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	GP-Wood	10/27/1992	07/13/1997

	Corporation, Columbus	Treating		
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 Processing (Subpart 429)	10/11/1994	09/01/2003
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

Report Date: 8/21/2006 6:55:30 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

Mississippi Department of Environmental Quality
Office of Pollution Control

I-sys 2000 Master Site Detail Report

Site Name: Kerr McGee Chemical Corporation, Columbus

PHYSICAL ADDRESS

LINE 1:	2300 14th Avenue and 20th Street
LINE 2:	
LINE 3:	
MUNICIPALITY:	Columbus
STATE CODE:	MS
ZIP CODE:	39703-

MAILING ADDRESS

LINE 1:	2300 Fourteenth Avenue North
LINE 2:	
LINE 3:	
MUNICIPALITY:	Columbus
STATE CODE:	MS
ZIP CODE:	39701-

OTHER INFORMATION

MASTER ID:	001696
COUNTY:	Lowndes
REGION	NRO
SIC 1:	2491
AIR TYPE:	SYNTHETIC MINOR
HW TYPE:	TSD
SOLID TYPE:	
WATER TYPE:	INDUSTRIAL
BRANCH:	Chemical Branch

ECED CONTACT:
Hamil, Larry

BASIN:
Tombigbee River Basin

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

Mississippi Department of Environmental Quality
Office of Pollution Control

Pemits

PROGRAM	PERMIT TYPE	PERMIT #	MDEQ PERMIT CONTACT	ACTIVE
AIR	SMOP	168000020	Hall, Bobby	NO
AIR	SMOP	168000020	Shanks, Brad	YES
WATER	PRE-TREATMENT	MSP090021	Brumfield, Milton	YES
HAZ. WASTE	EPA ID	MSD990866329	Ferguson, Bruce	NO
GENERAL	WOOD TREATING	MSR22010	LaFleur, Kenny	YES
HAZ. WASTE	TSD		Ferguson, Bruce	YES
WATER	PRE-TREATMENT	MSP090021	Taylor, John	YES
AIR	CONSTRUCTION	168000020	Shanks, Brad	YES
HAZ. WASTE	TSD	MSD990866329	Crawford, Louis	NO

Compliance Actions

MEDIA	ACTIVITY TYPE	SCHEDULED	COMPLETED	INSPECTED B
HAZ WASTE	Compliance (Groundware) Monitori	5/17/00	5/17/00	Twitty, Russ
HAZ WASTE	Financial Record Review	3/1/00	5/11/00	Hamil, Larry
WATER	CMI - PRETREATMENT			Whittington, Darryail
WATER	CEI - PRETREATMENT	9/30/00		Shelton, Kirk
WATER	CEI - NA	6/16/99	6/16/99	Shelton, Kirk
HAZ WASTE	Compliance Evaluation Inspection	6/16/99	6/16/99	Shelton, Kirk
AIR	State Compliance Inspection	6/16/99	6/16/99	Shelton, Kirk

Enforcement Actions

MEDIA	ENFORCEMENT STEP	DETERMINED	RESOLVED	EMPLOYEE ASSIGNE
HAZ. WASTE	AGREED ORDER	6/16/99	5/18/00	Hamil, Larry
HAZ. WASTE	APPARENT VIOLATION	6/16/99	5/18/00	Hamil, Larry
AIR	APPARENT VIOLATION	6/16/99	5/18/00	Hamil, Larry
AIR	AGREED ORDER	6/16/99	5/18/00	Hamil, Larry

Entered into I-SIP 2-8-99 smm.

Add a New Site

Site Name: Kerr McGee Chemical Corporation

Official / Legal Name:

Air Type: Synthetic Minor **Water Type:** Industrial

HW Type: LQG **SW Type:**

Site General Information

County: Lowndes

Contact Name: Mr. Murphy, Ron

Contact Title: Plant Manager

Contact Phone: 328-7551

Physical Address City, State, Zip: 2300 14th Ave N and 20th St; Columbus MS 39703

Mailing Address City, State, Zip: PO Box 906; Columbus MS 39703

Owner's Name:

Owner's Address City, State, Zip:

Operator or Contractor Name:

Address City, State, Zip:

Site Identification Information

ECED Contact: Kirk Shelton

SIC1: 2491 **SIC2:** **SIC3:**

Air ID: 00020 5 digit ID assigned by Air Divisio

Dunn and Bradstreet Number:

Site Basin

Tombigbee River Basin

Air Detail

Air Programs

☐ SIP ☐ PSD ☑ NSPS ☑ NESHAPS ☑ MACT

001696 Kerr McGee Chemical Corporation

AI NAME: Kerr McGee Chemical Corporation, Columbus

BRANCH: Chemical Branch

COUNTY: Lowndes

REGION: NRO

SIC 1: 2491

Physical Address

Line 1: 2300 14th Avenue North
Line 2:
Line 3:
City: Columbus
State: MS
Zip: 39701

Mailing Address

Line 1: 2300 14th Avenue North
Line 2:
Line 3:
City: Columbus
State: MS
Zip: 39701

Locational Information

Latitude: 33° 32' 30.51" **Longitude** -88° 24' 32.2"
Section: **Township:** **Range:**

Historic Names, Active Permit Numbers, and Other Associated IDs

RELATION or PERMIT TYPE	ALT/HISTORIC ID	ALT / HISTORIC NAME	START DATE
Air-AIRS AFS	08700020	Kerr McGee Chemical Corporation, Columbus	10/12/2000
Air-Construction	168000020	Kerr McGee Chemical Corporation, Columbus	06/12/1998
Air-Synthetic Minor Oper	168000020	Kerr McGee Chemical Corporation, Columbus	06/06/1997
Air-Synthetic Minor Oper	168000020	Kerr McGee Chemical Corporation, Columbus	06/12/1998
GP-Wood Treating	MSR22010	Kerr McGee Chemical Corporation, Columbus	10/27/1992
Hazardous Waste-EPA ID	MSD990866329	Kerr McGee Chemical Corporation, Columbus	10/12/2000
Hazardous Waste-TSD	MSD990866329	Kerr McGee Chemical Corporation, Columbus	06/11/2001
Official Site Name	1696	Kerr McGee Chemical Corporation	10/27/1992
Water-Pretreatment	MSP090021	Kerr McGee Chemical Corporation, Columbus	08/23/2000

Water Information

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

Staff to AI Assignments

001696 Kerr McGee Chemical Corporation

MDEQ STAFF	FUNCTIONAL AREA
Cook, Toby	Permitting, Branch Manager
Taylor, John	Permitting, Permit Writer
Sumrall, Rick	Compliance, Management
Thomas, Trayce	Compliance, Staff
Thomas, Trayce	Enforcement

Related People Information

PERSON NAME	REALTIONSHIP
Michel, R	Is Air Permit Contact For
Murphey, Ron	Is Contact For
Michel, R	Is Application Signatory for

Mississippi Department of Environmental Quality
Office of Pollution Control

I-sys 2000 Master Site Detail Report

Site Name: Kerr McGee Chemical Corporation, Columbus

PHYSICAL ADDRESS

LINE 1:	2300 14th Avenue and 20th Street
LINE 2:	
LINE 3:	
MUNICIPALITY:	Columbus
STATE CODE:	MS
ZIP CODE:	39703-

MAILING ADDRESS

LINE 1:	2300 Fourteenth Avenue North
LINE 2:	
LINE 3:	
MUNICIPALITY:	Columbus
STATE CODE:	MS
ZIP CODE:	39701-

OTHER INFORMATION

MASTER ID:	001696
COUNTY:	Lowndes
REGION	NRO
SIC 1:	2491
AIR TYPE:	SYNTHETIC MINOR
HW TYPE:	TSD
SOLID TYPE:	
WATER TYPE:	INDUSTRIAL
BRANCH:	Chemical Branch

ECED CONTACT:
Hamil, Larry

BASIN:
Tombigbee River Basin

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

Mississippi Department of Environmental Quality
Office of Pollution Control

Pemits

PROGRAM	PERMIT TYPE	PERMIT #	MDEQ PERMIT CONTACT	ACTIVE
AIR	SMOP	168000020	Hall, Bobby	NO
AIR	SMOP	168000020	Shanks, Brad	YES
WATER	PRE-TREATMENT	MSP090021	Brumfield, Milton	YES
HAZ. WASTE	EPA ID	MSD990866329	Ferguson, Bruce	NO
GENERAL	WOOD TREATING	MSR22010	LaFleur, Kenny	YES
HAZ. WASTE	TSD		Ferguson, Bruce	YES
WATER	PRE-TREATMENT	MSP090021	Taylor, John	YES
AIR	CONSTRUCTION	168000020	Shanks, Brad	YES
HAZ. WASTE	TSD	MSD990866329	Crawford, Louis	NO

Compliance Actions

MEDIA	ACTIVITY TYPE	SCHEDULED	COMPLETED	INSPECTED B
HAZ WASTE	Compliance (Groundware) Monitori	5/17/00	5/17/00	Twitty, Russ
HAZ WASTE	Financial Record Review	3/1/00	5/11/00	Hamil, Larry
WATER	CMI - PRETREATMENT			Whittington, Darryail
WATER	CEI - PRETREATMENT	9/30/00		Shelton, Kirk
WATER	CEI - NA	6/16/99	6/16/99	Shelton, Kirk
HAZ WASTE	Compliance Evaluation Inspection	6/16/99	6/16/99	Shelton, Kirk
AIR	State Compliance Inspection	6/16/99	6/16/99	Shelton, Kirk

Enforcement Actions

MEDIA	ENFORCEMENT STEP	DETERMINED	RESOLVED	EMPLOYEE ASSIGNE
HAZ. WASTE	AGREED ORDER	6/16/99	5/18/00	Hamil, Larry
HAZ. WASTE	APPARENT VIOLATION	6/16/99	5/18/00	Hamil, Larry
AIR	APPARENT VIOLATION	6/16/99	5/18/00	Hamil, Larry
AIR	AGREED ORDER	6/16/99	5/18/00	Hamil, Larry

001696 Kerr McGee Chemical Corporation

AI NAME: Kerr McGee Chemical Corporation, Columbus

BRANCH: Chemical Branch

COUNTY: Lowndes

REGION: NRO

SIC 1: 2491

Physical Address

Line 1: 2300 14th Avenue North
Line 2:
Line 3:
City: Columbus
State: MS
Zip: 39701

Mailing Address

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Line 2:
Line 3:
City: Columbus
State: MS
Zip: 39701

Locational Information

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Section: **Township:** **Range:**

Historic Names, Active Permit Numbers, and Other Associated IDs

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Air-Construction	168000020	Kerr McGee Chemical Corporation, Columbus	06/12/1998
Air-Synthetic Minor Oper	168000020	Kerr McGee Chemical Corporation, Columbus	06/06/1997
Air-Synthetic Minor Oper	168000020	Kerr McGee Chemical Corporation, Columbus	06/12/1998
GP-Wood Treating	MSR22010	Kerr McGee Chemical Corporation, Columbus	10/27/1992
Hazardous Waste-EPA ID	MSD990866329	Kerr McGee Chemical Corporation, Columbus	10/12/2000
Hazardous Waste-TSD	MSD990866329	Kerr McGee Chemical Corporation, Columbus	06/11/2001
Official Site Name	1696	Kerr McGee Chemical Corporation	10/27/1992
Water-Pretreatment	MSP090021	Kerr McGee Chemical Corporation, Columbus	08/23/2000

Water Information

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

Staff to AI Assignments

001696 Kerr McGee Chemical Corporation

MDEQ STAFF	FUNCTIONAL AREA
Cook, Toby	Permitting, Branch Manager
Taylor, John	Permitting, Permit Writer
Sumrall, Rick	Compliance, Management
Thomas, Trayce	Compliance, Staff
Thomas, Trayce	Enforcement

Related People Information

PERSON NAME	REALTIONSHIP
Michel, R	Is Air Permit Contact For
Murphey, Ron	Is Contact For
Michel, R	Is Application Signatory for

Mississippi Department of Environmental Quality
Office of Pollution Control

I-sys 2000 Master Site Detail Report

Site Name: Kerr McGee Chemical Corporation, Columbus

PHYSICAL ADDRESS	
LINE 1:	2300 14th Avenue and 20th Street
LINE 2:	
LINE 3:	
MUNICIPALITY:	Columbus
STATE CODE:	MS
ZIP CODE:	39703-

MAILING ADDRESS	
LINE 1:	2300 Fourteenth Avenue North
LINE 2:	
LINE 3:	
MUNICIPALITY:	Columbus
STATE CODE:	MS
ZIP CODE:	39701-

OTHER INFORMATION	
MASTER ID:	001696
COUNTY:	Lowndes
REGION	NRO
SIC 1:	2491
AIR TYPE:	SYNTHETIC MINOR
HW TYPE:	TSD
SOLID TYPE:	
WATER TYPE:	INDUSTRIAL
BRANCH:	Chemical Branch
ECED CONTACT:	Hamil, Larry
BASIN:	Tombigbee River Basin

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

Mississippi Department of Environmental Quality
Office of Pollution Control

Pemits

PROGRAM	PERMIT TYPE	PERMIT #	MDEQ PERMIT CONTACT	ACTIVE
AIR	SMOP	168000020	Hall, Bobby	NO
AIR	SMOP	168000020	Shanks, Brad	YES
WATER	PRE-TREATMENT	MSP090021	Brumfield, Milton	YES
HAZ. WASTE	EPA ID	MSD990866329	Ferguson, Bruce	NO
GENERAL	WOOD TREATING	MSR22010	LaFleur, Kenny	YES
HAZ. WASTE	TSD		Ferguson, Bruce	YES
WATER	PRE-TREATMENT	MSP090021	Taylor, John	YES
AIR	CONSTRUCTION	168000020	Shanks, Brad	YES
HAZ. WASTE	TSD	MSD990866329	Crawford, Louis	NO

Compliance Actions

MEDIA	ACTIVITY TYPE	SCHEDULED	COMPLETED	INSPECTED B
HAZ WASTE	Compliance (Groundware) Monitori	5/17/00	5/17/00	Twitty, Russ
HAZ WASTE	Financial Record Review	3/1/00	5/11/00	Hamil, Larry
WATER	CMI - PRETREATMENT			Whittington, Darryail
WATER	CEI - PRETREATMENT	9/30/00		Shelton, Kirk
WATER	CEI - NA	6/16/99	6/16/99	Shelton, Kirk
HAZ WASTE	Compliance Evaluation Inspection	6/16/99	6/16/99	Shelton, Kirk
AIR	State Compliance Inspection	6/16/99	6/16/99	Shelton, Kirk

Enforcement Actions

MEDIA	ENFORCEMENT STEP	DETERMINED	RESOLVED	EMPLOYEE ASSIGNE
HAZ. WASTE	AGREED ORDER	6/16/99	5/18/00	Hamil, Larry
HAZ. WASTE	APPARENT VIOLATION	6/16/99	5/18/00	Hamil, Larry
AIR	APPARENT VIOLATION	6/16/99	5/18/00	Hamil, Larry
AIR	AGREED ORDER	6/16/99	5/18/00	Hamil, Larry

MDEQ OPC Locational Data Entry Form

1696
9/27/02

Page 1 of 1

Site Name: Kerr McGEE

Address:
City: Columbus State: MS Zip:
County: Lowndes

Site Unique Identifier: NPDES 1680-00020
Site Unique Identifier Description: Permit # 90021
(Permit#, EPA ID, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 36.6 Seconds

Longitude: 88 Degrees 24 Minutes 36.1 Seconds

Elevation: ___ft.

Method of Collection: ___G3 - Differential (± 3m)
✓G6 - Autonomous (± 100m)

Point Description: ✓PG - Plant Entrance (General)
___NE - NE Corner of Land Parcel
___SE - SE Corner of Land Parcel
___NW - NW Corner of Land Parcel
___SW - SE Corner of Land Parcel
___CE - Center of Facility
___WL - Well*
___WM - Ambient Water Mon. Station
___AM - Ambient Air Mon. Station

Comments:

*This point should be used only for wells in cases where there is no other identifiable facility.

Collected By: Clift Jeter Date Collected: 6/13/02

MDEQ OPC Locational Data Entry Form

1/5/01-MD

Page 1 of 32

Site Name: [redacted]

Address: 2300 - 14th Avenue North 1480-00020
City: Columbus State: MS Zip: 39701
County: [redacted]

Site Unique Identifier: Front Door To Office
Site Unique Identifier Description: South Gate
(Permit#, EPA ID, Monitoring Station #, etc...)

Latitude: ~~33~~ 33 Degrees ~~58~~ 30 Minutes ~~15.56~~ 38.51 Seconds

Longitude: ~~88~~ 88 Degrees ~~24~~ 29 Minutes ~~02.30~~ 34.02 Seconds

Elevation: ~~236~~ ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

1696 1/5/01

Point Description: X PG - Plant Entrance (General)
___ NE - NE Corner of Land Parcel
___ SE - SE Corner of Land Parcel
___ NW - NW Corner of Land Parcel
___ SW - SE Corner of Land Parcel
___ CE - Center of Facility
___ WL - Well*
___ WM - Ambient Water Mon. Station
___ AM - Ambient Air Mon. Station

Comments: _____

*This point should be used only for wells in cases where there is no other identifiable facility.

Collected By: [signature] Date Collected: 11 JUL 00

Locational Data Entry Form Supplement
Page 2 of 32

Site Name: KERR-McGEE

Point Unique Identifier: ~~[illegible]~~ Closed surface impoundments
Point Unique Identifier Description: ~~RCRA [illegible]~~ RU
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 34.53 Seconds

Longitude: 98 Degrees 24 Minutes 36.49 Seconds

Elevation: 187 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
X SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
___ WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: [signature] Date Collected: 11 JUL 02

Locational Data Entry Form Supplement
Page 3 of 32

Site Name: KERR McGEE

Point Unique Identifier: CME-3
Point Unique Identifier Description: Monitoring Well (RCRA-GW)
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 35.14 Seconds

Longitude: 88 Degrees 24 Minutes 36.19 Seconds

Elevation: 193 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Page 4 of 32

Site Name: Kerr-McGee

Point Unique Identifier: CME-5

Point Unique Identifier Description: RCRA GW Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 28.69 Seconds

Longitude: 466 Degrees 24 Minutes 14.29 Seconds

Elevation: 3036 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: [signature] Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Page 5 of 32

Site Name: KERR-McGEE

Point Unique Identifier: CME-6

Point Unique Identifier Description: RCRA GW Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.30 Seconds

Longitude: 88 Degrees 24 Minutes 25.46 Seconds

Elevation: ___ ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 00

Locational Data Entry Form Supplement
Page 6 of 32

Site Name: ~~CME-7~~ KERR-McGEE

Point Unique Identifier: CME-7
Point Unique Identifier Description: RCRA GW Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.69 Seconds

Longitude: 88 Degrees 24 Minutes 19.30 Seconds

Elevation: 190 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 00

Locational Data Entry Form Supplement
Page 7 of 32

Site Name: KERR-McGEE

Point Unique Identifier: CME-8
Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 26.71 Seconds

Longitude: 84 Degrees 24 Minutes 30.12 Seconds

Elevation: 160 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: [signature] Date Collected: 11JUL00

Locational Data Entry Form Supplement

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Site Name: KERR McGEE

Point Unique Identifier: CMW 1AR

Point Unique Identifier Description: RCRA GW Monitoring well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 38 .52 Seconds

Longitude: 88 Degrees 24 Minutes 29 .79 Seconds

Elevation: 144 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: [signature] Date Collected: 11JUL00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 3

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.42 Seconds

Longitude: 88 Degrees 24 Minutes 31.92 Seconds

Elevation: 190 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 6

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: ~~33~~ 33 Degrees ~~30~~ 30 Minutes ~~35.23~~ 36 06 Seconds

Longitude: 88 Degrees 24 Minutes 32 .36 Seconds

Elevation: 177ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: [signature] Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 7

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 35.23 Seconds

Longitude: 88 Degrees 24 Minutes 33.22 Seconds

Elevation: 167 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 10 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 8

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 34.53 Seconds

Longitude: 88 Degrees 24 Minutes 33.93 Seconds

Elevation: 164 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 1/JUL00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 11

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 30.12 Seconds

Longitude: 86 Degrees 24 Minutes 27.62 Seconds

Elevation: ___ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 14

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.46 Seconds

Longitude: 88 Degrees 24 Minutes 29.95 Seconds

Elevation: 157 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11JUL00

Locational Data Entry Form Supplement

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Site Name: KERR-McGEE

Point Unique Identifier: CMW 16

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 35.06 Seconds

Longitude: 88 Degrees 24 Minutes 36.45 Seconds

Elevation: 150 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 19

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 33.26 Seconds

Longitude: 88 Degrees 24 Minutes 25.60 Seconds

Elevation: 190 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 24

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 28.48 Seconds

Longitude: 88 Degrees 24 Minutes 14.37 Seconds

Elevation: 170 ft.

Method of Collection: ✓ G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: [signature] Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW26

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30 .57 Seconds

Longitude: 88 Degrees 24 Minutes 37 .80 Seconds

Elevation: 170 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11 JUL 02

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 27

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.27 Seconds

Longitude: 88 Degrees 28 Minutes 16.83 Seconds

Elevation: 170 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 4 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR-McGEE

Point Unique Identifier: CMW 28

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.17 Seconds

Longitude: 96 Degrees 24 Minutes 14.95 Seconds

Elevation: 780 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: [signature] Date Collected: 11JUL00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 29

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.67 Seconds

Longitude: 88 Degrees 24 Minutes 15.68 Seconds

Elevation: 181 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11JUL00

Locational Data Entry Form Supplement
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Site Name: KERR-McGEE

Point Unique Identifier: CMW 30
Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.17 Seconds

Longitude: 88 Degrees 24 Minutes 16.06 Seconds

Elevation: 77 ft.

