: SMALL CYCLONE

Type particulate being handled: SAWDUST, CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: (X) Yes ( ) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of?

DUMPED INTO TRUCK AND HAULED OFF.

Comments:

Lowndes

INSPECTION REPORT FORM - GENERAL

Facility Name: KERR MCGEE CHEMICAL CORP. Date: 3/19/92

Address: 230 14TH AVENUE AND 20TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551

Inspected By: STANLEY WATKINS/RANDY BYARS

Person Contacted: JOHN GETZ AND ANTHONY HELMS

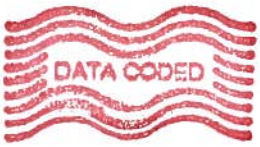
Facility No: 120-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
( ) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
(X) Annual
( ) Follow-up



Current Permit Status: PTO HAS EXPIRED BUT A NEW APPLICATION HAS BEEN FILED

Source Description: PRESSURE TREATING OF CROSSTIES WITH CRESOTE

Applicable Regulations:

( ) SIP
( ) PSD
(X) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

NO PROBLEMS FOUND

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/19/92

Emission Point No./Name: CLEAVER BROOKS

Rated Boiler Size: 44635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: _____ MMBTUH
OR
20,000 lbs steam/hr @ 130 psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
( ) Fuel Oil, No. _____ @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

NO VISIBLE EMISSIONS

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/19/92

Emission Point No./Name: _____

Rated Boiler Size: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Operating Rate @ Insp: _____ MMBTUH
OR
_____ lbs steam/hr @ _____ psig

Fuel(s) Being Used:
( ) Natural Gas @ _____ MCFH
( ) Fuel Oil, No. _____ @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

NOT OPERATING

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL **Date:** 3/19/92

Emission Point No./Name: PARK TOWER

Scrubbing Liquid: (X) Water ( ) Solution ( ) Reactant Solution

Scrubber Type:

(X) Spray Tower/Wet Washer
( ) Sieve Tray/Bubbler Cap/Packed Column
( ) Orifice
( ) Venturi
( ) Other, Explain: _____

Demisting Method: ( ) Cyclone
( ) Vanes
( ) Pad
( ) No Demisting
( ) Other, Explain: _____

Operating Conditions: 50 gpm @ 12 psig
UNKNOWN inches water gauge pressure drop
Rainout Occurring: ( ) Yes (X) No

Scrubbing Liquid: ( ) Once Through (X) Recycled

If recycled, VARIES **gpm makeup rate**

If water, describe settling basin: 5000 GALLON TANK

For solution/reactant systems:
Chemical makeup of liquid: _____
How is scrubber discharge handled/treated: _____

Emissions: (X) **Not Visible** ( ) **Visible, Dust Trail-off,** 0 **% Opacity (Do VEE)**

Comments: _____

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE Date: 3/19/92

Emission Point No./Name: LARGE CYCLONE

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL Date: 3/19/92

Emission Point No./Name: SMALL CYCLONE

Type particulate being handled: SAWDUST, CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL **Date:** 3/12/91

Emission Point No./Name: PACKED TOWER

Scrubbing Liquid: (X) Water ( ) Solution ( ) Reactant Solution

Scrubber Type:

(X) Spray Tower/Wet Washer
( ) Sieve Tray/Bubbler Cap/Packed Column
( ) Orifice
( ) Venturi
( ) Other, Explain: _____

Demisting Method: ( ) Cyclone
( ) Vanes
( ) Pad
( ) No Demisting
( ) Other, Explain: _____

Operating Conditions: 50 gpm @ 12 psig
18 inches water gauge pressure drop
Rainout Occurring: ( ) Yes (X) No

Scrubbing Liquid: ( ) Once Through (X) Recycled

If recycled, _____ **gpm makeup rate** TANK IS REFILLED WEEKLY

If water, describe settling basin: 2000 GALLON TANK

For solution/reactant systems:
Chemical makeup of liquid: _____
How is scrubber discharge handled/treated: _____

Emissions: (X) **Not Visible** ( ) **Visible, Dust Trail-off,** 0 **% Opacity (Do VEE)**

Comments: _____

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE Date: 3/12/91

Emission Point No./Name: LARGE CYCLONE

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL Date: 3/11/91

Emission Point No./Name: SMALL CYCLONE

Type particulate being handled: SAWDUST, CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of?

DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - GENERAL

Facility Name: KERR MCGEE CHEMICAL CORP. Date: APRIL 9th, 1991

Address: 230 14TH AVENUE AND 30TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551

Inspected By: KENNY HILL

Person Contacted: JOHN GETZ, TONY HELMS

Facility No: 130-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
(X) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
( ) Annual
( ) Follow-up

Current Permit Status: CURRENT PTO

Source Description: PRESSURE TREATS CROSS TIES WITH CRESOTE

Applicable Regulations:

( ) SIP
( ) PSD
( ) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 4/9/91

Emission Point No./Name: CLEAVERBROOKS

Rated Boiler Size: 44,635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
( ) Fuel Oil, No. _____ @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

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

Complete Appropriate Control Device Sheets

Stack Emissions: Opacity 0 % By (X) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

Mississippi Department of Natural Resources
Bureau of Pollution Control
Visible Emissions Evaluation Record

Plant Name: KERR - McGEE

Address:

City: Columbus

Emission Point: Cleaver Brooks Boiler

Date: 4-9-91

Is emission point operation normal ?

V. E. Observer: Kenny Hill

Certification Expiration: April 30, 1991

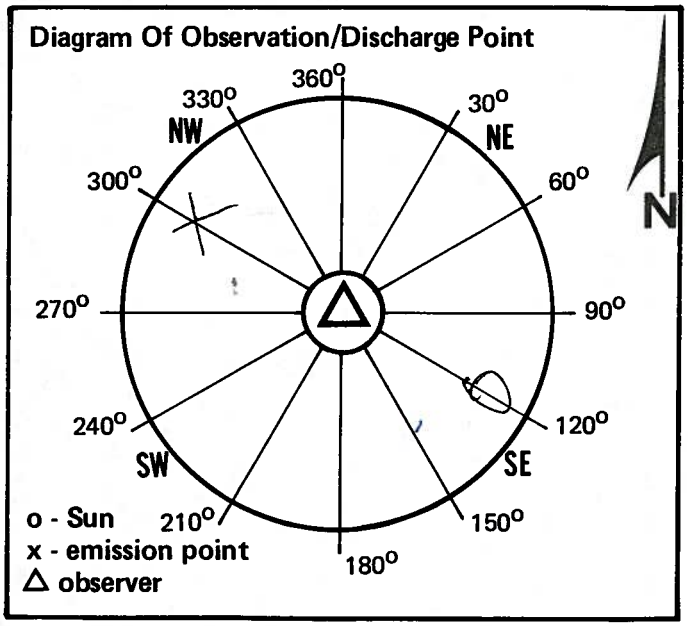
Set No.	Time		Opacity	
	Start	End	Sum	Average
1	10:15	10:21	0	0%

	Initial	Final
Distance to discharge	150'	150'
Height of observation point	Ground	Ground
Height of discharge	60'	60'
Plume color	Clear	Clear
Plume background	Sky	Sky
Water vapor in plume ?	No	No
Wind direction (from)	South	South
Wind speed	1-5	1-5
Ambient temperature	70°F	70°F
Discharge temperature		
Sky conditions	Cloudy	Cloudy

Min.	Seconds 0	15	30	45
0	0	0	0	0
1	0	0	0	0
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
0				
1				
2				
3				
4				
5				
0				
1				
2				
3				
4				
5				

DATA ENTERED

Diagram Of Observation/Discharge Point



Remarks:

Received By: Tony Helmer

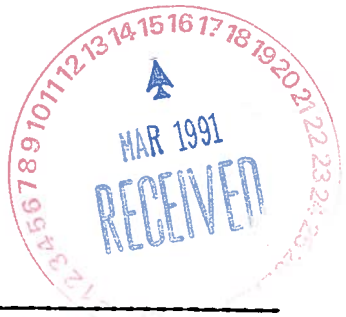
INSPECTION REPORT FORM - GENERAL

Facility Name: KERR MCGEE CHEMICAL CORP. Date: 3/12/91

Address: 230 14TH AVENUE AND 20TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551



Inspected By: STANLEY WATKINS

Person Contacted: JOHN GETZ AND ANTHONY HELMS

Facility No: 120-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
( ) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
(X) Annual
( ) Follow-up

Current Permit Status: PTO

Source Description: CRESOTE TREATING OF CROSS TIES, LANDSCAPE TIMBERS, ETC.

Applicable Regulations:

( ) SIP
( ) PSD
( ) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

NO PROBLEMS NOTED.

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: _____

Emission Point No./Name: CLEAVER BROOKS

Rated Boiler Size: 44635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: _____ MMBTUH
OR
_____ lbs steam/hr @ _____ psig

Fuel(s) Being Used:
( ) Natural Gas @ _____ MCFH
( ) Fuel Oil, No. _____ @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

_____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

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

Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

THIS BOILER WAS NOT BEING OPERATED ON THIS DATE.

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/12/91

Emission Point No./Name: _____

Rated Boiler Size: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Operating Rate @ Insp: _____ MMBTUH
OR
12000 lbs steam/hr @ 150 psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
( ) Fuel Oil, No. _____ @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

_____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

NO VISIBLE EMISSIONS WERE SEEN.

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
RAY MABUS
GOVERNOR

FILE COPY

April 16, 1991

Mr. John Getz, Plant Manager
Kerr-McGee Chemical Corporation
P.O. Box 906
Columbus, Mississippi 39704

Dear Mr. Getz:

Re: Air Emissions Complaint
Facility No. 1680-00020
Columbus, Mississippi
Lowndes County

On April 9, 1991, Office personnel investigated an air emissions complaint registered against your facility. Even though our investigation did not reveal any apparent emission problems, we would appreciate your cooperation in ensuring every precaution is taken to minimize air emissions from the facility, including odor emissions.

If there are any questions, please feel free to call.

Sincerely,

Dan N. McLeod
Stationary Source Compliance Section

DNM:lr

Lowndes Co.
Kerr-McGee
DeW

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

APR 1991
RECEIVED

TO: Dan McLeod
FROM: Kenny Hill, NRO
DATE: April 10th, 1991

SUBJECT: Kerr-McGee Chemcial Corp.
Columbus, MS
Lowndes County

On April 9th, 1991, I investigated a complaint at the referenced facility. Cathy Kearney, Complainant, stated that over the weekend there was thick black smoke coming from this facility or from one located near it.

I contacted Mr. John Getz, Plant Manager, and Mr. Tony Helms, Assistant Manager, on this investigation. I found no evidence that any burning had taken place at this facility. The only air emissions from this facility on this date was from the Cleaver Brooks boiler. This boiler was operating on natural gas and had an opacity of 0%. This boiler does have a #2 diesel backup system, but this is used only when there is a natural gas shortage.

Ms. Kearney's complaint, also, stated that there was a bad cresote smell associated with this smoke. There is a cresote smell around this facility, because they use cresote to pressure treat cross ties.

I called Ms. Kearney and told her of my findings.

If I can be of any further assistnace, please advise.

Respectfully,

Kenny Hill

DATA CODED

KH:c

cc: Charles Chisolm

FEB 1989
RECEIVED

SITE INSPECTION
PROPOSED AIR EMISSIONS SOURCE

I. ADMINISTRATIVE INFORMATION

A. Facility Name: KERR MCGEE CHEMICAL FOREST PRODUCTS DIVISION

Address: 14TH AVENUE NORTH, P.O. BOX 906

COLUMBUS, MS 39702 LOWNDES COUNTY

Phone No.: 328-7551

B. Proposed Source Location: EXISTING FACILITY.

C. Key Data: / / / / / / / / /

D. Engineer:

Address:

Phone No.:

E. Person to Contact: ROSS HERROD, PLANT MANAGER

Address:

Phone No.:

II. TECHNICAL INFORMATION

A. Type Project: NEW CREOSOTE STORAGE TANK AND ASSOCIATED SCRUBBER.

B. Type Emissions:

C. Type Control:

E. Site Terrain:

1. Site Elevation is: _____ Higher than surroundings
   _____ Lower than surroundings
   _X_ Same as surroundings

2. Lay of the land in and around site is:

   _X_ Flat
   _____ Sloping one direction
   _____ Steeply
   _____ Gently
   _____ Direction of slope is down to _____
   _____ Rolling (small hills)
   _____ Hilly (steep hills)

3. Comments on terrain: _____

F. Site Access:

1. Describe intersection and route of existing and/or proposed access roads to site: PAVED ROAD TURNS SOUTH OFF NORTH 14TH AVENUE.

2. Type (construction) of roads:

   _____ Unpaved
   _____ Gravel
   _____ Native soil
   _X_ Paved
   _X_ Asphalt
   _____ Concrete

G. Attach a detailed, scaled sketch (plan review) of the site and surroundings using the following criteria:

1. Urban and Suburban Sites - Show surroundings for at least one block on all sides.
2. Rural Sites - Show surroundings out to at least a 1/2 mile ra...
3. Identify any buildings, hills, and/or vegetation which is lik... to be taller than the point(s) of emission and which intervene between the site and other identified surroundings.
4. Identify hospitals, etc., described in III. C.
5. Identify terrain features described in III. E.

BUREAU OF POLLUTION CONTROL

COMPLAINT FORM

1/25/89 (DATE) 2:45 PM (TIME) [X] AIR [ ] WATER [ ] SOLID [ ] TANK [ ] HAZARDOUS

PERSON REPORTING: [ ] MR. [X] MS. ROSE ANN WEEKS

ADDRESS: COLUMBUS (CITY) LOWNDES (COUNTY) 1096 SOUTHDOWN PARKWAY (STREET OR BOX) 39701 (ZIP CODE)

TELEPHONE HOME: 327-3930
WORK:

COMPLAINT SITE: KERR MCGEE 14TH AVE. COLUMBUS

TEXT OF COMPLAINT: STRONG CRESOTE ODOR BEGINNING AROUND SUNSET AND LASTING UNTIL EARLY MORNING.

COMPLAINT TAKEN BY: DON WATTS (NAME) JACKSON (OFFICE)

REFERRED TO: [X] NORTH REGIONAL OFFICE
[ ] CENTRAL REGIONAL OFFICE
[ ] SOUTH REGIONAL OFFICE

SEND WRITTEN REPORT TO: BOBBY WHITTAKER

REFERRED BY: [X] PHONE [ ] MAIL [ ] COURIER

ROUTED TO R.O. BY: JAY BARKLEY DATE: 1/25/89 KH 4:20

RESOLUTION:

DO INSPECTION OF ACILITY. CHECK FOR ANY TYPE EMISSIONS THEY MAY HAVE. ALSO, ASK ABOUT CHANGES IN PROCESS OR PRODUCTION LEVEL FOR LAST FEW WEEKS. CHECK AREA FOR ODOR AND IF FOUND TRY TO IDENTIFY SOURCE.

sissippi Department of Natural Resour
Bureau of Pollution Control
Visible Emissions Evaluation Record

Plant Name: Kerr Mcgee Chemical V. E. Observer: Randy Byars

Address:

City: Columbus

Certification Expiration: April 92

Emission Point: Scrubber

Date: 3-19-92

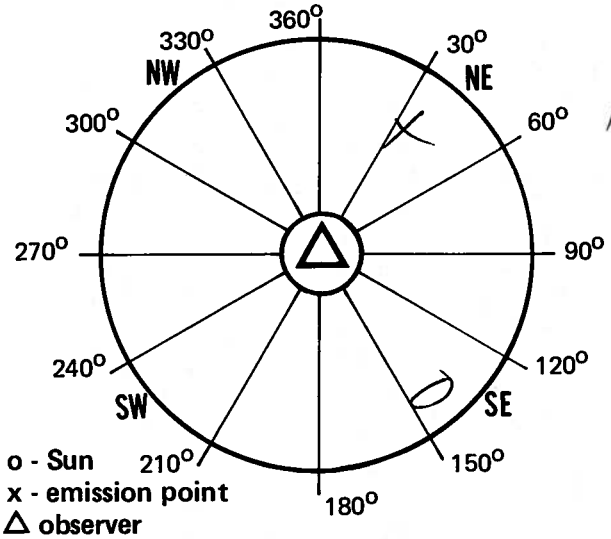
Is emission point operation normal ? Yes

Set No.	Time		Opacity	
	Start	End	Sum	Average
	10:45	10:51	0	0

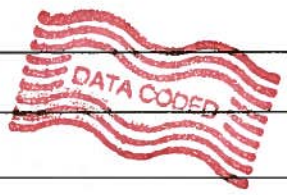
	Initial	Final
Distance to discharge	100'	100'
Height of observation point	0	0
Height of discharge	25'	25'
Plume color	None	None
Plume background	Sky	Sky
Water vapor in plume ?	No	No
Wind direction (from)	W	W
Wind speed	3-6	3-6
Ambient temperature	65'	65'
Discharge temperature	80'	80'
Sky conditions	Clear	Clear

Min.	Seconds 0	15	30	45
0	0	0	0	0
1	0	0	0	0
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
0				
1				
2				
3				
4				
5				
0				
1				
2				
3				
4				
5				

Diagram Of Observation/Discharge Point



Remarks:



Received By: Tony Helms

Mississippi Department of Natural Resources
Bureau of Pollution Control
Visible Emissions Evaluation Record

Plant Name: Kerr McGee

Address:

City: Columbus

Emission Point: scrubber

Date: 3-12-91

Is emission point operation normal ?

V. E. Observer: Stanley Watkins

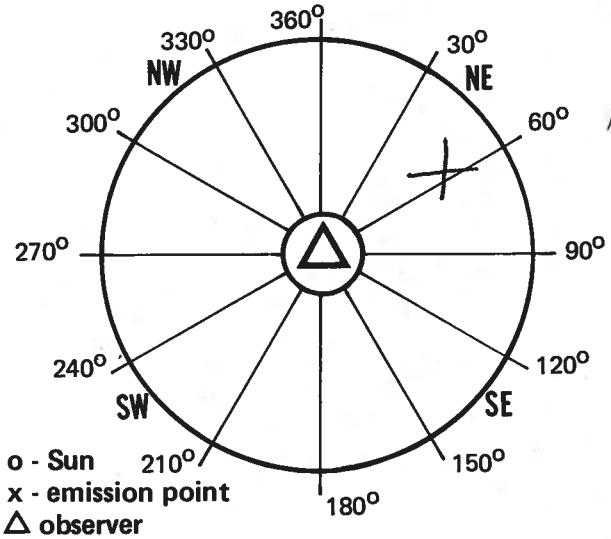
Certification Expiration: April 91

Set No.	Time		Opacity	
	Start	End	Sum	Average
1	12:55	1:01	0	0%

	Initial	Final
Distance to discharge	150	same
Height of observation point	gravel	"
Height of discharge	20'	"
Plume color	clear	"
Plume background	building	"
Water vapor in plume ?	NO	"
Wind direction (from)	S	"
Wind speed	1-3	"
Ambient temperature	60°	"
Discharge temperature		"
Sky conditions	cloudy	"

Min.	Seconds 0	15	30	45
0	0	0	0	0
1	0	0	0	0
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
0				
1				
2				
3				
4				
5				
0				
1				
2				
3				
4				
5				

Diagram Of Observation/Discharge Point



Remarks:

Received By: Joel J Hutz 3/12/91

Mississippi Department of Natural Resources
Bureau of Pollution Control
Visible Emissions Evaluation Record

Plant Name: Kerr McGee Forest V. E. Observer: Randy Byars

Address: _____ Certification Expiration: April 1990

City: Columbus

Emission Point: Small Cyclone

Date: 3/20/90

Is emission point operation normal ? Yes

Set No.	Time		Opacity	
	Start	End	Sum	Average
	1:25	1:31	120	5 o/o

	Initial	Final
Distance to discharge	20'	20'
Height of observation point	0	0
Height of discharge	75'	75'
Plume color	Brown	Brown
Plume background	Sky	Sky
Water vapor in plume ?	No	No
Wind direction (from)	NE	NE
Wind speed	3-6	3-6
Ambient temperature	60	60
Discharge temperature		
Sky conditions	Clear	Clear

Min.	Seconds 0	15	30	45
0	5	5	5	5
1	5	5	5	5
2	5	5	5	5
3	5	5	5	5
4	5	5	5	5
5	5	5	5	5
0				
1				
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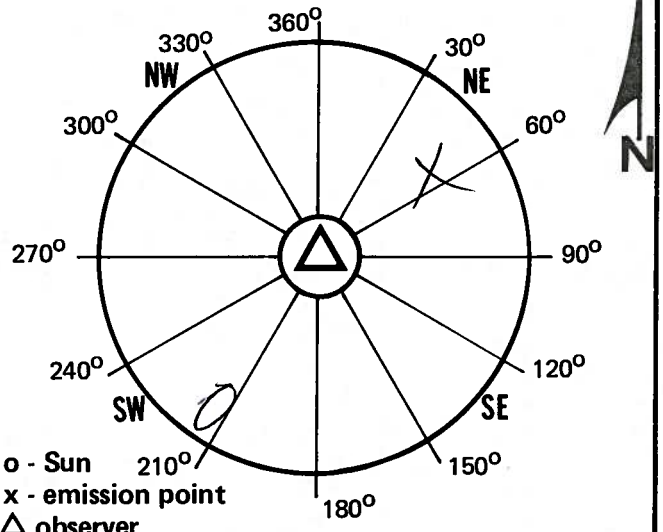
4				
5				

DATA LOGGED

Diagram Of Observation/Discharge Point



Remarks: _____

Received By: _____

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

FILE COPY

April 8, 1994

Mr. John Getz, Plant Manager
Kerr-McGee Chemical Corporation
Forest Products Division
PO Box 906
Columbus, MS 39703

Dear Mr. Getz:

Re: Facility No. 1680-00020
Columbus, MS

On March 24, 1994, the Mississippi Office of Pollution Control performed an inspection of the referenced facility. While there were no apparent air pollution problems at that time, we have since received a complaint from a resident in the area alleging that air emissions from the facility are causing health problems (nasal problems, irritated eyes, and breathing difficulties). In light of this and the history of public sensitivity in the area, we encourage you to take all reasonable steps to minimize air emissions, odor, and hopefully, complaints at your facility.

If you have any questions, please contact us.

Very truly yours,

Leslie Allen
Stationary Souce Compliance Section

RECEIVED
MAR 29 1994
DEPARTMENT OF

March 25, 1994

Mr. Jimmy Malone, Jr.
1502 North 26th Street
Columbus, Mississippi 39701

DATA CODED

Honorable James I. Palmer, Jr.
Executive Director
Department of Environmental Quality
Post Office Box 20305
Jackson, Mississippi 38289-1305

RE: KEER MCGEE CHEMICAL FOREST PRODUCTS DIVISION NORTH 14TH AVENUE COLUMBUS, MISSISSIPPI 39701 POLLUTEN EMISSION

Dear Mr. Palmer:

Please check on the status of the Kerr McGee wood product plant here in Columbus with regards to the polluten emission into the air in our area. I live within adjacent to, along with a large number of other residents within the vicenity of this plant.

Almost on a daily basis it is almost impossible to go out side due to the heavy emission of chemical into the air. You suffer from irritated eyes, running nose, difficulty in breathing; even outside. The fumes that are emitted by this plant are extremely heavy during the day and at night.

Please investigate this matter on behalf of the citizens that live around this facility.

Thank you very much for your assistance.

Sincerely yours,

Jimmy Malone, Jr.

JMJ

Jimmy Malone, Jr.
1502 North 26th Street
Columbus, Mississippi 39701

COLUMBUS, MS 39701
PM
1994

DPC - Air

Honorable James I. Palmer, Jr.
Executive Director
Department of Environmental Quality
Post Office Box 20305
Jackson, Mississippi 38289-1305

1680-20 Lowndes

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

RECEIVED
JUL -7 1993
DEQ-OPC

July 1, 1993

1680-00020

Melanie Miller
Air Quality Division
Mississippi Department Of Environmental Quality
P. O. Box 10385
Jackson, Mississippi 39289-0385

Re: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus, Mississippi Facility
Title V Permit

Dear Ms. Miller:

This serves to confirm our recent conversations and as a response to your letter dated June 8, 1993, regarding the Title V Permit Program for the Kerr-McGee Chemical Corporation, Forest Products Division (Kerr-McGee) Columbus, Mississippi Facility. Kerr-McGee has reviewed the regulations and believes that the Columbus Facility does not meet the requirements to require a Title V permit. In particular, the facility does not:

- Emit 10 tpy of any individual hazardous air pollutant or an aggregate of more than 25 tpy of all hazardous air pollutants or;
- Emit, or have the potential to emit, more than 100 tpy of any regulated pollutant.

In your letter dated June 8, 1993, the attached table indicted that the Columbus facility had the potential to emit:

- 71.7 tpy of particulate matter
- 231.8 tpy of SO2
- 3.5 tpy VOC (creosote vapors)

FOREST PRODUCTS

Lowndes

FILE COPY

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

August 6, 1992

Mr. John A. Crawford
Attorney At Law
Butler, Snow, O'Mara
Stevens & Cannada
P. O. Box 88567
Jackson, MS 39225-2567

Dear Mr. Crawford:

RE: Kerr-Magee Chemical Corporation
Forest Products Division
Columbus, Lowndes County, MS

Based on the Department's current knowledge, the Department has no reason to believe that any adverse health effects in the students or faculty attending Hunt High School are attributed to the air emissions of Kerr-McGee Chemical Corporation, Forest Products Division, nor does the Department have any reason to believe that the District should be concerned about the health of the students or faculty of Hunt High School due to its proximity to Kerr-McGee Chemical Corporation as the same may relate to air emissions.

Sincerely,

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

DKW/sse

Lowndes

FILE COPY

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

May 18, 1992

Mr. John Getz, Plant Manager
Kerr-McGee Chemical Corporation
Forest Products Division
P.O. Box 906
Columbus, Mississippi 39703

Dear Mr. Getz:

RE: Kerr-McGee Chemical Corporation
Facility No. 1680-00020
Lowndes County, Mississippi

As you are aware there has been significant public interest concerning possible environmental impacts at a school near your Columbus facility. Our investigations into the concerns of area residents included a review of the Toxic Release Inventory (TRI) reports submitted by the various facilities in the area. The air emissions reported by Kerr-McGee to the TRI do not correlate with the air emissions data in the applications we have in our files. Please explain this discrepancy as soon as possible.

If you have any questions, please advise.

Very truly yours,

J. Dewayne Headrick
Stationary Source Compliance Section

JDH/sse

BUTLER, SNOW,
O'MARA, STEVENS
& CANNADA

ATTORNEYS AT LAW

17TH FLOOR
DEPOSIT GUAI
P.O. BOX 2256
JACKSON, MS
(601) 948-5711
TELECOPIER: (

WRITER'S DIRI

April 30, 1992

(601) 949-

GEO. BUTLER (1948)
J. MORGAN STEVENS (1951)
CHAS. B. SNOW (1960)
JUNIOR O'MARA (1986)

ROBERT C. CANNADA
DAN McCULLEN
HAROLD D. MILLER, JR.
LAWRENCE J. FRANCK
C. EUGENE McROBERTS, JR.
JOHN A. CRAWFORD
D. CARL BLACK, JR.
LAUCH M. MAGRUDER, JR.
HUGH C. MONTGOMERY, JR.
JAMES W. O'MARA
W. SCOTT WELCH, III
JAY A. TRAVIS, III
LEE DAVIS THAMES
CHARLES L. BROCATO
KENNETH W. BARTON
CHARLES F. JOHNSON, III
STEPHEN W. ROSENBLATT
W. WAYNE DRINKWATER, JR.
JAMES S. OVERSTREET, JR.
HERBERT C. EHRHARDT
TY D. JONES
. CANNADA
. ABERNETHY
GENE MAGEE
AS E. WILLIAMS
D A. WILMESHERR
Y CANNADA
S C. LACEY, JR.
. HENEGAN
ER THOMPSON, JR.
G. HISE
A. WALKER
DAVIS
ARNER
NSON RAY
US WIGGS, III
ANCK MARTIN
. GRAVES
YNER BOBO
WINTER
TENBERRY CORSO
O. KENDALL MOORE
ROBERT M. FREY
GILBERT C. VAN LOON
THOMAS A. WEBB
A. CAMILLE HENICK
RONALD G. TAYLOR
J. COLLINS WOHNER JR.
DONNA BROWN JACOBS
H. MONROE SIMPKINS
J. CAL MAYO, JR.
GEORGE R. THOMAS
J. LEE WOODRUFF
SELBY A. IRELAND
E. BARRY BRIDGFORTH
WILLIAM M. GAGE
MICHAEL E. McWILLIAMS
STEPHANIE P. McGEE
ARTHUR D SPRATLIN, JR.
NANCY MORSE PARKES
BROOKS R. BUCHANAN

PHINEAS STEVENS
GEORGE H. BUTLER
OF COUNSEL

Mr. John Gertz
Plant Manager
Kerr-McGee Chemical Corporation
Forest Products Division
Post Office Box 906
Columbus, Mississippi 39704

Re: Hunt Junior High School
Columbus Municipal School District

Dear John:

As we discussed, Butler Snow is associated with David Dunn, Esquire, in representing the Columbus Municipal School District in issues arising from the Hunt Junior High School properties.