Method of Collection: ___G3 - Differential (± 3m)
___G6 - Autonomous (± 100m)

Point Description:
___PP - Plant Entrance (Personnel)
___PF - Plant Entrance (Freight)
___AS - Air Release Stack
___AV - Air Release Vent
___ST - Storage Vent
___WR - Water Release Pipe
___SP - Lagoon or Settling Pond
___LW - Liquid Waste Treatment Unit
___AE - Atmos. Emissions Trtmnt/Disp
___SD - Solid Waste Tretmt/Disp Unit
___SS - Solid Waste Storage Area
___LF - Loading Facility
___PU - Process Unit
_X_WL - Well
___WM - Water Monitoring Station
___AM - Air Monitoring Station
___OT - Other (Describe in Comments)
___UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11/30/00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 51

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: ___Degrees ___Minutes ___.___Seconds

Longitude: ___Degrees ___Minutes ___.___Seconds

Elevation: ___ft.

Method of Collection: ___G3 - Differential (± 3m)
___G6 - Autonomous (± 100m)

Point Description:
___PP - Plant Entrance (Personnel)
___PF - Plant Entrance (Freight)
___AS - Air Release Stack
___AV - Air Release Vent
___ST - Storage Vent
___WR - Water Release Pipe
___SP - Lagoon or Settling Pond
___LW - Liquid Waste Treatment Unit
___AE - Atmos. Emissions Trtmnt/Disp
___SD - Solid Waste Tretmt/Disp Unit
___SS - Solid Waste Storage Area
___LF - Loading Facility
___PU - Process Unit
X WL - Well
___WM - Water Monitoring Station
___AM - Air Monitoring Station
___OT - Other (Describe in Comments)
___UN - Unknown

Comments: Well temporarily inaccessible

Collected By: [signature]

Date Collected: 11/30/00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 56

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 26.39 Seconds

Longitude: 88 Degrees 24 Minutes 34.94 Seconds

Elevation: 487 ft.

Method of Collection:
- X G3 - Differential (± 3m)
- ___ G6 - Autonomous (± 100m)

Point Description:
- ___ PP - Plant Entrance (Personnel)
- ___ PF - Plant Entrance (Freight)
- ___ AS - Air Release Stack
- ___ AV - Air Release Vent
- ___ ST - Storage Vent
- ___ WR - Water Release Pipe
- ___ SP - Lagoon or Settling Pond
- ___ LW - Liquid Waste Treatment Unit
- ___ AE - Atmos. Emissions Trtmnt/Disp
- ___ SD - Solid Waste Tretmt/Disp Unit
- ___ SS - Solid Waste Storage Area
- ___ LF - Loading Facility
- ___ PU - Process Unit
- X WL - Well
- ___ WM - Water Monitoring Station
- ___ AM - Air Monitoring Station
- ___ OT - Other (Describe in Comments)
- ___ UN - Unknown

Comments: _____

Collected By: [signature]

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 57

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: ___Degrees ___Minutes ___.___Seconds

Longitude: ___Degrees ___Minutes ___.___Seconds

Elevation: ___ft.

Method of Collection: ___G3 - Differential (± 3m)
___G6 - Autonomous (± 100m)

Point Description:
___PP - Plant Entrance (Personnel)
___PF - Plant Entrance (Freight)
___AS - Air Release Stack
___AV - Air Release Vent
___ST - Storage Vent
___WR - Water Release Pipe
___SP - Lagoon or Settling Pond
___LW - Liquid Waste Treatment Unit
___AE - Atmos. Emissions Trtmnt/Disp
___SD - Solid Waste Tretmt/Disp Unit
___SS - Solid Waste Storage Area
___LF - Loading Facility
___PU - Process Unit
_X_WL - Well
___WM - Water Monitoring Station
___AM - Air Monitoring Station
___OT - Other (Describe in Comments)
___UN - Unknown

Comments: Well temporarily inaccessible

Collected By: [signature]

Date Collected: 11/1/00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 60

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 28.97 Seconds

Longitude: 88 Degrees 24 Minutes 12.18 Seconds

Elevation: 167 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11/5/02

Locational Data Entry Form Supplement
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Site Name: KERR-McGEE

Point Unique Identifier: CMW 61
Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 27.54 Seconds

Longitude: 88 Degrees 24 Minutes 12.26 Seconds

Elevation: 177 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 11/2/00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 65

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: ___Degrees ___Minutes ___.___Seconds

Longitude: ___Degrees ___Minutes ___.___Seconds

Elevation: ___ft.

Method of Collection: ___G3 - Differential (± 3m)
___G6 - Autonomous (± 100m)

Point Description:
___PP - Plant Entrance (Personnel)
___PF - Plant Entrance (Freight)
___AS - Air Release Stack
___AV - Air Release Vent
___ST - Storage Vent
___WR - Water Release Pipe
___SP - Lagoon or Settling Pond
___LW - Liquid Waste Treatment Unit
___AE - Atmos. Emissions Trtmnt/Disp
___SD - Solid Waste Tretmt/Disp Unit
___SS - Solid Waste Storage Area
___LF - Loading Facility
___PU - Process Unit
_X_WL - Well
___WM - Water Monitoring Station
___AM - Air Monitoring Station
___OT - Other (Describe in Comments)
___UN - Unknown

Comments: Well temporarily inaccessible

Collected By: [signature]

Date Collected: 1/31/00

Locational Data Entry Form Supplement

Site Name: KERR-McGEE

Point Unique Identifier: CMW 66

Point Unique Identifier Description: RCRA Monitoring Well
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 26.36 Seconds

Longitude: 88 Degrees 24 Minutes 37.05 Seconds

Elevation: 177 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
X WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
___ OT - Other (Describe in Comments)
___ UN - Unknown

Comments: _____

Collected By: _____ Date Collected: 1/JUN 02

Locational Data Entry Form Supplement
Page 30 of 32

Site Name: KERR McGEE

Point Unique Identifier: TRENCH 1A & 1B
Point Unique Identifier Description: _____
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes 27.64 Seconds

Longitude: ~~86~~ Degrees 24 Minutes 31.62 Seconds

Elevation: 174 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
___ WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
X OT - Other (Describe in Comments)
___ UN - Unknown

Comments: Corrective Action Recovery Trench - location taken at approximate intersection of Trenches 1A & 1B

Collected By: _____ Date Collected: 11/2000

Locational Data Entry Form Supplement
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Site Name: KERR McGEE

Point Unique Identifier: TRENCH 2
Point Unique Identifier Description: _____
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: 33 Degrees 30 Minutes ~~26~~ 30 . ~~84~~ 70 Seconds

Longitude: ~~84~~ 94 Degrees 24 Minutes ~~44~~ 17 . ~~66~~ 26 Seconds

Elevation: 173 ft.

Method of Collection: X G3 - Differential (± 3m)
___ G6 - Autonomous (± 100m)

Point Description:
___ PP - Plant Entrance (Personnel)
___ PF - Plant Entrance (Freight)
___ AS - Air Release Stack
___ AV - Air Release Vent
___ ST - Storage Vent
___ WR - Water Release Pipe
___ SP - Lagoon or Settling Pond
___ LW - Liquid Waste Treatment Unit
___ AE - Atmos. Emissions Trtmnt/Disp
___ SD - Solid Waste Tretmt/Disp Unit
___ SS - Solid Waste Storage Area
___ LF - Loading Facility
___ PU - Process Unit
___ WL - Well
___ WM - Water Monitoring Station
___ AM - Air Monitoring Station
X OT - Other (Describe in Comments)
___ UN - Unknown

Comments: Corrective action recovery trench - South end

Collected By: [signature] Date Collected: 11/11/00

Locational Data Entry Form Supplement

Site Name: Ken - McGee

Point Unique Identifier: Drip Pad

Point Unique Identifier Description: RCRA RU (Generator Status)
(Stack #, Discharge #, Monitoring Station #, etc…)

Latitude: ___Degrees ___Minutes ___.___Seconds

Longitude: ___Degrees ___Minutes ___.___Seconds

Elevation: ___ft.

Method of Collection: ___G3 - Differential (± 3m)
___G6 - Autonomous (± 100m)

Point Description:
___PP - Plant Entrance (Personnel)
___PF - Plant Entrance (Freight)
___AS - Air Release Stack
___AV - Air Release Vent
___ST - Storage Vent
___WR - Water Release Pipe
___SP - Lagoon or Settling Pond
___LW - Liquid Waste Treatment Unit
___AE - Atmos. Emissions Trtmnt/Disp
___SD - Solid Waste Tretmt/Disp Unit
___SS - Solid Waste Storage Area
___LF - Loading Facility
_X_PU - Process Unit
___WL - Well
___WM - Water Monitoring Station
___AM - Air Monitoring Station
___OT - Other (Describe in Comments)
___UN - Unknown

Comments: Missed

Collected By: _____ Date Collected: _____

Mississippi Department of Environmental Quality
Office of Pollution Control
Air Full Compliance Evaluation (FCE) Summary Report

FCE-2005

Site Name: Kerr McGee Chemical Corporation, Columbus Chemical Branch

Note: Facility has been out of business since 2002

AFS ID: 08700020

Air Permit No.: 1680-00020 {Iss./Mod. Date: 06/06/1997 Exp. Date: 06/01/2002}

Physical Address
2300 14th Avenue North
Columbus, MS 39701
Lowndes County

Mailing Address
PO Box 25861
Oklahoma City, Oklahoma 73125

Facility Contact: Roland Hill
Facility Phone No.: 662-327-7586
ECED Contact: Larry Hamil

CMS Source Category: Synthetic Minor - S
Date FCE Completed: 09/15/05
FCE Type: Onsite - FS

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

SIP	☒	NESHAPS	☐
PSD	☐	MACT	☐
NSPS	☐	Subparts:	N/A

Compliance Evaluation Activity	Date Report Received	Date Report Reviewed	enSite Activity No.
Annual Compliance Certification			
ACC ___ (Calendar Year covered in Certification)	N/A		
Stack Test Report(s)			
Stack Test Report	N/A		
Semi-Annual Monitoring Reports (MM/YY – MM/YY)			
Semi-Annual Monitoring Report (_/_-_/_)	N/A		
Semi-Annual Monitoring Report (_/_-_/_)	N/A		
Other Reports (e.g. Excess Emissions Report, CEMS/COMS Certification Report, NSPS Tank Inspection Report, etc.) (MM/YY – MM/YY)			
Excess Emissions Report (_/_-_/_)	N/A		

On-Site Air Compliance Evaluation Activity (e.g. On-Site Inspection, CEMS/COMS Certification Observation, etc.)	Date Conducted	enSite Activity No.
On-Site Inspection	08/02/05	INS20050003

Mississippi Department of Environmental Quality
Office of Pollution Control
Air Full Compliance Evaluation (FCE) Summary Report

Air Enforcement Actions* (e.g. Agreed Order, Commission Order, Unilateral Order, etc.)	Date Issued	enSite Activity No.
None		

* List all Enforcement Actions within last 2 years or since last FCE, whichever is shorter.

Compliance Assistance Provided: No If yes, describe:

Comments: Facility ceased operations in summer, 2003 and has had no air emissions since. Application for permit re-issuance was subsequently withdrawn and no air operating permit has been in effect since. Data base should be edited to note current status.

Signature: Larry Harrod Date: 9-15-05

FILE COPY

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

To: Larry Hamil

From: Stanley Watkins

Date: August 2, 2005

Subject: Kerr McGee Chemical Corp. AI : 1696
2300 14th Avenue North
Columbus Ms 39701

On this date I went by this facility to perform a scheduled air inspection. I contacted Roland Hill at the site. This facility was closed down in 2003. The company is currently remediating ground water pollution. The buildings have been removed except for an office building and a shop. The shop houses equipment for separating the creosote and filtering the water from various wells sunk on the property. The treated water is sent into the city sewer and the contaminated water is sent to a facility in Louisiana that recycles the creosote. There are no air permits or air emissions from the remediation process.

Kerr McGee Chemical Corporation Inspection Report

Facility Name: Kerr McGee Chemical Corporation **Date:** September 17, 1997

Address: 2300 14th Avenue & 20th Street
Columbus, Mississippi

Inspected By: Celina Matthes

Person Contacted: Chuck Swan, Plant Manager

FILE COPY

Facility No.: 1680-00020

Is facility major or minor? Synthetic Minor

Purpose of Inspection:

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

Current Permit Status: Operating, Synthetic Minor Operating Permit issued June, 6, 1997; Permit expires June 1, 2002

Source Description: Manufacturer of Creosote Coated Cross and Switch Ties

Applicable Regulations:

☒ SIP ☐ PSD ☐ NSPS ☐ NESHAPS

Cite regulation by description or regulatory section number: APC-S-1

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: AA-001, the 34 MMBTUH Cleaver Brooks D-6 Primary Boiler

Rated Boiler Size: 34 MMBTUH

Operating Rate @ Insp: ? lbs steam/hr @ 125 psig

Fuel(s) Being Used: ☒ Natural Gas

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

Stack Emissions: Opacity 0 % by VEE

Notes: The facility maintains fuel oil on site as a standby fuel. A records pertaining to fuel oil usage and sulfur content were current. There was a leak in the city water valve at the feed for the boiler water. No other problems were detected.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: AA-002, the 14.3 MMBTUH Vogt 14435 Standby Boiler

Rated Boiler Size: 14.3 MMBTUH

Operating Rate @ Insp: Not in Operation. Boiler is for standby only.

Fuel(s) Being Used: ☒ Natural Gas

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

Stack Emissions: Opacity 0 % by VEE

Notes: This boiler is limited to use of natural gas only. No problems were detected.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: AA-003, The Framing Mill with 2 cyclones

Description of Process: The framing mill produces uncoated bridge and cross timbers

Raw Materials: Wood

Processing Operations: Planing, Sawing, and Sizing of lumber on three production lines. All shavings are vented directly to a dust collector system consisting of 2 cyclones in series.

Products/By-Products: Bridge and Cross Timbers, Shavings and Sawdust

Emissions & Control Devices: Particulate Matter, 2 Cyclones
(Complete Appropriate Control Device Sheets)

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: AA-003, The Framing Mill Cyclones

Type of particulate being handled: Shavings, Sawdust

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

Multiclone(2)

Fan is Located: ☒ **Upstream** ☐ **Downstream of Cyclone**

If Downstream does fan have: ☐ **Direct Emission**

☐ **Auxiliary Stack**

If Upstream does cyclone have: ☐ **No Cap (Vertical Emission)**

☐ **Fixed Cap (Diffuse Emission)**

☒ **Wind Respondent Cap (Horizontal Emission)**

Is fallout occurring? ☒ **Yes** ☐ **No**

Does cyclone have dust buildup on exhaust? ☐ **Yes** ☒ **No**

How often is it cleaned up: 1 time per week

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

How is collected dust stored, moved, disposed of? Dumped into a truck and hauled away to be sold.

Comments: None

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: Emission Points AA-004, AA-005, AA-006, and AA-007, the creosote filled work tanks controlled by the treating system scrubber.

Description of Process: Storage of Creosote

Raw Materials: Creosote

Processing Operations: Storage

Products/By-Products: Creosote

Emissions & Control Devices: Scrubber and fan(SEE EMISSION POINT AA-010)
(Complete Appropriate Control Device Sheets)

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: Emission Point AA-008, The Switch Tie Unloader with Cyclone

Description of Process: The switch tie unloader saws the ends of switch ties of varying lengths. The saw dust is sucked into a bag cyclone that dumps to a dust box.

Raw Materials: Switch Ties

Processing Operations: Sawing

Products/By-Products: Switch Ties, Sawdust

Emissions & Control Devices: Cyclone

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: Emission Point AA-008, The Switch Tie Unloader Cyclone

Type of particulate being handled: Sawdust

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

Simple (Cylinder Length = 2 x Diameter)

Fan is Located: ☐ **Upstream** ☒ **Downstream of Cyclone**

If Downstream does fan have: ☒ **Direct Emission**

☐ **Auxiliary Stack**

If Upstream does cyclone have: ☐ **No Cap (Vertical Emission)**

☐ **Fixed Cap (Diffuse Emission)**

☐ **Wind Respondent Cap (Horizontal Emission)**

Is fallout occurring? ☐ **Yes** ☒ **No**

Does cyclone have dust buildup on exhaust? ☐ **Yes** ☒ **No**

How often is it cleaned up: Once per week

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

How is collected dust stored, moved, disposed of? Dumped to Bin and Hauled Away

Comments: None

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: Emission Point AA-009, The Cross Tie Unloader with Cyclone

Description of Process: The cross tie unloader saws the ends of cross ties to 8.5 foot lengths. The saw dust is sucked into a bag cyclone that dumps to a dust box.

Raw Materials: Cross Ties

Processing Operations: Sawing

Products/By-Products: Cross Ties, Sawdust

Emissions & Control Devices: Cyclone

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: Emission Point AA-009, The Cross Tie Unloader Cyclone

Type of particulate being handled: Sawdust

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

Simple (Cylinder Length = 2 x Diameter)

Fan is Located: ☒ **Upstream** ☐ **Downstream of Cyclone**

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

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

Is fallout occurring? ☐ **Yes** ☒ **No**

Does cyclone have dust buildup on exhaust? ☐ **Yes** ☒ **No**

How often is it cleaned up: Once per week

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

How is collected dust stored, moved, disposed of? Dumped to Bin and Hauled Away

Comments: None

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: AA-010, The Retort and corresponding Vacuum System controlled by the Treating System Scrubber

Description of Process: The retorts are the pressure vessels used for treating the lumber with creosote. It consists of 3 cylinders 8 ft. in diameter and 100 ft. long. The cylinders are filled with cross or switch ties and then pressurized and heated. The pressure and heat force the creosote into the wood. 1 cycle(referred to as a charge) takes approximately 12 hours. The average pressure or a vessel in operation is 200 psi and the temperature is 200 degrees Fahrenheit. The Vacuum System routes process water from the vessels to the Hot Tank. The process water eventually goes through the scrubber and to the wastewater treatment facility.

Raw Materials: Untreated Cross Ties and Switch Ties

Processing Operations: Creosote Treatment

Products/By-Products: Treated Cross Ties

Emissions & Control Devices: Venturi Scrubber
(Complete Appropriate Control Device Sheets)

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: Emission Points AA-011, AA-012, AA-013, and AA-014, The Hot Tank, The Primary Oil/Water Separator, The Reclaim Tank, and The Building Sump controlled by the treating system scrubber.

Description of Process: All of these tanks are part of the Vacuum System. The Hot Tank holds process water from the retorts before going through the scrubber. The Oil/ Water separates the oil and water. The Reclaim tank hold the oil to be reprocessed. The building sump collects wash down from the interior of the retort building and sends it to the scrubber.

Raw Materials: Retort Process Water

Processing Operations: Storage, Reclamation, Cleaning

Products/By-Products: Wastewater

Emissions & Control Devices: Scrubber and fan
(Complete Appropriate Control Device Sheets)

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: Emission Point AA-010, the Treating System Scrubber that controls the Retort and corresponding Vacuum System and the creosote work tanks.

Scrubbing Liquid: (✔) Water ( ) Solution

Scrubber Type: Jet Venturi

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

Demisting Method: ( ) Cyclone
( ) Vanes
( ) Pad
( ) No Demisting
(✔) Other, Explain: It Has a Mist Eliminator

Operating Conditions:
Rainout Occurring: 0 Yes (✔) No

Scrubbing Liquid: (✔) Once Through ( ) Recycled

If water, describe settling basin: Make Up Water goes to the wastewater treatment Facility

For solution/reactant systems:

Chemical makeup of liquid:

How is scrubber discharge handled/treated: Handled at Wastewater Treatment Facility on Site

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

Comments: There was liquid dripping from the flange connecting the scrubber to the mist eliminator. There was some bulidup around the scrubber.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: AA-015, AA-016, and AA-017; the Secondary Oil Water Separator, the Groundwater Oil/Water Separator, and the Surge Tank, respectively.

Description of Process: This equipment is part of the wastewater treatment facility. A packed tower scrubber is located on top of the groundwater separator. All of these tanks have lids to control fumes and odor and aerators.

Raw Materials: Wastewater

Processing Operations: Wastewater Treatment

Products/By-Products: Treated Water

Emissions & Control Devices: 1 Packed Tower Scrubber
(Complete Appropriate Control Device Sheets)

Describe any problems noted or permit conditions not being complied with:

None.

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: The Scrubber for the Wastewater Treatment Facility

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

Scrubber Type:

(✔) 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:
Rainout Occurring: ( ) Yes (✔) No

Scrubbing Liquid: (✔) Once Through ( ) Recycled

If water, describe settling basin:

For solution/reactant systems:

Chemical makeup of liquid:

How is scrubber discharge handled/treated: Sent to City Treatment Plant

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

Comments: None

Kerr McGee Chemical Corporation Inspection Report

Emission Point No./Name: See Table Below

Description of Process: Various Storage Tanks and Equipment

Raw Materials: See Below

Processing Operations: Miscellaneous

Products/By-Products: None

Emissions & Control Devices: None

Describe any problems noted or permit conditions not being complied with:
None

Emission Point	Description	Status	Location
AA-018	Sap and Vacuum Seal Water Tank	Operating	WWT*
AA-019	Aeration Basins	Operating	WWT
AA-020	Diesel Storage Tank	Empty	Diesel Fuel Storage Area
AA-021	Diesel Storage Tank	Contained 10,068 gallons at insp.	Diesel Fuel Storage Area
AA-022	Diesel Storage Tank	Empty	Diesel Fuel Storage Area
AA-023	Diesel Storage Tank	Empty	Diesel Fuel Storage Area
AA-024	Diesel Storage Tank	Empty	Diesel Fuel Storage Area
AA-025	Space Heaters	Not in Operation	Framing Mill
AA-026	Groundwater Oil/Water Separator	Operating	WWT
AA-027	WWT Scrubber Recycle Sump Tank	Operating	WWT

* WWT = Wastewater Treatment Facility

Tronox LLC
AI: 1696
Lowndes Co.
Permit No. 1680000020
DLR

ATSDR
AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY

ANNOUNCES
the

PUBLIC HEALTH ASSESSMENT

for

Air Exposures to Wood Treatment Chemicals

KERR-McGEE CHEMICAL CORPORATION
COLUMBUS, MISSISSIPPI
EPA FACILITY ID: MSD990866329

Enclosed for your review is the Public Health Assessment for the Kerr McGee Chemical Site. This document, dated October 21, 2009, was prepared by the Agency for Toxic Substances and Disease Registry (ATSDR).

Please address correspondence to:

Agency for Toxic Substances and Disease Registry
ATTN: Records Center
1600 Clifton Road, NE, MS F-09
Atlanta, GA 30333

If there are questions, please direct them to Greg Zarus, Health Assessor, at (770) 488-0778.

Enclosure

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

To: Larry Hamil

From: Stanley Watkins

Date: August 2, 2005

Subject: Kerr McGee Chemical Corp. AI : 1696
2300 14th Avenue North
Columbus Ms 39701

On this date I went by this facility to perform a scheduled air inspection. I contacted [redacted] the site. This facility was closed down in 2003. The company is currently remediatin[redacted] pollution. The buildings have been removed except for an office building and a s[redacted] houses equipment for separating the creosote and filtering the water from various we[redacted] property. The treated water is sent into the city sewer and the contaminated water is s[redacted] in Louisiana that recycles the creosote. There are no air permits or air emissions from t[redacted] process.

LOWNDES CO., MIR, 1680-00020, CLH

KERR-McGEE
KERR-McGEE CENTER • P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

January 13, 2004

JAN 26 2004

Mr. Larry Hammill
Mississippi DEQ
Office of Pollution Control
PO Box 10385
Jackson, Mississippi 39289

Re: Former Wood Treating Site
Kerr-McGee Chemical LLC
Columbus, Mississippi

Dear Mr. Hammill:

Thank you for your site visit on December 17, 2003. This correspondence serves as documentation of our discussions and for site closure of the wood treating plant located in Columbus, Mississippi owned by Kerr-McGee Chemical LLC.

As per our discussions, KMC LLC submitted a site closure strategy document on June 13, 2003 identifying the scope and procedures to close the former wood treating plant. AS a follow-up, we scheduled a site visit on December, 17 to review the work performed at the site, and the new wastewater treatment plant. As we discussed during our meeting, a separate correspondence will be sent with the Annual Stormwater Monitoring Report to discuss the status of the stormwater permit at the end of the month.

This letter will review the aforementioned topics and our disscusions:

Plant Closure

The demolition and closure of the site went according to the closure strategy prescribed in the workplan submitted in June. As was noted all existing structures with the exception of the maintenance building and office building were demolished. All areas involved in the process where demolished to grade leaving the concrete foundations at grade. Areas involved in the process, such as the Tank Farm, Retort building, and Drip Pad were sealed with asphalt over the concrete foundations for capping purposes.

As prescribed in the closure strategy workplan, the drip pad was closed as a Landfill.

A review of the site during your visit did not delineate areas of concern or areas that would need further investigation.

Wastewater Treatment Plant

As part of the tour and discussion, MissDEQ inspected the new wastewater treatment system that was re-piped and constructed in the former maintenance building. The new system utilizes the same methods to treat the groundwater as the former system. Enclosed please find a schematic of the new system (Attachment I).

Thank you for your time and consideration in this matter. Please feel free to contact me, Steve Ladner at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION

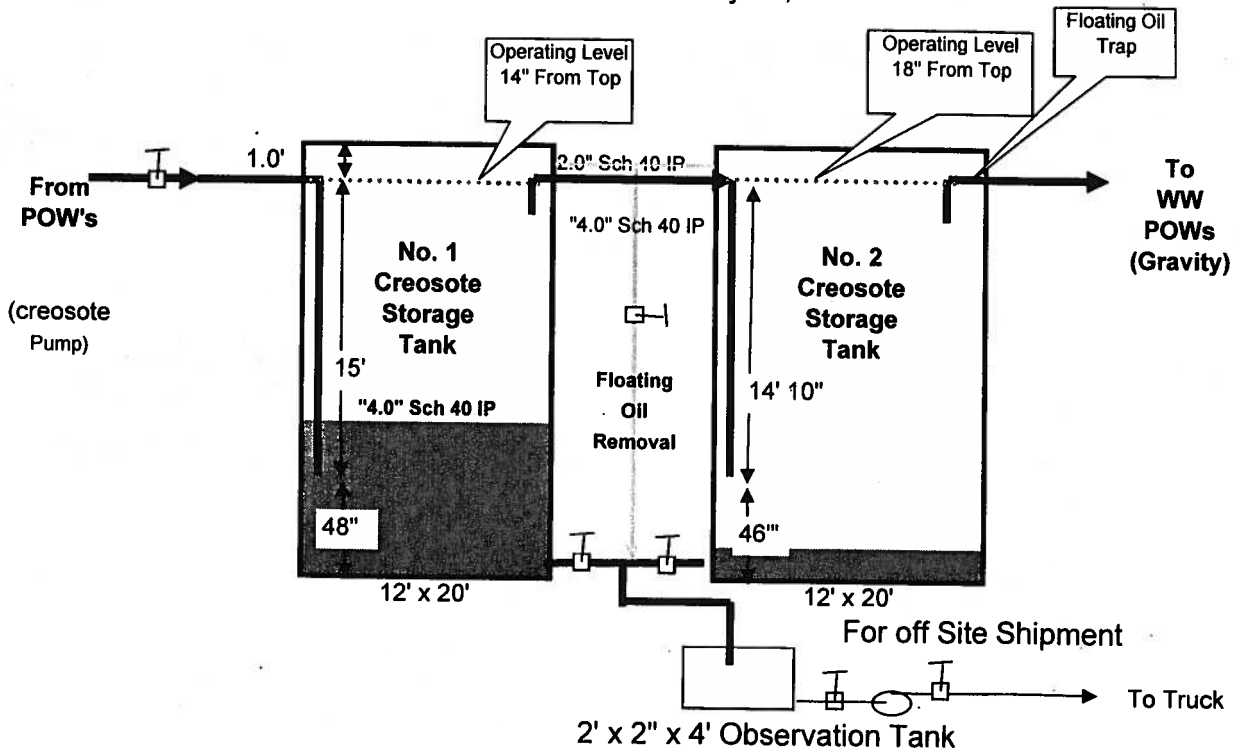
Stephen A. Ladner
Project Manager

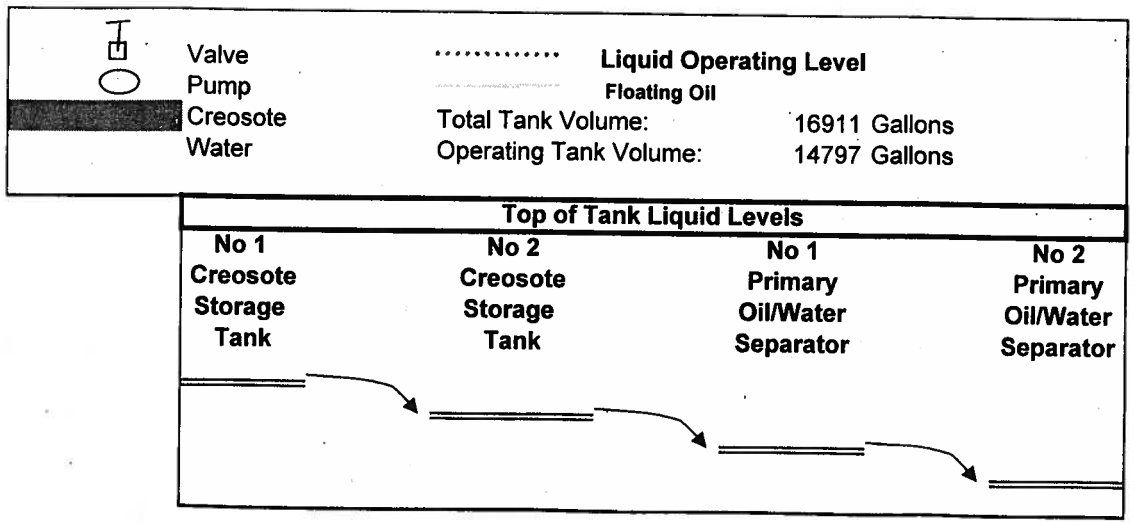
cc: Nick Bock
T.L. Cubbage

Creosote Storage Tanks

Columbus, MS

February 20, 2003

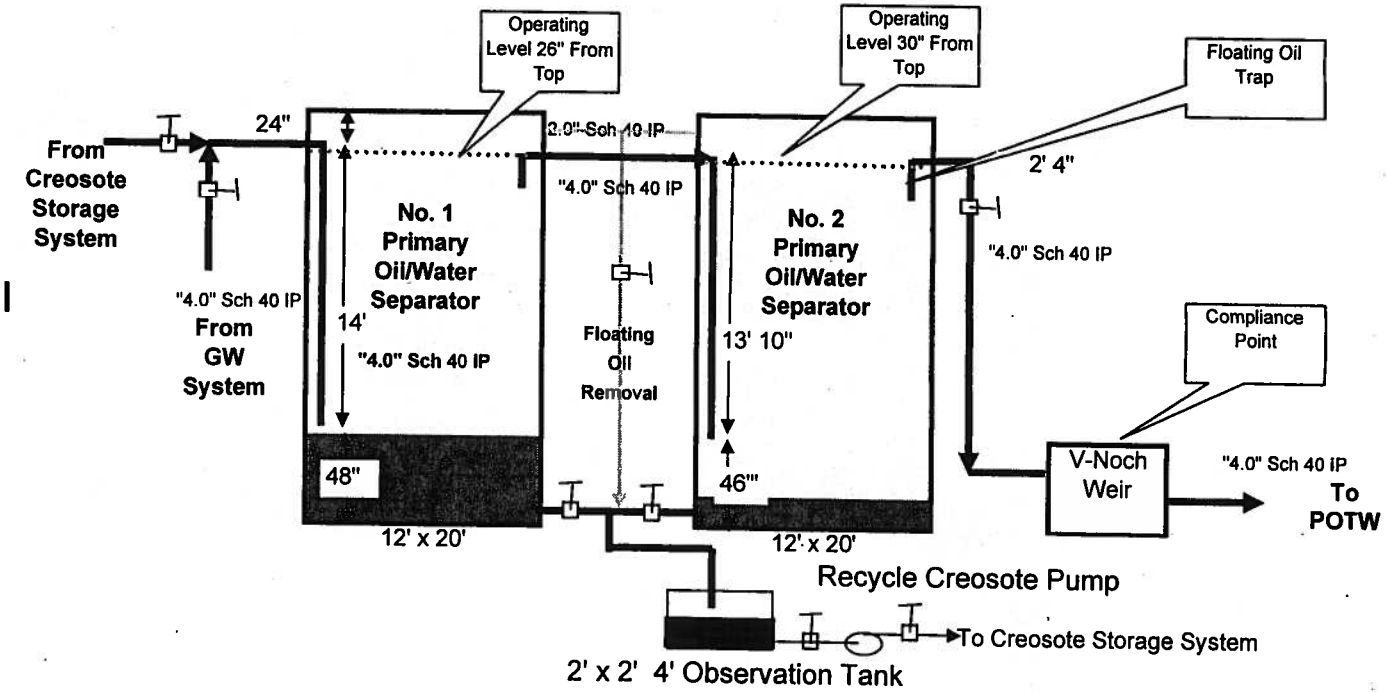


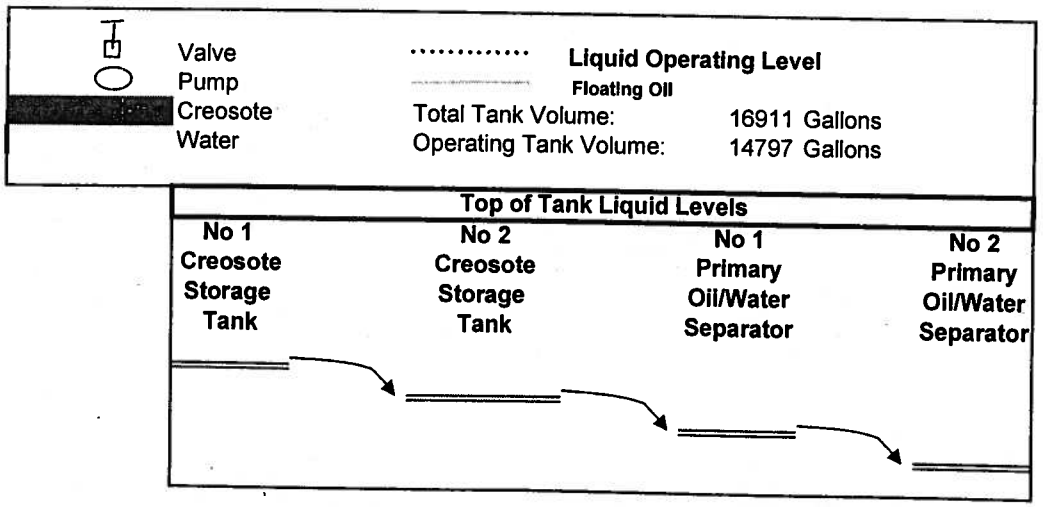


Primary Oil Water Separators

Columbus, MS

February 20, 2003





LOWNDES CO, AIR, 1680-WOOD, CCH

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 15 2003

OFFICE OF POLICY, ECONOMICS, AND INNOVATION

Mr. Stephen A. Ladner
Senior Staff Environmental Specialist
Kerr-McGee Chemical LLC
Kerr-McGee Center
P. O. Box 25861
Oklahoma City, OK 73125

Dear Mr. Ladner:

We have received your letter of August 22, 2003 regarding the closure of your domestic wood preserving operations. In accordance with your request, we are withdrawing the following six facilities from the National Environmental Performance Track:

Kerr-McGee Chemical LLC, Madison, IL
Kerr-McGee Chemical LLC, Springfield, MO
Kerr-McGee Chemical LLC, Texarkana, TX
Kerr-McGee Chemical LLC, Columbus, MS
Kerr-McGee Chemical LLC, Indianapolis, IN
Kerr-McGee Chemical LLC, The Dalles, OR

We regret that our relationship with these facilities is ending. Thank you for Kerr-McGee's participation in Performance Track and for your company's many efforts to improve its environmental performance. If you have any additional questions or comments about Performance Track, please feel free to contact me at (202) 566-2869 or fiorino.dan@epa.gov.

Sincerely,

Daniel J. Fiorino

Daniel J. Fiorino
Director, Performance Incentives Division

cc: Connie Raines, EPA Region IV
Mark Messersmith, EPA Region V
Craig Weeks, EPA Region VI

Chilton McLaughlin, EPA Region VII
Bill Glasser, EPA Region X
Don Watts, MS DEQ
Angela Tin, IL EPA
Marc Hancock, IN DEM
Rob Borowski, TX CEQ
Tod Crawford, MO DNR
Marianne Fitzgerald, OR DEQ

FILE COPY

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

September 11, 2002

Mr. R P. Michel
Kerr McGee Chemical Corporation, Columbus
2300 14th Avenue North
Columbus, Mississippi 39701

Dear Mr. Michel

Re: Kerr McGee Chemical Corporation, Columbus
Lowndes County
Air Ref. No. 1680-00020 (Revised Application)

This letter is to acknowledge receipt of your application on September 3, 2002. Within forty-five days after the date of receipt of the application, you will be notified either the submitted application is complete or of the major components required to complete the processing of your permit application.

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

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

Sincerely,

Teresa Dennington

Teresa Dennington
Environmental Permits Division

cc:

1696 PER20010003

FILE COPY

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

July 18, 2002

Mr. Nicholas E. Bock
Manager-Environmental Affairs and Reg. Compliance
Kerr McGee Chemical Corporation
P.O. Box 25861
Oklahoma City, Oklahoma 73125

Dear Mr. Bock:

Re: Kerr McGee Chemical Corporation, Columbus
Lowndes County
Air Ref. No. 1680-00020

Based upon review of the above referenced application received from Kerr McGee Chemical Corporation, Columbus on November 2, 2001, the following deficiencies were noted:

1. The process description is not sufficiently detailed to allow an evaluation of the potential/actual emissions from the plant. Please provide a sketch showing the major pieces of equipment and material flows and any narrative needed to explain the process. For example, I am not sure how many treating cylinders you may be operating.

2. A question related to item 1. above is the difficulty in determining which pollutants would cause you to be a major source, and therefore must be limited in order to issue a synthetic minor permit. The need to limit sulfur dioxide emissions is apparent, but we need to know the worst case emissions for HAPs. What is the treating capacity of the facility?

3. All tanks should be included on the tanks forms (section H). You should identify any tank subject to an NSPS. Don't you have raw creosote storage tanks?

4. Section N should be used to identify all applicable standards for the various emission units, such as NSPS for tanks and boilers.

Please address the above deficiencies by August 31, 2002. Upon receipt of this information, the Environmental Permits Division will continue the permitting process for your facility.

1696 PER20010003

If you have any questions regarding the application or the permitting process, please contact me at (601) 961-5067.

Sincerely,

Toby M. Cook, P.E.
Environmental Permits Division

1696 PER20010003

FILE COPY

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

November 9, 2001

Mr. R P. Michel
Kerr McGee Chemical Corporation, Columbus
2300 14th Avenue North
Columbus, Mississippi 39701

Dear Mr. Michel

Re: Kerr McGee Chemical Corporation, Columbus
Lowndes County
Air Ref. No. 1680-00020

This letter is to acknowledge receipt of your application on November 2, 2001. Within forty-five days after the date of receipt of the application, you will be notified either the submitted application is complete or of the major components required to complete the processing of your permit application.

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

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

Sincerely,

Teresa Dennington

Teresa Dennington
Environmental Permits Division

1696 PER20010003

OFFICE OF POLLUTION CONTROL
POST OFFICE BOX 10385 • JACKSON, MISSISSIPPI 39289-0385 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us
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LOWNDES Co., AIR, CLH

KERR-McGEE CHEMICAL LLC
2300 14TH AVENUE NORTH • COLUMBUS, MISSISSIPPI 39701

Certified Mail – 7000 0520 0016 3783 2680
Return Receipt Requested

October 10, 2001

Mr. Jerry Cain, Chief Environmental Permits Division
Mississippi Department of Environmental Quality
Air Permitting Branch
Office of Air Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

RE: Air Operating Permit 1680-0002
40 CFR 60.7 and 40 CFR 60, Subpart Dc Notifications
Kerr-McGee Chemical LLC, Columbus, Mississippi

Dear Mr. Cain:

Kerr-McGee Chemical LLC, (KMC LLC) recently modified permit 1680-002 and installed a 350 horsepower, 14.7 MMBTU/hour Hurst Boiler at our Columbus, MS wood preserving facility. The operating permit for this boiler was issued on September 18, 2001.

Notifications under 40 CFR 60.7

1. The date of construction of the 350 horsepower, 14.7 MMBTU/hour Hurst Boiler was September 24, 2001.

2. The date of startup of the 350 horsepower, 14.7 MMBTU/hour Hurst Boiler was October 10, 2001.

3. No increase in emission rate of any air pollutant is anticipated from the 350 horsepower, 14.7 MMBTU/hour Hurst Boiler.

4. No continuous monitoring system has been installed on the 350 horsepower, 14.7 MMBTU/hour Hurst Boiler

Standard of Performance of 40 CFR 60, Subpart Dc

1. The 350 horsepower, 14.7 MMBTU/hour Hurst Boiler is required to combust less than 0.5% sulfur as provided in 40 CFR 60.42c(h).

2. The 350 horsepower, 14.7 MMBTU/hour Hurst Boiler meet the criteria listed in 40 CFR 60.42(h).

3. The performance test of the 350 horsepower, 14.7 MMBTU/hour Hurst Boiler shall consist of fuel supplier certifications listed in 40 CFR 60.44c(h)

4. Fuel oil supplier certifications shall be in the format described in 40 CFR 48c(f)(1) and maintained at the facility for 5 years.

5. 60.48c(a)-The date of construction of the 350 horsepower, 14.7 MMBTU/hour Hurst Boiler was September 24, 2001.

6. 60.48c(a)(1)-The design heat input capacity is 14.7 MMBTU/hour and the boiler burns both natural gas and distillate fuel oil.

7. 60.48c(a)(2) is not applicable

8. 60.48c(a)(3) is not applicable

9. 60.48c(a)(4) is not applicable

10. 60.48c(g) the facility shall maintain records of each fuel combusted during each day.

Should you have questions or require additional information, please telephone me at (662) 328-7551.