We understand that we are to communicate directly with you or with other officials at Kerr-McGee until such time as you instruct us to communicate through your attorneys. Please place the undersigned on your mailing list so that you can provide us with copies of all reports, correspondence and other written communication with the Department of Environmental Quality or with others if these documents are to become a part of the public file.

In the future, we will appreciate your communicating directly with the undersigned, or in my absence, with Kendall Moore of this firm on matters relating to environmental issues and concerns arising from the Kerr-McGee operations and relating to Hunt Junior High School or the Columbus Municipal School District. Please do not deal directly with the Superintendent or the School Board since this blurs the line of communication.

Among other issues, the District is investigating and analyzing the presence of soil and groundwater contamination affecting the Hunt Junior High School property which was revealed for the first time in reports filed by Kerr-McGee during the first quarter of 1992. As a part of its analysis the District intends to analyze

and to file comments, where appropriate, on the post-closure activities and the corrective action aspects of the Part B filing and any subsequent HSWA permit. Please be certain that this firm is served with all filings and is shown as the attorneys of record for the Columbus Municipal School District.

In addition to the need for assurances that air emissions and other releases to the environment do not adversely affect the health, safety and welfare of the students and faculty, the District is greatly concerned that the plume of contamination may have damaged and will otherwise interfere with the use of the property and facilities.

We look forward to meeting with representatives of Kerr-McGee in an effort to reach satisfactory resolution of the various environmental issues.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA

John A. Crawford

JAC/mms
211S.C3160

cc: W. David Dunn, Esquire
Mr. Bruce Ferguson
Mr. Don Watts

BUTLER, SNOW
O'MARA, STEVENS
& CANNADA

ATTORNEYS AT LAW

17TH FLOOR
DEPOSIT GUARANTY PLAZA
P.O. BOX 22567
JACKSON, MS 39225-2567
(601) 948-5711
TELECOPIER: (601) 949-4555

RECEIVED
APR 28 1992
DEPARTMENT OF
ENVIRONMENTAL QUALITY

WRITER'S DIRECT NUMBER

April 27, 1992

(601) 949-4534

GEO. BUTLER (1948)
J. MORGAN STEVENS (1951)
CHAS. B. SNOW (1960)
JUNIOR O'MARA (1986)

ERT C. CANNADA
McCULLEN
OLD D. MILLER, JR.
ENCE J. FRANCK
GENE McROBERTS, JR.
A. CRAWFORD
L. BLACK, JR.
M. MAGRUDER, JR.
C. MONTGOMERY, JR.
W. O'MARA
TT WELCH, III
RAVIS III
VIS THAMES
ES L. BROCATO
TH W. BARTON
S F. JOHNSON, III
N W. ROSENBLATT
VE DRINKWATER, JR.
OVERSTREET, JR.
C. EHRHARDT
D. JONES
DON B. CANNADA
PHIL B. ABERNETHY
W. EUGENE MAGEE
THOMAS E. WILLIAMS
EDWARD A. WILMESHERR
R. BARRY CANNADA
THOMAS C. LACEY, JR.
JOHN C. HENEGAN
J. CARTER THOMPSON, JR.
DANIEL G. HISE
JEFFREY A. WALKER
PAUL N. DAVIS
J. PAUL VARNER
J. STEVENSON RAY
E. MARCUS WIGGS, III
JAMIE PLANCK MARTIN
PAULA A. GRAVES
LESLIE JOYNER BOBO
ANNE V. WINTER
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ARTHUR D. SPRATLIN, JR.
NANCY MORSE PARKES
BROOKS R. BUCHANAN

PHINEAS STEVENS
GEORGE H. BUTLER
OF COUNSEL

Mr. Don Watts
Branch Supervisor
Air Division
Office of Pollution Control
Department of Environmental Quality
Post Office Box 10385
Jackson, Mississippi 39289-0385

Re: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus, Lowndes County, Mississippi

Dear Don:

As you are aware, this firm, along with David Dunn of Columbus, represents the Columbus Municipal School District. The District operates Hunt High School, which is located southwest of the Kerr-McGee facility in Columbus.

Please consider this letter to be the District's formal request to the Department to make the following certification to the District:

> Based on the Department's current knowledge, the Department would not expect to observe any adverse health effects in the students or faculty attending Hunt High School that could be attributed to the air emissions of Kerr-McGee Chemical Corporation, Forest Products Division, nor does the Department believe that there is any reason for the District to be concerned about the health of the students or faculty of Hunt High School due to its proximity to Kerr-McGee Chemical Corporation as the same may relate to air emissions.

Please direct your reply to the undersigned.

We note that on or about April 16, 1992, the Stationary Source Compliance Section transmitted Operating Permit No. 1680-00020 to Kerr-McGee Chemical

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385
(601) 961-5171

April 4, 1989

FILE COPY

Certified Mail No. P 962 285 440

Mr. Peter C. Gaskin, Environmental Control
Kerr-McGee Chemical Corporation,
Forest Products Division
P.O. Box 906
Columbus, Mississippi 39701

DATA CODED

Dear Mr. Gaskin:

Re: Construction Permit No. 1680-00020
Columbus, Mississippi

We have completed our review of the plans and specifications for the above referenced permit and approval is hereby indicated for air pollution control purposes only. Enclosed please find Construction Permit No. 1680-00020 construction of the air emissions equipment and air pollution control equipment.

Prior to startup of the air emissions equipment at this facility, a Performance Evaluation Permit must be obtained from the Permit Board. In order to obtain the Performance Evaluation Permit, it will be necessary to submit certification by a professional engineer registered in the State of Mississippi that construction was completed in accordance with the approved plans and specifications and a written request for the permit.

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

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

Very truly yours,

Bobby V. Whitaker
North Air Emissions Section

BVW:sr
Enclosure

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

March 28, 1989

RECEIVED
MAR 31 1989
Dept. of Natural Resources
Bureau of Pollution Control

Certified - Return Receipt Requested

Mr. Bobby V. Whitaker
North Air Emissions Section
Bureau of Pollution Control
P.O. Box 10385
Jackson, MS 39209

Dear Mr. Whitaker:

Re: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus Facility
Odor Complaint

This serves to respond to an odor complaint received by the Bureau of Pollution Control (BPC) on January 25, 1989. The odor complaint investigated by the BPC on January 27, 1989 is alleged to have been caused by the Kerr-McGee Chemical Corporation, Forest Products Division (KMCC-FPD), Columbus Facility. In your March 10, 1989 letter you requested KMCC-FPD to evaluate our operations and determine any changes which may have caused increased odors. Our review indicates that there have been no changes within the production process system that could have increased the odor potential.

KMCC-FPD recognizes that the potential for citizen concerns regarding odor may exist at all plants throughout the U.S. due to increased community awareness of industry. Because of that awareness, KMCC-FPD has been reducing and eliminating sources of odor potential for the past couple of years. Areas of significant odor potential that have been reduced or eliminated at the Columbus Facility include closure of a production process wastewater aeration basin, a wastewater holding impoundment, clean out of two oil recovery separators and retrofitting one with a steel cover, and replacing process wastewater in the cooling tower system with water from the city. These activities resulted in the reduction or elimination of significant sources of odor potential that may be caused by evaporation.

KMCC-FPD has recently committed to install a new creosote storage tank with a closed vent system and emission control scrubber. The emission control scrubber will practically eliminate the potential odor emissions from the work tank. The new storage tank and scrubber will be installed by June, 1989.

A modification to the production process wood preserving system is currently being studied that will eliminate the use of large volumes of pressurized air to transfer creosote from storage tanks to the treating process and back to storage. The production process modification will result in a significant volume

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

March 20, 1989

Certified - Return Receipt Requested

RECEIVED
MAR 23 1989
Dept. of Natural Resources
Bureau of Pollution Control

Mr. Bobby V. Whitaker
North Air Emissions Section
Bureau of Pollution Control
P.O. Box 10385
Jackson, MS 39209

Dear Mr. Whitaker:

Re: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus Facility
Construction Schedule

This serves to advise the Bureau of Pollution Control (BPC) information regarding notification and recordkeeping required for the construction and installation of a new creosote storage tank and associated scrubber at the Kerr-McGee Chemical Corporation, Forest Products Division (KMCC-FPD), Columbus Facility.

1. Notification of start of construction.

   Field erection of the tank is scheduled to begin week of March 27, 1989. Completion is scheduled four to six weeks from start date.

   Construction of the scrubber is planned to begin week of April 3, 1989 and is scheduled for delivery to the Columbus Facility within eight to twelve weeks.

2. Notification of anticipated date of initial startup.

   Initial startup of storage tank and scrubber is anticipated week of June 5, 1989.

3. Notification of actual date of initial startup will be provided within fifteen days.

4. KMCC-FPD will provide notification of any proposed physical or operational changes to the existing facility which may increase the emission rate prior to implementation.

5. A performance test of the tank and scrubber system will be conducted within sixty days after achieving maximum production rate, and in no case later than one hundred eighty days after initial startup.

KM FOREST PRODUCTS

March 10, 1989

Lowndes

FILE COPY

Ms. Rose Ann Weeks
1096 Southdown Parkway
Columbus, Mississippi 39701

Dear Ms. Weeks:

Re: Odor Complaint
Columbus, Mississippi

The Bureau of Pollution Control has investigated your complaint of odor from Kerr-McGee.

At present, we have no reason to believe that the company was, or is, in violation of any air emission regulations. We are aware of the odor problem, and are in contact with the company to pursue a solution.

Very truly yours,

Bobby V. Whitaker
North Air Emissions Section

BVW:cm

Lowndes

March 10, 1989

FILE COPY

Mr. Ross Harrod, Plant Manager
Kerr-McGee
P. O. Box 906
Columbus, Mississippi 39701

Dear Mr. Harrod:

Re: Odor Complaint
Columbus, Mississippi

The Bureau of Pollution Control has recently investigated an odor complaint from your facility. The complaint was received January 25, 1989, and investigated January 27, 1989.

We have not experienced odor complaints in the past from your facility. Has a recent change in operation or production occurred which may have increased odor potential?

Please respond as soon as practical with your thoughts on what may be causing increased odor problems.

Very truly yours,

Bobby V. Whitaker
North Air Emissions Section

BVW:cm

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 961-5171

Lowndes

February 21, 1989

Mr. Peter C. Gaskin, Environmental Control
Kerr McGee Chemical Corporation
P. O. Box 906
Columbus, MS 39701

FILE COPY

Dear Mr. Gaskin:

Re: Construction Permit
Facility No. 120-1680-00020
Columbus, Mississippi

As you know, the construction of the new creosote storage tank and associated scrubber is subject to Federal New Source Performance Standards (NSPS). This letter is to advise you of the notification requirements of these regulations as outlined in 40 CFR Part 60.7, Notification and Recordkeeping. They are as follows:

1. Notification of start of construction.

2 Notification of the anticipated date of initial start-up no more than sixty (60) days nor less than thirty (30) days prior to such date.

3. Notification of the actual date of initial start-up within fifteen (15) days after such date.

4. Notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies.

The New Source Performance Standards also require that a performance test be conducted by the facility within sixty (60) days after achieving maximum production rate, but in no case later than one hundred eighty (180) days after initial start-up. In this case, the "performance test" would consist of submittal of certain information as described by 40 CFR Part 60.113 (b)(c). I have enclosed a copy of the applicable standard for your information.

If you have any questions regarding these requirements, please call me.

Very truly yours,

Bobby V. Whitaker
North Air emissions Section

BVW:em
Enclosure

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 961-5171

RECEIVED
FEB 1989

TO: Bobby Whitaker
FROM: Stanley Watkins, NRO
DATE: January 30th, 1989

SUBJECT: Kerr McGee
14TH Avenue
P.O. Box 906
Columbus, MS 39702
Lowndes County

On January 27th, 1989, Randy Byars and I investigated an odor complaint at this facility. We contacted the Plant Manager, Rods (Ross) Harrod.

This plant has three pressurized tanks where cross ties are treated with cresote. These are loaded three times a day and it takes about eight hours to treat each batch. After being treated, the cross ties are placed over a drip tank before being stacked on the plant yard.

At the time we inspected the plant around 11:00 AM, they were treating cross ties in all three tanks. There was a strong cresote odor at the plant and on the roads surrounding the plant. The area around the treatment tanks did not smell any worse than the rest of the plant. Most of the odor appeared to be coming from the large area of treated cross ties stacked on the plant yard. There was also a water problem with the large number of ditches that drain off the plant property. Rain water washes cresote off the stored cross ties and drains uncontrolled into ditches surrounding the plant.

Mr. Harrod said that they have not had any changes in the process or production level within the past few weeks. He did say that they ususaly take a batch of cross ties out of the treatment tanks between 7:00 and 9:00 in the mornings and 4:00 and 9:00 in the afternoons. This would account for the stronger odor that Mrs. Weeks claims occurs early in the morning and late in the evenings.

I tried to contact Rose Ann Weeks, the Complainant, but could not reach her.

If I can be of any further assistance, please let me know.

Respectfully,

Stanley Watkins

Stanley Watkins

SW:c

ATTACHMENTS

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

January 11, 1989

RECEIVED
JAN 12 1989
Dept. of Natural Resources
Bureau of Pollution Control

Mr. Bobby Whitaker
North Air Emissions Section
Bureau of Pollution Control
P.O. Box 10385
Jackson, MS 39209

Re: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus, MS Facility
Operating Permit 1680-00020

Dear Mr. Whitaker:

Please find enclosed the revised application to construct a creosote storage tank at the Kerr-McGee Chemical Corporation, Forest Products Division (KMCC-FPD) Columbus Facility. The original application submitted to the Bureau of Pollution Control (BPC) on August 12, 1988 is incorporated by reference and a copy attached as Appendix B.

The application to construct the storage tank was denied by the BPC for the reason that the new storage tank is subject to New Source Performance Standards that require control of volatile organic emissions from the tank. The enclosed revised application provides information on air emission control equipment proposed for the new storage tank.

Should you have any questions or would like to schedule a meeting to discuss the application or the project, please contact me at (405) 270-2395.

Sincerely,

KERR-McGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

P.C. Gaskin
Staff, Environmental Control
and Regulatory Affairs

PCG:wpc

cc: Ross Harrod, Plant Superintendent

FOREST PRODUCTS

July 24, 1986

CERTIFIED MAIL NO. P 283 765 865

Mr. P. C. Gaskin, Environmental
and Affairs
Kerr-McGee Chemical Corporation
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020
Columbus, Mississippi

Enclosed please find Operating Permit No. 1680-00020 issued for the operation of the air emissions equipment at the above referenced facility. This permit should be displayed prominently at the facility. Operation of the air emissions equipment at the facility shall be in accordance with the conditions of the permit.

Any significant modification to this process or facility which will alter the rate or composition of air pollutant emissions will cause this permit to become invalid. Should you wish to make such a modification, it will be necessary to submit a new application for a construction permit.

This permit expires on August 1, 1989. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

If you desire that a Permit Board hearing be held regarding this permit, you should make written application to the Permit Board within thirty (30) days after receipt of this notice; otherwise, the terms, conditions and limitations in the permit shall become final.

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

Very truly yours,

Jerry B. Banks, Coordinator
North Air Emissions Section

JBB:cm
Enclosure

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

RECEIVED
JUN 23 1986
DEPT. OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL

June 19, 1986

CERTIFIED-RETURN RECEIPT REQUESTED

Mr. Jerry B. Banks, P. E.
North Air Emissions Section
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

RE: Operating Permit No. 1680-00020
Renewal Application
Columbus Facility

Dear Mr. Banks:

Enclosed is the completed Air Pollution Control Operating Permit Renewal Application for the Kerr-McGee Chemical Corporation, Forest Products Division, Columbus Facility. Additionally, the Organic Compound Emissions Permit Application Addendum and Questionnaire is enclosed.

Should you have any questions, please contact me.

Sincerely yours,

KERR-MCGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

P. C. Gaskin
Environmental & Regulatory Affairs

PCG:jw
Enclosures

cc: B. W. Boisseau
J. H. Bull

FOREST PRODUCTS

FILE COPY

June 11, 1986

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020

This letter is for the purpose of alerting you to the fact that the referenced permit expires on August 1, 1986. If you wish the permit to be considered for renewal, you will need to file a new application. Application forms are enclosed.

If you have any questions, please advise.

Very truly yours,

Jerry B. Banks, P. E., Coordinator
North Air Emissions Section

JBB:hdb
Enclosures

FILE COPY

May 15, 1986

Found

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020

This letter is for the purpose of alerting you to the fact that the referenced permit expires on August 1, 1986. If you wish the permit to be considered for renewal, you will need to file a new application. Application forms are enclosed.

If you have any questions, please advise.

Very truly yours,

Jerry B. Banks, P. E., Coordinator
North Air Emissions Section

JBB:els
Enclosures

FILE COPY

Found

May 6, 1986

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020

This letter is for the purpose of alerting you to the fact that the referenced permit expires on August 1, 1986. If you wish the permit to be considered for renewal, you will need to file a new application. Application forms are enclosed.

If you have any questions, please advise.

Very truly yours,

Jerry B. Banks, P.E., Coordinator
North Air Emissions Section

JBB:vgr
Enclosures

FILE COPY

April 17, 1986

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020

This letter is for the purpose of alerting you to the fact that the referenced permit expires on August 1, 1986. If you wish the permit to be considered for renewal, you will need to file a new application. Application forms are enclosed.

If you have any questions, please advise.

Very truly yours,

Jerry B. Banks, P. E., Coordinator
North Air Emissions Section

JBB:els
Enclosures

FILE COPY

Laundes

February 11, 1986

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020

This letter is for the purpose of alerting you to the fact that the referenced permit expires on August 1, 1986. If you wish the permit to be considered for renewal, you will need to file a new application. Application forms are enclosed.

If you have any questions, please advise.

Very truly yours,

Jerry B. Banks, P. E., Coordinator
North Air Emissions Section

JBB:vgr
Enclosures

Lowndes 120

August 10, 1983

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020
Columbus, Mississippi

Enclosed please find Operating Permit No. 1680-00020 issued for the operation of the air emissions equipment at the above referenced facility. This permit should be displayed prominently at the facility. Operation of the air emissions equipment at the facility shall be in accordance with the conditions of the permit.

Any significant modification to this process or facility which will alter the rate or composition of air pollutant emissions will cause this permit to become invalid. Should you wish to make such a modification, it will be necessary to submit a new application for a construction permit.

This permit expires on August 1, 1986. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

If you desire that a Permit Board hearing be held regarding this permit, you should make written application to the Permit Board within thirty (30) days after receipt of this notice; otherwise, the terms, conditions and limitations in the permit shall become final.

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

Very truly yours,

Mr. Connie J. Simmons, P. E.
North Air Emissions Section

CJS:hdb
Enclosure

Lowndes

FILE COPY

February 17, 1983

Mr. G. D. Lowe
Kerr-McGee Chemical Corporation
Forrest Products Division
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Lowe:

Re: Operating Permit No. 1680-00020

This letter is for the purpose of alerting you to the fact that the referenced permit expires on August 1, 1983. If you wish the permit to be considered for renewal, you will need to file a new application. Application forms are enclosed.

If you have any questions, please advise.

Very truly yours,

Dan N. McLeod
North Air Emissions Section

DNM:els
Enclosure

September 2, 1980

Mr. G. D. Lowe
Kerr-McGee Chemical Corporation
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39607

Dear Mr. Lowe:

Re: Operating Permit No. 1680-00020

Enclosed please find Operating Permit No. 1680-00020 issued for the operation of the air emissions equipment at the above referenced facility. This permit should be displayed prominently at the facility. Operation of the air emissions equipment at the facility shall be in accordance with the conditions of the permit.

Any significant modification to this process or facility which will alter the rate or composition of air pollutant emissions will cause this permit to become invalid. Should you wish to make such a modification, it will be necessary to submit a new application for a construction permit.

This permit expires on August 1, 1983. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

If you desire that a Permit Board hearing be held regarding this permit, you should make written application to the Permit Board within thirty (30) days after receipt of this notice; otherwise, the terms, conditions and limitations in the permit shall become final.

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

Very truly yours,

Jerry B. Banks, P. E., Coordinator
Air Emissions Section

JBB:ls
Enclosure

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

August 11, 1980

RECEIVED
AUG 15 1980
DEPT OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL

CERTIFIED

Mr. Jerry B. Banks, P. E.
Mississippi Department of Natural Resources
P. O. Box 10385
Jackson, Mississippi 39209

Dear Mr. Banks:

Here is the completed Air Pollution Control Permit application for the Columbus plant.

Attachments include a plot plan indicating the emission points, a process flow diagram, and a written description of the processing techniques.

If you have any questions, please call me.

Very truly yours,

KERR-MCGEE CHEMICAL CORP.
FOREST PRODUCTS DIVISION

P. C. Gaskin
Environmental and Quality Control

PCG/dkw
Attachments

cc: G. D. Lowe
W. J. Broussard

Lowndes

FILE COPY

July 16, 1980

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
Forest Products Division
Kerr-McGee Center
Oklahoma City, Oklahoma 73125

Dear Mr. Gaskin:

In response to your letter of July 11, 1980, please be advised that your request for an extension until August 8, 1980, to submit a permit application for the Columbus, Mississippi plant is granted.

If you have any questions, please advise.

Yours truly,

Jerry B. Banks, P. E., Coordinator
Air Emissions Section

JBB:hdb

Lowndes County

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

RECEIVED
1980 JUL 12 AM 10: 13
AIR & WATER POLLUTION CONTROL COMMISSION
STATE OF MISSISSIPPI

July 11, 1980

Mr. Jerry B. Banks, P. E.
Mississippi Dept. of Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

Dear Mr. Banks:

We have received your notice of 23 June 80, along with the permit application for operation of the two boilers and for the wood processing facilities. You had requested the application be returned by 11 July 80.

We respectfully request a three-week extension of the deadline in order to gather the information. The completed application will be submitted no later than 8 Aug. 80.

Please contact me at 405-270-2395, if you have any questions.

Very truly yours,

KERR-MCGEE CHEMICAL CORP.
FOREST PRODUCTS DIVISION

P. C. Gaskin
Environmental & Quality Control

PCG:jw

cc: G. D. Lowe/D. G. Hoffman - Columbus

TABLE 1

CODE NUMBERS FOR CONTROL DEVICES

Vapor Control Equipment

00 Group – CONTROL BY COMBUSTION

01 catalytic combustion
02 furnace combustion
03 boiler firebox
04 steam injection flare
05 venturi flare
06 direct flame combustion (afterburner)

10 Group – ADSORBERS

10 activated carbon – nonregenerative
11 activated carbon – regenerative
12 silica gel – nonregenerative
13 silica gel – regenerative
14 lithium chloride
15 activated alumina
16 activated bauxite

20 Goup – ABSORBERS

20 sieve plate tower
21 bubble-cap tower
22 packed tower

Particulate Matter –
Liquid Mist Control Equipment

30 Group – DRY SEPARATORS AND FILTERS

30 simple cyclones
31 high efficiency cyclones
32 settling chamber
33 simple filters
34 baghouse (shaking)
35 baghouse (reverse jet)
36 dry collector (dynamic)

40 Group – WET COLLECTORS

40 spray chamber – no baffles
41 spray chamber – with baffles
42 wet cyclones – rotoclone
43 wet dynamic precipitator
44 venturi scrubber
45 spray tower (not absorption – scrubbers)
46 packed tower (not absorption – scrubbers)
47 condensors (tube and shell); air
48 barometric condensor with hot wells

50 Group – ELECTRICAL PRECIPITATORS

50 single stage
51 double stage
52 precipitron

60 Group

60 Counteractant

70 Group – SPECIAL

71 Jet exhausters (air dilution)
72 Mist eliminators

80 Group – Other
Specify

Description of Processing Techniques

Railroad crossties and other timbers are shipped into the plant by trucks and railroad gondolas. The material is unloaded, end trimmed, sorted and stacked for air seasoning on the yard. After 6 to 12 months of seasoning, the material is adzed, bored for spikes and trammed for pressure treatment with a creosote preservative. After treatment, the material is shipped out by truck or railroad gondola.

The incoming green wood products can be artificially seasoned in 6 to 20 hours instead of open air seasoning on the yard.

The total amount of creosote used during the year is approximately 2,400,000 gallons. The total amount of petroleum solvents used per year is approximately 120,000 gallons.

FILE COPY

Lourdes

June 23, 1980

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. P. C. Gaskin
Kerr-McGee Chemical Corporation
Environmental and Quality Control
P. O. Box 2581
Kerr-McGee Center
Oklahoma City, Oklahoma 73125

Dear Mr. Gaskin:

Re: Operating Permit No. 1680-00020
Columbus, Mississippi

Operating Permit No. 1680-00020, issued to the company, expired on March 8, 1980, and the company is presently operating without a permit.

Enclosed are copies of the permit application which should be completed and returned to this office by July 11, 1980.

The following information must be provided:

1. Emission Point 001 (Process Steam Boiler) and Emission Point 002 (Woodwaste Boiler):
    a. Stack Height (feet)
    b. Stack Diameter (feet)
    c. Stack Gas Exit Temperature (°F)
    d. Stack Gas Exit Velocity (Feet/second)
    e. Stack Gas Exit Volume (dry standard cubic feet/minute)
    f. Emissions Estimate:
        Particulate (pounds/hour)
        SO_2 (pounds/hour)
        CO^2 (pounds/hour)
        HC (pounds/hour)
        NO_2 (pounds/hour)

2. Emission Point 003 (Wood Processing) - For each cyclone provide the following:
    a. Stack Height (feet)
    b. Stack Diameter (feet)
    c. Stack Gas Exit Temperature (°F)
    d. Stack Gas Exit Velocity (Feet/second)
    e. Stack Gas Exit Volume (cubic feet/minute)
    f. Emissions Estimate:
        Particulate (pounds/hour)

Additional information which should be provided is as follows:

1. Emission Point 002: If fuel oil is used, specify the quantity burned per hour and the % sulfur.

2. Emission Point 002: Indicate the pounds per hour of woodwaste burned and heat value of the woodwaste (BTU/lb).

3. Emission Point 003: Indicate the total amount of wood processed at the plant and if possible, the amount of woodwaste handled by each cyclone.

4. A plot plan should be provided indicating the location of each emission point.

5. A process flow diagram along with a written description of the processing of the material from receipt until shipping.

6. The number of storage tanks for fuel oil and/or treating compounds, the capacity (gallons) of each tank, and the quantity used (gallons/year).

7. Any other emissions to the atmosphere not discussed above should be addressed in the application.

If you have any questions, please advise.

Yours truly,

Jerry B. Banks, P. E., Coordinator
Air Emissions Section

JBB:hdb
Enclosure

Columbus & Meridian

Lowndes

KERR-McGEE CHEMICAL CORPORATION

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

March 2, 1979

PHONE
405 236-1313

RECEIVED
1979 MAR 19 AM 9:32

Air & Water Pollution Control
Commission
State of Mississippi
P. O. Box 827
Jackson, Mississippi

Attn: Mike Vickery

Gentlemen:

Attached are the completed solvent questionnaires for our Columbus and Meridian plants.

If you have any questions, please call.

Very truly yours,

KERR-MCGEE CHEMICAL CORP.
FOREST PRODUCTS DIVISION

P. C. Gaskin
Environmental & Quality Control

PCG:jw
Attachments

cc: H. L. Dearman
G. D. Lowe
R. D. Burke
W. J. Broussard
M. G. Hayes

Forest Products

Kerr-McGee Ch[illegible]cal Corp., FPD, Columbus [illegible]nt
MISSISSIPPI AIR [illegible] WATER POLLUTION CONTROL COMMI[illegible]N QUESTIONNAIRE

The Mississippi Air and Water Pollution Control Commission requests your cooperation in determining if volatile organic compound emissions to the air from your facility exceed 100 tons/year and, if they do, the actual quantity of emission. The Commission is required to gather this information by the Federal Clean Air Act Amendments of 1977 and it is being requested under the provisions of Section 49-17-17(g) of the Mississippi Air and Water Pollution Control Act.

Technically, "volatile organic compound" means any compound of carbon that has a vapor pressure greater than 0.1 millimeters of mercury at standard conditions excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. The following compounds will not be considered volatile organic compounds: methane, ethane, 1,1,1-trichoroethane (methyl choroform) and trichorotrifuoroethane (Freon 113).

Please answer the following questions:

1. Do you use sufficient quantities of paint, ink, adhesive, varnish, laquer, enamel or other products to contain more than 100 tons/year of solvents? Solvents usually weigh between 5 and 14 pounds/gallon which implies that you would have to use at least 15,000 gallons of solvents in order to emit more than 100 tons of solvent vapors.
   Yes X No ___

2. Do you use more than 100 tons/year of solvents other than water for cleaning, thinning, surface preparation, degreasing, extraction or other purposes? Yes X No ___

3. Does the total amount of solvents used in the products listed in question "1" and for the purposes listed in question "2" exceed 100 tons/year? Yes X No ___

   If the answer to question one, two, or three is yes, please for the year 1977 (1) quantify the solvents contained in products and other solvents used, (2) report the quantity in pounds, (3) report the type products or solvents used, and (4) give a brief description of how they are used.

   (See attached answers.)

4. Does your facility emit more than 100 tons/year of volatile organic compounds from any source such as refining, organic chemical manufacture, industrial processes, storage and handling, waste disposal or other sources or a combination of these sources and solvent evaporation. If the answer to this question is yes, please report the total quantity of emissions for the year 1977 and a brief description of the sources. Yes ___ No X

RECEIVE FEB 12 1979 RECEIVE

If the answer to all four questions is no, please sign and return this questionnaire immediately. For your response, please include this original form. A copy will be returned to you, if you so request.

If you have any questions, please contact Mike Vickery at 601-354-2550.

Signature

Wood preserving

Columbus, MS, Plant

Answers to Question No. 3

For base year 1977:

(1) Quantity of solvents contained in products or used per year -

Approx. 558,700 lbs. entrained in products.
Approx. 10,000 lbs. fugitive and emission losses.

(3) An aliphatic petroleum hydrocarbon distillate.

(4) Used in the vapor drying of wood products.

CALCULATION SHEET KM 2056

TITLE

Kerr-McGee Chemical Corp., FPD

Columbus, MS, Plant

SHEET Of

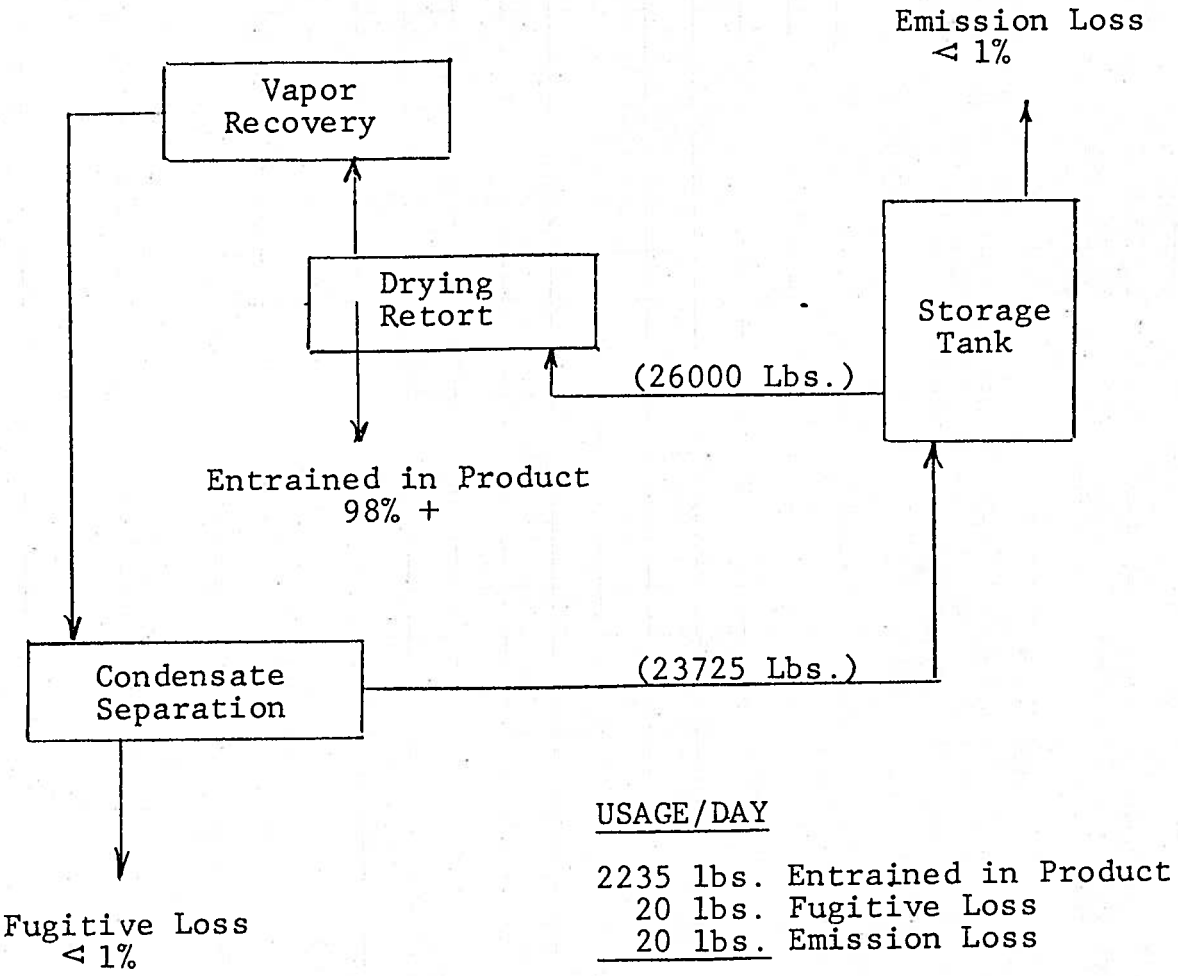
DATE

W O NO /A F E NO

PREPARED BY

CHECKED BY

SOLVENT FLOW DIAGRAM



USAGE/DAY

2235 lbs. Entrained in Product
20 lbs. Fugitive Loss
20 lbs. Emission Loss

Approx. 2275 Lbs. Used/Day

March 8, 1977

Kerr - McGee Chemical
14th Avenue
Columbus, Mississippi 39701

Gentlemen:

Re: Operating Permit
Permit No. 1680 00020 003
Wood Processing
Expires: March 8, 1980

The permit number indicated above has been assigned to your installation at the above address for the specific process indicated. This permit is valid for a period of three years and should be displayed prominently at the facility itself.

Please note that under State Regulations this permit becomes invalid if this process or facility is modified in any significant fashion which will alter the rate or composition of Air Pollution Emissions to the atmosphere. If such action is contemplated, a new construction permit application must be submitted to this agency.

A new permit application must be submitted ninety days prior to the end of the three year period covered by this permit.

Very truly yours,

Michael O. Saar
Engineer
Air Quality Control

MOS:lb
Enclosure

KERR-McGEE

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

November 22, 1976

PHONE
405 235-1310

RECEIVED
NOV 29 1976
AIR & WATER POLLU
CONTROL COMMISS
STATE OF MISSISSIP

Mr. Michael O. Saar
Air & Water Pollution
Control Commission
Division of Air Pollution Control
P. O. Box 827
Robert E. Lee Building
Jackson, Mississippi 39205

Dear Mr. Saar:

Reference your request of 3 Nov. 76, the total weight of all raw material introduced into the Columbus Plant and used in the manufacture and preservation of wood products is as follows:

Material	Lbs./Yr.
Preservatives, furnace oil and diesel fuel	31,510,000
Cross Ties, lumber and round wood material	107,227,000
Water (Cooling/condensing, steam processing)	122,850,000
Est. total pounds introduced/yr.	261,587,000

If you have any questions, please contact me.

Very truly yours,

KERR-MCGEE CHEMICAL CORP.
FOREST PRODUCTS DIVISION

P. C. Gaskin
Environmental & Quality Control

PCG:jw

cc: W. J. Broussard

KERR FOREST PRODUCTS

Wayne - How we acted on this

FILE LOWNDES

120-1680-00020-000
not in print-out
not in active, OB,
NPR
2/23/76

KERR-McGEE CHEMICAL CORPORATION Columbus

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

December 2, 1974

PHONE
405 236-1313

AIRMAIL
CERTIFIED-RETURN RECEIPT REQUESTED

Mr. Jerry M. Stubberfield
Chief, Air Pollution Control
Air & Water Pollution
Control Commission
State of Mississippi
P. O. Box 827, Robert E. Lee Bldg.
Jackson, Mississippi 39205

Dear Mr. Stubberfield:

We appreciate the granting of the postponement for the stack emissions test for the combination wood-coal-gas fired boiler and the evaluation of the performance for the newly installed gas-oil boiler at our Columbus facility.

The situation at Columbus is not good. The fire completely destroyed the manufacturing facilities. Of the three retorts in which wood material is pressure treated, we expect to have only one in operation by February. The other two retorts will not be operable until September 1975. The new boiler feedwater pumps, deaerator and all electrical controls were destroyed. We do not expect to be able to use the new oil-gas boiler for another 6 to 9 months.

During this period, we have continued to generate wood waste which we wish to use as fuel for the wood-gas boiler. By using the wood waste as fuel, enough heat can be generated to keep the preservative oil warm and to provide space heat for some of the facilities not destroyed by the fire.

FOREST PRODUCTS

Until we can repair the new boiler and the manufacturing facilities, we cannot perform the stack emissions test nor evaluate the new boiler. The new gas-oil boiler is being installed not only due to the increase in production demand, but to substantially reduce emission of particulates and sulfur dioxide emitted by the combination wood-coal-gas fired boiler.

It is for these reasons we respectfully request a tolerance permit to permit the incineration of wood waste during the estimated period of nine months we need to rebuild the plant.

Very truly yours,

KERR-MCGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

P. C. Gaskin
Environmental & Quality Control

PCG:jw

cc: W. J. Broussard

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

December 16, 1976

PHONE
405 236-1313

RECEIVED
DEC 21 1976
AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

CERTIFIED MAIL

Mr. Glen Wood, Jr.
Executive Director
Mississippi Air & Water Pollution
Control Commission
P. O. Box 827, Robert E. Lee Bldg.
Jackson, Mississippi 39205

RE: Boiler Operating Permits
Columbus Plant

Dear Mr. Wood:

Attached is a copy of the report of the Particulate Emissions Evaluation Test conducted by Environmental Protection Systems on 2 Dec. 76 at the Kerr-McGee, Columbus plant.

The average emission loading was 0.0327 grains/dscf and the allowable is 0.30.

With the successful completion of the emissions test, we respectfully request you issue the appropriate operating permits required for both steam process boilers at the Columbus facility.

If you have any questions, please contact me.

Very truly yours,

KERR-MCGEE CHEMICAL CORP.
FOREST PRODUCTS DIVISION

P. C. Gaskin
Environmental & Quality Control

PCG:jw
cc: W. J. Broussard
G. D. Lowe
R. D. Burke

FOREST PRODUCTS

Air & Water Pollution Control Commission

STATE OF MISSISSIPPI

COMMISSIONERS

RAY TRIBBLE
CHAIRMAN
MONEY

JAMES W. CARRAWAY
VICE CHAIRMAN
BASSFIELD

BOARD OF HEALTH
JOE D. BROWN

KENNETH COBB
LAMBERT

CHARLES W. ELSE
YAZOO CITY

GAME & FISH COMMISSION
BARRY O. FREEMAN

OIL & GAS BOARD
QUINCY R. HODGES

HERMIT A. JONES
CANTON

GLEN WOOD, JR., EXECUTIVE DIRECTOR
P. O. BOX 827 - ROBERT E. LEE BUILDING
JACKSON, MISSISSIPPI 39205

TELEPHONES:
ADMINISTRATIVE OFFICES 601-354-7513
AIR DIVISION 601-354-6783
WATER DIVISION 601-354-7661

COMMISSIONERS

MARINE CONSERVATION COMMISSION
CHARLES H. LYLES

BOARD OF WATER COMMISSIONERS
JACK PEPPER

JOE STONE
HATTIESBURG

ASSOCIATE MEMBERS

STATE PARK SYSTEM
WILLIAM M. BARNETT

A & I BOARD
HAROLD A. CROSS

GEOLOGICAL SURVEY
W. H. MOORE

TO: W. L. Pruitt
FROM: Stanley Watkins
DATE: Aug. 5, 1975

SUBJECT: Kerr-McGee Chemical
21st Street
Columbus, MS. 39701

An inspection was made of this new steam boiler on August 5, 1975. This is a gas-fired Cleaver Brooks boiler, model #WT439/BR3 with a maximum input of 44,635 BTU/hr. (This boiler has a standby fuel of #6 fuel oil). The boiler has an exhaust stack that is 120 ft. high. This company also has an old wood waste boiler that is exhausted into the same stack. (The wood waste boiler is also capable of using coal but coal has not been used in the past few years). Both of these boilers were operating at the time of the inspection and I could not see any visible emissions from the exhaust stack. I would recommend an Operating Permit for these boilers.

This facility also has a low efficiency cyclone which collects the sawdust from the planer mill and woodworking machines. There was only a slight amount of dusting from this cyclone.

Respectfully,

Stanley Watkins

Stanley Watkins

SW:br

RECEIVED
AUG 12 1975
AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

S. Jaynes

Continental Engineering Service

P. O. Box 416
Aberdeen, Mississippi 39730

RECEIVED
MAY 2 ? 1974
AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

May 15, 1974

Mississippi Air and Water Pollution Control Comm.
Air Division
P. O. Box 827
Jackson, Miss. 39205

RE: Moss-American, Inc.
Columbus, Miss.

Attention: Mr. W. C. Pruitt

Dear Sir:

Enclosed herewith are two copies of an "Application for Approval to Construct" from the above captioned company. This application covers the installation of a new Cleaver-Brooks, Model D-60, 35,000 pph process steam boiler. This boiler is being installed to replace the present boiler which is gas fired with coal alternate. The old boiler will be used only for stand-by service in case of a breakdown of the new boiler.

Submitted with the application are two copies of the site plan, two copies of boiler drawings, and two copies of "Explanation of Process". The flow diagram is being omitted as agreed in our telephone conversation of May 15, 1974 as it really is very elemental and does not add much to the information needed.

If you have any further questions on the above matter, please advise.

Yours truly,

Samuel L. Jaynes
Professional Engineer

SLJ/ecw

Enclosures

WOP110478 Fk

STATE OF MISSISSIPPI AND FEDERALLY-ENFORCEABLE AIR POLLUTION CONTROL PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Kerr-McGee Chemical Corporation
2300 14th Avenue & 20th Street
Columbus, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

Issued this _____ day of _________, 19___

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

____

HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires _____ day of ________, 19___

Permit No. 1680-00020

bgh-km.1

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PART I
GENERAL CONDITIONS

1. Any activities not identified in the application are not authorized by this permit.

2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits.

4. Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10.

5. 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.

6. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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7. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions.

8. For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

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

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

11. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

12. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

13. This permit is for air pollution control purposes only.

14. This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section V.D.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-001, the 34 MMBTU/HR Cleaver Brooks D-6 Primary Boiler.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Particulate Matter	0.2 lbs/hr and 0.50 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.
PM_{10}	0.2 lbs/hr and 0.50 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.
Sulfur Dioxide	7.1 lbs/hr and 7.84 tons/year, as determined by EPA Test Method 6, 40 CFR 60, Appendix A.
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect ISSUANCE DATE.

FUEL LIMITATIONS

Fuels other than natural gas and fuel oil, with a maximum sulfur content of 0.5%, are prohibited. Fuel oil usage shall be limited to 216,000 gallons in any consecutive 12 month period.

MONITORING & RECORDKEEPING REQUIREMENTS

The permittee shall monitor and document with recordkeeping the fuel oil usage each day. The permittee shall calculate daily the total fuel oil usage of the current calendar year.

These records shall be maintained at the facility for a period of five (5) years and made available to the Office of Pollution Control upon request.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-002, the 14.3 MMBTU/HR Vogt 14435 Stand-by Boiler.

Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

FUEL LIMITATIONS

Fuels other than natural gas are prohibited.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-003, the Framing Mill with two (2) cyclones (Reference Number EP002).

Such emissions shall be limited by the permittee as specified below:

	EMISSION LIMITATIONS
Particulate Matter	0.73 lbs/hr and 3.20 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.
PM_{10}	0.365 lbs/hr and 1.6 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect ISSUANCE DATE.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from the work tanks (which are controlled by the Treating System Scrubber - EP001) given below:

Emission Point No.	Tank No.	Size (Gallons)	Type	Material Stored
AA-004	EU004	57,000	Fixed Roof	Creosote
AA-005	EU006	78,000	Fixed Roof	Creosote
AA-006	EU007	57,000	Fixed Roof	Creosote
AA-007	EU005	57,000	Fixed Roof	Creosote

Such emissions shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-008, the Switch Tie Unloader with cyclone (Reference Number EP003).

Such emissions shall be limited by the permittee as specified below:

	EMISSION LIMITATIONS
Particulate Matter	0.21 lbs/hr and 0.93 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.
PM_{10}	0.11 lbs/hr and 0.47 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect ISSUANCE DATE.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-009, the Cross Tie Unloader with cyclone (Reference Number EP004).

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Particulate Matter	**0.38 lbs/hr and 1.67 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.**
PM_{10}	**0.094 lbs/hr and 0.41 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.**
Opacity	**40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.**

All test methods specified above shall be those versions, or their approved equivalents, which are in effect ISSUANCE DATE.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-010, the Retort and Corresponding Vacuum System (Reference Numbers EU001-003) with emissions being controlled by the Treating System Scrubber - EP001, and the Retort Doors (Reference Numbers EU001A-003B) which have no emission controls.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect ISSUANCE DATE.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from the following sources (with emissions being controlled by the Treating System Venturi Scrubber - EP001):

Emission Point	Description
AA-011	Hot Tank (EU008)
AA-012	Primary Oil/Water Separators (EU014, EU015)
AA-013	Reclaim Tank (EU022)
AA-014	Building Sump (EU025)

Such emissions shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from the following sources (with emissions being controlled by the Wastewater Treatment Facility Packed Tower Scrubber - EP013) as shown below:

Emission Point	Description
AA-015	Secondary Oil/Water Separator
AA-016	Groundwater Oil/Water Separator
AA-017	Surge Tank

Such emissions shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until EXPIRATION DATE, the permittee is authorized to operate air emissions equipment and emit air contaminants from the following sources:

Emission Point	Description
AA-018	Sap and Vacuum Seal Water Tank (EU009)
AA-019	Aeration Basins (EU018-020)
AA-020	Diesel Storage Tank (Capacity = 25,348 gallons)
AA-021	Diesel Storage Tank (Capacity = 25,348 gallons)
AA-022	Diesel Storage Tank (Capacity = 25,348 gallons)
AA-023	Diesel Storage Tank (Capacity = 25,348 gallons)
AA-024	Diesel Storage Tank (Capacity = 1,000 gallons)
AA-025	Building Space Heaters
AA-026	Groundwater Oil/Water Separator Lift Station
AA-027	Wastewater Treatment Facility Scrubber Recycle Sump Tank

Such emissions shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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PART III
OTHER REQUIREMENTS

(1) This permit does not authorize a modification as defined in Regulation APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". A modification requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) use of an alternative fuel or raw material by a stationary source which:

(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or

(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."

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PART III
OTHER REQUIREMENTS

2. The permittee shall maintain a file for each storage vessel containing the name of the stored material, the estimated true vapor pressure, and the dates of storage for each material stored.

3. The permittee shall operate in such a manner as to be consistent with good air pollution control practices for minimizing emissions.

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KERR-McGEE CHEMICAL CORPORATION
A SUBSIDIARY OF KERR-McGEE CORPORATION
KERR McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

CHECK NO 827100
CITIBANK DELAWARE
ONE PENN'S WAY
NEW CASTLE, DE 19720
02-20
311

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER - THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

PAY	DATE	CHECK NO.	VOID AFTER 6 MONTHS NET AMOUNT
	08/14/96	00827100	********366.88

THREE HUNDRED SIXTY SIX AND 88/100 DOLLARS

TO THE ORDER OF
MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325
TITLE V AIR OPERATING PERMIT FE
JACKSON, MS 39289--0325

KERR-McGEE CHEMICAL CORPORATION
DISBURSING ACCOUNT
BY Thomas B. Stanton

⑈00827100⑈ ⑆031100209⑆ 3871134 2⑈

CHECK NO. 00827100

01-706-A0000015204 KERR-MCGEE CHEMICAL CORP

VOUCHER NUMBER	INVOICE NUMBER	PURCHASE ORDER	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
02913 1680--0020	307		07-29-96	366.88	.00	366.88
		TOTALS		366.88	.00	366.88

KM-4114-H
DETACH BEFORE DEPOSITING

REMITTANCE ADVICE
THE ENDORSEMENT BY PAYEE OF THE DETACHED CHECK CONSTITUTES RECEIPT IN FULL FOR THE ITEMS LISTED ABOVE

KERR-McGEE CHEMICAL CORPORATION

1680 - 20

RECEIVED
AUG 20 1996
DEQ-OPC

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

** INVOICE **

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

BILL TO:
KERR-MCGEE CHEMICAL CORP

P O BOX 906
COLUMBUS, MS 39701

INVOICE # 307
INVOICE DATE: 7/29/96

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

FACILITY I.D. # 1680-00020

TERMS: DUE 9/1/96

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	9.910	9.910	16.00	158.56
SO2	0.020	0.020	16.00	0.32
NOX	5.310	5.310	16.00	84.96
CO	1.330	0.000	16.00	0.00
VOC	7.690	7.690	16.00	123.04
LEAD	0.000	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	0.000	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	0.000	0.000	16.00	0.00
CFC's / HCFC's	0.000	0.000	16.00	0.00

TOTAL ANNUAL FEE DUE 366.88

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

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

* * *FILE COPY* * *

Inspection Report Form - General

Facility Name:KERR MCGEE CHEMICAL CORP. Date: 10/7/96

Address: 2300 14TH AVENUE & 20TH STREET
P. O. BOX 906
COLUMBUS, MS LOWNDES COUNTY 328-7551

Inspected By: BOBBY HALL

Person Contacted: CHUCK SWANN, RON MURPHEY, NICK BOCK

Facility No: 1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

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

Current Permit Status: PERMIT EXPIRED: APRIL 1, 1997

Source Description: PRESSURE TREATING OF CROSS TIES WITH CREOSOTE.

Applicable Regulations:

(X) SIP
( ) PSD
( ) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

INSPECTION REPORT FORM - MISCELLANEOUS PROCESSES

Facility Name: KERR MCGEE CHEMICAL CORP. **Date: 10/7/96**

Emission Point No./Name: ALL PROCESSES

Description of Process:

Raw Materials: MIXED HARDWOOD, PINE, CREOSOTE.

Processing Operations: PRESSURE TREATING OF CROSS-TIES WITH CREOSOTE.

Products/By-Products: CREOSOTE TREATED CROSS-TIES / SAWDUST, CREOSOTE VAPORS.

Emissions & Control Devices: SAWDUST AND CREOSOTE VAPORS. TWO BOILERS, FOUR CYCLONES AND TWO SCRUBBERS.
(Complete Appropriate Control Device Sheets)

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

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL CORP. **Date: 10/7/96**

Emission Point No./Name: AA-001 / CLEAVER BROOKS PRIMARY BOILER

Rated Boiler Size: 34 MMBTUH
OR
lbs steam/hr @ psig

Operating Rate @ Insp: N/A MMBTUH
OR
lbs steam/hr @ psig

Fuel(s) Being Used: () Natural Gas @ MCFH
() Fuel Oil, No. @ Gal/hr
() Coal @ tons/hr; type;
%ash; % sulfur
() Woodwaste: () Sawdust @ tons/hr
() Shavings @ tons/hr
() Hogged Fuel @ tons/hr
() Bark @ tons/hr

() Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method:

Soot Blowing: () Periodic () Manual
() Continuous () Automatic

Schedule:

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

Complete Appropriate Control Device Sheets

Stack Emissions: Opacity % By () VEE () CEM
Sulfur Dioxide lbs/MMBTU by CEM
Nitrogen Oxides lbs/MMBTU by CEM

THIS BOILER WAS NOT OPERATING AT THE TIME OF INSPECTION.

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL CORP. **Date: 10/7/96**

Emission Point No./Name: AA-002 / HENRY VOGT STAND-BY BOILER

Rated Boiler Size: 14.3 MMBTUH
OR
lbs steam/hr @ psig

Operating Rate @ Insp: N/A MMBTUH
OR
lbs steam/hr @ psig

Fuel(s) Being Used: () Natural Gas @ MCFH
() Fuel Oil, No. @ Gal/hr
() Coal @ tons/hr; type;
%ash; % sulfur
() Woodwaste: () Sawdust @ tons/hr
() Shavings @ tons/hr
() Hogged Fuel @ tons/hr
() Bark @ tons/hr

() Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method:

Soot Blowing: () Periodic () Manual
() Continuous () Automatic

Schedule:

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

Complete Appropriate Control Device Sheets

Stack Emissions: Opacity % By () VEE () CEM
Sulfur Dioxide lbs/MMBTU by CEM
Nitrogen Oxides lbs/MMBTU by CEM

THIS BOILER WAS NOT OPERATING AT THE TIME OF INSPECTION.

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL CORP. **Date: 10/7/96**

Emission Point No./Name: AA-003 / FRAMING MILL

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

() Simple (Cylinder Length = 2 x Diameter)
() Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
() Multiclone

Fan is Located: (X) Upstream () Downstream of Cyclone
If Downstream, does fan have () Direct Emission
() Auxiliary Stack
If Upstream, does cyclone have () No Cap (Vertical Emission)
() Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap
(Horizontal Emission)

Is fallout occurring? () Yes (X) No

How often is it cleaned up? AS NEEDED

Does cyclone have any holes or split seams? () Yes (X) No

How is collected dust stored, moved, disposed of? COLLECTED IN DUMPSTER AND HAULED AWAY.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL CORP. **Date: 10/7/96**

Emission Point No./Name: SWITCH TIE UNLOADER

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

() Simple (Cylinder Length = 2 x Diameter)
() Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
() Multiclone

Fan is Located: (X) Upstream () Downstream of Cyclone
If Downstream, does fan have () Direct Emission
() Auxiliary Stack
If Upstream, does cyclone have () No Cap (Vertical Emission)
() Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizontal Emission)

Is fallout occurring? () Yes (X) No

How often is it cleaned up? AS NEEDED

Does cyclone have any holes or split seams? () Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED AWAY

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL COPR. **Date: 10/7/96**

Emission Point No./Name: CROSS TIE UNLOADER

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

() Simple (Cylinder Length = 2 x Diameter)
() Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
() Multiclone

Fan is Located: (X) Upstream () Downstream of Cyclone
If Downstream, does fan have () Direct Emission
() Auxiliary Stack
If Upstream, does cyclone have () No Cap (Vertical Emission)
() Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap
(Horizontal Emission)

Is fallout occurring? () Yes (X) No

How often is it cleaned up? AS NEEDED

Does cyclone have any holes or split seams? () Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED AWAY.

Comments:

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL CORP. **Date: 10/7/96**

Emission Point No./Name: TREATING SYSTEM SCRUBBER

Scrubbing Liquid: (X) Water () Solution () Reactant Solution

Scrubber Type:

() Spray Tower/Wet Washer
() Sieve Tray/Bubbler Cap/Packed Column
() Orifice
(X) Venturi
() Other, Explain:

Demisting Method: () Cyclone
() Vanes
() Pad
() No Demisting
() Other, Explain:

Operating Conditions: gpm @ psig
inches water gauge pressure drop
Rainout Occurring: () Yes (X) No

Scrubbing Liquid: (X) Once Through () Recycled

If recycled, gpm makeup rate

If water, describe settling basin:

For solution/reactant systems:

Chemical makeup of liquid:

How is scrubber discharge handled/treated:

Emissions: (X) Not Visible () Visible, Dust Trail-off,
% Opacity (Do VEE)

Comments:

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL CORP. **Date: 10/7/96**

Emission Point No./Name: WASTEWATER TREATMENT FACILITY SCRUBBER

Scrubbing Liquid: (X) Water () Solution () Reactant Solution

Scrubber Type:

(X) Spray Tower/Wet Washer
() Sieve Tray/Bubbler Cap/Packed Column
() Orifice
() Venturi
() Other, Explain:

Demisting Method: () Cyclone
() Vanes
(X) Pad
() No Demisting
() Other, Explain:

Operating Conditions: 50 gpm @ 7 psig
2.0 inches water gauge pressure drop
Rainout Occurring: () Yes (X) No

Scrubbing Liquid: () Once Through (X) Recycled

If recycled, 10 gpm makeup rate

If water, describe settling basin:

For solution/reactant systems:

Chemical makeup of liquid:

How is scrubber discharge handled/treated:

Emissions: (X) Not Visible () Visible, Dust Trail-off,
% Opacity (Do VEE)

Comments:

5-31-96

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

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

MDEQ Facility ID #: 1680 - 00020 SIC Code: 2491

Facility Name: Kerr-McGee Chemical Corporation

Site Address: 2300 14th Avenue & 20th Street Nort (Street Location) Columbus (City) MS (State) - (Zip Code)

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 1995. The annual permit fee is due on September 1st of each year.