Sincerely,

Kerr-McGee CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Ronald A Murphey

Ron Murphey,
Plant Manager Attachment

cc: N.E. Bock, Env. Manager
R. P. Michel, VP

"Murphey, Ron" <RMURPHEY@KMG.com> on 09/24/2001 02:09:01 PM

To: "'John_Taylor@deq.state.ms.us'" <John_Taylor@deq.state.ms.us>
cc: "Bock, Nick" <nbock@KMG.com>, "Sanders, James" <jsanders@KMG.com>, "Swann, Chuck" <CSWANN@KMG.com>
Subject: RE:

John, we are in receipt of our new modified Air Permit. Everything looks good with the permit. We anticipate firing up sometime next week. Please advise if you see any problems with this.
Ron Murphey
Plant Manager
Kerr McGee Chemical LLC
Columbus, Ms.

-----Original Message-----
From: John_Taylor@deq.state.ms.us [mailto:John_Taylor@deq.state.ms.us]
Sent: Monday, September 24, 2001 10:26 AM
To: nbock@kmg.com
Cc: Jackie_Summers@deq.state.ms.us; John_Taylor@deq.state.ms.us; CSWANN@kmg.com; RMURPHEY@kmg.com; Toby_Cook@deq.state.ms.us
Subject: Re:

Yes I believe you are correct. No. 2 Fuel Oil is a general distillate which fits into these requirements.

Kerr-McGee
Columbus Facility
Smop Air 1680-00020
Lowndes County

"Bock, Nick" <nbock@kmg.com> on 09/21/2001 01:56:59 PM

To: "Jacklyn Summers (E-mail)" <Jackie_Summers@deq.state.ms.us>, "John Taylor P. E. (E-mail)" <John_Taylor@deq.state.ms.us>
cc: "Swann, Chuck" <CSWANN@kmg.com>, "Murphey, Ron" <RMURPHEY@kmg.com>
Subject:

Page 14 of 16 of the permit requires NSPS:
40 CFR 60.7 and 40 CFR 60.8

I looks to me like 40 CFR 60.7 notification and recordkeeping for this boiler requires:

1. 60.48c(f)(1)....fuel oil supplier certification
2. 60.7(a)(1) date reconstruction (Mass-produced facility?)
3. 60.7.(a)(3) date of initial startup

This is all that I could find

Looks to me like 40 CFR 60.8 performance testing requires:

1. SO2 no testing
   60.42c > 60.42c(h)(1) > 60.48c(f)(1)

2. PM no testing

   Recordkeeping 60.48c(g) and 60.48c(I)

   Reporting 60.48c(a) notification
   60.48c(a)(1,3)

We really want to get this right. I appreciate your efforts. Is our analysis correct?

Nick Bock, Mgr. Reg. Compliance and Env. Affairs
Kerr- McGee Chemical LLC
P.O. Box 25861
123 R.S. Kerr Avenue
Oklahoma City, OK 73125
Tele (405) 270-2394
FAX (405) 270-4310

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

FILE COPY

September 19, 2001

CERTIFIED MAIL – 7000 1670 0008 1052 4412
Mr. Nick E. Bock, Manager of Environmental Affairs
Kerr-McGee Chemical Corporation
P. O. Box 25861
Oklahoma City, Oklahoma 73125

Dear Mr. R P. Michel :

Re: Kerr McGee Chemical Corporation, Columbus
Lowndes County, Ms
SMOP - Air Permit No. 1680-00020

Enclosed is the referenced Operating Permit No. 1680-00020 which has been modified for the operation of air emissions equipment at emission point AA-028. Operation of the air emissions equipment at the facility shall be in accordance with the terms, conditions, and limitations of the permit. This Operating Permit supersedes and replaces any previously held Operating Permit. Please note that this Operating Permit is federally enforceable.

Any modification to this process or facility which will alter the rate or composition of air pollutant emissions may require modification of this Operating Permit and may require a Construction Permit in accordance with Regulation APC-S-2.

This permit expires on June 1, 2002. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit. Any appeal of these permit actions 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 I can be reached at (601)961-5235.

Sincerely,

Jct

John C. Taylor, P.E., R.P.G.
Environmental Permits Division

Enclosure

Copy To: Mr. Ronald Murphey, Plant Manager

FILE COPY

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

September 13, 2001

Mr. R P. Michel
Kerr McGee Chemical Corporation, Columbus
2300 14th Avenue North
Columbus, Mississippi 39701

Dear Mr. Michel

Re: Kerr McGee Chemical Corporation, Columbus
Lowndes County
Air Ref. No. 1680-00020

This letter is to acknowledge receipt of your application on September 11, 2001. Within forty-five days after the date of receipt of the application, you will be notified either the submitted application is complete or of the major components required to complete the processing of your permit application.

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

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

Sincerely,

Teresa Dennington

Teresa Dennington
Environmental Permits Division

1696 PER20010002

OFFICE OF POLLUTION CONTROL
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KERR-McGEE CHEMICAL LLC
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

FedEx
Overnight

September 7, 2001

Mr. John Taylor, P.E., R.P.G.
Office of Air Pollution Control
20380 Highway 80 West
Jackson, MS 39204

RE: Title V Permit Application, Operating Permit 1680-0002
Permit Modification/Permit to Construct and Operate
Kerr-McGee Chemical LLC, Columbus, Mississippi

Dear Mr. Taylor:

Kerr McGee Chemical LLC (KMCLLC) desires to withdraw Permit Modifications dated July 11, 2001 and August 22, 2001 for Operating Permit 1680-0002. These modifications were associated with the installation of a new Hurst boiler.

Should you have questions or require additional information, please telephone me at (405) 270-2394.

Sincerely,

Kerr-McGee CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager - Environmental Affairs and Regulatory Compliance

cc: R. Murphey, Plant Manager
R. P. Michel, VP

FOREST PRODUCTS

AC 1696

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

FedEx
Overnight

September 7, 2001

Mr. John Taylor, P.E., R.P.G.
Office of Air Pollution Control
20380 Highway 80 West
Jackson, MS 39204

Air

RE: Title V Permit Application, Operating Permit 1680-0002O
Permit Modification/Permit to Construct and Operate
Kerr-McGee Chemical LLC, Columbus, Mississippi
Lowndes Co.

Dear Mr. Taylor:

Kerr McGee Chemical LLC (KMCLLC) desires to withdraw Permit Modifications dated July 11, 2001 and August 22, 2001 for Operating Permit 1680-0002. These modifications were associated with the installation of a new Hurst boiler.

Should you have questions or require additional information, please telephone me at (405) 270-2394.

Sincerely,

Kerr-McGee CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager - Environmental Affairs and Regulatory Compliance

cc: R. Murphey, Plant Manager
R. P. Michel, VP

FOREST PRODUCTS

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

FedEx
Overnight

September 7, 2001

Mr. John Taylor, P.E., R.P.G.
Office of Air Pollution Control
20380 Highway 80 West
Jackson, MS 39204

RE: Title V Permit Application, Operating Permit 1680-0002
Permit Modification/Permit to Construct and Operate
Kerr-McGee Chemical LLC, Columbus, Mississippi

Dear Mr. Taylor:

Kerr McGee Chemical LLC (KMCLLC) desires to withdraw Permit Modifications dated July 11, 2001 and August 22, 2001 for Operating Permit 1680-0002. These modifications were associated with the installation of a new Hurst boiler.

Should you have questions or require additional information, please telephone me at (405) 270-2394.

Sincerely,

Kerr-McGee CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager - Environmental Affairs and Regulatory Compliance

cc: R. Murphey, Plant Manager
R. P. Michel, VP

FOREST PRODUCTS

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

FedEx
Overnight

September 7, 2001

Mr. John Taylor, P.E., R.P.G.
Office of Air Pollution Control
20380 Highway 80 West
Jackson, MS 39204

RE: Operating Permit 1680-0002, Permit Modification
Installation of a Hurst Steam Boiler
Kerr-McGee Chemical LLC, Columbus, Mississippi

Dear Mr. Taylor:

Kerr McGee Chemical LLC (KMCLLC) desires to modify operating permit 1680-0002 by installing a new steam boiler (Hurst Boiler) at emission point AA-028 (page 14 of 16). With the exception of a Clever Brooks Boiler CB D-6 at emission point AA-001, all other boilers have been removed from service and decommissioned.

The existing 350 horsepower Clever Brook CB 655-350 boiler had reached the end of its useful life. This boiler is being replaced with a Series 400, 350 horsepower, Hurst Boiler. Upon state approval, the replacement boiler (Hurst Boiler) will be installed in the same location as the Clever Brooks boiler. The following Table compares relevant sizes of the replacement Cleaver Brooks and the new Hurst boiler:

Boiler Size/Characteristic	Cleaver Brooks Boiler	Hurst Boiler
Rated Capacity Natural Gas	Natural Gas- 11.72 MMBTU/hr	Natural Gas- 14.7 MMBTU/hr
Rated Capacity No. 2 Fuel Oil	No. 2 Fuel Oil- 97.6 GPH	No. 2 Fuel Oil- 105 GPH
Boiler Horsepower	350	350
Boiler Age	Rebuild early 1990's	New
Boiler Design	Natural Gas/Fuel Oil	Natural Gas/Fuel Oil
Emissions	See Table 1 & 2 & 3	See Table 1 & 2 &3

Facility Application

A permit application with sections B, C, N, M and O has been completed for your review. In addition, the application for an addendum for a synthetic minor operating permit has been completed.

Natural Gas Firing (Table 1)

1. Emission estimates for both boilers fired with natural gas at maximum capacity are shown in Table 1.
2. The source of the emission factors listed in the various tables is on EPA Website at http://www.epa.gov/ttn/chief/ap42/ch01

Firing with No. 2 Fuel Oil (Table 2)

1. Permit 1680-00020 limits annual fuel oil usage to 216,000 gallon per year, within any consecutive twelve-month period for the boiler the Clever Brooks boiler at EP AA-001.
2. Emission estimates for the new Hurst boiler have been calculated at 105 gallons/hour for 8760 hours per year.

3. The source of the emission factors listed in the various tables is on EPA Website at http://www.epa.gov/ttn/chief/ap42/ch01

Potential To Emit For The Boilers (Table 3)

Table 3 summarizes Tables 1 & 2 and determines the PTE for the boilers with the natural gas and fuel. NOx , VOC's and CO potential to emit emissions are based upon burning of natural gas, whereas particulate, PM-10 and SOx potential to emit emissions are based upon burning of fuel oil These tables demonstrate that facility potential emissions are below major thresholds.

Facility Potential To Emit (Table 8)

Emissions from all sources are summed in Table 8. These values were used to complete section C of the permit application. The green tie particulate matter estimations were developed in the 1995 Title V application and incorporated into our current permit. These estimates remained the same.

VOC estimates from the wood preserving process were developed in the 1995 Title V application and incorporated into our current permit. These estimates remained the same. However, hazardous air pollutant (HAP) have been included in Table 8. Table 8 demonstrates that the facility is below all major source thresholds without the necessity of additional controls or operating restrictions.

KMCLLC has compared the States emission inventory with our current permit levels and emission estimates calculated in this application. This comparison is shown in Table 9.

The new Hurst boiler is scheduled to be delivered during the week of September 10, 2001. Therefore, we are seeking your prompt action regarding this application. Should you have questions or require additional information, please telephone me at (405) 270-2394.

Sincerely,

Kerr-McGee CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager - Environmental Affairs and Regulatory Compliance

Attachment

cc: R. Murphey, Plant Manager
R. P. Michel, VP

Table 2

Emission Estimates of Current and Replacement Boiler
Number 2 Fuel Oil
Kerr-McGee Chemical LLC
Columbus, MS
Revised September 6, 2001

Hurst Series 400, 350 HP Boiler-No. 2 Fuel Oil Application: June 2001 Emission Point AA-028								
Regulated Air Pollutants	**Emission Factor* (lb)/1000gal**	**Conversion Factor (per 1000gal)**	**Fuel Value (Gal/hr)**	**Hourly Emission (lb/hr)**	**Hours Per Year (hours/yr)**	**Conversion Factor (lb/ton)**	**Annual Emissions (Ton/year)**	Hurst PTE (Ton/year)
Particulate	2	0.001	105	**0.21**	8760	2000	**0.92**	0.92
PM-10	2	0.001	105	**0.21**	8760	2000	**0.92**	0.92
SOx (.5% Sulfur)	71	0.001	105	**7.46**	8760	2000	**32.65**	32.65
NOx (.03%Nitrogen)	20	0.001	105	2.10	8760	2000	9.20	9.20
CO	5	0.001	105	0.53	8760	2000	2.30	2.30
VOC's	0.2	0.001	105	0.02	8760	2000	0.09	0.09
PAC lb/MMBTU	2.51E-08			0.000	8760		0.000	0.00

Cleaver Brooks Model CB D-6 Existing Boiler (Has Fuel Oil Limitation) Emission Point AA-001								
Regulated Air Pollutants	**Emission Factor* (lb)**	**Conversion Factor (per 1000gal)**	**Fuel Value (Gal/hr)**	**Hourly Emission (lb/hr)**	**Limit[1] 216,000 (gal/yr)**	**Conversion Factor (lb/ton)**	**Annual Emissions (Ton/year)**	CB D-6 PTE (Ton/year)
Particulate	2	0.001	100	0.20	2160	2000	0.22	0.88
PM-10	2	0.001	100	0.20	2160	2000	0.22	0.88
SOx (.5% Sulfur)	71	0.001	100	7.1	2160	2000	7.67	31.10
NOx (.03%Nitrogen)	20	0.001	100	2.00	2160	2000	2.16	8.76
CO	5	0.001	100	0.50	2160	2000	0.54	2.19
VOC's	0.2	0.001	100	0.02	2160	2000	0.02	0.09
PAC lb/MMBTU	2.51E-08			0.000			0.000	0.00

Maximum Emissions

* All Emission Factors are based on AP-42 Factors: Table 1.3-1, Distillate oil fired

Limit[1] **Operating Permit Limits annual fuel oil usage to 216,000 gallons in any 12 consecutive months Permit 1680-0002**

Table 3

Emission Estimates of Current and Replacement Boiler
Potential To Emit Summary (Permit Limit)

Kerr-McGee Chemical LLC

Columbus, MS

Revised September 6, 2001

Regulated Air Pollutants	Short Term Permit Limit (lb/hr)						
	See Table_	Boiler Fuel	Boiler Fuel	Hurst Boiler	CB D-6 Boiler	Two Boiler Sum	Short Term Allowable lb/hr
Particulate	Table 2	No. 2 Fuel Oil	No. 2 Fuel Oil	0.21	0.20	0.41	0.41
PM-10	Table 2	No. 2 Fuel Oil	No. 2 Fuel Oil	0.21	0.20	0.41	0.41
SOx	Table 2	No. 2 Fuel Oil	No. 2 Fuel Oil	7.46	7.10	14.56	14.56
NOx	Table 1	Natural Gas	Natural Gas	1.47	3.40	4.87	4.87
CO	Table 1	Natural Gas	Natural Gas	1.23	2.86	4.09	4.09
VOC's	Table 1	Natural Gas	Natural Gas	0.08	0.19	24.34	24.34

PAC is NA

Allowable
Based on the greatest emission level using either natural gas or No. 2 fuel oil

Regulated Air Pollutants	Long Term Permit Limit (TPY)						
	See Table_	Boiler Fuel	Hurst Boiler	CB D-6 12 Mon. Gas	CB D-6 3 Mons. Oil	CB D-6 9 Mons. Gas	Long Term Allowable TPY*
Particulate	Table 2	No. 2 Fuel Oil	0.92	0.28	0.22	0.21	1.35
PM-10	Table 2	No. 2 Fuel Oil	0.92	0.28	0.22	0.21	1.35
SOx	Table 2	No. 2 Fuel Oil	32.65	0.09	7.67	0.07	40.39
NOx	Table 1	Natural Gas	6.44	14.89			21.33
CO	Table 1	Natural Gas	5.41	12.51			12.51
VOC's	Table 1	Natural Gas	0.35	0.82			1.17

Permit Value PAC is NA

All Emission Factors are based on AP-42 Factors

Allowable TPY* **Operating Permit Limits annual fuel oil usage to 216,000 gallons in any 12 consecutive months for CB D-6 Boiler**

Based on higher of 12 months natural gas usage or 3 months oil/9months natural gas usage.

Table 8
June 2001 Title V Application
Revised August 20, 2001
PTE - Emission Summary - Columbus, MS

Pollutant	Maximum Emission Rate (PTE To Emission Summary Section C)																						Data Source
	Particulate		PM10		SOx		NOx		CO		VOC		Naphthalene		Dibenzofuran		Quninoline		Biphenyl		PAC		
	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	Short (lb/hr)	Long TPY	
Particulate - Boilers (Fuel Oil/Table 3)	0.41	1.35																					Table 3*
PM-10 -Boilers(Fuel Oil/Table 3)			0.41	1.35																			Table 3
Particulate - Framing Mill (Title V App.)**	0.73	3.20																					1995 Title V
PM-10 - Framing Mill (Title V App.)**			0.37	1.60																			1995 Titl
Particulate - Switch Tie Unloader (Title V App.)**	0.21	0.93																					1995 Titl
PM-10 - Switch Tie Unloader (Title V App.)**			0.11	0.47																			1995 Title V
Particulate -Cross Tie Unloader (Title V App.)**	0.38	1.67																					1995 Title V
PM-10 - Cross Tie Unloader (Title V App.)**			0.19	0.84																			1995 Title V
SOx Boilers (Table 3)					14.56	40.39																	Table 3*
NOx - Boilers (Natural Gas/Table 3)							4.87	21.33															Table 3*
CO - Boilers (Natural Gas/Table 3)									4.09	12.51													Table 3*
VOC's - Boilers Natural Gas/Table 3)											24.34	1.17											Table 3*
Wood Preserving VOC											0.17	0.51											1995 Title V
Wood Preserving Naphthalene (43.6% VOC)													0.08	0.22									1995 Title V
Wood Preserving Dibenzofuran (4.96% VOC)															0.01	0.03							1995 Title V
Wood Preserving Quinoline (2.05% VOC)																	0.00	0.01					1995 Title V
Wood Preserving Biphenyl (1.80% VOC)																			0.00	0.01			1995 Title V
Wood Preserving Process PAC (9.52% VOC)																					0.02	0.05	1995 Title V
Total Maximum	**1.73**	**7.15**	**1.07**	**4.26**	**14.56**	**40.39**	**4.87**	**21.33**	**4.09**	**12.51**	**24.51**	**1.68**	**0.08**	**0.22**	**0.01**	**0.03**	**0.00**	**0.01**	**0.00**	**0.01**	**0.02**	**0.05**	

Table 3* Based on Tables 1 & 2

** Point Source PM and PM-10 emissions are based on estimated provided to DEQ on 11/1/96 in Additional Information Number 5

Table 9

Revised September 6, 2001

Comparison of Emissions Inventory, Permit Application and Current Permit

Emission	Emission Point	Emission Unit	6/4/1998 MDEQ-EI TPY	Boiler Permit App. TPY	6/12/1998 Permit Limit TPY	Difference (Charge) TPY	Potential Reasons For Differences
			DEQ-EI	Table 3	Pg 4 of 16		
PM	CB Boiler	AA-001	0.50	0.28	0.50	-0.22	
PM	Vogt Boiler	AA-002	0.16	Demolished		NA	Boiler Replaced
PM	Framing Mill	AA-003	3.20	3.20	3.20	0.00	3 Boilers Included in 1998 PTE Estimate
PM	SW Unloader	AA-008	0.93	0.93	0.93	0.00	
PM	Tie Unloader	AA-009	1.67	1.67	1.67	0.00	
PM	Fuel Storage	AA-020	0.85	0.85		0.00	
PM	Hurst Boiler	AA-028	0.85	0.92	New 2001	0.07	
PM	Total		8.17	7.85		-0.32	See Table 3
PM-10	CB Boiler	AA-001	0.50	0.28	0.50	-0.22	
PM-10	Vogt Boiler	AA-002	0.16	Demolished		NA	Boiler Replaced
PM-10	Framing Mill	AA-003	1.60	1.60	1.6	0.00	3 Boilers Included in 1998 PTE Estimate
PM-10	SW Unloader	AA-008	0.47	0.47	0.47	0.00	
PM-10	Tie Unloader	AA-009	0.84	0.84	0.41	0.00	
PM-10	Fuel Storage	AA-020	0.85	0.85		0.00	
PM-10	Hurst Boiler	AA-028	0.85	0.92	New 2001	0.07	
PM-10	Total		5.27	4.96		-0.31	See Table 3
SO2	Boiler (2 Boilers)		70.34	40.39	7.84	-29.95	2001 Based on Table 3 3 Boilers Included in PTE Estimate
NOx	Boiler (2 Boilers)		46.69	21.33	NA	-25.36	2001 Based on 3 Months Oil/ 9 Months Natural Gas. See Table 8 Emission Factor Decreased From 140 to 100 lb/MMft3 Hurst boiler annual gas consumption higher than Cleaver Brooks 3 Boilers Included in 1998 PTE Estimate
CO	Boiler (2 Boilers)		11.68	12.51	NA	0.83	2001 Based on 3 Months Oil/ 9 Months Natural Gas. See Table 8 Emission Factor Increased From 35 to 84 lb MMft3 Hurst boiler annual gas consumption higher than Cleaver Brooks 3 Boilers Included in 1998 PTE Estimate
VOC	(2 Boilers)		0.75	1.17	0.75	0.43	2001 Based on 3 Months Oil/ 9 Months Natural Gas. See Table 8
	A004		0.11	0.11	0.11	0.00	Emission Factor Increased From 2.8 to 5.5 lb MMft3
	A005		0.11	0.11	0.11	0.00	Hurst boiler annual gas consumption higher than Cleaver Brooks
	A006		0.11	0.11	0.11	0.00	3 Boilers Included in 1998 PTE Estimate
	A007		0.04	0.04	0.04	0.00	
	A020		0.14	0.14	0.14	0.00	
	Total		1.26	1.68	0.51	0.43	
							Wood Preserving Fugitives not Included in Estimate