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	315.80	
SO2	1,015.28	
NOX	29.07	
CO	7.27	
VOC*	6.31	
TRS	0.00	
LEAD	0.00	
CFCs/HCFCs	0.00	
Other	0.00	
Total HAPs (Voc)	0.00	
Total HAPs (Non-Voc)	0.00	

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

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

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

Signature and Title

Date

NEW SOURCE PERFORMANCE STANDARDS EXEMPTION DETERMINATION

The two new work tanks that KMCC-Columbus would like to install will hold creosote at an approximate temperature of 180 °F or 82.2 °C. The creosote has a vapor pressure at this temperature of between 0.47 and 2.00 kPa as calculated from the information supplied by Allied in Figure 1. The calculations are as follows:

1. Temperature conversion to °K = °C + 273.16 = 82.22 + 273.16 = 355.38 °K;

2. 1/°K = 1/355.38 = 0.002814;

3. From Figure 1, pressure of 3 different creosote mixtures at 180 °F ranges from 3.5 to 15 mm Hg;

4. Convert mm Hg to psia and then to kPa

   - for low volatility creosote

     3.5 mm Hg * 0.01934 psia/mm Hg * kPa/0.14504 psia = 0.467 kPa (low naphthalene)

   - to a maximum for maximum volatility creosote (solution)

     15 mm Hg * 0.01934 psia/mm Hg * kPa/0.14504 psia = 2.00 kPa

5. These tanks are regulated under 40 CFR Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

6. As given in Subpart Kb, 60.110b(c)

   ... vessels with a capacity greater than or equal to 151 m^3 (40,000 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kPa... are exempt from the general provisions (part 60, subpart A) and from the provisions of this subpart.

7. These tanks are therefore exempt from the 95 percent reduction of emissions required under 60.112b(3)(ii).

8. These are therefore exempt under NSPS requirements.

Vapor Pressure (kPa) of Creosote Solution*
Kerr-McGee Chemical Corporation
Columbus, Mississippi

Temperature (F)	Conversion Factor	Temperatur (C)	Conversion To Kelvin	Temperatur (K)	Conversion 1/K	mm Hg	Conversion psia/mm Hg	Conversion kPa/psia	kPa
Work Tank Temperature:									
180	0.555556	32	82.22222	273.16	355.3822	0.002814	15	0.01934	0.14504	2.000138
200	0.555556	32	93.33333	273.16	366.4933	0.002729	20	0.01934	0.14504	2.666851
210	0.555556	32	98.88889	273.16	372.0489	0.002688	22	0.01934	0.14504	2.933536
220	0.555556	32	104.4444	273.16	377.6044	0.002648	28	0.01934	0.14504	3.733591
NSP Standard							26.25	0.01934	0.14504	3.5

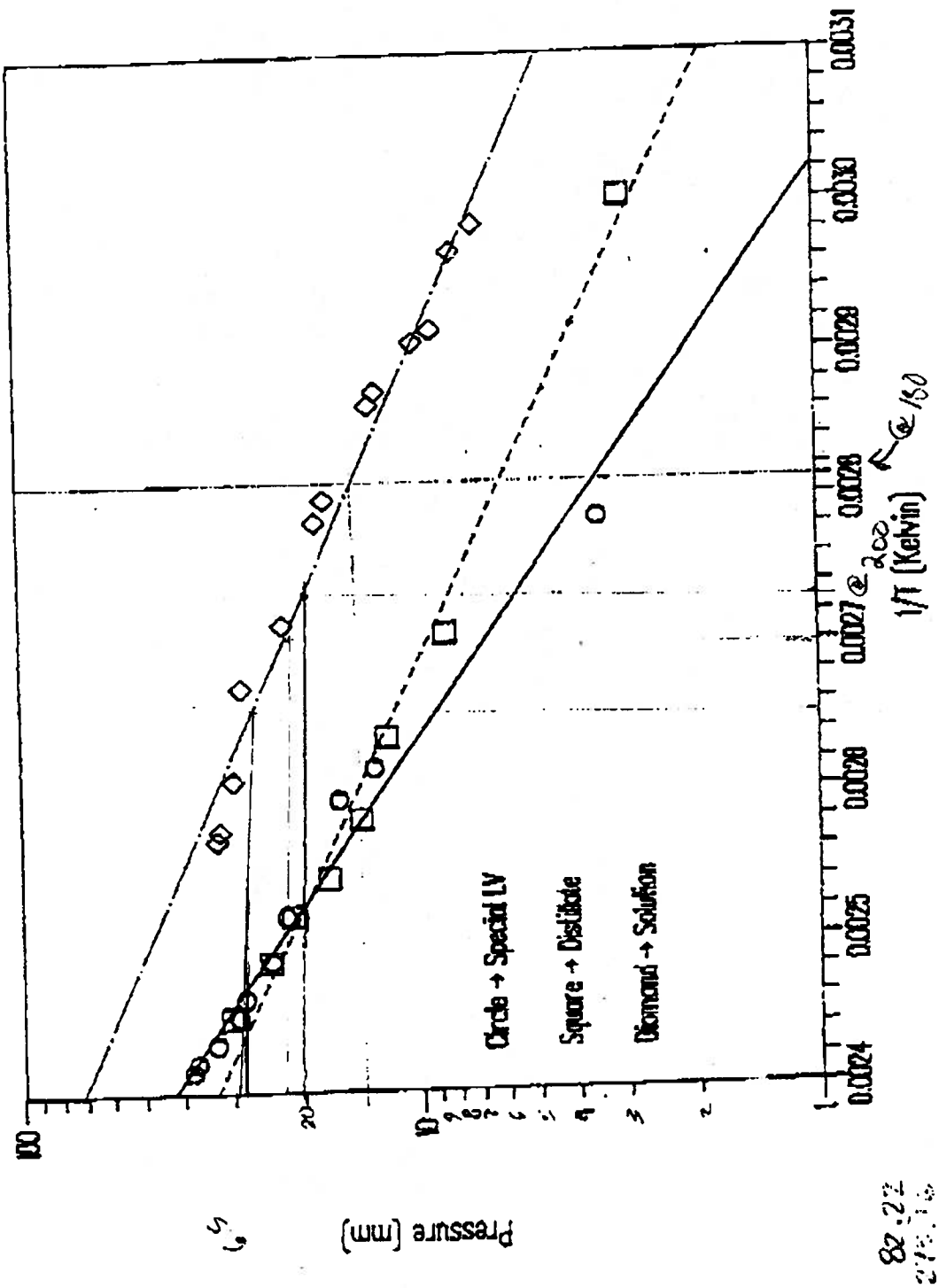
The Columbus Facility is using creosote distillate rather than creosote solution. However creosote solution data was used since this assumes a worst case condition. Additionally, since the naphthalene content of Kerr-McGee creosote is required to be less than 10%, vapor pressures are expected to be less than the data plotted on the on the graph when naphthalene content was considerably higher.

Therefore, the NSPS exemption of less than 3.5 kPa vapor pressure will not be exceeded at the Columbus facility when temperatures are maintained less than 210 degrees F, creosote distillate is used and low naphthalene creosote is used.

Post-it® Fax Note 7671 | Date 1-17-96 | # of pages ▶ 3
To Bobby HALL | From N Bock
Co./Dept. MBAC | Co. KERR MCGEE
Phone # 601-981 5174 | Phone # 6013287531
Fax # 601 961 5742 | Fax #

01/18 '96 08:26 ID:KERR-MCGEE COLUMBUS 601 329 3424 FAX:601-329-1 PAGE 1

FIGURE 1
Creosote Oils
(Vapor Pressure Plot)



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

** CREDIT MEMO **

* * TITLE V AIR OPERATING PERMIT FEE * *

BILL TO:
KERR-MCGEE CHEMICAL CORP

P O BOX 906
COLUMBUS, MS 39701

CREDIT MEMO 786
INVOICE DATE: 11/15/95

CONTACT PERSON: Cheryl Shelby
TELEPHONE: 601-961-5381

FACILITY I.D. # 1680-00020

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	315.800	315.800	16.00	(5,052.80)
SO2	1,015.280	1,015.280	16.00	(16,244.48)
NOX	29.070	29.070	16.00	(465.12)
CO	0.000	0.000	16.00	0.00
VOC	6.310	6.310	16.00	(100.96)
LEAD	0.000	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	0.000	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	0.000	0.000	16.00	0.00
CFC's / HCFC's	0.000	0.000	16.00	0.00
				(21,863.36)

** CREDIT MEMO **

THIS CM CANCELS OUR INVOICE # 415. FACILITY SUBMITTED ACTUALS

RECEIVED
NOV 17 1995
DEQ-OPC

FILE COPY

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

** INVOICE **

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

BILL TO:
KERR-MCGEE CHEMICAL CORP

P O BOX 906
COLUMBUS, MS 39701

INVOICE # 787
INVOICE DATE: 11/15/95

CONTACT PERSON: Cheryl Shelby
TELEPHONE: 601-961-5381

FACILITY I.D. # 1680-00020

TERMS: DUE 12/15/95

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	0.760	0.760	16.00	12.16
SO2	0.280	0.280	16.00	4.48
NOX	5.420	5.420	16.00	86.72
CO	1.340	0.000	16.00	0.00
VOC	10.370	10.370	16.00	165.92
LEAD	0.000	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	5.380	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	0.000	0.000	16.00	0.00
CFC's / HCFC's	0.000	0.000	16.00	0.00

TOTAL ANNUAL FEE DUE 269.28

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

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

RECEIVED
NOV 17 1995
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FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: 1994 MDEQ Facility ID #: 1680 - 00020 Date: 9-25-95 SIC Code: 2491

Facility Name: KERR-McGEE CHEM. CORP.

Mailing Address: P.O Box 906 (Street or P.O. Box) Columbus (City) Ms. (State) 39703 (Zip)

Site Address: 2300 14th Ave. and 20th. St. North (Street Location) Columbus (City) Lowndes (County)

Contact and Title: Anthony N. Helms Contact's Phone #: 601-328-7551

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	71.7	0.76
SO2	231.8	0.28
NOX	0	5.42
CO	0	1.34
VOC*	3.5	10.37
LEAD	0	0
TRS	0	0
Total HAPs (Voc)	0	5.68
Total HAPs (Non-Voc)	0	~~4.69~~
CFCs/HCFCs	0	0
Other	0	0

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

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

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

Anthony N. Helms
Signature and Title

9/29/95
Date

Boilers

Natural Gas

The volume of natural gas used in our boilers in 1994 was 76.44 mmcf. This volume is used in calculating our emissions from our boilers. The emission factors used are AP42 factors.

Particulate Matter (PM)

76.4352 mmcf x 2.5 lbs PM/mmcf x 1 ton/2000 lbs = 0.096 tons/year

SO_2

76.4352 mmcf x 0.6 lbs. SO_2 /mmcf x 1 ton/2000 lbs. = 0.023 tons/year

NO_x

76.4352 mmcf x 140 lbs NO_x /mmcf x 1 ton/2000 lbs. = 5.350 tons/year

CO

76.4352 mmcf x 35 lbs CO/mmcf x 1 ton/2000 lbs = 1.338 tons/year

VOC

76.4352 mmcf x 2.8 lbs/mmcf x 1 ton/200 lbs = 0.107 tons/year

#2 Fuel Oil

The total volume of fuel oil burned in our boilers in 1994 was 7,300 gallons. This was due to a curtailment of our natural gas supply for one week in January 1994. The sulfur content of the fuel oil used at the Columbus facility is 0.50%. This is used in used in calculating SO_2 emissions.

Particulate Matter (PM)

7300 gal x 2 lbs/1000 gallons x 1 ton/2000 lbs. = 0.007 tons/year

SO_2

7300 gal x 142/1000 gal x .50% sulfur x 1 ton/2000 lbs = 0.259 tons/year

NO_x

7300 gal x 20 lbs/1000 gal x 1 ton/2000 lbs = 0.073 tons/year

VOC

7300 gal x 0.2 lbs/1000 gal x 1 ton/2000 lbs = 0.001 tons/year

Wood Treating

In 1994 the Columbus facility treated a total of 3,004,679 cubic feet of wood. The VOC and HAP data for point source and fugitive emissions is taken from our Form R for the 1994 reporting year.

VOC - Fugitive Emissions - 1631 lbs. (Form R)
Point Source Emissions - 14309 lbs (Form R)
Storage Yard Emissions - 4578 lbs. (attached calculations)
Total - 20518 lbs x 1 ton/2000 lbs = 10.26 tons/year

HAPS - Fugitive Emissions - 79 lbs.
Point Source Emissions - 5284 lbs.
Storage Yard Emissions - 6000 lbs.
Total - 11363 lbs x 1 ton/2000 lbs = 5.68 tons/year

Fugitive Emissions - $\frac{125.5 \text{ HAPS*}}{2597 \text{ VOC*}} = \frac{\text{HAPS}}{1631 \text{ VOC **}}$

HAPS = 79 lbs.

Point Source Emissions - $\frac{5340 \text{ HAPS*}}{14460 \text{ VOC*}} = \frac{\text{HAPS}}{14308 \text{ VOC**}}$

HAPS = 5284 lbs.

* From Title V Data
** From 1994 Form R Data

Tie Processing

A total of 832,879 cross tie equivalents were processed at our Columbus facility in 1994. A total of 73,976 pieces were also bored.

Particulate Matter (PM)

Saw Cuts

832879 pcs. x 0.98 lbs./pcs. x 0.01* x 1 ton/2000 lbs. = 4.08 tons

Boring

73976 pcs. x 0.43 lbs/pcs. x 0.01* x 1 ton/2000 lbs. = 0.159 tons

* The factor 0.01 is used to convert from volume of wood waste produced to amount of wood waste that is particulate matter. 90% of the sawdust is captured in our dust collection systems. 10% of the sawdust not captured is particulate matter. The remainder of the sawdust is captured in our solid waste containers.

SUMMARY

Pollutant	(Tons) Actual Emissions 1994				Total (TONS)
	Boilers Natural Gas	Boilers Fuel Oil	Tie Processing	Wood Treating	
PM	0.10	0.01	0.65	0	0.76
SO_2	0.02	0.26	0	0	0.28
NO_x	5.35	0.07	0	0	5.42
CO	1.34	0	0	0	1.34
VOC	0.11	0	0	10.26	10.37
LEAD	0	0	0	0	0
TRS	0	0	0	0	0
Total HAPS	0	0	0	5.68	5.68
Total HAPS (non Voc)	0	0	0	~~4.58~~ * JHB	~~4.69~~ * JHB
CFC's/HCFC's	0	0	0	0	0
Other	0	0	0	0	0

* values reported for "Total HAP (non-VOC)" ~~should~~ appear to to "VOC" less "Total HAPs"
(10.26 - 5.68 = 4.58 ✓
10.37 - 5.68 = 4.69
which would be "Non-HAP VOCs"
JHB

CODE NO: 4150
REVISION: 10-1-93

HUNT REFINING COMPANY
1855 Fairlawn Road
Tuscaloosa, Alabama 35401
FAX: (205) 345-8769

P.O. Box 1850
Tuscaloosa, Alabama 35403
(205) 391-3300

IDENTITY: DIESEL FUEL

Synonym(s): Regular Diesel
Chemical Formula: Consists mainly of saturated aliphatic hydrocarbons having carbon in the range of C_{11} - C_{25}.
C.A.S. Number: 64742-80-9

N.F.P.A. CODE:	HEALTH	FIRE	REACTIVITY	OTHER
	0	2	0	

HAZARDOUS INGREDIENTS

	WT % / PPM	OSHA PEL	ACGIH TLV	EPA 313	C.A.S. NO.
DIESEL FUEL	≈99.50 %	-	-	-	64742-80-9
TOTAL SULFUR	<0.50 %	-	-	-	7704-34-9
DUPONT BLUE DYE	5 PPM	-	-	-	"

PHYSICAL CHEMICAL CHARACTERISTICS

Boiling Range (°F): 375-720
Vapor Pressure (psi): < 1
Vapor Density (Air = 1): 8
Solubility in Water: Negligible
Appearance and Odor: Typical straw yellow color, hydrocarbon odor
API Gravity: 29.3-38.9
Specific Gravity (H_2O = 1): 0.83-0.88
Evap. Rate (Butyl Acetate = 1): < 1

FIRE AND EXPLOSION HAZARD DATA

Flash Point > 125 °F **(Method Used)**

Flammable Limits:	LEL	UEL
	0.7	5.0

Extinguishing Media:
Dry chemical, foam, carbon dioxide, water spray
Special Fire Fighting Procedures:
Water should be used to keep fire-exposed containers cool.
Unusual Fire and Explosive Hazards: CO and other hazardous vapors may be a product of combustion.

REACTIVITY DATA

Stability:
Stable (X) Unstable ( )
Decomposition or by-product: CO, CO_2, fumes, smoke

EPA
United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
39701KRRMC230001
Toxic Chemical, Category, or Generic Name
CREOSOTE

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/ year) (enter range code from Instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	☐ NA	1631	E	
5.2	Stack or point air emissions	☐ NA	14309	M	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name Tributatry of Luxapallia Creek		130	M	100%
5.3.2	Stream or Water Body Name na				
5.3.3	Stream or Water Body Name na				
5.4	Underground injections on-site	☒ NA			
5.5	Releases to land on-site				
5.5.1	Landfill	☒ NA			
5.5.2	Land treatment/ application farming	☒ NA			
5.5.3	Surface Impoundment	☒ NA			
5.5.4	Other disposal	☒ NA			

☒ Check here only if additional Section 5.3 information is provided on page 5 of this form.

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

COLUMBUS - ESTIMATED NAPHTHALENE EMISSIONS FROM A BLACK TIE STORAGE YARD

F:\DATA\0168\COLUMBUS\BLACKTIE.WK3 02/23/95 10:06 AM

Facility	Kerr-McGee Chemical Corporation				
Location	Columbus, MS				
Max. Ties On Site	138,500				
Min. Ties On Site	27,700				
Ties/Unit	27,700		Equivalent Annual Production is 332400 ties/yr.		
S.A. of Six 49-tie Bundles	1,212 ft²		Most conservative surface area from reply to EPA.		
Diameter of Test Pole	11 in				
Length of Test Pole	40 ft				
No. of Test Poles	6 poles				
S.A. of Test Poles	699 ft²				
Emissions (mg/hr):	N1(t) =	18.104	* exp (	0.46683 * t),	t <= 0.25 days
(Based on 6 poles with a	N2(t) =	36.697	* exp (	-2.43497 * t),	0.25 < t <= 1.0 day
ft² surface area)	N3(t) =	3.347	* exp (	-0.04358 * t),	t > 1.0 day
tions (lb/day/ft²):	N1(t) =	1.370E-03	* exp (	0.46683 * t),	t <= 0.25 days
d on 6 poles with a	N2(t) =	2.777E-03	* exp (	-2.43497 * t),	0.25 < t <= 1.0 day
699 ft² surface area]	N3(t) =	2.533E-04	* exp (	-0.04358 * t),	t > 1.0 day
Calculated 24-hr Average California Pole Test Temperature =			80 °F		
Temperature Correction Factor for Other Geographic Locations = exp[-11,161.25*(1/(T, °F+460)-1/(80+460)]					
Assumes 30 days/month					

Month	Black Tie Units on Site	No. of Black Ties	No. of 294-Tie Stacks	Total Yard Surface Area (ft²)	Percent of Ties __ Months Old: 0 mo. (0-30 d)	1 mo. (30-60 d)	2 mo. (60-90 d)	3 mo. (90-120 d)	4 mo. (120-150 d)	Tram Emissions: Surface Area (27700 ties/mo) (ft²/month)	N1 Rate (lb/ft²) 0-0.25 d	N2 Rate (lb/ft²) 0.25-1.0 d	Yard Emissions * Percent of Ties __ Months Old: Rate N3(t) Emissions (lb naphthalene/ft² treated surface area) 1.0-30 d	30-60 d	60-90 d	90-120 d	120-150 d	Tram Sum	Yard Sum	Columbus, MS Average Temperature (°F)	Temperature Correction Factor	Total Naphthalene Emissions (lb)
1	3	83,100	283	342,576	33.3	33.3	33.3			103,047	3.63E-04	5.21E-04	1.33E-03	3.82E-04	1.03E-04			8.84E-04	1.82E-03	41.2	0.202	144
2	4	110,800	377	456,767	25.0	25.0	25.0	25.0		103,047	3.63E-04	5.21E-04	9.98E-04	2.87E-04	7.76E-05	2.10E-05		8.84E-04	1.38E-03	44.9	0.238	172
3	5	138,500	471	570,959	20.0	20.0	20.0	20.0	20.0	103,047	3.63E-04	5.21E-04	7.99E-04	2.29E-04	6.21E-05	1.68E-05	4.54E-06	8.84E-04	1.11E-03	52.6	0.331	240
4	4.43	122,671	417	505,707	22.6	22.6	22.6	22.6	9.7	103,047	3.63E-04	5.21E-04	9.02E-04	2.59E-04	7.01E-05	1.90E-05	2.20E-06	8.84E-04	1.25E-03	62.6	0.502	364
5	3.86	106,843	363	440,454	25.9	25.9	25.9	22.2		103,047	3.63E-04	5.21E-04	1.04E-03	2.97E-04	8.05E-05	1.87E-05		8.84E-04	1.43E-03	70.4	0.688	496
6	3.29	91,014	310	375,202	30.4	30.4	30.4	8.7		103,047	3.63E-04	5.21E-04	1.22E-03	3.49E-04	9.45E-05	7.30E-06		8.84E-04	1.67E-03	77.7	0.915	656
7	2.71	75,186	256	309,949	36.8	36.8	26.3			103,047	3.63E-04	5.21E-04	1.47E-03	4.23E-04	8.17E-05			8.84E-04	1.98E-03	80.9	1.035	728
8	2.14	59,357	202	244,697	46.7	46.7	6.7			103,047	3.63E-04	5.21E-04	1.86E-03	5.35E-04	2.07E-05			8.84E-04	2.42E-03	80.1	1.004	686
9	1.57	43,529	148	179,444	63.6	36.4				103,047	3.63E-04	5.21E-04	2.54E-03	4.17E-04				8.84E-04	2.96E-03	74.1	0.796	495
10	1	27,700	94	114,192	100.0					103,047	3.63E-04	5.21E-04	3.99E-03					8.84E-04	3.99E-03	62.3	0.496	272
11	1	27,700	94	114,192	100.0					103,047	3.63E-04	5.21E-04	3.99E-03					8.84E-04	3.99E-03	51.1	0.311	170
12	2	55,400	188	228,384	50.0	50.0				103,047	3.63E-04	5.21E-04	2.00E-03	5.74E-04				8.84E-04	2.57E-03	44.1	0.229	156
													Emissions for maximum on-site storage of 138500 ties is:								Total (lb/yr)	4,578
													Annual Production is 332400 ties/yr								Total (tons/yr)	2.29

INDIVIDUAL HAP EMISSIONS (tons/yr)					TOTAL
HAP	Quinoline	Biphenyl	Naphthalene	Dibenzofuran	HAPs
Percentage	7.5%	1.5%	77.4%	15.0%	(tons/yr)
Totals (tons/yr)	0.22	0.04	2.29	0.44	3.00

Note: Black tie storage yard emissions were based on measured naphthalene emissions only. The additional three HAPs will therefore be additive.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

SEP 1995 RECEIVED

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: 1995 **MDEQ Facility ID #:** 1680 - 00020 **Date:** 8/31/95 **SIC Code:** 2491

Facility Name: KERR-McGEE CHEM. CORP.

Mailing Address: P.O. Box 906 (Street or P.O. Box) Columbus (City) MS (State) 39703 (Zip)

Site Address: 2300 14th AVE. & 20th St. N. (Street Location) Columbus (City) MS (County) 39701

Contact and Title: Anthony N. Helms Plant Mgr. **Contact's Phone #:** 601-328-7551

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	71.7	24.6
SO2	231.8	17.2
NOX	0	0
CO	0	0
VOC*	3.5	3.5
LEAD	0	0
TRS	0	0
Total HAPs (Voc)	0	0
Total HAPs (Non-Voc)	0	0
CFCs/HCFCs	0	0
Other	0	0

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

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

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

Anthony N. Helms — Signature and Title

8/31/95 — Date

KERR-McGEE CHEMICAL CORPORATION
P.O. BOX 906 • COLUMBUS, MISSISSIPPI 39703-0906

June 21, 1994

Don Watts
Chief, Air Permitting Branch
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

RE: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus, MS
Title V Permit Assessment Fees

Dear Mr. Watts:

In response to your May 13, 1994 letter regarding the fee program for the Title V program, Kerr-McGee Chemical Corporation desires to use actual emissions in determining the annual quantity of emissions to be used in assessing fees.

Enclosed please find a copy of a letter dated July 1, 1993, sent to Ms Miller of the Air Quality Division regarding emission rates from the Columbus, MS facility. The estimates in this letter are very conservative estimates and Kerr-McGee wishes to use these estimates in assessing Title V fees.

A summary of the emissions source as well as the emissions values from the facility were estimated on July 1, 1993 are as follows:

Pollutant	Point AA-001 Boiler	Point AA-002 Woodwaste Boiler	Point AA-003 Cyclones	Point AA-004 Process Tank	Facility Total
Particulate	0.2 tpy	0.2 tpy	24.2 tpy	0.0 tpy	24.6 tpy
S02	8.6 tpy	8.6 tpy	0.0 tpy	0.0 tpy	17.2 tpy
VOC	0.0 tpy	0.0 tpy	0.0 tpy	3.5 tpy	3.5 tpy

Should you have any questions, please contact me at 601/328-7551.

Sincerely,

Anthony N. Helms

Anthony N. Helms
Plant Manager

FOREST PRODUCTS

cc: N. E. Bock

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

AIR 71

July 1, 1993

Melanie Miller
Air Quality Division
Mississippi Department Of Environmental Quality
P. O. Box 10385
Jackson, Mississippi 39289-0385

Re: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus, Mississippi Facility
Title V Permit

Dear Ms. Miller:

This serves to confirm our recent conversations and as a response to your letter dated June 8, 1993, regarding the Title V Permit Program for the Kerr-McGee Chemical Corporation, Forest Products Division (Kerr-McGee) Columbus, Mississippi Facility. Kerr-McGee has reviewed the regulations and believes that the Columbus Facility does not meet the requirements to require a Title V permit. In particular, the facility does not:

- Emit 10 tpy of any individual hazardous air pollutant or an aggregate of more than 25 tpy of all hazardous air pollutants or;
- Emit, or have the potential to emit, more than 100 tpy of any regulated pollutant.

In your letter dated June 8, 1993, the attached table indicted that the Columbus facility had the potential to emit:

- 71.7 tpy of particulate matter
- 231.8 tpy of SO2
- 3.5 tpy VOC (creosote vapors)

facility to emit the stated values as follows:

POLLUTANT	POINT AA-001 BOILER	POINT AA-002 WOODWASTE BOILER	POINT AA-003 CYCLONES	POINT AA-004 PROCESS TANK	FACILITY TOTAL
Particulate	16.6 tpy	31.3 tpy	24.2 tpy	0.0 tpy	72.1 tpy
SO2	163.2 tpy	68.6 tpy	0.0 tpy	0.0 tpy	231.8 tpy
VOC	0.0 tpy	0.0 tpy	0.0 tpy	3.5 tpy	3.5 tpy

Based upon the SO2 from the boilers being greater than 100 tpy, it would appear that the facility would require a Title V permit. However, as we discussed, the permitted values are estimates that were made with the original permit application. A review of current and future operation indicates the following:

- The facility has the ability and requirement to operate only one (1) boiler at a time. The second boiler is a standby boiler. Thus, the maximum potential to emit should be based on the higher rate of emission from one of the two boilers.
- The primary fuel source for both boilers is natural gas. Fuel oil is the back-up fuel for both boilers should there be a curtailment of natural gas supply. This has occurred only once in the last five (5) years. The facility does operate for approximately one (1) week per year using fuel oil to ensure the ability to fire with fuel oil, should the need arise.
- The fuel oil used by the facility has a sulfur content ranging from 0.20% to 0.34% by weight. This is well within the state maximum amount of 0.50%.
- The facility will burn approximately 666 gpd fuel oil when operating on 100% fuel oil.
- The AA-002 boiler no longer has the capability to burn woodwaste.

When taking these factors into account and using the standard AP42 emission factors, the potential to emit for the facility is as follows:

POLLUTANT	POINT AA-001 BOILER	POINT AA-002 WOODWASTE BOILER	POINT AA-003 CYCLONES	POINT AA-004 PROCESS TANK	FACILITY TOTAL
Particulate	0.2 tpy	0.2 tpy	24.2 tpy	0.0 tpy	24.6 tpy
SO2	8.6 tpy	8.6 tpy	0.0 tpy	0.0 tpy	17.2 tpy
VOC	0.0 tpy	0.0 tpy	0.0 tpy	3.5 tpy	3.5 tpy

The estimates are based upon burning oil in one (1) boiler, 365 days per year and using fuel oil with the current state maximum allowable sulfur content of 0.5%. This is a very conservative estimate as the facility will only operate its boilers 5-6 days per week, does not routinely burn fuel oil and purchases a lower sulfur fuel.

As we talked, Kerr-McGee understands that our existing permits may have to be modified to better represent current operation. To this end, Mr. Nick Bock, Environmental Specialist, will contact you in the near future to further discuss the situation. In the meantime, should you have any questions, do not hesitate to contact either Mr. Bock at 405/270-2391 or the Plant Manager, Mr. John Getz at 601/328-7551.

Sincerely,

KERR-McGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Jeffrey H. Bull

Jeffrey H. Bull
Manager, Environmental, Quality,
& Technical Services

JHB/s

cc: N. E. Bock
J. J. Getz

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

** INVOICE **

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

BILL TO:
KERR-MCGEE CHEMICAL CORP

P O BOX 906
COLUMBUS, MS 39701

INVOICE # 415
INVOICE DATE: 8/01/95

CONTACT PERSON: Cheryl Shelby
TELEPHONE: 601-961-5381

FACILITY I.D. # 1680-00020

TERMS: DUE 9/1/95

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	315.800	315.800	16.00	5,052.80
SO2	1,015.280	1,015.280	16.00	16,244.48
NOX	29.070	29.070	16.00	465.12
CO	7.270	0.000	16.00	0.00
VOC	6.310	6.310	16.00	100.96
LEAD	0.000	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	0.000	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	0.000	0.000	16.00	0.00
CFC's / HCFC's	0.000	0.000	16.00	0.00

TOTAL ANNUAL FEE DUE 21,863.36

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

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

FILE COPY

KERR-McGEE CHEMICAL CORPORATION
A SUBSIDIARY OF KERR-McGEE CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

CHECK NO. 765218

TO CITIBANK DELAWARE
ONE PENN'S WAY
NEW CASTLE, DE 19720

62-20
311

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER • THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK – HOLD AT AN ANGLE TO VIEW

DATE 09/01/95

CHECK NO. 00765218

VOID AFTER 6 MONTHS
NET AMOUNT ******5,465.84

PAY
IVE THOUSAND FOUR HUNDRED SIXTY FIVE AND 84/100 DOLLARS

TO THE ORDER OF
MISSISSIPPI DEPT ENVIRONMENTAL
QUALITY
PO BOX 20325
TITLE V AIR OPERATING PERMIT FE
JACKSON, MS 39289-0325

KERR-McGEE CHEMICAL CORPORATION
DISBURSING ACCOUNT

By Thomas B Stanton

"00765218" :031100209: 3871134 2"

01-706-A00015204 KERR-MCGEE CHEMICAL CORP CHECK NO. 00765218

VOUCHER NUMBER	INVOICE NUMBER	PURCHASE ORDER	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
Q8773	415	PYMT #1	08-01-95	5,465.84	.00	5,465.84
FAC #1680-00020		21,863.36				
		TOTALS		5,465.84	.00	5,465.84

KM-4114-H
DETACH BEFORE DEPOSITING

REMITTANCE ADVICE
THE ENDORSEMENT BY PAYEE OF THE DETACHED CHECK CONSTITUTES RECEIPT IN FULL FOR THE ITEMS LISTED ABOVE

KERR-McGEE CHEMICAL CORPORATIC

SEP 1995
RECEIVED
AS/BS
FEES

6-12-95

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 1680 - 00020 **Date:** _____ **SIC Code:** 2491

Facility Name: Kerr-McGee Chem. Corp.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	315.8	
SO2	1015.28	
NOX	29.07	
CO	7.27	
VOC*	6.31	
LEAD	0	
TRS	0	
Total HAPs (Voc)	0	
Total HAPs (Non-Voc)	0	
CFCs/HCFCs	0	
Other	0	

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

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

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

_____ _____
Signature and Title Date

6-1-93

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 1680 - 00020 **Date:** _____ **SIC Code:** 2491

Facility Name: Kerr-McGee Chem. Corp.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	72.1	
SO2	231.8	
NOX	0	
CO	0	
VOC*	3.5	
LEAD	0	
TRS	0	
Total HAPs (Voc)	0	
Total HAPs (Non-Voc)	0	
CFCs/HCFCs	0	
Other	0	

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

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

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

_____ _____
Signature and Title Date

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT
TO CONSTRUCT AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT

Kerr-McGee
2300 14th Avenue & 20th Street
Columbus, Mississippi

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Issued this 23rd day of May, 1995

DATA CODED

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____

HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Permit No. 1680-00020

PART I
GENERAL CONDITIONS

1. The plans, specifications, schedules, dates and other data submitted to the Permit Board are filed with and considered as a part of this permit.

2. All air pollution control facilities shall be designed and constructed such as to allow proper operation and maintenance of the facilities.

3. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Environmental Quality Permit Board.

5. The construction of facilities shall be performed in such a manner as to reduce both point source and fugitive dust emissions to a minimum.

6. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.

7. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts, or

   c. A change in any condition that requires either a temporary or permanent reduction or elimination of authorized air emissions.

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

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

10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

11. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

12. This permit is for air pollution control purposes only.

13. Approval to construct will expire should construction not begin within eighteen (18) months of the issuance of this permit, or should construction be suspended for eighteen (18) months.

14. Prior to startup of air emissions equipment at this source, the permittee must obtain a Permit to Operate and submit certification that construction was completed in accordance with the approved plans and specifications.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning May 23, 1959, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from the storage tanks given below:

Emission Point No.	Tank No.	Size (Gallons)	Type	Material Stored
AA-005	EU006	57,000	Fixed Roof	Creosote
AA-006	EU007	57,000	Fixed Roof	Creosote

Such air emissions equipment shall be constructed in accordance with design criteria in the application, plans, and other technical documents submitted with the application to construct.

PART III
OTHER REQUIREMENTS

For Emission Points AA-005 and AA-006, the permittee is subject to and shall comply with the New Source Performance Standards for Volatile Organic Liquid Storage Vessels as described in 40 CFR 60.110b and 60.116b.

EMISSION INVENTORY -- [redacted]ERAL

County ID: 1680 Facility ID: 00020 Date: 05-18-95

Facility Name: Kerr-McGee

Mailing Address: Street: P.O. BOX 906
City: Columbus
State: Mississippi
Zip code: 39703
Telephone N 601 328-7551

Site Address: Street: 2300 14th Avenue and 2
City: Columbus
Zip code: 39703
County: lowndes
Telephone N (601) 328-7551

Contact & Title: Anthony Helms, Plant Manager

Facility / Plant Type: Kerr-McGee

Principal processes include wood preserving SIC Code: 2491

EMISSION SUMMARY (TOTAL FOR EACH POLLUTANT FROM ALL SOURCE

POLLUTANT	ACTUAL TPY	POTENTIAL TPY	NOTES
PARTICULATE MATTER		315.80	
PM (10)			
SO2		1015.28	
NOx		29.07	
CO		7.27	
VOC		6.31	
TRS			
LEAD			
HAP (TOTAL FOR ALL)			
HAP > 10 TPY (LIST BELOW)			
OTHER:			
OTHER:			

REGULATION APPLICABILITY

(X) SIP ONLY
( ) PSD ONLY
( ) NESHAP: SUBPART :

(✓) NSPS SUBPART: Kb
( ) MACT CATEGORY:
( ) OTHER:

DEQ ENGINEER: Mesha Williams

EMISSION INVENTORY -- SOURCES

COUNTY ID: 1680 FACILITY ID: 00020

AQCR: UTM ZONE:

UTM EAST: UTM NORTH:

SOURCES		UTM COORDINATES		STACK PARAMETERS			
ID #	DESCRIPTION	EAST	NORTH	HEIGHT (FT.)	DIAMETER (FT.)	VELOCITY (FT/SEC)	TEMP (° F)
AA-001	CD D-6 Boiler			40	2.5	46	500
AA-002	Vogt 14435 Woodwaste Boiler			120	5	16.83	575
AA-003	Cyclone #1 (D & N Size 12)			50	7	11.7	amb
	Cyclone #2 (D & N Size 39)			40	13	13.3	amb
AA-004	57,000 gallon creosote storage tank			22	1.5	55	92
AA-005	57,000 gallon creosote storage tank	629168.6	1397854	30	18	na	180
AA-006	57,000 gallon creosote storage tank	629138.4	1397851	30	18	na	180
END							

Program version date : December 14, 1994 18-May-95

EMISSION INVENTORY -- CRITERIA POLLUTANTS (POTENTIAL)

COUNTY ID: 1680 FACILITY ID: 00020

SOURCE ID #	RATED CAPACITY (MMBTU/HR)	HOURS PER DAY	DAYS PER WEEK	WEEKS PER YEAR	POTENTIAL EMISSIONS															
					PARTICULATE		PM (10)		SO2		NOx		CO		VOC		TRS		LEAD	
					PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY
AA-001		8	5	52	16.6	72.71			163.2	714.82	4.76	20.85	1.19	5.21	0.197	0.86				
AA-002					31.3	137.09			68.6	300.47	1.876	8.22	0.469	2.05	0.078	0.34				
AA-003					9.1	39.86														
					15.1	66.14														
AA-004															0.8	3.50				
AA-005		24	7	52												0.80				
AA-006		24	7	52												0.80				
END																				
TOTALS						315.80				1015.28		29.07		7.27		6.31				

Program version date : December 14, 1994

18-May-95

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

Kerr-McGee
2300 14th Avenue & 20th Street
Columbus, Mississippi

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

Issued this 14th day of April, 1992

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires 1st day of April, 1997

Permit No. 1680-00020

Permit Modified: May 23, 1995

PART I
GENERAL CONDITIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any air pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions or modifications which will result in new, different, or increased emission of air pollutants must be reported by submission of a new application.

2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits.

4. Any diversion from or bypass of collection and control facilities is prohibited except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Environmental Quality Permit Board.

5. Whenever any emergency, accidental or excessive discharge of air contaminants occurs, the Mississippi Department of Environmental Quality Office of Pollution Control shall be notified immediately of all information concerning cause of the discharge, point of discharge, volume and characteristics, and whether discharge is continuing or stopped.

6. 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.

7. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

8. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions.

9. For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

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

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

12. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

13. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

14. This permit is for air pollution control purposes only.

15. This permit is not a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. This permit is a transitional operating permit to satisfy the requirements of State Law only. After new State operating permit regulations are developed and adopted to satisfy the conditions of Title V of the Federal Act, the permittee will be required to submit an updated application to comply with said regulations and this permit may be modified, suspended, or revoked as necessary to comply with said regulations.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-001, the CB D-6 Boiler.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Particulate Matter	**16.6 lbs/hr**
Sulfur Dioxide	**163.2 lbs/hr**
Opacity	**40% Maximum**

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-002, the Vogt 14435 Woodwaste Boiler.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Particulate Matter	**31.3 lbs/hr**
Sulfur Dioxide	**68.6 lbs/hr**
Opacity	**40% Maximum**

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-003, two (2) wood processing cyclones.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Cyclone #1:	
Particulate Matter	**9.1 lbs/hr**
Cyclone #2:	
Particulate Matter	**15.1 lbs/hr**

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-004, the 57,000 gallon creosote storage tank controlled by a scrubber.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Volatile Organic Compounds (VOC) 0.8 lbs/hr and 3.5 tons/year and reduction of control equipment inlet VOC by 95% as set forth by 40 CFR 60.112b(a)(3).

REPORTING & RECORDKEEPING

The permittee shall provide notices and reports, and maintain records as required by 40 CFR 60, Section 60.115b.

TESTING & PROCEDURES

The permittee shall demonstrate compliance with the required control efficiency for VOC emissions as required by 40 CFR 60.113b.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning upon receipt of certification of construction, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from the storage tanks given below:

Emission Point No.	Tank No.	Size (Gallons)	Type	Material Stored
AA-005	EU006	57,000	Fixed Roof	Creosote
AA-006	EU007	57,000	Fixed Roof	Creosote

Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

PART III
OTHER REQUIREMENTS

(1) The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Emission Regulations.

(2) For Emission Point AA-004, the permittee is required to meet all applicable conditions and requirements contained in New-Source Performance Standards (NSPS), Subpart Kb. The tank must be controlled by a closed vent system and scrubber. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater.

(3) For Emission Point AA-005 and AA-006, the permittee is subject to and shall comply with the New Source Performance Standards for Volatile Organic Storage Vessels as described in 40 CFR 60.110b and 60.116b.

(4) For Emission Points AA-004, AA-005, and AA-006, the permittee is allowed to store only creosote in the storage vessel. The amount of creosote stored must be recorded at all times. The maximum true vapor pressure of the stored creosote must be recorded at all times.

(5) For Emission Points AA-005 and AA-006, the permittee must provide in writing the date of startup and the date maximum production rates are reached. Each date must be provided no later than ten days after the actual date.

FILE COPY

NEW SOURCE PERMIT REVIEW SUMMARY

Company Name: Kerr McGee

Source Number: 1680-00020

Site Address: 2300 14th Avenue & 20th Street, Columbus, MS

PERMIT TYPE: Construction / Operating Modification

SOURCE CLASS: A

For May 23, 1995, Permit Board

Review Engineer: Mesha Williams

Date: May 18, 1995

APPLICABLE REGULATIONS:

_____ APC-S-1, Section(s):

_X_ NSPS, Subpart(s): Kb

_____ NESHAP, Subpart(s):

_____ PSD, Pollutant(s)

_____ Other:

FACILITY DESCRIPTION:

Wood preserving.

PROJECT DESCRIPTION, IF DIFFERENT:

Kerr-McGee Corporation has applied for a permit to construct two new 57,000 gallon tanks at its existing facility. Emissions for the proposed tanks are less than 2 tons per year. These tanks are subject to 40 CFR 60, Subpart Kb, Sections 60.110b and 60.116b, but are exempt from the 95% reduction of emissions required under 60.112b(3) because of low vapor pressure.

SITING CRITERIA:

Applicable Criteria:

Siting Criteria Met? NA

If no, have they requested a variance?

If no, have they submitted letters of no objection?

PUBLIC NOTICE:

Did we go to notice? No

Why? Not necessary because of level of emissions.

Comment Period:

Were Comments Received?

If so, give brief description of comments & responses:

AIR QUALITY IMPACT ANALYSIS:

Has modelling been performed? No

By Whom?

What Pollutants?

Results?

If modelling was not performed, why? Not necessary,

PERMIT LIMITS

Are any permit emission limitations based on something other than uncontrolled emissions or an applicable regulation? No

Is this an existing facility? Yes

If so, is the facility a major stationary source as defined by PSD? No

Is this a project a major source? No

Is this project a major modification? No

Is this project a moderate source? No

Is this project a moderate modification? No

Are potential uncontrolled emissions (as defined in APC-S-2) less than the applicable PSD thresholds? Yes

RECOMMENDATION:

Permit issuance.

Kerr McGee
Facility No. 1680-00020
Emissions Data for Proposed Source
May 18, 1995

Emission Point	Pollutants	Emission Rate Allowed by Regulations		Emission Rate Without Controls		Emission Rate Proposed as Allowable	
		lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
AA-005	VOC			0.17	0.80	0.17	0.80
AA-006	VOC			0.17	0.80	0.17	0.80

KERR-McGEE CHEMICAL CORPORATION
A SUBSIDIARY OF KERR-McGEE CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

CHECK NO 725561

TO CITIBANK DELAWARE
ONE PENN'S WAY
NEW CASTLE, DE 19720

62-20
311

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER • THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK – HOLD AT AN ANGLE TO VIEW

DATE	CHECK NO.	VOID AFTER 6 MONTHS NET AMOUNT
01/18/95	00725561	********370.38

PAY
THREE HUNDRED SEVENTY AND 38/100 DOLLARS

TO THE ORDER OF
MISSISSIPPI DEPT ENVIRONMENTAL
QUALITY - POLLUTION CONTROL
PO BOX 20325
JACKSON, MS 39289-0325

KERR-McGEE CHEMICAL CORPORATION
DISBURSING ACCOUNT

BY Thomas B. Stanton

⑈00725561⑈ ⑆031100209⑆ 3871134 2⑈

01-706-A00048552 KERR-MCGEE CHEMICAL CORP CHECK NO. 00725561

VOUCHER NUMBER	INVOICE NUMBER	PURCHASE ORDER	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
A3297	792	16800020	01-02-95	370.38	.00	370.38
		1680-0002D				
		TOTALS		370.38	.00	370.38

KM-4114-H
DETACH BEFORE DEPOSITING

REMITTANCE ADVICE
THE ENDORSEMENT BY PAYEE OF THE DETACHED CHECK CONSTITUTES RECEIPT IN FULL FOR THE ITEMS LISTED ABOVE

KERR-McGEE CHEMICAL CORPORATION

JAN 1995
RECEIVED
AS/BS
FEES

DEPT OF ENVIRONMENTAL QUALITY

P. O. Box 20325
Jackson, MS 39289-0325

** INVOICE **

* TITLE V AIR OPERATING PERMIT FEE *

BILL TO:
KERR-MCGEE CHEMICAL CORP

P O BOX 906
COLUMBUS, MS 39701

INVOICE # 792
INVOICE DATE: 1/02/95

CONTACT PERSON: Cheryl Shelby
TELEPHONE: 601-961-5381

FACILITY I.D. # 1680-00020

TERMS: DUE 2/1/95

POLLUTANT	TOTAL TONS OF EMISSIONS	FEE PER TON OF EMISSIONS	TOTAL FEE
APPROVED TITLE V FEE $23.39 FOR 1/2 YEAR OR $11.695	45.300	11.695	529.78
RAMP UP FEE $4.00 FOR 1/2 YEAR OR $2.00	45.300	2.000	90.60
LESS: FEES PREVIOUSLY PAID			(250.00)
TOTAL APPROVED ANNUAL FEE DUE			370.38

The total tons shown above is the total of all pollutants for which you were previously billed. The maximum emission rate for each pollutant for purposes of fee calculation is 4,000 tons.

* * * FAILURE TO REMIT PAYMENT BY THE DUE DATE COULD * * *
* * RESULT IN SUBSTANTIAL PENALTY AND INTEREST CHARGES * *

FILE COPY

KERR-McGEE CHEMICAL CORPORATION
A SUBSIDIARY OF KERR-McGEE CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

CHECK NO 697090

[illegible]BANK DELAWARE
ONE PENN'S WAY
NEW CASTLE, DE 19720

62-20
311

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER • THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK – HOLD AT AN ANGLE TO VIEW

DATE 08/12/94 CHECK NO. 00697090 VOID AFTER 6 MONTHS NET AMOUNT [illegible]250.00

PAY TWO HUNDRED FIFTY AND 00 100 DOLLARS

TO THE ORDER OF MISSISSIPPI DEPT ENVIRONMENTAL QUALITY-ATTN BEVERLY TAYLOR PO BOX 10385 INTERIM TITLE V AIR FEE JACKSON, MS 39289-0385

KERR-McGEE CHEMICAL CORPORATION
DISBURSING ACCOUNT

BY Thomas B. Taylor

"00697090" :031100209: 3871134 2"

01-706-A00015204 KERR-MCGEE CHEMICAL CORP CHECK NO. 00697090

VOUCHER NUMBER	INVOICE NUMBER	PURCHASE ORDER	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
Q1752	122	PERMITFEE	08-01-94	250.00	.00	250.00
FAC 1680000020						
		TOTALS		250.00	.00	250.00

KM-4114-H
DETACH BEFORE DEPOSITING

REMITTANCE ADVICE
THE ENDORSEMENT BY PAYEE OF THE DETACHED CHECK CONSTITUTES RECEIPT IN FULL FOR THE ITEMS LISTED ABOVE

KERR-McGEE CHEMICAL CORPORATION

AUG 1994 RECEIVED OPC FEES

DEPT OF ENVIRONMENTAL QUALITY
INTERIM TITLE V AIR FEE
P. O. Box 10305
Jackson, MS 39289-0385

** INVOICE **

** INTERIM TITLE V AIR OPERATING PERMIT FEE **

BILL TO:
KERR-MCGEE CHEMICAL CORP

P O BOX 906
COLUMBUS, MS 39701

INVOICE # 122
INVOICE DATE: 8/01/94

CONTACT PERSON: Cheryl Shelby
TELEPHONE: 601-961-5381

FACILITY I.D. # 1680-00020

TERMS: Due 9/1/94

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	24.600	24.600	4.00	98.40
SO2	17.200	17.200	4.00	68.80
NOX	0.000	0.000	4.00	0.00
CO	0.000	0.000	4.00	0.00
VOC	3.500	3.500	4.00	14.00
LEAD	0.000	0.000	4.00	0.00
TRS	0.000	0.000	4.00	0.00
TOTAL HAP's (VOC)	0.000	0.000	4.00	0.00
TOTAL HAPs (Non-Voc)	0.000	0.000	4.00	0.00
CFC's / HCFC's	0.000	0.000	4.00	0.00

ADJUSTMENT FOR $250 MINIMUM FEE	68.80
TOTAL ANNUAL FEE DUE	250.00

As defined in Senate Bill # 2649, 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.

* * * FAILURE TO REMIT PAYMENT BY THE DUE DATE MAY * * *
* * RESULT IN SUBSTANTIAL PENALTY AND INTEREST CHARGES* *

FILE COPY

5-13-94

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 1680 - 00020 **Date:** _____ **SIC Code:** 2491

Facility Name: KERR-McGEE CHEM. CORP.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	72.1	
SO2	231.8	
NOX	0	
CO	0	
VOC*	3.5	
LEAD	0	
TRS	0	
Total HAPs (Voc)	0	
Total HAPs (Non-Voc)	0	
CFCs/HCFCs	0	
Other	0	

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

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

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

_____ _____
Signature and Title Date

FACILITY NAME [redacted]mbus

FACILITY ADDRESS 14th Avenue & 20th Street

3-2

TANK INDENTIFICATION NO./NAME Storage Tanks A, B, C,

1. Product stored; e.g. crude oil, gasoline, etc.	Creosote
2. True vapor pressure of product at storage temperature (PSIA/°F) @ 100°C	80 MM
3. Reid vapor pressure of product at storage temperature (PSIA/°F)	Unk
4. Density of product stored at storage temperature (lbs/gal)	9.2
5. Molecular weight of product vapor at storage temperature lb/lb mole	Unk
6. Throughput for the year 1985 (gals/year) Total for Tanks	55,700 (Total
7. Tank Capacity (gals)	78,200 ea.
8. Tank Diameter (feet)	22 ea.
9. Tank Height (feet)	27.5 ea.
10. Average Vapor Space Height (feet)	5± ea.
11. Tank Construction: Riveted or Welded	Riveted
12. Type of Tank:	
Fixed Roof	X
Floating Roof: External or Internal	
Variable Vapor Space	N/A
Pressure	Yes
Other, Describe	No
13. For external floating roof tanks, Type Seals:	
Metallic shoe seal	
Primary seal only N/A	
With shoe mounted secondary seal	
With rim mounted secondary seal	
Liquid mounted resilient seal	
Primary seal only	
With weather shield	
With rim mounted secondary seal	
Vapor mounted resilient seal	
Primary seal only	
With weather shield	
With rim mounted secondary seal	

INSPECTION REPORT FORM - GENERAL

Facility Name: KERR MCGEE CHEMICAL CORP. Date: 3/24/94

Address: 230 14TH AVENUE AND 20TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551

Inspected By: RANDY BYARS/STANLEY WATKINS

Person Contacted: CHUCK SWAN, SUPERVISOR TREATING OPERATING

Facility No: 120-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
( ) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
(X) Annual
( ) Follow-up

Current Permit Status: EXPIRES FIRST DAY OF APRIL 1997

Source Description: PRESSURE TREATING OF CROSS TIES WITH CREOSOTE.

Applicable Regulations:

( ) SIP
( ) PSD
(X) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

NO PROBLEMS FOUND.

INSPECTION REPORT FORM - BOI[illegible]

Facility Name: KERR MCGEE CHEMICAL Date: 3/24/94

Emission Point No./Name: CLEAVER BROOKS

Rated Boiler Size: 44635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: UNKNOWN MMBTUH
OR
[illegible] lbs steam/hr @ 145 psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NUMBER 2 FUEL OIL IS USED AS BACKUP FUEL.

For Solid Fuels, Describe Fuel Stoking Method: NONE USED

Soot Blowing: ( ) Periodic ( ) Manual NA
( ) Continuous ( ) Automatic

Schedule:

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity 0% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/24/94

Emission Point No./Name: HENRY VOUGHT

Rated Boiler Size: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Operating Rate @ Insp: _____ MMBTUH
OR
_____ lbs steam/hr @ _____ psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: NONE USED

Soot Blowing: ( ) Periodic ( ) Manual NA
( ) Continuous ( ) Automatic

Schedule: _____

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

Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

THIS BOILER WAS NOT OPERATING AT THE TIME AND IS USED ONLY AS A BACK-UP.

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/24/94

Emission Point No./Name: PARK TOWER

Scrubbing Liquid: (X) Water ( ) Solution ( ) Reactant Solution

Scrubber Type:

(X) Spray Tower/Wet Washer
( ) Sieve Tray/Bubbler Cap/Packed Column
( ) Orifice
( ) Venturi
( ) Other, Explain: _____

Demisting Method: ( ) Cyclone
( ) Vanes
( ) Pad
( ) No Demisting
( ) Other, Explain: _____

Operating Conditions: _____ gpm @ _____ psig
_____ inches water gauge pressure drop
Rainout Occurring: ( ) Yes (X) No

Scrubbing Liquid: (X) Once Through ( ) Recycled

If recycled, VARIES gpm makeup rate

If water, describe settling basin: _____

For solution/reactant systems:
Chemical makeup of liquid: 5000 GALLON TANKS
How is scrubber discharge handled/treated: _____

Emissions: ( ) Not Visible ( ) Visible, Dust Trail-off, _____% Opacity (Do VEE)

Comments: NOT IN OPERATION AT THE TIME.

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE Date: 3/24/92

Emission Point No./Name: LARGE CYCLONE

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND [illegible] SOLD AS BOILER FUEL.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL Date: 3/24/94

Emission Point No./Name: SMALL CYCLONE

Type particulate being handled: SAWDUST, CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap
(Horizonal Emission)

Is fallout occurring?: ( ) Yes (X) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?: WHEN NEEDED

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of?

DUMPED INTO TRUCK AND SOLD AS BOILER FUEL.

Comments:

6-893

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 1680 - 00020 **Date:** _____ **SIC Code:** 2491

Facility Name: KERR-McGEE CHEM. CORP.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	71.7	
SO2	231.8	
NOX	0	
CO	0	
VOC*	3.5	
LEAD	0	
TRS	0	
Total HAPs (Voc)	0	
Total HAPs (Non-Voc)	0	
CFCs/HCFCs	0	
Other	0	

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

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

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

_____ _____
Signature and Title Date

6-893

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 1680 - 00020 **Date:** _____ **SIC Code:** 2491

Facility Name: KERR-McGEE CHEM. CORP.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	71.7	
SO2	231.8	
NOX	0	
CO	0	
VOC*	3.5	
LEAD	0	
TRS	0	
Total HAPs (Voc)	0	
Total HAPs (Non-Voc)	0	
CFCs/HCFCs	0	
Other	0	

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

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

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

_____ _____
Signature and Title Date

PART I
GENERAL CONDITIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any air pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions or modifications which will result in new, different, or increased emission of air pollutants must be reported by submission of a new application.

2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits.

4. Any diversion from or bypass of collection and control facilities is prohibited except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Environmental Quality Permit Board.