Table 1

Emission Estimates of Current and Replacement Boiler
Natural Gas
Kerr-McGee Chemical LLC
Columbus, MS
Revised September 6, 2001

Hurst Series 400, 350 HP Boiler-Natural Gas Application: June 2001 Emission Point AA-028								
Regulated Air Pollutants	**Emission Factor* (lb/MMft3)**	**Fuel Value (BTU/ft3)**	**Firing Rate (MMBTU/hr)**	**Hourly Emission (lb/hr)**	**Hours Per Year (hours/yr)**	**Conversion Factor (lb/ton)**	**Annual Emissions (Ton/year)**	**Hurst Boiler PTE (Ton/year)**
Particulate	1.9	1000	14.7	0.03	8760	2000	0.12	0.12
PM-10	1.9	1000	14.7	0.03	8760	2000	0.12	0.12
SO_2	0.6	1000	14.7	0.01	8760	2000	0.04	0.04
NOx	100	1000	14.7	1.47	8760	2000	6.44	6.44
CO	84	1000	14.7	1.23	8760	2000	5.41	5.41
VOC's	5.5	1000	14.7	0.08	8760	2000	0.35	0.35
PAC (lb/MMBTU)	3.15E-05	1000	14.7	0.00	8760	2000	0.00	0.00

Hurst Series 400, 350 HP Boiler-Natural Gas has the maximum capacity of 129 $MMft^3$/year

Cleaver Brooks Model CB D-6 Existing Boiler Emission Point AA-001								
Regulated Air Pollutants	**Emission Factor* (lb/MMft3)**	**Fuel Value (BTU/ft3)**	**Firing Rate (MMBTU/hr)**	**Hourly Emission (lb/hr)**	**Hours Per Year (hours/yr)**	**Conversion Factor (lb/ton)**	**Annual Emissions (Ton/year)**	**CB-D-6 Boiler PTE (Ton/year)**
Particulate	1.9	1000	34	0.06	8760	2000	0.28	0.28
PM-10	1.9	1000	34	0.06	8760	2000	0.28	0.28
SO_2	0.6	1000	34	0.02	8760	2000	0.09	0.09
NOx	100	1000	34	**3.40**	8760	2000	14.89	14.89
CO	84	1000	34	**2.86**	8760	2000	12.51	12.51
VOC's	5.5	1000	34	**0.19**	8760	2000	0.82	0.82
PAC (lb/MMBTU)	3.15E-05	1000	34	0.00	8760	2000	0.00	0.00

Maximum Emission From Oil or Gas

* All Emission Factors are based on AP-42 Factors: Table 1.4-1/2, 7/98

PAC (lb/MMBTU) Emission Factor From EPA Seminar

Clever Brooks Boiler-Natural Gas has the maximum capacity of 298 $MMft^3$/year

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

FILE COPY

August 6, 2001

Mr. Nicholas E. Bock, Manager
Environmental Affairs
Kerr-McGee Chemical, LLC
P. O. Box 25861
Oklahoma City, Oklahoma 73125

Dear Mr. Bock:

Re: Kerr McGee Chemical Corporation
Lowndes County, Ms
Air SMOP No. 1680-00020

Based upon our review of the above referenced application received from Kerr McGee on July 16, 2001, the following deficiencies were noted:

1. It is unclear as to which page and emission point you are referring to in your letter dated July 11, 2001. Page 5 of the current permit, modified on June 12, 1998, describes a Vogt 14435 Stand-by Boiler at Emission Point AA-002. Page 4 describes a Cleaver Brooks D-6 Boiler but its capacity is 34 MMBTU/HR, not 11.72 MMBTU/HR as stated in your letter. Enclosed is a copy of the modified permit.

2. The source of the emission factors listed in the attached tables must be identified and defined so that we can confirm their acceptability. It is stated that the factors originate from AP-42. Our office must be able to confirm that these emission factors are current and based on the correct heat input.

3. Section C of the submitted application is not signed by the necessary responsible official as required. Also for this section C the Emissions Summary appears to be for the new boiler emission point only. As stated this summary must list the Potential-to-Emit inventory for the entire facility with this new modification. Enclosed for your reference is a past emissions inventory compiled for the last modification at this facility.

Please address the above deficiencies by August 24, 2001. Since this boiler replacement is not considered routine or like-kind our office will have to go to 30-day public notice. We plan to go to public notice soon after all deficiencies are addressed and necessary information is obtained. Subsequently the Environmental Permits Division will continue the permitting process for your facility.

POST OFFICE BOX 10385 • JACKSON, MISSISSIPPI 39289-0385 • TEL: (601) 961-5171 • FAX: (601) 354-6612
OFFICE OF POLLUTION CONTROL
AN EQUAL OPPORTUNITY

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

Sincerely,

John C. Taylor, P.E., R.P.G.
Environmental Permits Division

Copy To: Mr. Ron Murphey, Plant Manager

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

July 11, 2001

Mr. Jerry Cain, Chief Environmental Permits Division
Mississippi Department of Environmental Quality
Air Permitting Branch
Office of Air Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

RE: Title V Permit Application, Operating Permit 1680-0002
Permit Modification/Permit to Construct and Operate
Kerr-McGee Chemical LLC, Columbus, Mississippi

Dear Mr. Cain:

As a follow-up to our telephone conversation with Mr. Toby Cook, Kerr-McGee Chemical LLC, (KMC LLC) is submitting an application to construct and operate a boiler for our Columbus, MS wood preserving facility. Per Mr. Cook's recommendation, Sections B, C. D, M, N and O have been completed. The application seeks authority to replace a boiler with a replacement boiler. The boiler is covered by the facility's Synthetic Minor Source Permit in Part II, Page 5 of 16.

The existing 350 horsepower Clever Brook CB 655-350 boiler has reached the end of its useful life. This boiler is being replaced with a Series 400, 350 horsepower, Hurst Boiler. Upon state approval, the replacement boiler (Hurst Boiler) will be installed in the same location as the Clever Brooks boiler. The following Table compares relevant sizes of the replacement Cleaver Brooks and Hurst boilers:

Boiler Size/Characteristic	Cleaver Brooks Boiler	Hurst Boiler
Rated Capacity Natural Gas	Natural Gas- 11.72 MMBTU/hr	Natural Gas- 14.7 MMBTU/hr
Rated Capacity No. 2 Fuel Oil	No. 2 Fuel Oil- 97.6 GPH	No. 2 Fuel Oil- 105 GPH
Boiler Horsepower	350	350
Boiler Age	Rebuild early 1990's	New
Boiler Design	Natural Gas/Fuel Oil	Natural Gas/Fuel Oil
Emissions	See Table 1 & 2 & 3	See Table 1 & 2 &3

Net Change in Facility Emissions

Natural Gas Firing

Only one boiler will be operated except during brief period of start up and shut down. Net facility emissions will be the same or less than in the previous permit for the following reasons:

1. Kerr McGee Chemical LLC is seeking a natural gas fuel limitation of 150 $MMft^3$/year. This is approximately one-half of the annual capacity (298 MM ft^3/year) of the Clever Brooks CB D-6 (34 MMBTU/hour). Thus, annual potential emissions decrease by about one-half.
2. The replacement Hurst boiler may be operated during periods of low steam demand and thus allow greater operating flexibility and efficiency.

Firing with No. 2 Fuel Oil

1. Permit 1680-00020 limits annual fuel oil usage to 216,000 gallon per year, within any consecutive twelve-month period for the boiler. **This limitation extents to the combined annual fuel oil usage of both boilers and thereby maintain fuel usage limitations imposed by current permit.** This will ensure that emissions resulting from fuel oil usage do not increase annually from the facility.

KMC LLC therefore believes that net facility emissions will decrease. However, Operating Permit No. 1680-00020 will require a modification to allow operation of the replacement Cleaver Brooks boiler and the natural gas fuel limitation.

Wood Preserving Process Emissions

At the request of the Department, emissions from the creosote wood preserving process have been estimated. The AWPI emission model was utilized to make estimates. Estimates, for both 100% green wood treatment and 100% dry treatment are presented in Tables 4 through 6 and Figure 1.

The facility neither process 100% green, nor does it process 100% dry in any year. Table 6 show that green treatment has the higher potential to emit than dry treatment. However, there are a greater number of dry charges treated in a year (2190 dry Vs 913 green charges) thus, the overall emissions (TPY) are higher for dry charges. KMCLLC is therefore basing our proposed emission limits on dry treatment with the following permit restriction.

1. Maximum number of 2190 dry charges **or** 913 green charges in any year.

2. Maximum number of 216 dry charges **or** 90 green charges in any month.

3. Table 6 and Figure 1 demonstrate that as dry charges are replaced with green charges, total emission levels decrease. This restriction is a self regulating restriction for combinations of green and dry charges since it requires approximately 2.4 times the cycle time (24 hours Vs. 10 hours) to treat a green charge as a dry charge. This relationship is demonstrated in Figure 1.

Our intent is to install the new Hurst boiler within three months; consequently, we are seeking your prompt action regarding this application. Should you have questions or require additional information, please telephone me at (405) 270-2394.

Sincerely,

KERR-McGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager - Environmental Affairs and Regulatory Compliance

Attachment

cc: R. Murphey, Plant Manager
R. P. Michel, VP

Lowndes Co.
1680 00020
SD 990866329
L. Hamil

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

May 25, 2000

John Milner, Esq.
Brunini, Grantham, Grower & Hewes, PLLC
P.O. Drawer 119
Jackson, MS 39205

Re: Mississippi Commission on Environmental Quality v.
Kerr McGee Chemical LLC

Dear John:

Enclosed is a copy of an Order that has been issued by the Mississippi Commission on Environmental Quality in the referenced case. I trust that you will forward a copy of the Order to your client.

Thank you for your assistance in this matter. Should you have any questions, please call me.

Sincerely,

Betty Ruth Fox
Senior Attorney

BRF/sas

Enclosure

cc: David Lee
Pamela Layton

LEGAL DIVISION
P.O. Box 20305 Jackson, MS 39289.1305 Phone 601.961.5171 Fax 601.961.5349

Lowndes Co.
80 00020
HW TSD 990866329
L. Hamil

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

May 25, 2000

John Milner, Esq.
Brunini, Grantham, Grower & Hewes, PLLC
P.O. Drawer 119
Jackson, MS 39205

Re: Mississippi Commission on Environmental Quality v.
Kerr McGee Chemical LLC

Dear John:

Enclosed is a copy of an Order that has been issued by the Mississippi Commission on Environmental Quality in the referenced case. I trust that you will forward a copy of the Order to your client.

Thank you for your assistance in this matter. Should you have any questions, please call me.

Sincerely,

Betty Ruth Fox
Senior Attorney

BRF/sas

Enclosure

cc: David Lee
Pamela Layton

LEGAL DIVISION
P.O. Box 20305 Jackson, MS 39289.1305 Phone 601.961.5171 Fax 601.961.5349

Lowndes County

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

April 19, 1999

FILE COPY

Certified Mail No. Z 389 970 471

Mr. R.P. Murphey, Plant Manager
Kerr McGee Chemical LLC
Forest Products Division
2300 14 th Avenue North
Columbus, MS 39701

Dear Mr. Murphey:

Re: Notice of Effective Dates
Columbus, Mississippi
Facility No. 1680-00020

This is to acknowledge receipt on February 3, 1999 of certification of construction for Emission Point AA-028, the 11.7 MMBTUH, natural gas or fuel oil fired, Cleaver Brooks boiler, Model CB55-350.

The effective date of Operating Permit requirements for Emission Point AA-028 is therefore February 3, 1999. Operation of the air emissions equipment at the facility shall be in accordance with the terms, conditions, and limitations 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.

The Operating Permit expires on June 1, 2002. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

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

Very truly yours,

Brad Shanks BS
Environmental Permits Division

BS

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

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

October 27, 1999

Certified Mail No. P 411 701 098

FILE COPY

Mr. Ron Murphy, Plant Manager
Kerr McGee Chemical Corporation
2300 14th Avenue
Columbus, MS 39701

Dear Mr. Murphy:

Re: Notice of Violations
Kerr McGee Chemical Corporation
Air Permit No. 1680-00020
EPA ID No: MSD990866329
Pretreatment Permit No. MSP090021
Lowndes County-Columbus, MS KAS

An inspection performed by the Mississippi Department of Environmental Quality and the U.S. Environmental Protection Agency on June 16, 1999, and a recent file review have revealed the following apparent violations at the referenced facility:

(1) The facility has not complied with design and operating requirements that require drip pads to have a curb or berm around the perimeter which represents a violation of 40 CFR 265.443 (a)(3). The end of the drip pad where trams are brought onto the drip pad does not have a curb or berm.

(2) The facility has not complied with design and operating requirements which require that drip pads must be operated and maintained in a manner to minimize tracking of hazardous waste or hazardous constituents off the drip pad as a result of activities by personnel or equipment. There was a stain on the ground at the end of the drip pad where trams are brought onto and taken off the drip pad. This is a violation of 40 CFR 265.443(j).

(3) The facility has not complied with the requirement of 40 CFR 265.441 for annual certification of the existing drip pad integrity. Assessment of existing drip pad integrity requires that an assessment must be reviewed, updated and re-certified annually until all upgrades, repairs, or modification necessary to achieve compliance with all of the standards of 264.443 of this subpart are complete. The record of this certification for 1997 was not found onsite during the inspection.

(4) The facility has not complied with the requirement to include the address of the emergency coordinator in the contingency plan which represents a violation of 40 CFR 265.52(d). It is required that the contingency plan must list the names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator and that this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in order in which they will assume responsibilities as alternates. The address for the emergency coordinator was not listed in the contingency plan.

Kerr McGee Chemical Corporation Air Inspection Report

Facility Name: Kerr McGee Chemical Corporation **Date: June 16, 1999**

Address: 2300 14th Avenue
Columbus, MS

Inspected By: Kirk Shelton, Mississippi Department of Environmental Quality
Mindy Gardner, U.S. Environmental Protection Agency

Person Contacted: Ron Murphey, Kerr McGee
Chuck Swann, Kerr McGee

Facility No.: 1680-00020

Is facility major or minor? The facility is a synthetic minor source.

Purpose of Inspection:

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

Current Permit Status: The facility was issued a Synthetic Minor Operating Permit (SMOP) on June 6, 1997. The permit was modified on June 12, 1998.

Source Description: The facility is a wood treating operation. Cross ties and switch ties are treated with creosote. Air pollution is generated from fuel burning equipment (boilers), wood trimming, storage tanks and the treatment operations. The air pollutants generated are PM, PM(10), SO2, NOX, CO, and VOC.

Applicable Regulations:

☒ SIP ☐ PSD ☒ NSPS ☐ NESHAPS

Cite regulation by description or regulatory section number:
Mississippi Air Emission Regulations for the Abatement, Prevention, and Control of Air Contaminants (APC-S-1); New Source Performance Standards: General Provisions-40 CFR Part 60 Subpart A; New Source Performance Standards: -40 CFR Part 60 Subpart Dc.

Describe any problems noted or permit conditions not being complied with:

The facility was asked about the recordkeeping requirements stated in the SMOP. The facility indicated operating records were onsite. The facility indicated the required records may be at Corporate Headquarters.

The SMOP requires the permittee to maintain records for emission point AA-001, onsite, for a period of five years. 40 CFR 60.7 (f) requires the facility to maintain a file of all information required by 40 CFR Part 60 in a permanent form suitable for inspection for at least two years. This applies to Emission Point AA-028. No air program records were produced for review on inspection day. Also, from our file review it appears the facility did not notify MDEQ as required by the SMOP and New Source Performance Standards 40 CFR 60.7 (a)(3). Therefore, we have listed the following apparent violations.

(1) The facility was unable to demonstrate compliance with the fuel usage limitations of 0.5% maximum sulfur content and the 216,000 gallons of fuel oil usage in any consecutive 12 month period for emission point AA-001. Facility failed to monitor and document fuel oil usage each day. The facility failed to calculate daily the total fuel oil usage of the current calendar year. The facility failed to maintain these records at the facility for a period of five years. These failures represent violations of Emission Limitations and Monitoring Requirements of Part II, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998.

(2) The facility was unable to demonstrate compliance with the fuel usage limitations of 0.5% maximum sulfur content for emission point AA-028, the 11.7 MMBTU/HR natural gas or fuel oil fired, Cleaver Brooks Boiler. The facility failed to monitor and document fuel oil usage each day. These failures represent violations of Emission Limitations and Monitoring Requirements of Part II, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998. Failing to record and maintain records of the amounts of each fuel combusted during each day is also a violation of the New Source Performance Standards 40 CFR 60.48c (g).

(3) The facility failed to 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. This is a violation of Other Requirements of Part III, item 1, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998.

(4) The facility failed to notify MDEQ of the actual date of the initial startup for emission point AA-028. This is a violation of 40 CFR 60.7 (a)(3) and a violation of Other Requirements of Part III, item 3, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998. The facility also failed to notify MDEQ of the date maximum production was reached for emission point AA-028. This is a violation of Other Requirements of Part III, item 3, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998.

KERR-McGEE CHEMICAL LLC
2300 14TH AVENUE NORTH • COLUMBUS, MISSISSIPPI 39701

February 1, 1999

Mississippi Department of Environmental
Office of Pollution Control
Brad Shanks
Environmental Permits Division
P.O. Box 10385
Jackson, MS 39289-0385

Re: Facility No. 1680-00020
Columbus, Mississippi

Dear Mr. Shanks:

This letter is to certify that construction of our fire tube boiler listed in Construction Permit No. 1680-00020 is complete. I certify that construction was completed in accordance with the approved plans and specifications.

Should you require any additional information regarding this matter, please contact me at 601-328-7551.

Sincerely,
Kerr McGee Chemical LLC
Forest Products Division

R.P. Murphey
Plant Manager

RPM/cjs

cc: Nick Bock

FOREST PRODUCTS

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

May 5, 1998

Mr. Ron Murphey
Kerr-McGee Chemical, LLC
2300 14th Avenue & 20th Street N.
Columbus, Mississippi 39703

Dear Mr. Murphey:

Re: Kerr-McGee Chemical LLC
Columbus, Mississippi
Air Emissions Permit
1680-00020

This letter is to acknowledge receipt of your application on April 28, 1998, for an Air Emissions permit. Within forty-five (45) days after the date of receipt of the application, you will be notified either that the application is complete or of deficiencies that will have to be corrected to make the application complete. The permitting process can continue only after we are in receipt of a complete application.

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

If you have any questions, do not hesitate to contact Mr. Steve Spengler at 961-5070.

Sincerely,

Denise Turner
Environmental Permits Division

DHT

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

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

April 28, 1998

Mr. Jerry Cain, Chief Environmental Permits Division
Mississippi Department of Environmental Quality
Air Permitting Branch
Office of Air Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

RE: Title V Permit Application, Operating Permit 1680-0002
Permit Modification/Permit to Construct and Operate
Kerr-McGee Chemical LLC, Columbus, Mississippi

Dear Mr. Cain:

Please find enclosed Tables 1 and 2 that pertain to the subject referenced permit modification. These tables were inadvertently omitted from the original submission.

If you have any questions, please contact me.

Sincerely,

KERR-McGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager – Environmental Affairs and Regulatory Compliance

Enclosures

cc: R.Murphey, Plant Manager
R.P. Michel, VP
S. McCormick, AquAeTer

4/28/98 7:38 AM

Table 1

Emission Estimates of Current and Replacement Boiler
Natural Gas
Kerr-McGee Chemical LLC
Columbus, MS

	Current Standby Boiler-Natural Gas Vogt 14435 Woodwaste Boiler Emission Point AA-002						
	Emission Factor* (lb/MMft3)	Fuel Value (BTU/ft3)	Firing Rate (MMBTU/hr)	Hourly Emission (lb/hr)	Hours Per Year (hours/yr)	Conversion Factor (lb/ton)	Annual Emissions (Ton/year)
Particulate	2.5	1000	14.3	0.036	8760	2000	0.16
PM-10	2.5	1000	14.3	0.036	8760	2000	0.16
SOx	0.6	1000	14.3	0.009	8760	2000	0.04
NOx	140	1000	14.3	2.002	8760	2000	8.77
CO	35	1000	14.3	0.501	8760	2000	2.19
VOC's	2.8	1000	14.3	0.040	8760	2000	0.18

	Replacement Standby Boiler-Natural Gas Cleaver Brooks Model CB55-350 Emission Point AA002						
	Emission Factor* (lb/MMft3)	Fuel Value (BTU/ft3)	Firing Rate (MMBTU/hr)	Hourly Emission (lb/hr)	Hours Per Year (hours/yr)	Conversion Factor (lb/ton)	A En (To
Particulate	2.5	1000	11.7	0.029	8760	2000	
PM-10	2.5	1000	11.7	0.029	8760	2000	
SOx	0.6	1000	11.7	0.007	8760	2000	
NOx	140	1000	11.7	1.638	8760	2000	7.17
CO	35	1000	11.7	0.410	8760	2000	1.79
VOC's	2.8	1000	11.7	0.033	8760	2000	0.14

lb/hr

0.029
0.029
0.007
1.64
0.409
0.033

* All Emission Factors are based on AP-42 Factors

Table 1 demonstrates that all emissions of the replacement standby boiler are less than the existing standby boiler while burning natural gas.

Table 2

Emission Estimates of Current and Replacement Boiler
Number 2 Fuel Oil
Kerr-McGee Chemical LLC
Columbus, MS

	Primary Boiler-Fuel Oil** Cleaver Brooks CB D-6 Emission Point AA-002						
	Emission Factor* (lb)	Conversion Factor (per 1000gal)	Fuel Value (Gal/hr)	Hourly Emission (lb/hr)	Hours Per Year (hours/yr)	Conversion Factor (lb/ton)	Annual Emissions (Ton/year)
Particulate	2	0.001	100	0.200	8760	2000	0.88
PM-10	2	0.001	100	0.200	8760	2000	0.88
SOx (.5% Sulfur)	71	0.001	100	7.1	8760	2000	31.10
NOx (.03%Nitrogen)	20	0.001	100	2.00	8760	2000	8.76
CO	5	0.001	100	0.50	8760	2000	2.19
VOC's	0.2	0.001	100	0.020	8760	2000	0.09

	Replacement Standby Boiler-Fuel Oil** Cleaver Brooks Model CB55-350 Emission Point AA-002					
	Emission Factor* (lb)	Conversion Factor (per 1000gal)	Fuel Value (Gal/hr)	Hourly Emission (lb/hr)	Hours Per Year (hours/yr)	Conversion Factor (lb/ton)
Particulate	2	0.001	97.6	0.195	8760	2000
PM-10	2	0.001	97.6	0.195	8760	2000
SOx (.5% Sulfur)	71	0.001	97.6	6.9	8760	2000
NOx (.03%Nitrogen)	20	0.001	97.6	1.95	8760	2000
CO	5	0.001	97.6	0.49	8760	2000
VOC's	0.2	0.001	97.6	0.020	8760	2000

lb/hr | NSPS
0.195 | .5%S
0.195
6.93
1.95
0.488
0.0195

* All
** Oı
Burn

NSPS

$97.6 \frac{gal\ oil}{hr} \times \frac{7.3\ lb\ oil}{gal\ oil} \times \frac{.5\ lb\ S}{100\ lb\ oil} \times \frac{2\ lb\ SO_2}{lb\ S}$

$= 7.13\ lb\ SO_2/hr$

$= 31.2\ TPY\ SO_2$

6-4-98

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

April 23, 1998

Mr. Jerry Cain, Chief Environmental Permits Division
Mississippi Department of Environmental Quality
Air Permitting Branch
Office of Air Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

RE: Title V Permit Application, Operating Permit 1680-0002
Permit Modification/Permit to Construct and Operate
Kerr-McGee Chemical LLC, Columbus, Mississippi

Dear Mr. Cain:

As a follow-up to our telephone conversation with Mr. Bobby Hall, Kerr-McGee Chemical LLC, (KMC LLC) is submitting an application to construct and operate a boiler for our Columbus, MS wood preserving facility. The application seeks authority to replace our standby boiler with a replacement boiler. The standby boiler is covered by the facility's Synthetic Minor Source Permit in Part II, Page 5 of 5.

The existing standby Vogt boiler has reached the end of its useful life. The boiler has asbestos containing material and will require abatement as part of the demolition. Prior to demolition, proper notifications will be provided to all applicable agencies.

Upon approval of the construction permit, the replacement boiler (Cleaver Brooks Model CB55-230) will be installed in the same location as the Vogt boiler. The following Table compares relevant sizes of the Vogt and replacement Cleaver Brooks boilers:

Boiler Size/Characteristic	Existing Vogt Boiler	Replacement Cleaver Brooks Boiler
Rated Capacity Natural Gas	Natural Gas- 14.3 MMBTU/hr	Natural Gas- 11.72 MMBTU/hr
Rated Capacity No. 2 Fuel Oil	None	No. 2 Fuel Oil- 97.6 GPH
Boiler Horsepower	Approx. 427	350
Boiler Age	>40 years	Rebuild early 1990's
Boiler Design	Coal/Wood Waste	Natural Gas/Fuel Oil
Boiler Use	Standby	Standby
Emissions	See Table 1 & 2	See Table 1 & 2

Net Change in Facility Emissions

Natural Gas Firing

The boiler is operated only as a backup unit. Net facility emissions will be less for the following reasons:

1. The replacement boiler was specifically designed to burn natural gas and No. 2 fuel oil. The Vogt boiler was designed to burn solid fuels and was converted to burn natural gas. Therefore, improved energy efficiency will result.

2. The replacement boiler has approximately 82% of the capacity of the Vogt boiler. Therefore, the firing rate is less than the Vogt boiler.

3. The replacement Cleaver Brooks boiler may allow operation as a primary boiler during periods of low steam demand and thus allow greater operating flexibility.

Firing with No. 2 Fuel Oil

1. The Vogt boiler does not have the ability to burn fuel oil. The replacement boiler will provide greater flexibility should the facility be curtailed from natural gas usage.

2. Operating Permit 1680-00020 limits annual fuel oil usage to 216,000 gallon per year within any consecutive twelve-month period for the primary boiler. **This limitation should extend to the combined annual fuel oil usage of both the primary and standby boiler and thereby maintain fuel usage limitations imposed by Title V.** This will ensure that emissions resulting from fuel oil usage do not increase annually from the facility.

KMC LLC therefore believes that net facility emissions will decrease. We have enclosed a construction permit application understanding that the replacement of the Vogt boiler with the Cleaver Brooks boiler may not require a construction permit. However, Operating Permit No. 1680-00020 will require a modification to allow operation of the replacement Cleaver Brooks boiler.

Should you have questions or require additional information , please telephone me at (405) 270-2394.

Sincerely,

Kerr-McGee CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager - Environmental Affairs and Regulatory Compliance

Attachment

cc: R. Murphey, Plant Manager
R. P. Michel, VP
S. McCormick, AquAeTer

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

FILE COPY

January 30, 1998

Mr. Nicholas E. Bock
Manager of Environmental and Regulatory Affairs
Kerr McGee Chemical Corporation
P. O. Box 25861
Oklahoma City, Oklahoma 73125

Re: Facility No. 1680-00020
Columbus, Mississippi

Dear Mr. Bock:

A recent complaint investigation was conducted by our Office regarding a strong creosote odor leaving Kerr McGee Chemical Corporation in Columbus. This investigation revealed no indication that any apparent violations have occurred at this site with regards to creosote odors.

Should you have any questions or comments, contact me at (601) 961-5367.

Sincerely,

Marc Wyatt
Air Facilities Branch

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

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

FILE COPY

January 30, 1998

Mrs. Margaret Henry
624 2nd Avenue N.
Columbus, MS 39701

Dear Mrs. Henry:

Re: Kerr McGee Chemical Corporation
Facility No. 1680-00020
Columbus, Mississippi

On December 22, 1997, Office personnel investigated your complaint regarding a strong creosote odor coming from the referenced facility. At the time of the inspection, only a slight creosote odor was detected while on the plant property and the area around the facility. Our inspector was informed that all operations were normal on the night of December 18, 1997.

Should you have any questions or comments, please contact me at (601) 961-5367.

Sincerely,

Marc Wyatt
Air Facilities Branch

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

1680-00020

SM

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

January 23, 1998

Mr. Bobby Hall
Air Facilities Branch
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Re: Kerr-McGee Chemical Corporation Name Changed to Kerr-McGee Chemical LLC (Air Operating Permit # 1680-00020)

Dear Mr. Hall:

This is to advise you that effective January 1, 1998, Kerr-McGee Chemical Corporation was included in an overall corporate reorganization and its name was changed to Kerr-McGee Chemical LLC.

This object of the reorganization is to make Kerr-McGee more competitive in its businesses through a more efficient corporate structure.

Kerr-McGee Chemical LLC operations are managed and directed by the same personnel that previously managed Kerr-McGee Chemical Corporation. Further, Kerr-McGee Chemical LLC continues to be 100% owned by Kerr-McGee Corporation just as Kerr-McGee Chemical Corporation was prior to the reorganization.

The above referenced permit has not been assigned, conveyed nor transferred. However, we are providing you this notification so that you may be prepared as our company letterhead changes over the course of the next year.

Should you have any questions please contact me directly at (601) 328-7551.

Sincereiy,

KERR-McGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION

Ronald P. Murphey
Plant Manager

RPM/tjj

cc: N. E. Bock

FOREST PRODUCTS

Marc

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

To: Wayne Anderson

From: Randy Byars

Subject: Kerr McGee Chemical Corp., P.O. Box 906, Columbus, MS 39705
Facility No.: 120-1680-00020

Date: December 23, 1997

On December 22, 1997, I investigated a complaint reported by Mrs. Margaret Henry, concerning a strong creosote odor coming from Kerr McGee Chemical in Columbus. The complaint stated that this odor occurred on the night of December 18, 1997. Prior to my inspection, I phone Mrs. Henry, who informed me that she was unable to smell the creosote at the time. Mrs. Henry also informed me that she lived approximately three miles from Kerr McGee. I contacted Mr. Chuck Swann, the treatment supervisor for Kerr McGee, and inspected the facility.

Mr. Swann informed me that this facility was in normal operating condition on the night of the complaint and experienced no problems. I detected only a slight creosote odor while on the plant property and the area around the facility. However, the odor was stronger in the area where the treated timber was stock piled. I detected no odor from this facility at a distance of one mile.

If I can be of further assistance, please feel free to give me a call.

Respectfully,

Randy Byars

Randy Byars

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

State of Mississippi
Department of Environmental Quality
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

COMPLAINT FORM

Date: 12/19/97 **Time:** 11:00 AM

☒ Air ☐ Surface Water ☐ Groundwater ☐ Hazardous Waste

Person Reporting: ☐ Mr. ☒ Mrs. Margaret Henry

Address: Columbus (City) Lowndes (County) 624 2nd Ave. N (Street or P. O. Box) 39701 (Zip) 328-2457 (Phone)

Complaint Site: Kerr McGee Chemical - Forest Products (Formerly Moss Tie) 2300 14th Ave North 327-7024 or 328-7551
Take 45 S to Columbus to first 4 way stop (Bluecut Road) Turn left onto Bluecut road. Take this road until it dead ends. Turn left onto Military Road. Go approximately 1-2 miles to Railroad Street. The plant is at the end of Railroad Street.

Text of Complaint: Approximately 9:00 the night of 12/18/97 there was a strong smell of creosote coming from this plant. It was burning the throat and eyes of several people

Complaint Taken by: Scott Hodges

Referred to: ☒ North Regional Office ☐ Other _____
☐ Central Regional Office
☐ South Regional Office

Referred By: ☐ Phone ☐ Mail ☒ Fax ☐ Other _____

Routed to R. O. By: _____ **Date:** _____

Additional Instructions: _____

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

September 22, 1997

Mr. Nicholas E. Bock
Manager of Environmental and Regulatory Affairs
Kerr McGee Chemical Corporation
P.O. Box 25861
Oklahoma City, Oklahoma 73125

Dear Mr. Bock:

Re: Facility No. 1680-00020
Columbus, Mississippi

On September 17, 1997, Dewayne Headrick and I performed an inspection of the referenced facility. There were no apparent air pollution problems.

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

Very truly yours,

Celina Matthes
Air Support Branch

CM/cm

cc: Mr. Chuck Swan, Kerr McGee Chemical Corporation, P.O. Box 906, Columbus, MS 39701

FILE COPY

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

June 9, 1997

Certified Mail No. P 354 269 538

Mr. Nicholas E. Bock, Manager of Environmental & Regulatory Affairs
Kerr - McGee Chemical Corporation
P.O. Box 25861
Oklahoma, City, Oklahoma 73125

Dear Mr. Bock:

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

Enclosed please find Operating Permit No. 1680-00020 issued for the operation of air emissions equipment at "a synthetic minor source". Operation of the air emissions equipment at the facility shall be in accordance with the terms, conditions, and limitations of the permit. This Operating Permit supersedes and replaces any previously held Operating Permit. Please note that this Operating Permit is federally-enforceable.

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 June 1, 2002. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

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

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

Very truly yours,

Bobby Hall
Air Facilities Branch

BH:st
Enclosure

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

April 28, 1997

Ms. Leigh Nichols
Commercial Dispatch
P. O. Box 511
Columbus, MS 39701

Dear Ms. Nichols:

Enclosed herewith is a legal notice to be published in your newspaper on Friday, May 2, 1997. Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact Bobby Hall of my staff at 961-5174.

Very truly yours,

For

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

DKW:BGH
Enclosure

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

File

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

April 28, 1997

Certified Mail No. P 215 643 247

Ms. Chebie Bateman, Director
Columbus Public Library
314 Seventh Street, North
Columbus, MS 39701

Dear Ms. Bateman:

Re: Kerr-McGee Chemical Corporation
Facility No. 1680-00020
Columbus, Mississippi

Enclosed is a copy of the public notice for comment on the request by Kerr-McGee Chemical Corporation for a permit to operate a synthetic minor source for the facility in Columbus, Mississippi. Please post this notice in the library.

Also, enclosed is a copy of information pertinent to Kerr-McGee Chemical Corporation request. This information should be kept on hand for review by the public until June 2, 1997, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

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

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

If you have any questions, please let me know at 961-5171.

Very truly yours,

Bobby Hall
Air Facilities Branch

BGH:bh
Enclosure

cc: Ms. Sherry Traweek, OPC

OFFICE OF POLLUTION CONTROL, P. O. BOX 10385, JACKSON, MS 39289-0385, (601) 961-5171

97A-SM-008.5

File

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

April 28, 1997

Ms. Leigh Nichols
Commercial Dispatch
P. O. Box 511
Columbus, MS 39701

Dear Ms. Nichols:

Enclosed herewith is a legal notice to be published in your newspaper on Friday, May 2, 1997. Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact Bobby Hall of my staff at 961-5174.

Very truly yours,

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

DKW:BGH
Enclosure

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

File

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

April 28, 1997

Mr. Nicholas E. Bock
Mgr.,Environmental & Regulatory Affairs
Kerr-McGee Chemical Corporation
P. O. Box 25861
Oklahoma City, OK 73125

Dear Mr. Bock:

Re: Facility No. 1680-00020
Columbus, Mississippi

Enclosed is a copy of a public notice, permit review summary and draft permits for comment on the above referenced facility. As we discussed on April 23, 1997, the comments from your previous review of the draft permit have been addressed and the draft permit has been revised to reflect your comments.

If you have any questions, please contact us.

Very truly yours,

Bobby Hall
Air Facilities Branch

BGH:bh
Enclosure

cc: Ms. Sherry Traweek, OPC

97A-SM-008.4

File

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

April 28, 1997

Postmaster
Columbus, MS 39703

Dear Sir:

Re: Kerr-McGee Chemical Corporation
Facility No. 1680-00020
Columbus, Mississippi

Please post the attached public notice in your post office on or before May 2, 1997.

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

Very truly yours,

Bobby Hall
Air Facilities Branch

BGH:bh
Attachment
cc: Ms. Sherry Traweek, OPC

97A-SM-008.3

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

April 28, 1997

Certified Mail No. P 215 643 247

Ms. Chebie Bateman, Director
Columbus Public Library
314 Seventh Street, North
Columbus, MS 39701

Dear Ms. Bateman:

Re: Kerr-McGee Chemical Corporation
Facility No. 1680-00020
Columbus, Mississippi

Enclosed is a copy of the public notice for comment on the request by Kerr-McGee Chemical Corporation for a permit to operate a synthetic minor source for the facility in Columbus, Mississippi. Please post this notice in the library.

Also, enclosed is a copy of information pertinent to Kerr-McGee Chemical Corporation request. This information should be kept on hand for review by the public until June 2, 1997, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

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

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

If you have any questions, please let me know at 961-5171.

Very truly yours,

Bobby Hall
Air Facilities Branch

BGH:bh
Enclosure

cc: Ms. Sherry Traweek, OPC

Received & Agreed to By: Chebie Bateman Director 5-1-97

(Name and Title) **(Date)**

97A-SM-008.5

File

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

April 17, 1997

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

RE: Comments On The Draft Synthetic Minor Operating Permit No. 1680-00020
Kerr-McGee Chemical Corporation, Columbus, Mississippi

Dear Mr. Hall:

As a follow-up to telephone conversation of April 7, 1997, Kerr-McGee Chemical Corporation (KMCC) has reviewed the draft Synthetic Minor Operating Permit No. 1680-00020. We believe the Mississippi Department of Environmental Quality (MDEQ) has issued a permit which is based on the information submitted in the application, firmly rooted on science and is enforceable. I do wish to express my appreciation that the draft Synthetic Minor Operating Permit as written, is concise and very understandable. KMCC does however wish to clarify the following three permit conditions:

Comment 1
Although not expressed as part of the draft Synthetic Minor Operating Permit, it is our understanding that the facility's state operating permit which expires in April 1997 will not be renewed. The draft Synthetic Minor Operating Permit will replace our existing state operating permit.

Comment 2, Page 10 of 15
Emission Point AA-010 contains emission sources which are controlled by the Treating System Scrubber-EP001 and the retort doors which are not controlled by Treating System Scrubber -EP001. Including the retort doors with emission sources which are controlled by the Treating System Scrubber -EP001 may result in confusion. Therefore, KMCC recommends that the following changes be made to this condition.

"Beginning ISSUANCE DATE, and lasting until EPIRATION DATE, the permitee is authorized to ~~operate air emission equipment and~~ emit air contaminants from Emission Point AA-010, the Retort, Retort Door and Corresponding Vacuum System (Reference Numbers EU001-003). ***Beginning ISSUANCE DATE, and lasting until EPIRATION DATE, the permitee is authorized to operate air emission control equipment and emit air contaminants from Emission Point AA-010, the Retort and Corresponding Vacuum System (Reference Numbers EU001-003) with emission being controlled by the treating system Scrubber - EP001.***"

We believe the addition of the last sentence will clarify that emission control equipment is operated on the retort and corresponding vacuum system.

Comment 3, Page 15 of 15, Item No. 2.
The facility operates numerous storage vessels containing creosote which is the sole wood preservative used at the facility. Multiple shipments of creosote are received during a given month and placed in various tanks. The condition is not clear as to the frequency which the file requires updating. As we discussed, the intent of this condition is to ensure that the storage vessels do not contain material which is significantly different from the material (creosote) vapor pressure used for emission estimates. Therefore, KMCC proposes that this condition be written as follows:

"The permitee shall notify the department within 5 working days of any change in material stored in any storage vessel which may result in a significant change in the true vapor pressure of the material."

Should you have any questions please telephone me at (405) 270-2394.

Sincerely,

KERR-McGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION

Nicholas E. Bock
Manager - Environmental Affairs and Regulatory Compliance

cc: R. Murphey, Facility
S. McCormick, AquAeTer
S. Ladner

File

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

March 26, 1997

Mr. Nicholas E. Bock
Manager - Env. Affairs & Regulatory Compliance
Kerr-McGee Chemical Corp.
P. O. Box 25861
Oklahoma City, OK 73125

Dear Mr. Bock:

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

Enclosed is a copy of the draft Synthetic Minor Operating Permit for the referenced facility.

Please review the draft permit and submit your concurrence or comments within two (2) weeks of receipt of this letter.

If I can be of assistance, contact me at (601) 961-5174.

Very truly yours,

Bobby Hall, P.E.
Air Facilities Branch

bh
Enclosure

AFR

For MDEQ Use Only:
AI - 1696
Facility No. 168000020
Lowndes

Wood Preserving Area Source Applicability Survey
40 CFR Part 63, Subpart QQQQQQ

Company Name & Address (Please make corrections)

Company Name: Tronox LLC, Columbus
Mailing Address: PO Box 268859
Physical Address: 2300 14th Avenue North, Columbus
City: Oklohoma City State: OK Zip: 73126-8860

Contact Information

Representative Name: _____
Title: _____
Phone Number: _____
Representative Signature: _____

Applicability Information

1. Do you own or operate a wood preserving operation that is an area source of Hazardous Air Pollutants(HAPs)?

   Note: Area sources are those sources that emit less than 10 tons annually of a single hazardous air pollutant or less than 25 tons or more annually of a combination of hazardous air pollutants.

   ___ Yes ___ No

2. Do you use a wood preservative containing chromium, arsenic, dioxins or methylene chloride?

   ___ Yes ___ No

3. Do you operate either of the following processes?

   _____ Thermal Treatment Process

   _____ Pressure Treatment Process

   Note: Affected sources that are exempt from obtaining a permit under 40 CFR part 70 & 71 must continue to comply with the provisions of this subpart.

Return Information

Please send response to:

John Cole
Department of Environmental Quality
101 West Capitol Street, Suite 100
Jackson, MS 39201

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

July 30, 2007

Environmental Contact
Tronox LLC, Columbus
PO Box 268859
Oklohoma City, OK 73126-8860

Dear Sir or Madam:

On June 16, 2007, the Environmental Protection Agency proposed the National Emission Standards for Hazardous Air Pollutants for Area Sources: Wood Preserving, 40 CFR Part 63, Subpart QQQQQQ. We are in the process of identifying the facilities that will be subject to this standard. Therefore, we ask that you complete, sign and return the enclosed survey no later than August 14, 2007, so that our staff can assist the affected facilities in preparing for the implementation of these regulations. For facilities subject to the requirements of Subpart QQQQQQ, returning the enclosed survey will satisfy the requirement to submit an initial notification of applicability as required in §63.11432(b).

Thank you for responding in a timely manner.