5. Whenever any emergency, accidental or excessive discharge of air contaminants occurs, the Mississippi Department of Environmental Quality Office of Pollution Control shall be notified immediately of all information concerning cause of the discharge, point of discharge, volume and characteristics, and whether discharge is continuing or stopped.

6. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Control Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule.

7. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

8. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions.

9. For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

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

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

12. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

13. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

14. This permit is for air pollution control purposes only.

15. This permit is not a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. This permit is a transitional operating permit to satisfy the requirements of State Law only. After new State operating permit regulations are developed and adopted to satisfy the conditions of Title V of the Federal Act, the permittee will be required to submit an updated application to comply with said regulations and this permit may be modified, suspended, or revoked as necessary to comply with said regulations.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-001, the CB D-6 Boiler.

Such emissions shall be limited by the permittee as specified below:

	EMISSION LIMITATIONS
Particulate Matter	16.6 lbs/hr
Sulfur Dioxide	163.2 lbs/hr
Opacity	40% Maximum

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-002, the Vogt 14435 Woodwaste Boiler.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Particulate Matter	31.3 lbs/hr
Sulfur Dioxide	68.6
Opacity	40% Maximum

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-003, two (2) wood processing cyclones.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Cyclone #1:

Particulate Matter	9.1 lbs/hr

Cyclone #2:

Particulate Matter	15.1 lbs/hr

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning April 14, 1992, and lasting until April 1, 1997, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-004, the 57,000 gallon creosote storage tank controlled by a scrubber.

Such emissions shall be limited by the permittee as specified below:

EMISSION LIMITATIONS

Volatile Organic Compounds (VOC) 0.8 lbs/hr and 3.5 tons/year and reduction of control equipment inlet VOC by 95% as set forth by 40 CFR 60.112b(a)(3).

REPORTING & RECORDKEEPING

The permittee shall provide notices and reports, and maintain records as required by 40 CFR 60, Section 60.115b.

TESTING & PROCEDURES

The permittee shall demonstrate compliance with the required control efficiency for VOC emissions as required by 40 CFR 60.113b.

PART III
OTHER REQUIREMENTS

(1) The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Emission Regulations.

(2) The permittee is required to meet all applicable conditions and requirements contained in New-Source Performance Standards (NSPS), Subpart Kb.

(3) The NSPS tank must be controlled by a closed vent system and scrubber. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater.

(4) The permittee is allowed to store only creosote in the storage vessel. The amount of creosote stored must be recorded at all times. The maximum true vapor pressure of the stored creosote must be recorded at all times.

PERMIT REVIEW SUMMARY

FILE COPY

COMPANY NAME: Kerr-McGee Chemical Company

SOURCE NUMBER: 1680-00020

COUNTY: Lowndes

PERMIT TYPE: OPERATING

SOURCE TYPE: A1(a)

APPLICABLE REGULATIONS: NSPS / SIP

FOR April 14, 1992, PERMIT BOARD

BY: J. Dewayne Headrick

DATE: April 7, 1992

PROJECT DESCRIPTION, INCLUDING SITE INFORMATION

This action is to combine an old PTO with a first time PTO from a PEP for a 57,000 gallon NSPS creosote storage tank. The facility, located in Columbus at the intersection of 14th Avenue and 20th Street, had an operating permit for two boilers and two cyclones. They have submitted a timely application for renewal of the old PTO and fulfilled the requirements of the PEP. Emission limitations for the NSPS tank are 0.8 lbs/hr and 3.5 TPY for VOC.

EMISSIONS EVALUATION

a) Permit Limits

Total emission limits from all sources include 72.1 lbs/hr and 316 TPY for particulate matter; 232 lbs/hr and 1015 TPY of sulfur dioxide; 0.8 lbs/hr and 3.5 TPY for VOC.

b) Maximum allowed by SIP, NSPS, or NESHAPS

See above.

c) Uncontrolled

NA

AIR QUALITY IMPACT ANALYSIS

NA

PUBLIC PARTICIPATION

NA

RECOMMENDATION

I recommend that Permit to Operate No. 1680-00020 be issued. This will cancel an overdue action.

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noncontact
ept for auto-
ium breaker
vents is to
w the liquid

the internal
leg sleeves,
rim space
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gap) except
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other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.

(A) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in § 60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and tank wall.

(B) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in § 60.113b(b)(4).

(ii) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

(iii) The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

(3) A closed vent system and control device meeting the following specifications:

(i) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable

emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in Part 60, Subpart VV, § 60.485(b).

(ii) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (§ 60.18) of the General Provisions.

(4) A system equivalent to those described in paragraphs (a)(1), (a)(2), or (a)(3) of this section as provided in § 60.114b of this subpart.

(b) The owner or operator of each storage vessel with a design capacity greater than or equal to 75 m^3 which contains a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa shall equip each storage vessel with one of the following:

(1) A closed vent system and control device as specified in § 60.112b(a)(3).

(2) A system equivalent to that described in paragraph (b)(1) as provided in § 60.114b of this subpart.

§ 60.113b Testing and procedures.

The owner or operator of each storage vessel as specified in § 60.112b(a) shall meet the requirements of paragraph (a), (b), or (c) of this section. The applicable paragraph for a particular storage vessel depends on the control equipment installed to meet the requirements of § 60.112b.

(a) After installing the control equipment required to meet § 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:

(1) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.

(2) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the p
seal or the secondary seal (if o
service) through manholes an
hatches on the fixed roof at le
every 12 months after initial
the internal floating roof is not
on the surface of the VOL ins
storage vessel, or there is liqui
mulated on the roof, or the sea
tached, or there are holes or
the seal fabric, the owner or o
shall repair the items or emp
remove the storage vessel from
within 45 days. If a failure tha
tected during inspections requ
this paragraph cannot be
within 45 days and if the vessel
be emptied within 45 days, a
extension may be requested fr
Administrator in the inspectio
required in § 60.115(a)(b)(3).
request for an extension mus
ment that alternate storage ca
unavailable and specify a sch
actions the company will take
assure that the control equipn
be repaired or the vessel will
tied as soon as possible.

(3) For vessels equipped
double-seal system as spec
§ 60.112b(a)(1)(ii)(B):

(i) Visually inspect the
specified in paragraph (a)(4)
section at least every 5 years;

(ii) Visually inspect the
specified in paragraph (a)(2)
section.

(4) Visually inspect the
floating roof, the primary
secondary seal (if one is in
gaskets, slotted membranes
and sleeve seals (if any) each
storage vessel is emptied and
If the internal floating roo
fects, the primary seal h
tears, or other openings in t
the seal fabric, or the secon
has holes, tears, or other op
the seal or the seal fabric, o
kets no longer close off the
faces from the atmosphere
slotted membrane has more
percent open area, the owner
tor shall repair the items as
so that none of the conditi
fied in this paragraph exist
filling the storage vessel wit
no event shall inspections
in accordance with this

ATTACHMENT I

Operating Plan

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT

FOR THE PURPOSE OF PERFORMANCE EVALUATION

THIS CERTIFIES THAT

Kerr-McGee Chemical Corporation
Forest Products Division
14th Avenue & 20th Street North
Columbus, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1982), and the regulations and standards adopted and promulgated thereunder.

Issued this 11th day of July, 1989

MISSISSIPPI NATURAL RESOURCES PERMIT BOARD

Charles Chism

DIRECTOR, BUREAU OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

Expires 11th day of November, 1989

Permit No. 1680-00020
Emission Point 004

PART I
GENERAL CONDITIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any air pollutant identified in this permit more frequently than or at a level in excess of authorized shall constitute a violation of the permit. Any anticipated facility expansions or modifications which will result in new, different, or increased emission of air pollutants must be reported by submission of a new application.

2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters.

4. Any diversion from or bypass of collection and control facilities is prohibited except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Natural Resources Permit Board.

5. Whenever any emergency, accidental or excessive discharge of air contaminants occurs, the office of the Mississippi Department of Natural Resources Bureau of Pollution Control shall be notified immediately of all information concerning cause of the discharge, point of discharge, volume and characteristics, and whether discharge is continuing or stopped.

6. Should the Executive Director of the Mississippi Department of Natural Resources declare an Air Pollution Control Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule.

7. The permittee shall allow the Mississippi Department of Natural Resources Bureau of Pollution Control and the Mississippi Natural Resources Permit Board and/or their authorized representatives, upon the presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

8. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions.

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

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

11. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

12. This permit is non-transferable.

13. This permit is for air pollution control purposes only.

14. This permit is only for the purpose of initial start-up and determining compliance with the applicable terms and conditions of this permit.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning July 11, 1989, and lasting until November 11, 1989, the permittee is authorized to operate air emissions equipment and emit air contaminants from a 57,000 gallon creosote storage tank, controlled by a scrubber, Emission Point 004.

During this period the permittee shall demonstrate compliance with the emission limitations and testing methods specified:

EMISSION LIMITATIONS

Volatile Organic Compounds (VOC) 0.8 lb/hr, 3.5 tons/year, and reduction of control equipment inlet VOC by 95% as set forth by 40 CFR 60.112b(a)(3).

REPORTING & RECORDKEEPING

The permittee shall provide notices and reports, and maintain records as required by 40 CFR 60, Section 60.115b.

TESTING & PROCEDURES

The permittee shall demonstrate compliance with the required control efficiency for VOC emissions as required by 40 CFR 60.113b.

PART III
OTHER REQUIREMENTS

(1) The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Emission Regulations.

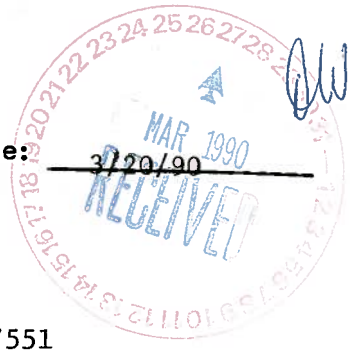
(2) The permittee is required to meet all applicable conditions and requirements contained in New-Source Performance Standards (NSPS), Subpart Kb.

(3) The permitted system must be controlled by a closed vent system and scrubber. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater.

(4) The permittee is allowed to store only creosote in the storage vessel. The amount of creosote stored must be recorded at all times. The maximum true vapor pressure of the stored creosote must be recorded at all times.

Lowndes

INSPECTION REPORT FORM - GENERAL



Facility Name: KERR MCGEE CHEMICAL CORP. Date: 3/20/90

Address: 230 14TH AVENUE AND 20TH STREET NORTH

P.O. BOX 906

COLUMBUS, MS LOWNDES COUNTY 328-7551

Inspected By: RANDY BYARS

Person Contacted: JOHN GETZ

Facility No: 120-1680-00020

Is facility major or minor? MAJOR

Purpose of Inspection:

( ) Compliance Verification
( ) Performance Evaluation
( ) Complaint Investigation
( ) Surveillance
( ) Other (Explain):

( ) O&M
( ) VEE
(X) Annual
( ) Follow-up

Current Permit Status:

Source Description:

Applicable Regulations:

( ) SIP
( ) PSD
( ) NSPS
( ) NESHAPS

Cite regulation by description or regulatory section number:

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

MR. GETZ COULD NOT FIND HIS PERMIT, HE ASKED ME IF YOU COULD SEND HIM A COPY.

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/20/90

Emission Point No./Name: CLEAVER BROOKS

Rated Boiler Size: 44635 MMBTUH
OR
30,000 lbs steam/hr @ 225 psig

Operating Rate @ Insp: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity 0 % By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

INSPECTION REPORT FORM - BOILERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/20/90

Emission Point No./Name: _____

Rated Boiler Size: _____ MMBTUH
OR
20,000 lbs steam/hr @ 150 psig

Operating Rate @ Insp: _____ MMBTUH
OR
_____ lbs steam/hr @ _____ psig

Fuel(s) Being Used:
(X) Natural Gas @ _____ MCFH
(X) Fuel Oil, No. 2 @ _____ Gal/hr
( ) Coal @ _____ tons/hr; _____ type; _____% ash; _____% sulfur
( ) Woodwaste: ( ) Sawdust @ _____ tons/hr
( ) Shavings @ _____ tons/hr
( ) Hogged Fuel @ _____ tons/hr
( ) Bark @ _____ tons/hr

( ) Other Fuels, Explain: NONE

For Solid Fuels, Describe Fuel Stoking Method: _____

Soot Blowing: ( ) Periodic ( ) Manual
( ) Continuous ( ) Automatic

Schedule: _____

Air Pollution Controls: (X) None ( ) Baghouse
( ) Cyclone ( ) ESP
( ) Multiclone
( ) Scrubber (For Particulate)
Complete Appropriate Control Device Sheets

Stack Emissions: Opacity _____% By ( ) VEE ( ) CEM
Sulfur Dioxide _____ lbs/MMBTU by CEM
Nitrogen Oxides _____ lbs/MMBTU by CEM

WAS NOT OPERATING AT THE TIME. THIS IS AN OLD BOILER THERE WAS NO MANUFACTURER NAME PLATE ON IT.

INSPECTION REPORT FORM - SCRUBBERS

Facility Name: KERR MCGEE CHEMICAL Date: 3/20/90

Emission Point No./Name: PARK TOWER

Scrubbing Liquid: (X) Water ( ) Solution ( ) Reactant Solution

Scrubber Type:

(X) Spray Tower/Wet Washer
( ) Sieve Tray/Bubbler Cap/Packed Column
( ) Orifice
( ) Venturi
( ) Other, Explain: _____

Demisting Method: ( ) Cyclone
( ) Vanes
( ) Pad
( ) No Demisting
( ) Other, Explain: _____

Operating Conditions: 50 gpm @ 12 psig
18 inches water gauge pressure drop
Rainout Occurring: ( ) Yes (X) No

Scrubbing Liquid: (X) Once Through ( ) Recycled

If recycled, _____ gpm makeup rate

If water, describe settling basin: _____

For solution/reactant systems:
Chemical makeup of liquid: _____
How is scrubber discharge handled/treated: _____

Emissions: ( ) Not Visible ( ) Visible, Dust Trail-off, _____% Opacity (Do VEE)

Comments: _____

THERE WAS TOO MUCH STEAM TO DO A VEE.

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE Date: 3/20/90

Emission Point No./Name: LARGE CYCLONE

Type particulate being handled: SAWDUST CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have
( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have
( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: (X) Yes ( ) No

Does cyclone have dust buildup on exhaust?: ( ) Yes (X) No

How often is it cleaned up?:

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of? DUMPED INTO TRUCK AND HAULED OFF.

Comments:

INSPECTION REPORT FORM - CYCLONES

Facility Name: KERR MCGEE CHEMICAL Date: 3/20/90

Emission Point No./Name: SMALL CYCLONE

Type particulate being handled: SAWDUST, CHIPS AND SHAVINGS

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

( ) Simple (Cylinder Length = 2 x Diameter)
( ) Potbellied (Cylinder Length < 2 x Diameter)
(X) High Efficiency (Cylinder Length > 2 x Diameter)
( ) Multiclone

Fan is Located: (X) Upstream ( ) Downstream of Cyclone
If Downstream, does fan have ( ) Direct Emission
( ) Auxiliary Stack
If Upstream, does cyclone have ( ) No Cap (Vertical Emission)
( ) Fixed Cap (Diffuse Emission)
(X) Wind Respondent Cap (Horizonal Emission)

Is fallout occurring?: (X) Yes ( ) No

Does cyclone have dust buildup on exhaust?: (X) Yes ( ) No

How often is it cleaned up?:

Does cyclone have any holes or split seams? ( ) Yes (X) No

How is collected dust stored, moved, disposed of?

DUMPED INTO TRUCK AND HAULED OFF.

Comments:

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT

FOR THE PURPOSE OF PERFORMANCE EVALUATION

THIS CERTIFIES THAT

Kerr-McGee Chemical Corporation
Forest Products Division
14th Avenue & 20th Street North
Columbus, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1982), and the regulations and standards adopted and promulgated thereunder.

Issued this 11th day of July, 1989

MISSISSIPPI NATURAL RESOURCES PERMIT BOARD

_____

DIRECTOR, BUREAU OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

Expires 11th day of November, 1989

Permit No. 1680-00020
Emission Point 004

PART I
GENERAL CONDITIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any air pollutant identified in this permit more frequently than or at a level in excess of authorized shall constitute a violation of the permit. Any anticipated facility expansions or modifications which will result in new, different, or increased emission of air pollutants must be reported by submission of a new application.

2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters.

4. Any diversion from or bypass of collection and control facilities is prohibited except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Natural Resources Permit Board.

5. Whenever any emergency, accidental or excessive discharge of air contaminants occurs, the office of the Mississippi Department of Natural Resources Bureau of Pollution Control shall be notified immediately of all information concerning cause of the discharge, point of discharge, volume and characteristics, and whether discharge is continuing or stopped.

6. Should the Executive Director of the Mississippi Department of Natural Resources declare an Air Pollution Control Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule.

7. The permittee shall allow the Mississippi Department of Natural Resources Bureau of Pollution Control and the Mississippi Natural Resources Permit Board and/or their authorized representatives, upon the presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

8. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions.

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

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

11. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

12. This permit is non-transferable.

13. This permit is for air pollution control purposes only.

14. This permit is only for the purpose of initial start-up and determining compliance with the applicable terms and conditions of this permit.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

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During this period the permittee shall demonstrate compliance with the emission limitations and testing methods specified:

EMISSION LIMITATIONS

Volatile Organic Compounds (VOC) 0.8 lb/hr, 3.5 tons/year, and reduction of control equipment inlet VOC by 95% as set forth by 40 CFR 60.112b(a)(3).

REPORTING & RECORDKEEPING

The permittee shall provide notices and reports, and maintain records as required by 40 CFR 60, Section 60.115b.

TESTING & PROCEDURES

The permittee shall demonstrate compliance with the required control efficiency for VOC emissions as required by 40 CFR 60.113b.

PART III
OTHER REQUIREMENTS

(1) The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Emission Regulations.

(2) The permittee is required to meet all applicable conditions and requirements contained in New-Source Performance Standards (NSPS), Subpart Kb.

(3) The permitted system must be controlled by a closed vent system and scrubber. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater.

(4) The permittee is allowed to store only creosote in the storage vessel. The amount of creosote stored must be recorded at all times. The maximum true vapor pressure of the stored creosote must be recorded at all times.

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

June 27, 1989

RECEIVED
JUN 29 1989
DEPT. OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL

Mr. Bobby V. Whitaker
North Air Emissions Section
Bureau of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Re: Kerr-McGee Chemical Corporation
Forest Products Division
Columbus Facility

Dear Mr. Whitaker:

Please find enclosed the certification by a professional engineer registered in the State of Mississippi, which certifies the creosote storage tank and associated packed tower water scrubber located at the Kerr-McGee Chemical Corporation, Forest Products Division (KMCC-FPD), Columbus Facility, were constructed in accordance with the approved plans and specifications. The certification is included as Attachment I to this letter.

As stipulated in the approved Construction Permit No. 1680-00020, a Performance Evaluation Permit must be obtained prior to startup of the air emissions equipment. With startup now scheduled for week of July 10, 1989, KMCC-FPD hereby requests the Bureau of Pollution Control to issue the Performance Evaluation Permit to run for a period of not more than 120 days. KMCC-FPD will substantiate the adequacy of the air emissions control equipment within the 120 day period.

The methods used to evaluate the performance of the scrubber are provided in the Operating Plan for the air emissions equipment included as Attachment II to this letter. The Operating Plan presents the following:

1) Documentation that the control device will achieve the required control efficiency during maximum operating loading conditions. Documentation will include a description of the gas stream entering and exiting the scrubber, and the manufacturer's design specifications for the scrubber.

2) The Operating Plan includes a description of the parameters to be monitored to ensure the scrubber will be operated in compliance with its design at all times, and an explanation of the criteria used for selection of the parameters.

3) The Operating Plan provides the detailed plan of operations, maintenance, monitoring, reporting and recordkeeping.

We trust the enclosed Operating Plan for the operation and monitoring of the air emissions control equipment is complete and sufficient for the Bureau of Pollution Control to approve the permit to operate.

Should you have any questions or would like to schedule a visit to the facility, please contact Ross Harrod, Superintendent, (601) 328-7551, or me at (405) 270-2395.

Sincerely,
KERR-MCGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

P. C. Gaskin
Staff, Environmental Control
and Regulatory Affairs

PCG:wpc

cc: Ross Harrod
J. H. Bull

ATTACHMENT I

Certification By Professional Engineer

CHARLES E. HUDNALL
CONSULTING ENGINEER P.A.
CHARLES E. HUDNALL, P.E.
820 2ND AVE. N., P.O. BOX 2100, COLUMBUS, MS 39704-2100
TELEPHONE 601-328-4460

June 21, 1989

Mr. G. R. Herrod
Plant Manager
Kerr-McGee Chemical Corp.
Forest Products Division
P.O. Box 906
Columbus, Mississippi 39702

Re: Packed tower water scrubber
and new creosote storage tank

Dear Sir:

This is to certify that the new creosote storage tank and associated packed tower water scrubber were constructed in accordance with previously approved plans and specifications and in accordance with the manufacturer's recommendations.

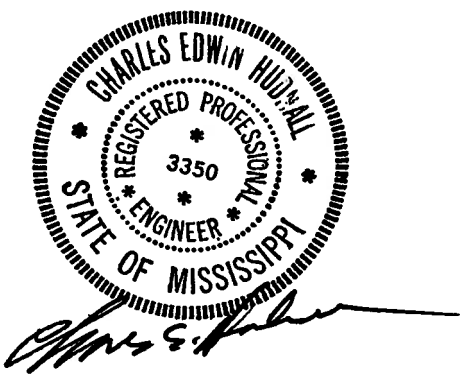
Please advise if we can be of further assistance in this matter.

Very truly yours,

Charles E. Hudnall, P. E.
Mississippi Reg. P. E. No. 3350

CEH/lh

Seal:



ATTACHMENT II

Operating Plan

ATTACHMENT II

OPERATING PLAN

For Operation and Monitoring of a Creosote Storage Tank

and

Packed Tower Water Scrubber

Introduction

This Operating Plan has been developed to insure the air emissions control device for the creosote storage tank at the Kerr-McGee Chemical Corporation, Forest Products Division (KMCC-FPD), Columbus Facility, will be operated and maintained to achieve the required control efficiency during maximum operating loading conditions.

Use of Storage Tank and Packed Tower Water Scrubber

The tank will be used as a storage tank for creosote utilized in the production process wood preserving system. Appendix A presents the description and use of the storage tank and scrubber.

Operating Instructions for Packed Tower Scrubbers

The manufacturer's operating instructions for the Croll-Reynolds counter-current packed tower is presented in Appendix B.

Description of Storage Tank and Scrubber

The tank, designated Storage Tank No. 2, will store creosote used in the production process wood preserving system. The above ground vertical, cylindrical welded steel tank measures 18' dia. x 30' high. The fixed roof

tank has one 8" vent attached to the scrubber. A pressure-vacuum safety relief valve is attached to the fixed roof to protect the tank structure from rupture due to excessive pressure and vacuum.

The scrubber is a countercurrent packed tower water scrubber designed for using water as the scrubbing liquid. The Model No. 18T-10H scrubber was manufactured by Croll-Reynolds Company in May, 1989, and is 18" dia. x 17' high. Appendix C presents the manufacturer's design specifications and a layout drawing of the packed tower.

Description of Gas Streams

KMCC-FPD employed Aristech Research Laboratory to prepare a computer simulation program using water as the scrubbing medium in a packed tower water scrubber. The computer simulation program identified the total volatile organic carbon compounds present in the emissions from the storage tank, and quantified the total organic compounds entering and exiting the packed tower water scrubber, and absorbed by the circulating water. Total hydrocarbon vapor in the gas stream entering the water scrubber at an instantaneous rate of 19.5 lbs./hr. is reduced to 0.8 lbs./hr. for a reduction efficiency of 95.9%. Aristech Chemical Corporation is a major manufacturer of creosote and is experienced in making these computer simulations. The description of the gas stream and material balance using water as the scrubbing medium is presented in Appendix D.

Monitoring Plan

The packed tower water scrubber will be monitored to ensure both it and the storage tank are properly operated and maintained to achieve the required control efficiency during maximum operating loading conditions.

As described in Appendix A, the storage tank scrubber will be in operation whenever one or more of the three pumps are transfering creosote to the storage tank. The maximum operating loading condition would be 147 ACFM when all three creosote transfer pumps are operating simultaneously. The operating conditions and performance data provided by the manufacturer of the scrubber is based upon a maximum gas inlet flow rate of 200 ACFM at a temperature of 200°F. Based upon the manufacturer's operating conditions and performance data, and the results of the computer simulation program, the scrubber will operate well within its operating capacity under maximum loading conditions. Appendix E presents the manufacturer's operating conditions and performance data.

The monitoring program is based upon compliance with the state approved design specifications in the construction permit, and includes the instantaneous monitoring of the packed tower water scrubber during use. A copy of the Construction Permit is included as Appendix F.

The following TABLE I lists the equipment items to be monitored to ensure that the storage tank and packed tower are operating in conformance with their design. The table lists the equipment, frequency, typical operating condition and design specifications.

TABLE I

AIR EMISSION
MONITORING PROGRAM

Equipment	Location	Frequency	Typical Operating Condition	Design Specifications
Storage Tank				
	8" Vent/Line	3/Day	Closed Vent	Closed Vent
	Press/Vac Safety Relief	3/Day	Closed Vent	Closed Vent
Scrubber				
	Inlet Flow Rate	3/Week	120 ACFM	200 ACFM
	Inlet Temp.	3/Day	190°F	200°F
	Inlet Press.	3/Day	14.6 psia	14.6 psia
	Press. Drop	3/Day	1.20 oz.	1.20 oz.
Water Circulation System				
	Inlet Flow Rate	3/Day	50.1 GPM	50 GPM
	Inlet Temp.	3/Day	85°F	90°F
	Inlet Press.	3/Day	7.0 psia	7.0 psia
	Level in Scrubber	3/Day	18 inches	18 inches

The daily inspection schedule for the air emission and control equipment shall include:

1) The creosote storage tank shall be inspected daily for signs of liquid and air emission leakage. The 8" vent line connecting the storage tank to the packed tower scrubber will likewise be checked.

2) The packed tower scrubber will be inspected daily for air emission leakage from flanged connections, and pipe fittings for circulating water leakage.

3) The tank storing the water supply for the scrubber will be checked daily for optimum volume of water.

4) The scrubber's water circulating pump will be checked daily for lubrication needs and mechanical wear and tear.

5) Interlocked electrical controls for the three creosote transfer pumps will be checked each time any of the pumps are used to ensure that the scrubber's water circulating pump system is in operation.

The parameters to be monitored to ensure that the packed tower is operated in conformance with its design specifications are as follows:

Gas Inlet Flow to Scrubber

1) Gas Inlet Flow Rate - The gas inlet flow rate to the scrubber will be checked three times a week for maximum operating loading conditions. The gas inlet flow rate will be measured by timing the storage tank's fill rate in GPM when the large fill pump (900 GPM cap.) is in operation or in simultaneous operation with one or both of the other two smaller fill pumps. The combined operation of the large fill pump with one or both of the other fill pumps will give a maximum operating loading condition. The gas inlet flow rate design capacity is 200 ACFM.

2) Gas Inlet Temperature - The temperature of the air emissions entering the packed tower will be checked once each 8-hour shift during operation of the production process system. The maximum gas inlet temperature is 200°F.

3) Gas Inlet Pressure - The gas inlet pressure will be checked once each 8-hour shift during operation of the system. The manufacturer's maximum gas inlet pressure specification is one (1) atmosphere (14.7 psia).

4) Gas Pressure Drop Across Scrubber - The design pressure drop across the system is 2 inches W.G. (1.2 oz.). The maximum gas inlet pressure and pressure drop across the system will be monitored daily to detect any increases in the pressure drop. Maximum gas inlet pressure will be limited to 6 inches W.G. (3.47 oz.).

Water Inlet Flow to Scrubber

1) Water Inlet Pressure and Flow Rate - The pressure and flow rate of water to the scrubber will be checked once each 8-hour shift during operation to ensure the pump pipelines and spray nozzle are free of blockage and the required 50 GPM of water at 7 psig is being provided at the spray nozzle.

2) Water Inlet Temperature - The temperature of the water used as the scrubbing medium will be checked each 8-hour shift. Makeup water will be added to the water storage tank as necessary to stay below the maximum water inlet temperature of 90°F.

3) Water Level in Storage Compartment - The water level in the scrubber's storage compartment will be checked daily to assure the water level has not reached an excessive level and is blocking the gas inlet. The storage compartment will be drained daily as necessary.

Recordkeeping and Reporting

The KMCC-FPD, Columbus Facility shall keep a copy of the Operating Plan in file for the life of the source.