If you have questions or comments, you may reach me by calling (601) 961-5675 or e-mailing me at John_Cole@deq.state.ms.us.

Sincerely,

John Cole
Air Toxics Branch

Enclosure

OFFICE OF POLLUTION CONTROL
POST OFFICE BOX 10385 • JACKSON, MISSISSIPPI 39289-0385 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us
AN EQUAL OPPORTUNITY EMPLOYER

ENTERED BY

PERMIT BOARD REPORT

SEP 2 5 2001

Permit Action Form

Kerr McGee Chemical Corporation
2300 14th Avenue North
Lowndes County
Columbus, MS 39701

Branch Manager: Toby Cook
SIC: 2491

Recommendations

Folder No. – Activity Type	Permit No.	DEQ Contact
PER20010001 - MA-Air-SMOP	1680-00020	John C.Taylor

Action:
- ☐ Issue
- ☐ Reissue
- X Modification
- ☐ Name Change
- ☐ Transfer
- ☐ Deny
- ☐ Revoke

By:
- X Division Chief
- ☐ Permit Board

Basis: The basis for this permit and its modification is the SIP and NSPS Subpart Dc!

Coordination: ECED Approval!

Comments: This is a synthetic minor facility operating with federally enforceable limits. The permit is being modified to change out boilers for Emission Point AA-028 on Page 14. No appreciable increase in criteria pollutants are expected based on the application. Since this was considered a minor modification no public notice was issued.

Relationships

People

Name	Address	City	State	Zip	Relationship
R Michel	2300 14th Avenue North	Columbus	MS	39701	Is Air Permit Contact
Ron Murphey	2300 14th Avenue North	Columbus	MS	39701	Is Contact
R Michel	2300 14th Avenue North	Columbus	MS	39701	Is Application Signatory

Administrative Tasks

Task	Scheduled Date	Completed Date
Application Received	7/23/01	7/16/01
NOD(s) to Applicant Issued	8/30/01	8/2/01
Issue Adminstrative Completeness Letter	8/30/01	9/13/01
Conduct Technical Review	9/14/01	9/13/01

EMISSION INVENTORY -- CRITERIA POLLUTANTS (POTENTIAL)

COUNTY ID: 1680

FACILITY ID: 00020

SOURCE ID #	RATED CAPACITY (MMBTU/HR) (HEAT INPUT)	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	34	24	7	52	0.20	0.88	0.20	0.88	7.10	7.84	3.40	14.89	2.86	12.53	0.19	0.83		0.00		0.00
AA-002	14.3	24	7	52	0.036	0.16	0.036	0.16	0.009	0.04	2	8.76	0.5	2.19	0.04	0.18		0.00		0.00
AA-003		24	7	52	0.73	3.20	0.37	1.62		0.00		0.00		0.00		0.00		0.00		0.00
						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-004		24	7	52		0.00		0.00		0.00		0.00		0.00	0.026	0.11		0.00		0.00
AA-005		24	7	52		0.00		0.00		0.00		0.00		0.00	0.026	0.11		0.00		0.00
AA-006		24	7	52		0.00		0.00		0.00		0.00		0.00	0.026	0.11		0.00		0.00
AA-007		24	7	52		0.00		0.00		0.00		0.00		0.00	0.0098	0.04		0.00		0.00
AA-008		24	7	52	0.213	0.93	0.107	0.47		0.00		0.00		0.00		0.00		0.00		0.00
AA-009		24	7	52	0.381	1.67	0.192	0.84		0.00		0.00		0.00		0.00		0.00		0.00
AA-010		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-011		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-012		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-013		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-014		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-015		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-016		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-017		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-018		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-019		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-020		24	7	52	0.195	0.85	0.195	0.85	7.13	31.23	1.95	8.54	0.488	2.14	0.033	0.14		0.00		0.00
AA-021						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-022						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-023						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-024						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-025						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-026						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-027						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-028		24	7	52	0.21	0.92	0.21	0.92	7.46	32.67	1.47	6.44	1.23	5.39	0.08	0.35		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
END						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
TOTALS						8.61		5.74		71.78		38.63		22.24		1.89		0.00		0.00

Program version date : September 19, 1996

09/13/2001

EMISSION INVENTORY -- GENERAL

County ID: 1680 Facility ID: 00020 Date: Sept. 13, 2001

Facility Name: Kerr-McGee Chemical Corporation

Mailing Address: Street: P. O. Box 25861
City: Oklahoma City
State: Ok
Zip code: 73125
Telephone: (405) 270-2394

Site Address: Street: 2300 14th Avenue
City: Columbus
Zip code: 39703
County: Lowndes
Telephone: (601)328-7551

Contact & Title: Nicholas E. Bock, Manager of Environmental Affairs

Facility / Plant Type: Principle processes include wood preserving and framing

SIC Code: 2491

EMISSION SUMMARY (TOTAL FOR EACH POLLUTANT FROM ALL SOURCES)

POLLUTANT	ACTUAL TPY	POTENTIAL TPY	NOTES
PARTICULATE MATTER	0.00	8.61	
PM (10)	0.00	5.74	
SO2	0.00	71.78	
NOx	0.00	38.63	
CO	0.00	22.24	
VOC	0.00	1.89	
TRS	0.00	0.00	
LEAD	0.00	0.00	
HAP (TOTAL FOR ALL)	0.00	0.00	
HAP > 10 TPY (LIST BELOW)			
OTHER:			
OTHER:			

REGULATION APPLICABILITY: SIP

NSPS SUBPART(S): A, Dc
PART 61 NESHAP(S):
PART 63 NESHAP(S):

TITLE V SOURCE:
SYNTHETIC MINOR: X
TRUE MINOR:

SR Number :

DEQ ENGINEER: John C. Taylor - (09/13/01)

EMISSION INVENTORY -- SOURCES

COUNTY ID: 1680 FACILITY ID: 00020

AQCR: 135 UTM ZONE: 16

UTM EAST: 629267.66 UTM NORTH: 1397846.6

SOURCES		UTM COORDINATES		STACK PARAMETERS			
ID #	DESCRIPTION	EAST	NORTH	HEIGHT (FT.)	DIAMETER (FT.)	VELOCITY (FT/SEC)	TEMP (° F)
AA-001	Cleaver Brooks D-6 Boiler			40	2.5	46	500
AA-002	Vogt 14435 Woodwaste Boiler			120	5	16.83	575
AA-003	Framing Mill with 2 cyclones: Cyclone #1(D & N Size 12) & Cyclone #2 (D & N Size 39)			50	7	11.7	amb.
				40	13	13.3	amb.
AA-004	57,000 gallon creosote storage tank			22	1.5	55	92
AA-005	78,000 gallon creosote storage tank			30	18	NA	180
AA-006	57,000 gallon creosote storage tank			30	18	NA	180
AA-007	57,000 gallon creosote storage tank			30	18	NA	180
AA-008	Switch Tie Unloader with cyclone						
AA-009	Cross Tie Unloader with cyclone						
AA-010	Retort, Retort Doors, and Corresponding Vacuum System						
AA-011	Hot Tank						
AA-012	Primary Oil/Water Separators (EU 014, EU 015)						
AA-013	Reclaim Tank (EU 022)						
AA-014	Building Sump (EU 025)						
AA-015	Secondary Oil/Water Separator						
AA-016	Groundwater Oil/Water Separator						
AA-017	SOW Surge Tank						
AA-018	Sap and Vacuum Seal Water Tank (EU 009)						
AA-019	Aeration Basins (EU 018-020)						
AA-020	25,348 gallon, diesel storage tank						
AA-021	25,348 gallon, diesel storage tank						
AA-022	25,348 gallon, diesel storage tank						
AA-023	25,348 gallon, diesel storage tank						
AA-024	1,000 gallon, diesel storage tank						
AA-025	Building Space Heaters						
AA-026	Groundwater Oil/Water Separator Lift Station						
AA-027	Wastewater Treatment Facility Scrubber Recycle Sump Tank						
AA-028	The 14.7 MMBTU/Hr, Hurst Boiler, Series 400, 350 HP, Fired by Natural Gas or standby No. 2 Fuel Oil;			40	20	40	450
	Subject to NSPS Subpart Dc						
END							

EMISSION INVENTORY -- CRITERIA POLLUTANTS (ACTUAL)

COUNTY ID: 1680

FACILITY ID: 00020

SOURCE ID #	HOURS PER DAY	DAYS PER WEEK	WEEKS PER YEAR	ACTUAL 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					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-002					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-003					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-004					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-005					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-006					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-007					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-008					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-009					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-010					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-011					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-012					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-013					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-014					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-015					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-016					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-017					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-018					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-019					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-020					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-021					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-022					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-023					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-024					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-025					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-026					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-027					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-028					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
END					0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
	TOTALS				0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00

EMISSION INVENTORY -- CRITERIA POLLUTANTS (POTENTIAL)

COUNTY ID: 1680 FACILITY ID: 00020

SOURCE ID #	RATED CAPACITY (MMBTU/HR) (HEAT INPUT)	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	34	24	7	52	0.20	0.88	0.20	0.88	7.10	7.84	3.40	14.89	2.86	12.53	0.19	0.83		0.00		0.00
AA-002	14.3	24	7	52	0.036	0.16	0.036	0.16	0.009	0.04	2	8.76	0.5	2.19	0.04	0.18		0.00		0.00
AA-003		24	7	52	0.73	3.20	0.37	1.62		0.00		0.00		0.00		0.00		0.00		0.00
						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-004		24	7	52		0.00		0.00		0.00		0.00		0.00	0.026	0.11		0.00		0.00
AA-005		24	7	52		0.00		0.00		0.00		0.00		0.00	0.026	0.11		0.00		0.00
AA-006		24	7	52		0.00		0.00		0.00		0.00		0.00	0.026	0.11		0.00		0.00
AA-007		24	7	52		0.00		0.00		0.00		0.00		0.00	0.0098	0.04		0.00		0.00
AA-008		24	7	52	0.213	0.93	0.107	0.47		0.00		0.00		0.00		0.00		0.00		0.00
AA-009		24	7	52	0.381	1.67	0.192	0.84		0.00		0.00		0.00		0.00		0.00		0.00
AA-010		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-011		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-012		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-013		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-014		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-015		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-016		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-017		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-018		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-019		24	7	52		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-020		24	7	52	0.195	0.85	0.195	0.85	7.13	31.23	1.95	8.54	0.488	2.14	0.033	0.14		0.00		0.00
AA-021						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-022						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-023						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-024						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-025						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-026						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-027						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
AA-028		24	7	52	0.21	0.92	0.21	0.92	7.46	32.67	1.47	6.44	1.23	5.39	0.08	0.35		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
0						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
END						0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
	TOTALS					8.61		5.74		71.78		38.63		22.24		1.89		0.00		0.00

FILE COPY

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.

Permit Issued: June 6, 1997

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires 1st **day of** June **, 2002**

Permit No. 1680-00020

Permit Modified: June 12, 1998 and SEP 18 2001

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.

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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-028, the 14.7 MMBTUH, natural gas or fuel oil fired, Hurst boiler, Series 400, 350 horsepower.

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

NEW SOURCE PERFORMANCE STANDARDS

1. **For Emission Point AA-028, the boiler is subject to and shall comply with the Section 111, New Source Performance Standards (NSPS), as described in 40 CFR 60, Subpart A - General Provisions, including Notification and Recordkeeping as provided in 40 CFR 60.7, the Performance Test Requirements as provided in 40 CFR 60.8, and the specific requirements outlined in 40 CFR 60, Subpart Dc.**

2. **As outlined in 40 CFR 60, Subpart Dc, the affected facility, Emission Point AA-028, shall not be fired with oil that contains greater than 0.5 weight percent sulfur.**

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."

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.

4. For Emission Point AA-028, 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.

5. 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.

BEFORE THE MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

COMPLAINANT

VS. **ORDER NO. 4037 00**

KERR MCGEE CHEMICAL LLC
2300 14TH AVENUE
COLUMBUS, MS 39701
LOWNDES COUNTY
EPA ID MSD990866329
AIR PERMIT NO. 1680-00020

RESPONDENT

AGREED ORDER

COME NOW THE Mississippi Commission on Environmental Quality (Commission), (Complainant), and Kerr McGee Chemical LLC, (Respondent), in the above captioned cause and agree as follows:

1.

On October 15, 1999, as a result of information obtained by the Mississippi Department of Environmental Quality (MDEQ) during an inspection of Kerr McGee's facility located at 2300 14th Avenue in Columbus, Mississippi, MDEQ, acting on behalf of the Commission, delivered to Kerr McGee a notice of violation indicating MDEQ's belief that Kerr McGee had violated or is violating environmental laws or regulations applicable to the Kerr McGee facility. The Commission and Kerr McGee now enter this agreement in order to avoid a prolonged contested enforcement proceeding. The parties agree that by entering into this Agreed Order, Kerr McGee does not admit the truth of any allegation in the notice of violation or in this Agreed Order, and that without any admission of liability by Kerr McGee, Kerr McGee consents to the entry of this

Agreed Order resolving the claims of the Commission addressed herein. At the same time, the parties agree that the Commission continues to allege that the matters addressed herein are violations of environmental laws or regulations applicable to the Kerr McGee facility. On October 15, 1999, Complainant notified Respondent of the following asserted violations:

A. The Kerr McGee Contingency Plan does not include (1) the address of the emergency coordinator or (2) the location of all emergency equipment at the Kerr McGee facility and a brief outline of safety equipment capabilities in violation of 40 CFR 265.52 (d) and (e), respectively.

B. The facility did not demonstrate compliance with the fuel usage limitations of 0.5% maximum sulfur content and the 216,000 gallons of fuel oil usage in any consecutive 12 month period for emission point AA-001 (the 34 MMBTU/HR Cleaver Brooks D-6 Primary Boiler) since it failed to (1) daily monitor and document fuel oil usage, (2) daily calculate the total fuel oil usage of the current calendar year and (3) maintain these records at the facility in violation of Emission Limitations and Monitoring Requirements of Part II, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998.

C. The facility did not demonstrate compliance with the fuel usage limitations of 0.5% maximum sulfur content for emission point AA-028 (the 11.7 MMBTU/HR natural gas or fuel oil fired Cleaver Brooks Boiler) since it failed to daily record and maintain records of the amounts of each fuel type combusted in violation of Emission Limitations and Monitoring Requirements of Part II, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998, and of the New Source Performance Standards 40 CFR 60.48c(g).

D. The facility failed to notify the Mississippi Department of Environmental Quality (MDEQ) of the actual date of the initial startup for emission point AA-028 in violation of

40 CFR 60.7 (a)(3) and Other Requirements of Part III, item 3, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998. The facility failed to notify MDEQ of the date maximum production was reached for emission point AA-028 in violation of Other Requirements of Part III, item 3, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998.

2.

In lieu of a formal enforcement hearing concerning the violation(s)specifically listed above, Complainant and Respondent agree to settle this matter as follows:

A. Respondent agrees to pay and Complainant agrees to accept a monetary penalty in the amount of $ 12,500.00 as full and complete settlement for the matters addressed herein. This penalty shall be paid by Respondent to MDEQ within thirty (30) days after the issuance of this Agreed Order in the form of a certified check or money order.

B. Within thirty (30) days after the issuance of this Agreed Order, Respondent shall revise the facility contingency plan to include the address of the emergency coordinator as required by 40 CFR 265.52(d) and to include a brief outline of safety equipment capabilities and the location of all emergency equipment as required by 40 CFR 265.52(e).

C. Within thirty (30) days after the issuance of this Agreed Order, Respondent shall submit a report demonstrating compliance with the monitoring and record keeping requirements for emission point AA-028 and emission point AA-001, of Emission Limitations and Monitoring Requirements of Part II, of the Synthetic Minor Operating Permit issued on June 6, 1997, and modified on June 12, 1998.

3.

Nothing in this Agreed Order shall limit the rights of the Mississippi Department of Environmental Quality or the Mississippi Commission on Environmental Quality in the event Respondent fails to comply with this Agreed Order. The Agreed Order shall be strictly construed to apply to those matters expressly resolved herein.

4.

Nothing contained in this Agreed Order shall limit the rights of Complainant to take enforcement or other actions against Respondent for violations not addressed herein and for future violations of environmental laws, rules, and regulations.

5.

Respondent understands and acknowledges that it is entitled to an evidentiary hearing before the Commission pursuant to Miss. Code Ann. Section 49-17-31 (Rev. 1999), and that it has made an informed waiver of that right.

ORDERED, this the 15th day of May, 2000.

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

BY: _____
CHARLES H. CHISOLM
EXECUTIVE DIRECTOR
MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

AGREED, this the 12th day of May, 2000.

BY: _____

TITLE: Vice President

STATE OF Oklahoma

COUNTY OF Cleveland

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named Robert P. Michel who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the Vice President of Kerr McGee Chemical LLC and is authorized by that Corporation to sign this Agreement.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 12th day of May 2000.

Loreen Luke
NOTARY PUBLIC

MY COMMISSION EXPIRES:

June 22, 2003

Air File
Kerr-Magee
Lowndes County

DSM 4/8/99

Scott Mills 04/08/99 09:44 AM

FILE COPY

To: Mohammad Yassin/HW/OPC/DEQ
cc: Earl Mahaffey/SW/OPC/DEQ
Subject: Report of release at Kerr Magee

Learnard Dickerson of Kerr Magee called to report a release of Chlorine gas from their Title V permit emission point EP202 - Emergency Vent Stack. Forty (40) pounds of chlorine was released from point EP202 at 8:45 am this morning and lasted for 50 minutes. The gas did leave plant property but there were no reports of injuries or evacuation. Cause was identified as incinerator #2 diverted during a chlorine slip of the chlorinators. The lime scrubber did not handle all the slip gas. As corrective action, incinerator #2 was placed on line again to accept the waste gas at 9:35 am today. Reportable quantity for chlorine is 10 pounds, there for a release must be reported to the proper agency.

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT
TO CONSTRUCT AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT

Kerr-McGee Chemical Corporation
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.

ISSUANCE DATE: JUN 12 1998

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Permit No. 1680-00020

PART I
GENERAL CONDITIONS

1. Any activities not identified in the application are not authorized by 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 as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10.

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 June 12, 1998, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-028, the 11.7 MMBTUH, natural gas or fuel oil fired, Cleaver Brooks boiler, Model CB55-350.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements 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 June 12, 1998.

NEW SOURCE PERFORMANCE STANDARDS

1. **For Emission Point AA-028, the boiler is subject to and shall comply with the Section 111, New Source Performance Standards (NSPS), as described in 40 CFR 60, Subpart A - General Provisions, including Notification and Recordkeeping as provided in 40 CFR 60.7, the Performance Test Requirements as provided in 40 CFR 60.8, and the specific requirements outlined in 40 CFR 60, Subpart Dc.**

2. **As outlined in 40 CFR 60, Subpart Dc, the affected facility, Emission Point AA-028, shall not be fired with oil that contains greater than 0.5 weight percent sulfur.**

PART III
OTHER REQUIREMENTS

None.