The storage tank closed vent system and packed tower water scrubber shall be operated and parameters monitored in accordance with the Operating Plan. A record of the measured values of the parameters shall be maintained in file at the facility for at least 2 years.

Appendix G presents the Inspection Checklist Form to record the inspections and values of the parameters that will be monitored in accordance with the Operating Plan.

APPENDIX A

Use of Storage Tank

and

Countercurrent Packed Tower Water Scrubber

APPENDIX A

Use of Storage Tank and Countercurrent Packed Tower Water Scrubber

The tank shall be used as a storage tank that will store hot creosote utilized in the production process wood preserving system. The temperature of the creosote will range from ambient to 200°F.

When a wood preserving treating cylinder (retort) is charged with a load of wood products such as crossties, creosote is pumped from the storage tank to the retort to completely fill all voids. The pumping flow rate is about 900 gpm, and the pump requires about 20 minutes to completely fill the retort. The storage tank is normally maintained at two-thirds full and after the retort is filled, the tank has been reduced to about one-third full.

Following pressure treatment of the wood crossties to the required retention of creosote, the creosote is then pumped from the retort back to the storage tank at the same 900 gpm flow rate.

The packed tower water scrubber shall be operated during the pump back cycle when the creosote is being pumped from the retort to the storage tank. As the tank fills, the vapor displaced will flow to the packed tower.

The electrical control for the pump feeding water to the packed tower will be interlocked with the electrical control for the creosote fill pump, so that the fill pump can only be used when there is water being circulated to the packed tower.

Within the production process system there are two additional smaller pumps that will transfer creosote into the storage tank. They are identified as the creosote recycle pump rated at 50 GPM and the tank car unloading pump rated at 150 GPM. The electrical controls for these two pumps will likewise be interlocked with the packed tower water pump system so that the two creosote transfer pump can only be used when there is water being circulated to the packed tower.

APPENDIX B

Manufacturer's Operating Instructions

for Countercurrent Packed Tower Water Scrubber

APPENDIX B

Manufacturer's Operating Instructions for Countercurrent Packed Tower Water Scrubber

The Croll-Reynolds countercurrent packed tower water scrubber consists of custom-designed units where the gas flow is directed upwards through a packed bed while the liquid flow is distributed downwards over the packing. This countercurrent flow assures the highest possible efficiency of gas absorption for a particular application. The height of packing was selected to assure the required efficiency for the particular need.

The basic features of all countercurrent packed towers include a side gas inlet, top gas outlet, packing support grate, packed bed, liquid distributor, and mist eliminator. Materials of construction will vary, but these essential features will always be the same. All wetted parts are stainless steel.

The 316 stainless steel packing support grate is a fixed grating located directly above the gas inlet. It is sufficiently open to allow gas to pass through it without causing excessive pressure drop. All openings are small enough to provide sufficient support for the packing used on this particular application.

A flanged top is included in the unit. This opening can be used for inspection of the liquid distributor as well as installing the packing. The packing is shipped loose in boxes and installed at the site. The method of installation will vary with the particular material being used, but for the

lightweight 316 stainless steel packing, it is simply necessary to dump the boxes of packing directly into the tower. This should continue until the design height as listed in the specification is reached.

Normally, the packing is supplied in increments of 5 or 10 cubic feet per box. Care must be taken that the proper number of feet of height of packing is installed rather than trying to install all the packing. Normally, some excess packing is included with the unit. This excess packing should not be installed in the unit, as it will cause liquid distribution problems.

When installing the metal packing, it is desirable to have the box of packing lowered into the bottom of the unit and then turned over. Dropping stainless steel packing from high elevations may cause distortion of the packing or damage to the support grate.

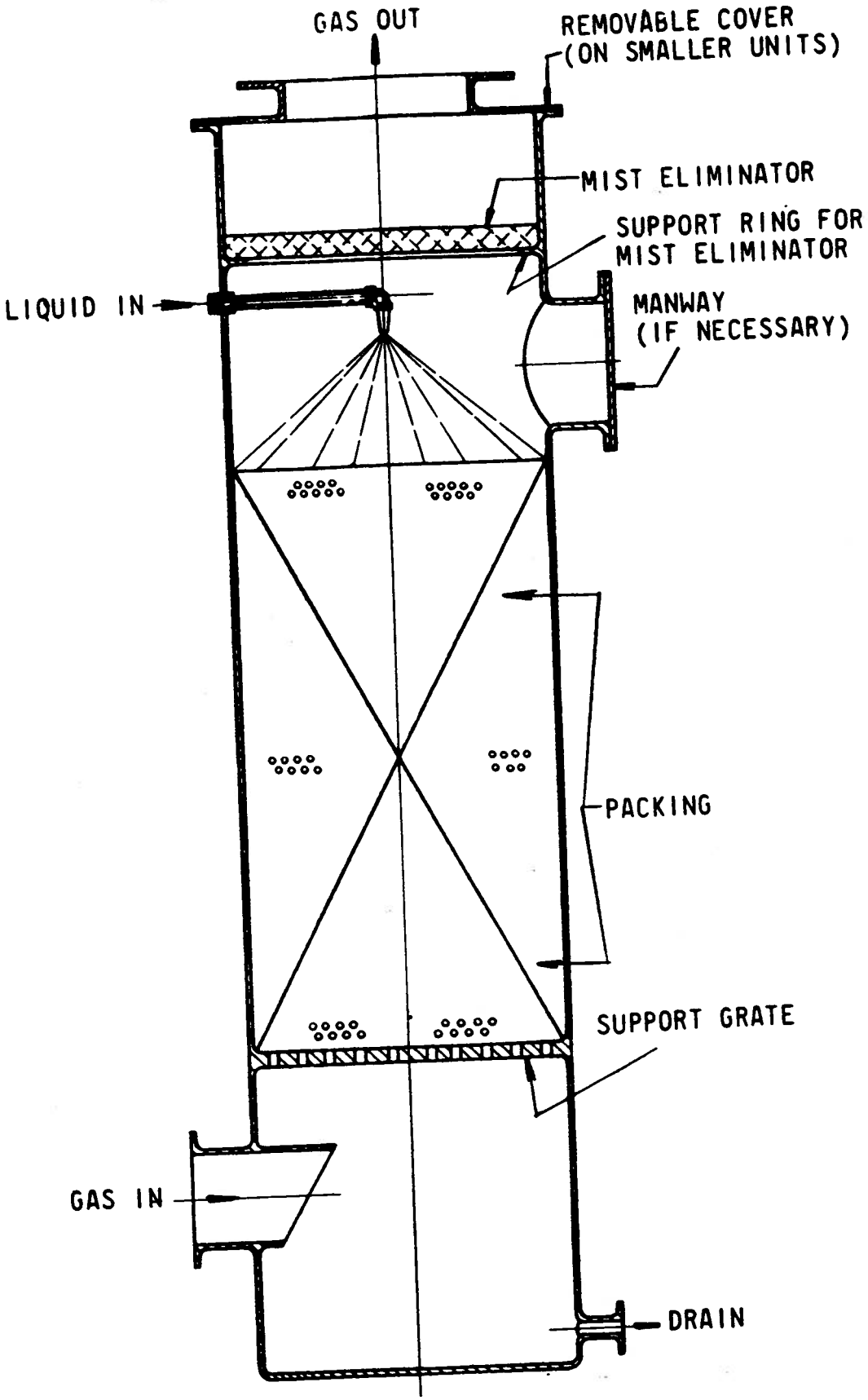
It is not desirable to shake down or try to reduce the voidage in the packing. Shaking, tamping, or walking on the packing should be avoided.

A 304 stainless steel knitted wire mesh mist eliminator is included as a feature of the packed tower. The mist eliminator is extremely efficient and provides the maximum possible elimination of any mist carryover from the packed tower. This item is installed last.

To operate the tower, it is necessary simply to provide the specified liquid pressure of 7 psig at the spray nozzle and to provide adequate draft for the resistance due to pressure drop through the unit.

Should there be an increase in the pressure drop through the packed tower in excess of 2 inches W.G., check the mist eliminator and packing materials to see if they are plugged with foreign substances. Next check the liquid pressure to the liquid distributor. Since the liquid distributor has a spray nozzle system built into it, if the proper pressure is applied, the flow rate will be correct. Excessive flow rates through the liquid distributor can cause additional pressure drop not accounted for in the design.

Check the liquid level in the storage compartment to assure that it has not reached an excessive height and is blocking the gas inlet. After a Croll-Reynolds packed tower is in operation, it requires very little maintenance and should give excellent service if it is kept clean.


GAS OUT
REMOVABLE COVER
(ON SMALLER UNITS)
MIST ELIMINATOR
SUPPORT RING FOR
MIST ELIMINATOR
LIQUID IN
MANWAY
(IF NECESSARY)
PACKING
SUPPORT GRATE
GAS IN
DRAIN

APPENDIX C

Manufacturer's Design Specifications

and Layout Drawing of the

Croll-Reynolds Model No. 18T-10H

Packed Tower Water Scrubber

CR PROPOSAL Customer Inquiry Coal Tar Distillate Fumes C.R. Ref. 1111 11 0 111

CROLL-REYNOLDS PACKED TOWER

TO: Kerr-McGee Corporation

MODEL NO.: 18T-10H
QUANTITY: One (1)
PRICE PER SYSTEM:

F.O.B.:
TERMS: Net 30 ☒

ESTIMATED DELIVERY:
12-14 Weeks after drawing approval
3 Weeks for drawings

☐ ITEM IN STOCK DELIVERY:
_____ Weeks after receipt of order

Deliveries are quoted based on standard shop schedules at the time of quote. Special delivery requirements may be accommodated on an individual basis.

COMMENTS:
Since Croll-Reynolds Co. has no control over the mixture or concentration of corrosive elements which may come in contact with the equipment supplied, no guarantee is expressed or implied concerning materials of construction for corrosion resistance.
Customer should make every effort to assure suitability prior to purchase.

Proposal by: Arthur Schlett
Date: 11-19-88

SPECIFICATIONS

DIMENSIONS

Gas Inlet/Outlet 8" / 8"
Scrubbing Liquid Inlet: 1.5"
Tower Diameter: 18" Height: 17'-0"
Liquid Storage: YES ☒ NO ☐ Capacity 20 Gallons
Tank Connections: Drain 2", Fill -, Overflow 2"
Recycle No, Manway No, Removable Top Yes
Separator Type: Mesh Mist Eliminator
Packing Type Rings Size: 1"

MATERIALS OF CONSTRUCTION

ITEM	MATERIAL
Tower Shell:	"304L" SS or "316L SS" *
Packing:	"316" Stainless Steel
Mist Eliminator:	"304" " "
Liquid Distributor:	"316" " "

*All wetted parts.

APPROXIMATE WEIGHT
Shipping: 2630 lbs. Operating: 3120 lb.

CONSTRUCTION DESIGN

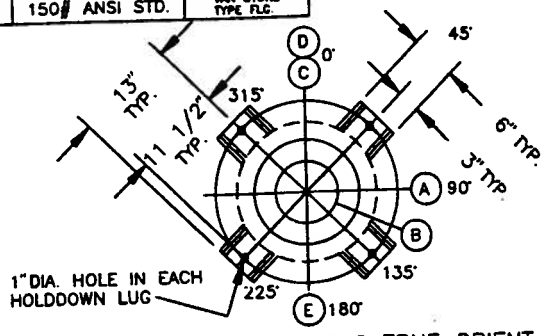
In general accordance with: standard good shop practice.
PS 15-69 ☐ ASME Code ☐ ASME Code Stamped ☐
or vessel designed for pressure/vacuum flooded -
Wall Thicknesses: 1/8"
Head Thicknesses Bottom/Top 1/8" / 1/8"

Hold down lugs	Included ☒	Not included ☐
Lifting lugs	Included ☐	Not included ☒

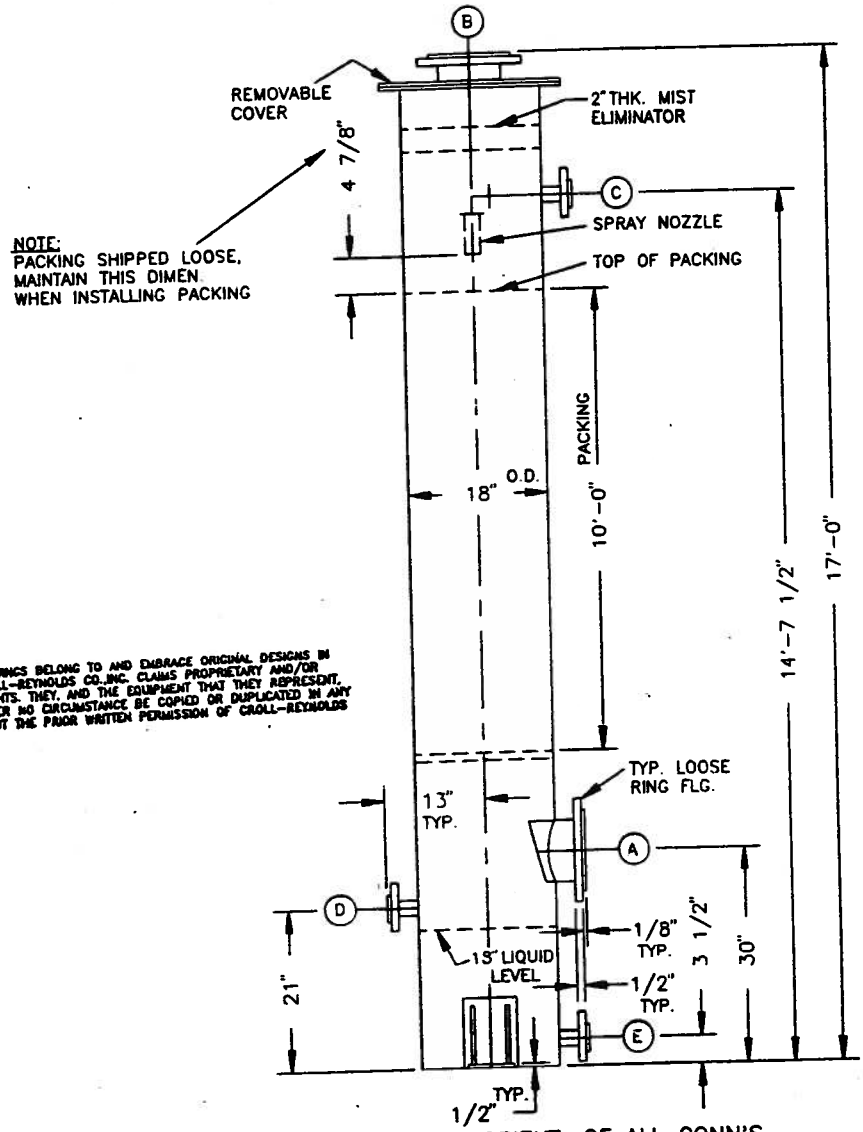
OPERATING CONDITIONS

Gas Inlet Rate Capacity: 200 acfm
Gas Inlet Temperature: 200°F
Pressure: 1 Atmosphere
Gas Composition: By Wt. 51.5% H2O, 9.1% O2, 35.2% N2, 4.2% Total Carbon
Liquid Inlet Rate: 50 gpm
Pressure at Liquid Inlet: 7.0 psig
x Specific Gravity:
Liquid Composition: water
Maximum Liquid Temperature: 90°F (Inlet)
Pressure Drop Across System: 2 Inch(es) W.G.

MARK	SIZE	DESCRIPTION	FLANGE O.D. AND DRILLING	REMARKS
A	8"	GAS INLET	150# ANSI STD.	VAN STONE TYPE FLG.
B	8"	GAS OUTLET	150# ANSI STD.	VAN STONE TYPE FLG.
C	2"	LIQUID INLET	150# ANSI STD.	VAN STONE TYPE FLG.
D	2"	OVERFLOW	150# ANSI STD	VAN STONE TYPE FLG.
E	2"	DRAIN	150# ANSI STD.	VAN STONE TYPE FLG.



PLAN VIEW SHOWING TRUE ORIENT. OF ALL CONN'S. & HOLDDOWN LUGS



ELEVATION–FOR TRUE ORIENT. OF ALL CONN'S. & HOLDDOWN LUGS–SEE PLAN VIEW

THESE DRAWINGS BELONG TO AND EMBRACE ORIGINAL DESIGNS IN WHICH CROLL-REYNOLDS CO.,INC. CLAIMS PROPRIETARY AND/OR PATENT RIGHTS. THEY, AND THE EQUIPMENT THAT THEY REPRESENT, SHALL UNDER NO CIRCUMSTANCE BE COPIED OR DUPLICATED IN ANY WAY WITHOUT THE PRIOR WRITTEN PERMISSION OF CROLL-REYNOLDS CO.,INC.

NOTES:
1.) APPROX. WTS.--EMPTY-2,630 LBS.
OPERATING-3,120 LBS.
2.) HOLDDOWN LUGS FOR PLACEMENT ONLY, NOT DESIGNED FOR WINDLOADING
3.) BOLT HOLES IN ALL FLG'D. CONN'S. ARE EQUALLY SPACED.
4.) MAT'L OF CONSTRUCTION
SHELL-S.S. TYPE 316-L
LOOSE RING FLG'S.-CARBON STL.
PACKING & MIST ELIM.-S.S. TYPE 316
SPRAY NOZZLE-S.S. TYPE 316

CERTIFIED CORRECT FOR:
CUST. ORDER NO.- CB9-188801
ITEM NO.-
TAG NO.-
C.R. CO. SERIAL NO.- 67459
CROLL-REYNOLDS CO. INC.
ENGINEERING DEPT.
DATE: 4-5-89

REV	DATE	DESCRIPTION

CROLL-REYNOLDS COMPANY, INC.
WESTFIELD, N.J.

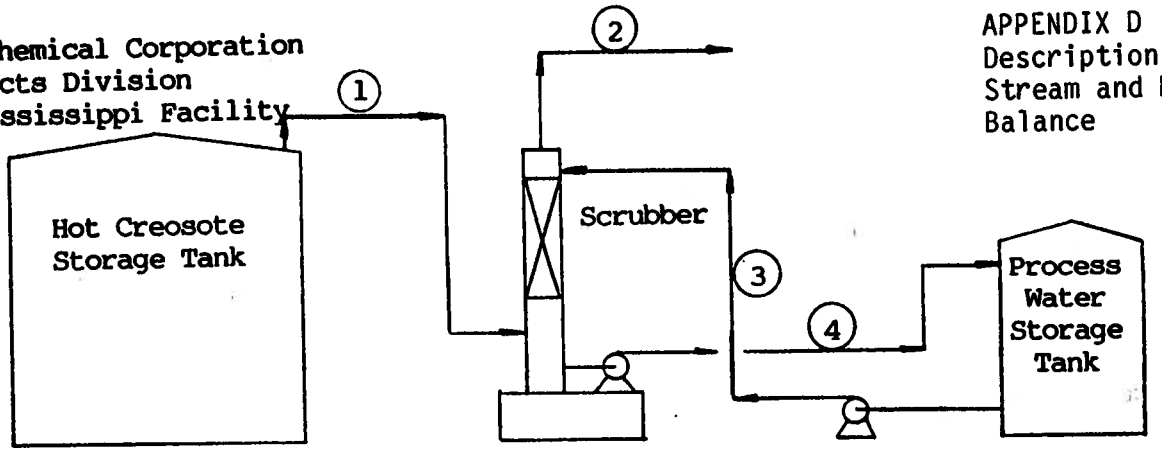
NO.18-10H PACKED TOWER LAYOUT
SCALE: 3/4"=1'
F.M. 2-27-89
FSB-20433-E

APPENDIX D

Description of Gas Streams and Material Balance

Kerr-McGee Chemical Corporation
Forest Products Division
Columbus, Mississippi Facility

APPENDIX D
Description of Gas Stream and Material Balance



Emission Description	Stream 1	Stream 2	Stream 3	Stream 4
H_2O (lb./hr.)	251.4	6.0	24989	25234
O_2 (lb./hr.)	46.6	46.6	—	—
N_2 (lb./hr.)	179.2	179.2	—	< 1
Hydrocarbon Vapor (lb./hr.)	19.5	0.8	—	< 1
Creosote (lb./hr.)	—	—	1	20
Total (lb./hr.)	496.7	232.6	24990	25254
HC Vapor Mole. Wt.	123	80	—	—
ACFM	174	55	—	—
Actual GPM	—	—	50.1	50.7
Temp., ^oF	190	85	85	87
Pressure (psia)	14.6	14.6	7.0	—

SOURCE LEVEL INFORMATION NEEDED FOR CDS

KERR-McGEE FOREST PRODUCTS | 135 | 1680 | 00020 |
NAME OF PLANT | ACQR | COUNTY NUMBER | PLANT NUMBER | CITY CODE

Physical Plant Location - Street No. and Street Name or Highway and Approximate Location with Regard to Nearest Town (P.O. Box No. is acceptable if that is all that is known): 14th AVENUE & 20th STREET NORTH, COLUMBUS

Mailing Address: P.O. BOX 906

Nearest Town: COLUMBUS

14th AVENUE & 20th STREET NORTH
Physical Location

Zip Code of Nearest Town or City: 39701

Inspection Frequency (RDE-3)

NSPS
Air Program (i.e., PSD, NSPS, NESHAP, NSR, SIP) (APCD)

UNDER CONSTRUCTION
Operating Status (i.e., Planned, Under Construction, Operating, Temporarily Closed, Dismantled, etc.) (APST)

B
Class (Emissions Classification of Entire Source) A1 (a); A1 (p); A2; B (CLAS)

Compliance Status of Source (SCMS)

VOC, PM, SO_2, NO_x, CO
Pollutants Emitted (Circle Any Pollutant Which is In Violation) and Emission Rates - (Potential and Actual) (PLLT) (PCMS)

NO
Is The Area In Which The Source Is Located Nonattainment For Any Of These Pollutants? Is so, List Which Are. (PAQC)

NO
Is This Source A Regulated Class A VOC Source? If So, What Is The Hydrocarbon Classification (i.e., A1, A2, B, Unknown) (RDE-12) (PCLS)

2491
Standard Industrial Classified Code (SICC)

SIP
Cross Reference Air Programs (i.e., NSR, PSD, NSPS, NESHAP, SIP) (A Source May Be Subject To Multiple Programs)

Please fill in this form completely for each source added to the source list.[1] On identified sources fill in only the blanks that are checked.

1. For those facilities which are subject to multiple programs, a sheet should be completed for those portions of the plant subject to each program as if this constituted a separate source.

POINT LEVEL INFORMATION NEEDED FOR CDS

KERR-McGEE FOREST PROD. | 1680 | 00020 | _____
NAME OF PLANT | COUNTY NUMBER | PLANT NUMBER | POINT NUMBER IN STATE DATA SYSTEMS (NEDS POINT NUMBER)

_____ Point Level Compliance Status (CMST) (RDE7)

VOC Major Pollutant From This Point (PLUT)

_____ NEDS Source Classification Code (This Must Be Listed For All Boilers And For All Other Points Where It Is Available) (SCC8)

STORAGE TANK WITH A SCRUBBER Process Description of Point (i.e., BOILER 1, CUPOLA, etc.) (PRDS)

N/A Capacity (Heat Input In mmBTU's Per Hour) For All Boilers Other Than Electic Utilities (CAPC)

K_b Applicable NSPS Or NESHAP Subpart (SREG)

_____ Start up date

This form should be completed for all violating points, points at new sources (e.g., NSPS, PSD, NSR) and any boilers for industries other than electric utilities.

FOR EPA INTERNAL USE ONLY

In addition, the EPA Regional Office should code:

SIPC and final compliance date under ATPE = E5 for all Class A sources with CMST = 0, 1, 5, 6, 7

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Kerr-McGee Chemical Corporation
Forest Products Division
14th Avenue & 20th Street North
Columbus, Mississippi

has been granted permission to construct air emissions equipment to comply with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Issued this 14th day of February, 1989

MISSISSIPPI NATURAL RESOURCES PERMIT BOARD

DIRECTOR, BUREAU OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

Permit No. 1680-00020
Emission Point 004

PART I
GENERAL CONDITIONS

1. The plans, specifications, schedules, dates and other data submitted to the Permit Board are filed with and considered as a part of this permit.

2. All air pollution control facilities shall be designed and constructed such as to allow proper operation and maintenance of this permit.

3. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters.

4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Natural Resources Permit Board.

5. The construction of facilities shall be performed in such a manner as to reduce both point source and fugitive dust emissions to a minimum.

6. The permittee shall allow the Mississippi Department of Natural Resources Bureau of Pollution Control and the Mississippi Natural Resources Permit Board and/or their representatives upon presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

7. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit;

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts, or

   c. A change in any condition that requires either a temporary or permanent reduction or elimination of authorized air emissions.

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

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

10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

11. This permit is non-transferable.

12. This permit is for air pollution control purposes only.

13. Approval to construct will expire should construction not begin within one (1) year of the issuance of this permit, or should construction be suspended for one (1) year or more.

14. This permit shall become void upon completion of construction. The permittee shall furnish the Bureau of Pollution Control written notification of construction completion within 15 days of such date.

15. Prior to startup of air emissions equipment at this source, a Performance Evaluation Permit must be obtained. The permittee shall submit certification by a professional engineer registered in the State of Mississippi that construction completed in accordance with the approved plans and specifications and a written request for the permit.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning February 14, 1989, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from a 57,000 gallon creosote storage tank, controlled by a scrubber, Emission Point 004.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

Volatile Organic Compounds (VOC) 0.8 lb/hr, 3.5 tons/year, and reduction of control equipment inlet VOC by 95% as set forth by 40 CFR 60.112b(a)(3).

REPORTING & RECORDKEEPING

The permittee shall provide notices and reports, and maintain records as required by 40 CFR 60, Section 60.115b.

TESTING & PROCEDURES

The permittee shall demonstrate compliance with the required control efficiency for VOC emissions as required by 40 CFR 60.113b.

PART III
OTHER REQUIREMENTS

(1) The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Emission Regulations.

(2) The permittee is required to meet all applicable conditions and requirements contained in New-Source Performance Standards (NSPS), Subpart Kb.

(3) The permitted system must be controlled by a closed vent system and scrubber. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater.

(4) The permittee is allowed to store only creosote in the storage vessel. The amount of creosote stored must be recorded at all times. The maximum true vapor pressure of the stored creosote must be recorded at all times.

EMISSION INVENTORY FORM

NAME: Kerr-McGee [redacted] mical Corp. ADDRESS: [redacted] ve & 20th Street Columbus

EMS NO. 11210-116181O-0/0/0/210 PLANT TYPE: Wood Treating

MAJOR ( ) MINOR (X)

	Source/ Reference
Emission Point Description: Cleaver Brooks Boiler -	34x10^6 BTU/hour
Emission Point No.: 001	
Emission Data:	
Stack Height: 40 feet	
Exit Gas Temperature: 450 °F	
Exit Diameter: 2.5 feet	
Exit Velocity: 46 feet/sec	
Volumetric Flowrate: 13,548 cfm	

Emission Rates:		lb/hr	tons/yr	Date
Current Allowable	PM	16.6	72.7	8760 hours
	SO_2	163.2	714.8	
	NO_x			
	CO			
	HC			
	OTHER			
Current Actual	PM	0.5	0.5	
	SO_2	NEG	—	
	NO_x	4.1	4.3	
	CO	0.6	0.6	
	HC	0.1	0.1	
	OTHER			

Applicable Baseline Emission Rate		Act.	All.	Act.	All.
	PM				
	SO_2				
	NO_x				
	CO				
	HC				
	OTHER				

UTM ZONE: 16 AQCR: 135

UTM NORTH: LATITUDE :

UTM EAST: LONGITUDE:

OPERATING SCHEDULE: 8 Hours/Day 5 Days/Week 52 Weeks/Year? 2080 Hours/Year

PSD Review Subject: NSPS: NESHAPS:

SCC CODE: 1-02-006-02 SIC CODE: 2491
1-02-005-01

COMMENTS:

EMISSION INVENTORY FORM

NAME: [redacted] ADDRESS: [redacted]

EMS NO. / / - / / / - / / / / PLANT TYPE:

MAJOR ( ) MINOR ( )

			Source/ Reference
Emission Point Description	VOGT BOILER - 13.4 x 10^6 BTU/hour (NG & Wood)		
Emission Point No.	002		
Emission Data:			
Stack Height:	120 feet		
Exit Gas Temperature:	550 °F		
Exit Diameter:	5 feet		
Exit Velocity:	16.83 feet/sec		
Volumetric Flowrate:	19,831 cfm		

Emission Rates:		lb/hr	tons/yr	Date	
Current Allowable	PM	31.3	137.1		
	SO_2	68.6	300.5		
	NO_x				
	CO				
	HC				
	OTHER				
Current Actual	PM	3.3	3.4		
	SO_2	0.1	0.1		
	NO_x	0.6	0.6		
	CO	22.3	23.2		
	HC	1.3	1.3		
	OTHER				

Applicable Baseline Emission Rate		Act.	All.	Act.	All.		
	PM						
	SO_2						
	NO_x						
	CO						
	HC						
	OTHER						

UTM ZONE: AQCR:

UTM NORTH: LATITUDE :

UTM EAST: LONGITUDE:

OPERATING SCHEDULE: Hours/Day Days/Week Weeks/Year Hours/Year

PSD Review Subject: NSPS: NESHAPS:

SCC CODE: 1-02-006-02 SIC CODE:

COMMENTS: 1-02-009-06

EMISSION INVENTORY FORM

NAME: [redacted] ADDRESS: [redacted]

EMS NO. / / - / / / - / / / / PLANT TYPE:

MAJOR ( ) MINOR ( )

					Source/ Reference
Emission Point Description	Cyclone				
Emission Point No.					
Emission Data:					
Stack Height:	8.75 feet				
Exit Gas Temperature:	ambient				
Exit Diameter:	6 feet				
Exit Velocity:	14.5 feet/sec				
Volumetric Flowrate:	24,599 cfm				

Emission Rates:		lb/hr		tons/yr		Date	
Current Allowable	PM	9.1		39.9			
	SO_2						
	NO_x						
	CO						
	HC						
	OTHER						
Current Actual	PM	3.3		3.4			
	SO_2						
	NO_x						
	CO						
	HC						
	OTHER						
Applicable Baseline Emission Rate	PM	Act.	All.	Act.	All.		
	SO_2						
	NO_x						
	CO						
	HC						
	OTHER						

UTM ZONE: AQCR:

UTM NORTH: LATITUDE :

UTM EAST: LONGITUDE:

OPERATING SCHEDULE: Hours/Day Days/Week Weeks/Year Hours/Year

PSD Review Subject: NSPS: NESHAPS:

SCC CODE: SIC CODE:

COMMENTS:

EMISSION INVENTORY FORM

NAME: [redacted] ADDRESS: [redacted]

EMS NO. / / - / / / - / / / / PLANT TYPE:

MAJOR ( ) MINOR ( )

				Source/ Reference
Emission Point Description	Cyclone.			
Emission Point No.				
Emission Data:				
Stack Height:	16 feet			
Exit Gas Temperature:	ambient			
Exit Diameter:	9 feet			
Exit Velocity:	10 feet/sec			
Volumetric Flowrate:	38,170 cfm			

Emission Rates:		lb/hr	tons/yr	Date	
Current Allowable	PM	15.1	66.1		
	SO_2				
	NO_x				
	CO				
	HC				
	OTHER				
Current Actual	PM	3.0	7.3		
	SO_2				
	NO_x				
	CO				
	HC				
	OTHER				

Applicable Baseline Emission Rate		Act.	All.	Act.	All.		
	PM						
	SO_2						
	NO_x						
	CO						
	HC						
	OTHER						

UTM ZONE: AQCR:

UTM NORTH: LATITUDE :

UTM EAST: LONGITUDE:

OPERATING SCHEDULE: Hours/Day Days/Week Weeks/Year Hours/Year

PSD Review Subject: NSPS: NESHAPS:

SCC CODE: SIC CODE:

COMMENTS:

State of Mississippi
Air Pollution Control
PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Kerr McGee Chemical Corporation
14th Avenue and 20th Street
Columbus, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Issued this 9th day of August, 19 83

MISSISSIPPI POLLUTION CONTROL PERMIT BOARD

_____

DIRECTOR, BUREAU OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

Expires 1st day of August, 19 86.

Permit No. 1680-00020

DATA CODED

PART I
GENERAL CONDITIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any air pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions or modifications which will result in new, different, or increased emission of air pollutants must be reported by submission of a new application.

2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters.

4. Any diversion from or bypass of collection and control facilities is prohibited except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Department of Natural Resources Bureau of Pollution Control Permit Board.

5. Whenever any emergency, accidental or excessive discharge of air contaminants occurs, the office of the Mississippi Department of Natural Resources Bureau of Pollution Control shall be notified immediately of all information concerning cause of the discharge, point of discharge, volume and characteristics, and whether discharge is continuing or stopped.

6. Should the Executive Director of the Mississippi Department of Natural Resources declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule.

7. The permittee shall allow the Mississippi Department of Natural Resources Bureau of Pollution Control and the Mississippi Department of Natural Resources Bureau of Pollution Control Permit Board and/or their authorized representatives, upon the presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

8. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
   a. Violation of any terms or conditions of this permit;
   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
   c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions.

9. For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Department of Natural Resources Bureau of Pollution Control Permit Board.

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

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

12. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

13. This permit is non-transferable.

14. This permit is for air pollution control purposes only.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 9, 1983, and lasting until August 1, 1986, the permittee is authorized to operate air emissions equipment and emit air contaminants from the CB D-6 Boiler, Emission Point 001.

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

EMISSION CHARACTERISTIC	EMISSION LIMITATIONS		
	lb/hr	lbs/day	Other units (specify)
Particulate Matter	16.6		
Sulfur Dioxide	163.2		
Opacity			40% Maximum

EMISSION CHARACTERISTIC	MONITORING REQUIREMENTS		
	Measurement Frequency	Sample Type	Reporting Frequency

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 9, 1983, and lasting until August 1, 1986, the permittee is authorized to operate air emissions equipment and emit air contaminants from the Vogt 14435 woodwaste boiler, Emission Point 002.

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

EMISSION CHARACTERISTIC	EMISSION LIMITATIONS		
	lb/hr	lbs/day	Other units (specify)
Particulate Matter	31.3		
Sulfur Dioxide	68.6		
Opacity			40% Maximum

EMISSION CHARACTERISTIC	MONITORING REQUIREMENTS		
	Measurement Frequency	Sample Type	Reporting Frequency

FOR ALL APPLICANTS, WHETHER NEW CONSTRUCTION, EXISTING FACILITY, OR RENEWAL

CONTROL EQUIPMENT COVERED UNDER THIS APPLICATION - PLEASE CHECK ALL APPLICABLE AND INDICATE NUMBER OF UNITS.

PARTICULATE EMISSIONS CONTROL EQUIPMENT

1. Cyclone(s) 2
2. Water Scrubber _____
3. Baghouse _____
4. Electrostatic Precipitator _____
5. Venturi Scrubber _____
6. Cyclonic Baghouse _____
7. Cyclonic Scrubber _____
8. Other _____

GASEOUS EMISSIONS CONTROL EQUIPMENT

1. Water Scrubber N/A
2. Activated Carbon Bed _____
3. Other _____

WASTE DISPOSAL SYSTEMS

1. Solid Waste Incinerator _____
2. Liquid Waste Incinerator _____
3. Wood or Other Waste Fuel Recovery Boiler xx
4. Gaseous Waste Flare _____
5. Liquid Waste Flare _____
6. Other _____

Pneumatic Conveying System N/A

Other (please describe)

N/A

FOR ALL APPLICANTS

FUEL BURNING EQUIPMENT
(Except for Refuse Disposal)

This form has 3 pages; each is a continuation of the equipment information from the page before. Please fill in as completely as possible, listing all fuel burning equipment. Reasons should be given explaining any data not filled in.

PAGE 1

1. Fill in company name and address, plus year for which data is given (if existing facility) at top of page. Use data for most recent calendar year available.
2. Reference Number. Use an identifying number for each boiler, furnace, kiln, etc., and use the same reference number on each of the three pages to identify information for the same unit.
3. Manufacturer and Model Number. Nameplate data for boiler, furnace, kiln, etc. Waste gas flares and stationary internal combustion engines should also be included on this form.
4. Rated Capacity in Millions of BTU per hour.
5. Type of Burner Unit. Use Codes (1*) at bottom of form. If not listed put (11) and specify.
6. Usage. Type of fuel burning equipment. Use codes (2*) at bottom of form. If not listed put (5) and specify.
7. Heat Usage. Percent of heat used for process and percent for space heating.

TABLE 1

CODE NUMBERS FOR CONTROL DEVICES

Vapor Control Equipment

00 Group – CONTROL BY COMBUSTION

01 catalytic combustion
02 furnace combustion
03 boiler firebox
04 steam injection flare
05 venturi flare
06 direct flame combustion (afterburner)

10 Group – ADSORBERS

10 activated carbon – nonregenerative
11 activated carbon – regenerative
12 silica gel – nonregenerative
13 silica gel – regenerative
14 lithium chloride
15 activated alumina
16 activated bauxite

20 Group – ABSORBERS

20 sieve plate tower
21 bubble-cap tower
22 packed tower

Particulate Matter – Liquid Mist Control Equipment

30 Group – DRY SEPARATORS AND FILTERS

30 simple cyclones
31 high efficiency cyclones
32 settling chamber
33 simple filters
34 baghouse (shaking)
35 baghouse (reverse jet)
36 dry collector (dynamic)

40 Group – WET COLLECTORS

40 spray chamber – no baffles
41 spray chamber – with baffles
42 wet cyclones – rotoclone
43 wet dynamic precipitator
44 venturi scrubber
45 spray tower (not absorption – scrubbers)
46 packed tower (not absorption – scrubbers)
47 condensors (tube and shell); air
48 barometric condensor with hot wells

50 Group – ELECTRICAL PRECIPITATORS

50 single stage
51 double stage
52 precipitron

60 Group

60 Counteractant

70 Group – SPECIAL

71 Jet exhausters (air dilution)
72 Mist eliminators

80 Group – Other
Specify

MANUFACTURING PROCESS OPERATIONS

Company Name	Address	FOR AGENCY USE
KERR-McGEE CHEMICAL CORPORATION	14th Avenue & 20th Street Columbus, MS 39607	

FACILITY NUMBER	Information for Calendar Year	Date
168-00020-001, 002, 003	1982	7/12/83

Reference Number	Process or Unit Operation Name	Rated Process Capacity Tons/Hour	Feed Input		Number of Emission Points To Air	Product Output*	
			Quantity Per Hour	Quantity Per Year		Quantity Per Hour	Quantity Per Year
003	Cyclone	3.3	Varies according to production rate.		1	200	cu. ft. 102,000
	Cyclone	7	"	"	1	1000 cft	cu. ft. 1,050,000

*Specify Units of Measure Used

(FOR AGENCY USE ONLY)

MANUFACTURING PROCESS OPERATIONS

Reference Number	Stack Data				Air Pollution Control Equipment			
	Height Feet	Inside Unit Dia. Feet	Exit Gas Velocity Feet/Sec.	Exit Gas Temperature °F	Manufacturer and Model Number	Type* (use Table 1)	Collection Efficiency	
							Design	Actual
003	8.75	6	14.50	AMB	Dill & Norris Model B 18	30	90	90
	16	9	10	AMB	UNK	30	90	90

*For Wet Scrubbers Give Gallons per minute Water Flow and Water Pressure if known.

(FOR AGENCY USE ONLY)

FUEL BURNING EQUIPMENT

Reference Number	Stack Parameters				Fuel Type	Fuel Data				
	Stack Height Feet	Inside Exit Dia. Feet	Exit Gas Velocity Feet/Sec.	Exit Gas Temperature Degree F.		Maximum Amount Per Hour (Specify Units)	Amount Per Year (Specify Units)	Heat Content BTU/Gal, etc. (Specify Units)	Percent Sulfur	Percent Ash
001	40	2.50	46	500	Nat. Gas	15,000 cu. ft.	34,112 MCF	1000/cu.ft.	< 0.2	< 0.5
002	120	5	UNK	575	Wood Waste	642#/Hr.	900 Tons	8600/lb.	< 0.5	1.80
			37	530	Nat. Gas	12,000 cu. ft.	Est.60 MCF	1000/cu.ft.	< 0.2	< 0.5

FUEL SUPPLIERS:	Fuel Type	Supplier
	Nat. Gas	Ms. Valley Gas Co.
	No. 2 Fuel Oil	Triangle Refinery
	Wood Waste	K-M Facility

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 9, 1983, and lasting until August 1, 1986, the permittee is authorized to operate air emissions equipment and emit air contaminants from two wood processing cyclones, Emission Point 003.

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

EMISSION CHARACTERISTIC	EMISSION LIMITATIONS		
	lb/hr	lbs/day	Other units (specify)
Cyclone #1:			
Particulate Matter	9.1		
Cyclone #2:			
Particulate Matter	15.1		

EMISSION CHARACTERISTIC	MONITORING REQUIREMENTS		
	Measurement Frequency	Sample Type	Reporting Frequency

PART III
OTHER REQUIREMENTS

The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Quality Regulations.

KERR-McGEE CHEMICAL CORPORATION
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

RECEIVED
JUL 18 REC'D
DEPT OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL

July 12, 1983

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. Dan N. McLeod
North Air Emissions Section
Bureau of Pollution Control
Mississippi Department of Natural Resources
P. O. Box 10385
Jackson, MS 39209

Re: Operating Permit No. 1680-00020
Renewal Application
Kerr-McGee Chemical Corporation
Forest Products Division
Columbus Facility

Dear Mr. McLeod:

Enclosed is the completed Air Pollution Control Operating Permit Renewal Application for the Kerr-McGee Chemical Corporation, Forest Products Division, Columbus Facility.

If you have any questions, I would appreciate you calling me at AC 405/270-2395.

Very truly yours,

KERR-McGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

P. C. GASKIN
Environmental and Quality Control

PCG:rc
enc.

cc: B. W. Boisseau, Supt.
Columbus Facility

DATA CODED

State of Mississippi
Air Pollution Control
PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Kerr-McGee Chemical Corporation
Forest Products Division
14th Avenue & 20th Street
Columbus, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Issued this 26th day of August, 19 80

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
BUREAU OF POLLUTION CONTROL PERMIT BOARD

_____
Director

Expires 1st day of August, 19 83.

Permit No. 1680-00020

DATA CODED

PART I
GENERAL CONDITIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any air pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions or modifications which will result in new, different, or increased emission of air pollutants must be reported by submission of a new application.

2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters.

4. Any diversion from or bypass of collection and control facilities is prohibited except (i) where unavoidable to prevent loss of life or severe property damage or (ii) when approved by the Mississippi Department of Natural Resources Bureau of Pollution Control Permit Board.

5. Whenever any emergency, accidental or excessive discharge of air contaminants occurs, the office of the Mississippi Department of Natural Resources Bureau of Pollution Control shall be notified immediately of all information concerning cause of the discharge, point of discharge, volume and characteristics, and whether discharge is continuing or stopped.

6. Should the Executive Director of the Mississippi Department of Natural Resources declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule.

7. The permittee shall allow the Mississippi Department of Natural Resources Bureau of Pollution Control and the Mississippi Department of Natural Resources Bureau of Pollution Control Permit Board and/or their authorized representatives, upon the presentation of credentials:

   a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

8. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Violation of any terms or conditions of this permit;

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions.

9. For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Department of Natural Resources Bureau of Pollution Control Permit Board.

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

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

12. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

13. This permit is non-transferable.

14. This permit is for air pollution control purposes only.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 26, 1980, and lasting until August 1, 1983, the permittee is authorized to operate air emissions equipment and emit air contaminants from CB D-6 Boiler, Emission Point 001.

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

EMISSION CHARACTERISTIC	EMISSION LIMITATIONS		
	lb/hr	lbs/day	Other units (specify)
Particulate Matter	16.6		
Sulfur Dioxide	163.2		
Opacity			40% Maximum

EMISSION CHARACTERISTIC	MONITORING REQUIREMENTS		
	Measurement Frequency	Sample Type	Reporting Frequency

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 26, 1980, and lasting until August 1, 1983, the permittee is authorized to operate air emissions equipment and emit air contaminants from Vogt 14435 Woodwaste Boiler, Emission Point002.

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

EMISSION CHARACTERISTIC	EMISSION LIMITATIONS		
	lb/hr	lbs/day	Other units (specify)
Particulate Matter	31.3		
Sulfur Dioxide	68.6		
Opacity			40% Maximum

EMISSION CHARACTERISTIC	MONITORING REQUIREMENTS		
	Measurement Frequency	Sample Type	Reporting Frequency

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 26, 1980, and lasting until August 1, 1983, the permittee is authorized to operate air emissions equipment and emit air contaminants from wood processing cyclones (2), Emission Point 003.

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

EMISSION CHARACTERISTIC	EMISSION LIMITATIONS		
	lb/hr	lbs/day	Other units (specify)
Cyclone #1:			
Particulate Matter	9.1		
Cyclone #2:			
Particulate Matter	15.1		

EMISSION CHARACTERISTIC	MONITORING REQUIREMENTS		
	Measurement Frequency	Sample Type	Reporting Frequency

PART III
OTHER REQUIREMENTS

The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Quality Regulations.

KERR-McGEE CHEMICAL CORPORATION

Columbus, Ms.

Lowndes County

120-1680-00020

WOOD PRESERVING

001 - CB D-6 Boiler (34×10^6 BTU/hour)

002 - WOODWASTE BOILER (14.3×10^6 BTU/hour) 642 lb/hour

003 - WOOD PROCESSING Cyclones

(1) 3.3 tons/hour
(2) 7.0 tons/hour

001

ALLOWABLE:

(1) Particulate = $0.8803\,(34)^{-0.1665}$ = 0.48937 lb/10^6 BTU

0.48937 lb/10^6 BTU (34×10^6 BTU/hour) = 16.64 lb/hr

(2) SO_2 = 4.8 lb/10^6 BTU (34×10^6 BTU/hr) = 163.2 lb/hour

ACTUAL = POTENTIAL:

$$\frac{34 \times 10^6 \text{ BTU/hour}}{1 \times 10^3 \text{ BTU/ft}^3} = 34 \times 10^3 \text{ ft}^3\text{/hour} = 0.034 \times 10^6 \text{ ft}^3\text{/hour}$$

Particulate	=	0.034 ft³/hour	(15 lb/ft³)	= 0.51 lb/hour
SO_2	=	"	(0.6 ")	= 0.02 "
CO	=	"	(17 ")	= 0.58 "
HC	=	"	(3 ")	= 0.10 "
NO_x	=	"	(120 ")	= 4.08 "

002

ALLOWABLE:

(1) Particulate = 0.3 gr/dscf or

$$\frac{730{,}500\ \text{dsft}^3}{\text{hour}}\left(\frac{0.3\ \text{gr}}{\text{dsft}^3}\right)\left(\frac{\text{lb}}{7000\ \text{gr}}\right) = 31.3\ \text{lb/hour}$$

(2) SO_2 = 4.8 lb/10^6 BTU (14.3 x 10^6 BTU/hr) = 68.6 lb/hour

ACTUAL:

(1) Particulate - 3.4 lb/hour (Stack Test)

(2) SO_2 = POTENTIAL = 1.3 lb/hour

POTENTIAL:

$$\frac{14{,}300{,}000\ \text{BTU/hr}}{8500\ \text{BTU/lb}} = 1683\ \text{lb/hour or } 0.84\ \text{tons/hour}$$

Particulate	=	0.84 tons/hour	(15 lb/ton) =	12.6 lb/hour
SO_2	=	"	(1.5 lb/ton) =	1.3 "
CO	=	"	(2 lb/ton) =	1.7 "
HC	=	"	(2 lb/ton) =	1.7 "
NO_x	=	"	(10 lb/ton) =	8.4 "

003

ALLOWABLE PARTICULATE:

(1) $4.1(3.3\ \text{tons/hour})^{0.67}$ = 9.1 lb/hour

(2) $4.1(7.0\ \text{tons/hour})^{0.67}$ = 15.1 lb/hour

POTENTIAL: Assume 1/4 of 1% potentially airborne

(1) 3.3 tons/hour (0.0025) = 0.00825 tons/hour or 16.5 lb/hour

(2) 7.0 tons/hour (0.0025) = 0.0175 tons/hour or 35 lb/hour

ACTUAL: Assume cyclones @ 80% efficiency

(1) 16.5 lb/hour (0.20) = 3,3 lb/hour

(2) 35 lb/hour (0.20) = 7 lb/hour

HYDROCARBONS:

120,000 gallons/year

42-182 100 SHEETS
NATIONAL

State of Mississippi
Air and Water Pollution Control Commission

PERMIT

To Operate Air Emissions Equipment

This Certifies That

Kerr-McGee Chemical
14th Avenue
Columbus, Mississippi 39701

has been granted permission to operate Air Emissions Equipment in connection with the operation of the plant or process Wood Processing

Operation of such a facility shall be in accordance with the provisions of the Mississippi Air and Water Pollution Control Act, (Mississippi Laws, 1966, ch. 258) and the rules adopted and promulgated thereunder, or this permit may be revoked by the Mississippi Air and Water Pollution Control Commission. The plans, specifications, schedules, dates and other data submitted to the Commission are filed with and considered as a part of this permit.

The Mississippi Air and Water Pollution Control Commission reserves the right to withdraw this permit, after due notice, if it is found that additional equipment of alterations are necessary to prevent pollution of the air of the state as defined in the Mississippi Air and Water Pollution Control Act, (Mississippi Laws, 1966, ch. 258) and the regulations or standards adopted and promulgated thereunder.

Issued this 8th day of March, 1977.

AIR AND WATER POLLUTION CONTROL COMMISSION

Glen Wood Jr.

Executive Director

Expires 8th day of March, 1980.

Facility No. 1680-00020-003

№ 2375

MPC FORM

EMISSIONS SUMMARY FOR PERMIT DETERMINATION

KEY DATA 1/1/2/0/ 1/1/6/8/0/ 1/0/0/0/0/2/0/ 1/0/0/3/
Agency County Source EmPt

PLAN REVIEW ENGINEER ____________

FACILITY NAME Kerr - Mcgee Chemical

ADDRESS 14 th Ave.

Columbus, Ms. 39701

SITE LOCATION 14 th Ave., Columbus, Ms.

TYPE PLANT OR PROCESS Wood ~~Lumber~~ Processing

NO. EMISSION POINTS 2

TYPE EMISSIONS: (✓) PM ( ) SO_2 ( ) H_2S ( ) HC

( ) CO ( ) Other (specify) ____________

ALLOWABLE EMISSIONS: ____________

APPLICABLE REGULATION(S): ____________

HOW EMISSIONS DETERMINED: ( ) Source Test ( ) Calculation
( ) Estimate

WHO DETERMINED EMISSIONS: ( ) MAWPCC Engineer (Attach Calculations)
( ) Facility making application
( ) Outside Consultant

AIR QUALITY IMPACT:
(To be completed by AQM Engineer) AQM Engineer ____________

If total emissions are greater than 0.25 tons/day, what are:

Max. ground level concentration? ____________

At what distance? ____________

Percent contribution to total ambient levels caused by this source ____________

If new or modified source, what is percent change in emissions inventory caused by this source:

County _____ AQCR: _____ State: _____

COMMENTS: ____________

Kerr-McGee
Permit to Operate
Minor

Process: Wood processing

Process wt: 107,227,000 #/yr.

Control Devices: Two cyclones handling woodwaste

Operating Schedule: 24 hrs/day, 5.5 days/wk, 52 wks/yr

Allowable Emissions: 16.25 #/hr

Actual Emission: None from cyclones, light fugitive dust around woodwaste storage building

Recommendation: The cyclones appear to be handling the woodwaste sufficiently. The fugitive dust from storage area is not a nuisance. Therefore issue a Permit to Operate

Air & Water Pollution Control Commission

STATE OF MISSISSIPPI

MEMORANDUM

TO: File 120-1680-20

FROM: J. J. Wells, Jr.

SUBJECT: Kerr-McGee Chemical, 14th Avenue, Columbus, Mississippi, 39701
Stack Emission Test

DATE January 14, 1977

Background

Emission point tested - Woodwaste boiler
Testing Firm - E.P.S., Jackson, Mississippi
Date of Test - December 2, 1976
Observer - Marvin Bradley
Method & Procedure - EPA #5
Acceptability - Test is acceptable

Results

Test No.	Emission Loading in Grains/D.S.C.F. Actual	Allowable	Emission Rate lbs/hr	Percent Isokinetic
1	.0450	.3	4.65	107.
2	.0271	.3	2.75	106.
3	.0254	.3	2.55	105.
Ave.	.0325	.3	3.32	106.

Production Rate - 600 lbs/hr

Recommendation

Accept as proof of compliance.

JJWjr:lb

Kerr-McGee
Columbus, Ms.
(120-1680-20)

METHOD 5

J.L. Wells Jr.
1-13-77

	Run #1	Run #2	Run #3
Average stack temperature; Ts(°R)	676.8	671.7	670.8
Average dry gas meter temperature: Tm(°R)	Run #1	Run #2	Run #3
$Tm = \frac{(\text{avg. temp. in}) + (\text{Avg. temp. out})}{2} =$	519.1	532.6	531.6
Average orifice pressure drop: ΔH (Inches H_2O)	Run #1	Run #2	Run #3
From data sheet ΔH =	1.36	1.24	1.22
	Run #1	Run #2	Run #3
Gas volume through meter: $Vm(ft^3)$ =	57.41	57.56	56.25
Dry gas volume: Vm_{std} (std. conditions, ft^3)	Run #1	Run #2	Run #3
$Vm_{std} = \left(17.71 \frac{°R}{\text{In. Hg}}\right) Vm \left(\frac{Pbar + \frac{\Delta H}{13.6}}{Tm}\right) =$	59.7	58.4	57.1
	Run #1	Run #2	Run #3
Volume of water collected: Vlc(ml) =	63	65	60
Volume of water vapor: Vw_{std} (std. conditions, ft^3)	Run #1	Run #2	Run #3
$Vw_{std} = 0.0474 \frac{ft^3}{ml} Vlc =$	2.99	3.08	2.84
Moisture content: Bwo (proportion, dimensionless)	Run #1	Run #2	Run #3
$Bwo = \frac{Vw_{std}}{Vm_{std} + Vw_{std}} =$	.0477	.0501	.0474

Pitot tube coefficient: Cp (from calibration)

$Cp_{(s)} = Cp_{(std)} \sqrt{\frac{\Delta P_{(std)}}{\Delta P_{(s)}}} =$ .83

Average square root of ΔP:

$(\sqrt{\Delta P})_{avg.}$ [illegible]

$(\sqrt{\Delta P})_{avg.} = \frac{\sum_{i=1}^{n} \Delta P}{n} =$

Run #1	Run #2	Run #3
.267	.262	.259

Stack pressure: Ps (in. Hg)

Ps =

Run #1	Run #2	Run #3
30.4	30.4	30.4

Molecular wt. of stack gas:
Ms (lb/lb-mole) wet basis

Ms =

Run #1	Run #2	Run #3
28.80	28.77	28.80

Average stack gas velocity: Vs (f/s)

$(Vs)_{avg} = Kp\ Cp\ (\sqrt{\Delta P})_{avg.} \sqrt{\frac{(Ts)_{avg}}{Ps\ Ms}} =$

Run #1	Run #2	Run #3
16.66	16.29	16.08

Stack gas volumetric flow rate: Qs (ft^3/hr)

$Qs = 3600(1-Bwo)(Vs)(A)\left(\frac{Tstd}{(Ts)_{avg}}\right)\left(\frac{Ps}{Pstd}\right) =$

15.9

Run #1	Run #2	Run #3
722563	710,086.	703,868.

Acetone blank correction: Ac(mg)

$Ac = \frac{Rab}{Vag}\ Vaw =$

Run #1	Run #2	Run #3
-0-	-0-	-0-

Total particulate sample weight: Mn (mg)

$Mn = Mn_1 + Mn_2 - Ac =$

Run #1	Run #2	Run #3
114.6	102.8	94.1

Particulate concentration: C's
(gr./s.c.f.)

$C's = 0.0154 \frac{gr.}{mg.} \left(\frac{Mn}{Vm_{std}} \right) =$

Run #1	Run #2	Run #3
.0450	.0271	.0254

AVE. = .0325

Conversion:

Convert C's to units comparable to the applicable regulation:

Calculation: (show units)

LBS/HR. =

Run #1	Run #2	Run #3
4.65	2.75	2.55

AVE. = 3.32

Isokinetic Variation: I

$$I = Ts \left(1.667 \frac{min.}{sec.} \right) \left[\left(0.00267 \frac{in.\ Hg\text{-}ft.^3}{ml.\text{-}^\circ R} \right) Vlc + \frac{Vm}{Tm} \left(Pbar + \frac{\Delta H}{13.6} \right) \right] = \frac{}{\theta Vs\ Ps\ An}$$

Run #1	Run #2	Run #3
107.1	106.5	105.2

AVE. = 106.3

Comments:

(Add attachments as necessary)