EMISSION INVENTORY -- GENERAL

County ID: 1680 Facility ID: 00020 Date: 04-Jun-98

Facility Name: Kerr-McGee Chemical Corporation

Mailing Address:	Street:	P.O. BOX 25861	Site Address:	Street:	2300 14th Ave. & 20th St.
	City:	Oklahoma City		City:	Columbus
	State:	OK		Zip code:	39703
	Zip code:	73125		County:	Lowndes
	Telephone No.:	405 270-2394		Telephone No.:	(601) 328-7551

Contact & Title: Nicholas E. Bock, Mgr., Environmental & Regulatory Affairs

Facility / Plant Type: Principal processes include wood preserving and framing

SIC Code: 2491

EMISSION SUMMARY (TOTAL FOR EACH POLLUTANT FROM ALL SOURCES)

POLLUTANT	ACTUAL TPY	POTENTIAL TPY	NOTES
PARTICULATE MATTER		8.17	
PM (10)		5.27	
SO2		70.34	
NOx		46.69	
CO		11.68	
VOC		1.26	
TRS			
LEAD			
HAP (TOTAL FOR ALL)			
HAP > 10 TPY (LIST BELOW)			
OTHER:			
OTHER:			

REGULATION APPLICABILITY

(X) SIP ONLY
( ) PSD ONLY
( ) NESHAP: SUBPART :

(X) NSPS SUBPART:
( ) MACT CATEGORY:
( ) OTHER:

DEQ ENGINEER: BGH | Brad Shanks June 1998

EMISSION INVENTORY -- SOURCES

COUNTY ID: 1680 FACILITY ID: 00020

AQCR: 135 UTM ZONE: 16

UTM EAST: 629267.66 UTM NORTH: 1397846.6

SOURCES		UTM COORDINATES		STACK PARAMETERS			
ID #	DESCRIPTION	EAST	NORTH	HEIGHT (FT.)	DIAMETER (FT.)	VELOCITY (FT/SEC)	TEMP (° F)
AA-001	Cleaver Brooks D-6 Boiler			40	2.5	46	500
AA-002	Vogt 14435 Woodwaste Boiler			120	5	16.83	575
AA-003	Framing Mill w/ two cyclones : 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	78,000 gallon creosote storage tank			30	18	na	180
AA-006	57,000 gallon creosote storage tank			30	18	na	180
AA-007	57,000 gallon creosote storage tank			30	18	na	180
AA-008	Switch Tie Unloader w/ cyclone						
AA-009	Cross Tie Unloader w/ cyclone						
AA-010	Retort, Retort Doors, and Corresponding Vacuum System						
AA-011	Hot Tank						
AA-012	Primary Oil/Water Separators (EU014, EU 015)						
AA-013	Reclaim Tank (EU022)						
AA-014	Building Sump (EU025)						
AA-015	Secondary Oil/Water Separator						
AA-016	Groundwater Oil/Water Separator						
AA-017	SOW Surge Tank						
AA-018	Sap and Vacuum Seal Water Tank (EU 009)						
AA-019	Aeration Basins (EU 018-020)						
AA-020	25,348 gallon, diesel storage tank						
AA-021	25,348 gallon, diesel storage tank						
AA-022	25,348 gallon, diesel storage tank						
AA-023	25,348 gallon, diesel storage tank						
AA-024	1,000 gallon, diesel storage tank						
AA-025	Building Space Heaters						
AA-026	Groundwater oil/water separator lift station						
AA-027	Wastewater treatment facility scrubber recycle sump tank						
AA-028	The 11.71 MMBTUH, Cleaver Brooks, Model CB55-350, boiler,			40	20	37	430
	fired by natural gas or No.2 fuel oil and subject to NSPS, Subpart Dc						
END							

Program version date : December 14, 1994

06/04/1998

EMISSION INVENTORY -- HAZARDOUS AIR POLLUTANTS

COUNTY ID: 1680

FACILITY ID: 00020

SOURCE ID #	OPERATING SCHEDULE			EMISSIONS					
				HAP		ACTUAL		POTENTIAL	
	HOUR/DAY	DAY/WEEK	WEEK/YEAR	CAS#	NAME	LB/HR	TON/YEAR	LB/HR	TON/YEAR
AA-001									
AA-002									
AA-003									
AA-004									
AA-005									
AA-006									
AA-007									
AA-008									
AA-009									
AA-010									
AA-011									
AA-012									
AA-013									
AA-014									
AA-015									
AA-016									
AA-017									
AA-018									
AA-019									
AA-020									
AA-021									
AA-022									
AA-023									
AA-024									
AA-025									
AA-026									
AA-027									
AA-028									
END									
					TOTAL				

Program version date : December 14, 1994

EMISSION INVENTORY -- CRITERIA POLLUTANTS (ACTUAL)

COUNTY ID: 1680

FACILITY ID: 00020

SOURCE ID #	HOURS PER DAY	DAYS PER WEEK	WEEKS PER YEAR	ACTUAL 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																			
AA-002																			
AA-003																			
AA-004																			
AA-005																			
AA-006																			
AA-007																			
AA-008																			
AA-009																			
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AA-020																			
AA-021																			
AA-022																			
AA-023																			
AA-024																			
AA-025																			
AA-026																			
AA-027																			
AA-028																			
END																			
TOTALS																			

Program version date : December 14, 1994

06/04/1998

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	34	24	7	52	0.2	0.50	0.2	0.50	7.1	7.84	4.76	20.85	1.19	5.21	0.095	0.42				
AA-002	14.3	24	7	52	0.036	0.16	0.036	0.16	0.009	0.04	2	8.76	0.5	2.19	0.04	0.18				
AA-003		24	7	52	0.73	3.20	0.365	1.60												
AA-004		24	7	52											0.026	0.11				
AA-005		24	7	52											0.026	0.11				
AA-006		24	7	52											0.026	0.11				
AA-007		24	7	52											0.0098	0.04				
AA-008		24	7	52	0.213	0.93	0.107	0.47												
AA-009		24	7	52	0.381	1.67	0.192	0.84												
AA-010		24	7	52																
AA-011		24	7	52																
AA-012		24	7	52																
AA-013		24	7	52																
AA-014		24	7	52																
AA-015		24	7	52																
AA-016		24	7	52																
AA-017		24	7	52																
AA-018		24	7	52																
AA-019		24	7	52																
AA-020		24	7	52	0.195	0.85	0.195	0.85	7.13	31.23	1.95	8.54	0.488	2.14	0.033	0.14				
AA-021																				
AA-022																				
AA-023																				
AA-024																				
AA-025																				
AA-026																				
AA-027																				
AA-028		24	7	52	0.195	0.85	0.195	0.85	7.13	31.23	1.95	8.54	0.488	2.14	0.033	0.14				
	The above numbers represent the worst case for natural gas or fuel oil at .5% S content as per NSPS, Subpart Dc																			
END																				
	TOTALS					8.17		5.27		70.34		46.69		11.68		1.26				

Program version date : December 14, 1994

06/04/1998

NEW SOURCE PERMIT REVIEW SUMMARY

Company Name : Kerr-McGee Chemical Corporation

Source Number : 1680-00020

Site Address : 2300 14th Avenue & 20th Street Columbus Lowndes

Street | Town or City | County

Permit Type : Construction / modification of SMOP

Source Class: SM

Date permit(s) approved by Permit Board or signed by delegated authority :

Date permit(s) presented to Permit Board :

Review Engineer : Brad Shanks

Date prepared : June 8, 1998

Applicable Regulations :

APC-S-1, Section(s) :

NSPS, Subpart(s) : Dc

NESHAP, Subpart(s) :

PSD, Pollutant :

Other :

Facility Description :

The principal processes include wood preserving and framing

Project Description, if different :

The company has applied for permits to construct and operate an 11.7 MMBTUH, natural gas and fuel oil fired, boiler.

Since this boiler will be subject to NSPS, Subpart Dc, the company has requested the maximum standard of 0.5 weight percent sulfur for fuel oil. This standard results in a potential to emit of 31.2 tpy of SO_2. All other criteria pollutant emissions increases will be less that the PSD significant increase threshold limits.

The increase in emissions from this boiler, without any other federally enforceable restrictions other than the NSPS, Subpart Dc standards, will not cause this facility to become a major Title V source. Therefore, the restrictions in the current Synthetic Minor Permit to Operate will not need to be modified and thus, a 30-day public comment period is not required. Additionally, the facility will not be subject to a PSD review either.

Delegation of Authority Constraints :

Will this action affect a commercial hazardous waste management facility ?	____	Yes	X	No
Will this action affect a municipal solid waste landfill ?	____	Yes	X	No
Will this action affect a municipal solid waste incinerator ?	____	Yes	X	No
Have **ANY** comments been received concerning this project ?	____	Yes	X	No
Are any other permits required from another division ?	____	Yes	X	No
If so, which permit(s) are required and what is the status of those permit(s) ?	____			
From the above answers, Is the Executive Director or a delegated authority allowed to issue, deny, modify, or revoke the permit(s) required for this action ?	X	Yes	____	No

Recommendation :

Permit Issuance

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.

Permit Issued: June 6, 1997

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires 1st **day of** June, **2002**

Permit No. 1680-00020

Permit Modified: JUN 12 1998

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.

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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-028, the 11.7 MMBTUH, natural gas or fuel oil fired, Cleaver Brooks boiler, Model CB55-350.

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

NEW SOURCE PERFORMANCE STANDARDS

1. **For Emission Point AA-028, the boiler is subject to and shall comply with the Section 111, New Source Performance Standards (NSPS), as described in 40 CFR 60, Subpart A - General Provisions, including Notification and Recordkeeping as provided in 40 CFR 60.7, the Performance Test Requirements as provided in 40 CFR 60.8, and the specific requirements outlined in 40 CFR 60, Subpart Dc.**

2. **As outlined in 40 CFR 60, Subpart Dc, the affected facility, Emission Point AA-028, shall not be fired with oil that contains greater than 0.5 weight percent sulfur.**

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."

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.

4. For Emission Point AA-028, 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.

5. 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.

Duplicate

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.

Permit Issued: June 6, 1997

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires 1st **day of** June, 2002

Permit No. 1680-00020

Permit Modified: June 12, 1998 and SEP 18 2001

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.

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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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 June 6, 1997.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning June 6, 1997, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, the permittee is authorized to operate air emissions equipment and emit air contaminants from Emission Point AA-028, the 14.7 MMBTUH, natural gas or fuel oil fired, Hurst boiler, Series 400, 350 horsepower.

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

NEW SOURCE PERFORMANCE STANDARDS

1. **For Emission Point AA-028, the boiler is subject to and shall comply with the Section 111, New Source Performance Standards (NSPS), as described in 40 CFR 60, Subpart A - General Provisions, including Notification and Recordkeeping as provided in 40 CFR 60.7, the Performance Test Requirements as provided in 40 CFR 60.8, and the specific requirements outlined in 40 CFR 60, Subpart Dc.**

2. **As outlined in 40 CFR 60, Subpart Dc, the affected facility, Emission Point AA-028, shall not be fired with oil that contains greater than 0.5 weight percent sulfur.**

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."

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.

4. For Emission Point AA-028, 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.

5. 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.

Table 1.3-6. CUMULATIVE PARTICLE SIZE DISTRIBUTION AND SIZE-SPECIFIC EMISSION FACTORS FOR UNCONTROLLED INDUSTRIAL BOILERS FIRING DISTILLATE OIL[a]

EMISSION FACTOR RATING: E

Particle Size[b] (μm)	Cumulative Mass % ≤ Stated Size	Cumulative Emission Factor (lb/10^3 gal)
15	68	1.33
10	50	1.00
6	30	0.58
2.5	12	0.25
1.25	9	0.17
1.00	8	0.17
0.625	2	0.04
TOTAL	100	2.00

[a] Reference 26. Source Classification Codes 1-02-005-01/02/03. To convert from lb/10^3 gal to kg/10^3 L, multiply by 0.12.
[b] Expressed as aerodynamic equivalent diameter.

Table 1.3-7. CUMULATIVE PARTICLE SIZE DISTRIBUTION AND SIZE-SPECIFIC EMISSION FACTORS UNCONTROLLED COMMERCIAL BOILERS BURNING RESIDUAL OR DISTILLATE OIL[a]

EMISSION FACTOR RATING: D

Particle Size[b] (μm)	Cumulative Mass % ≤ Stated Size		Cumulative Emission Factor[c] (lb/10^3 gal)	
	Residual Oil	Distillate Oil	Residual Oil	Distillate Oil
15	78	60	6.50A	1.17
10	62	55	5.17A	1.08
6	44	49	3.67A	1.00
2.5	23	42	1.92A	0.83
1.25	16	38	1.33A	0.75
1.00	14	37	1.17A	0.75
0.625	13	35	1.08A	0.67
TOTAL	100	100	8.34A	2.00

[a] Reference 26. Source Classification Codes: 1-03-004-01/02/03/04 and 1-03-005-01/02/03/04. To convert from lb/10^3 gal to kg/10^3 L, multiply by 0.12.
[b] Expressed as aerodynamic equivalent diameter.
[c] Particulate emission factors for residual oil combustion without emission controls are, on average, a function of fuel oil grade and sulfur content where S is the weight % of sulfur in the fuel. For example, if the fuel is 1.0% sulfur, then S = 1.
No. 6 oil: A = 1.12(S) + 0.37
No. 5 oil: A = 1.2
No. 4 oil: A = 0.84
No. 2 oil: A = 0.24

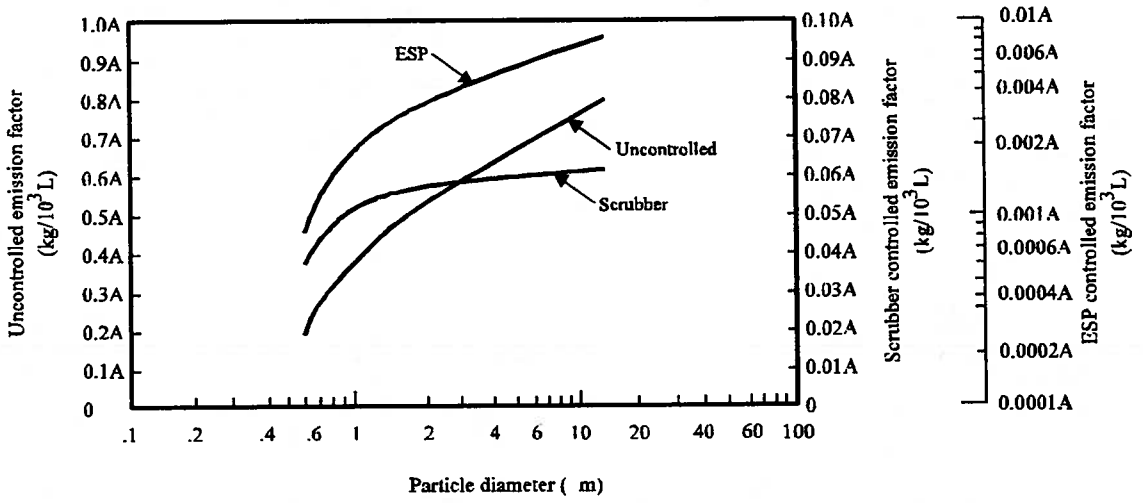

Figure 1.3-1. Cumulative size-specific emission factors for utility boilers firing residual oil.

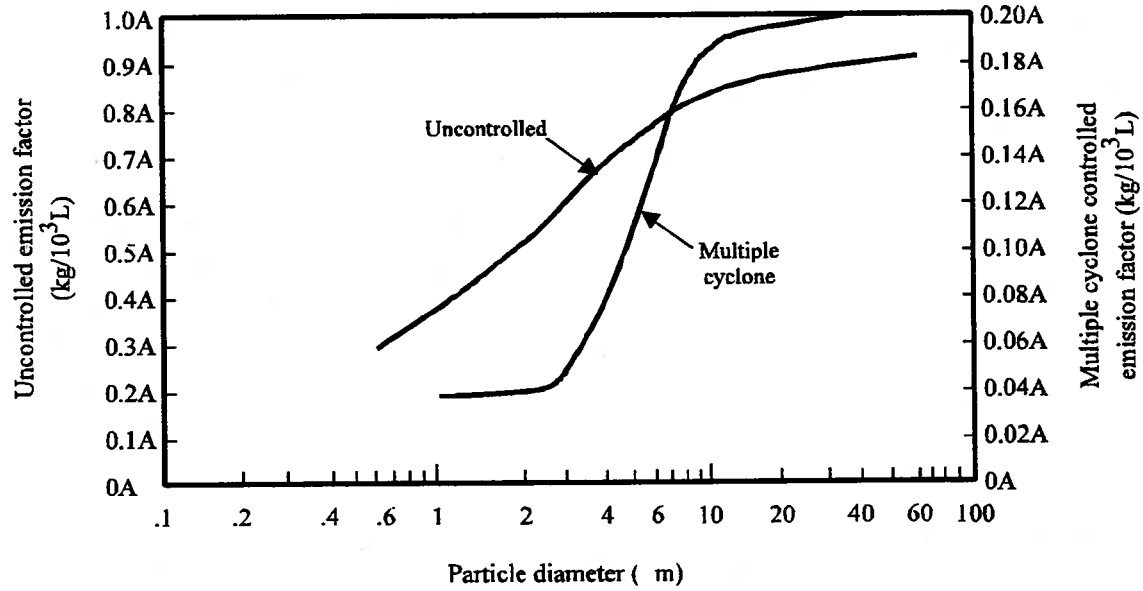

Figure 1.3-2. Cumulative size-specific emission factors for industrial boilers firing residual oil.

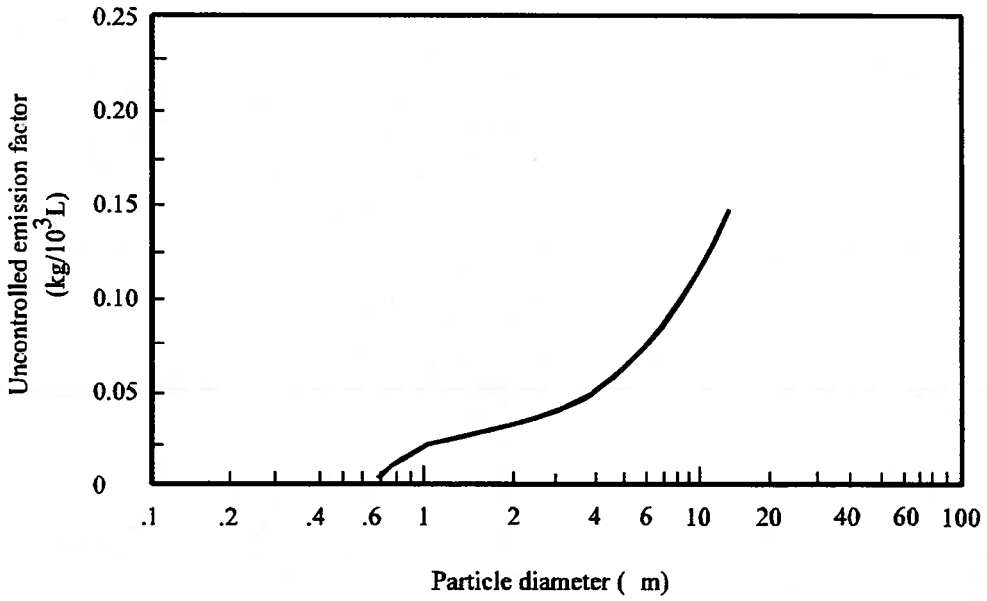

Figure 1.3-3. Cumulative size-specific emission factors for uncontrolled industrial boilers firing distillate oil.

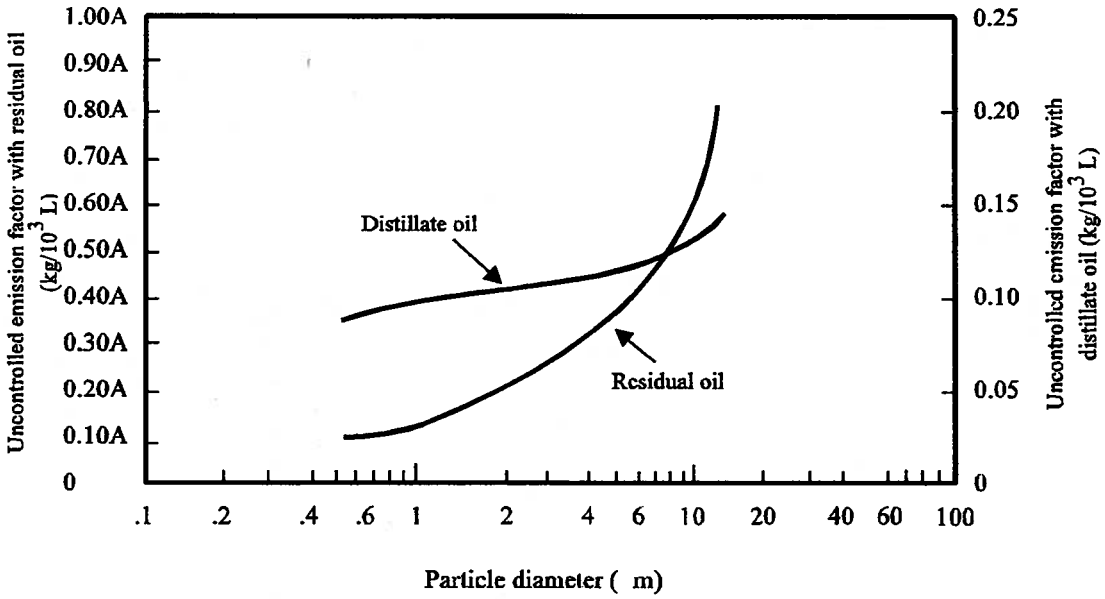

Figure 1.3-4. Cumulative size-specific emission factors for uncontrolled commercial boilers burning residual and distillate oil.

Table 1.3-8. EMISSION FACTORS FOR NITROUS OXIDE (N_2O), POLYCYCLIC ORGANIC MATTER (POM), AND FORMALDEHYDE (HCOH) FROM FUEL OIL COMBUSTION[a]

EMISSION FACTOR RATING: E

Firing Configuration (SCC)	Emission Factor (lb/10^3 gal)		
	N_2O[b]	POM[c]	HCOH[c]
Utility/industrial/commercial boilers			
No. 6 oil fired (1-01-004-01, 1-02-004-01, 1-03-004-01)	0.11	0.0011 - 0.0013[d]	0.024 - 0.061
Distillate oil fired (1-01-005-01, 1-02-005-01, 1-03-005-01)	0.11	0.0033[e]	0.035 - 0.061
Residential furnaces (A2104004/A2104011)	0.05	ND	ND

[a] To convert from lb/10^3 gal to kg/10^3 L, multiply by 0.12. SCC = Source Classification Code. ND = no data.
[b] References 45-46. EMISSION FACTOR RATING = B.
[c] References 29-32.
[d] Particulate and gaseous POM.
[e] Particulate POM only.

Table 1.3-9. EMISSION FACTORS FOR SPECIATED ORGANIC COMPOUNDS FROM FUEL OIL COMBUSTION[a]

Organic Compound	Average Emission Factor[b] ($lb/10^3$ Gal)	EMISSION FACTOR RATING
Benzene	2.14E-04	C
Ethylbenzene	6.36E-05[c]	E
Formaldehyde[d]	3.30E-02	C
Naphthalene	1.13E-03	C
1,1,1-Trichloroethane	2.36E-04[c]	E
Toluene	6.20E-03	D
o-Xylene	1.09E-04[c]	E
Acenaphthene	2.11E-05	C
Acenaphthylene	2.53E-07	D
Anthracene	1.22E-06	C
Benz(a)anthracene	4.01E-06	C
Benzo(b,k)fluoranthene	1.48E-06	C
Benzo(g,h,i)perylene	2.26E-06	C
Chrysene	2.38E-06	C
Dibenzo(a,h) anthracene	1.67E-06	D
Fluoranthene	4.84E-06	C
Fluorene	4.47E-06	C
Indo(1,2,3-cd)pyrene	2.14E-06	C
Phenanthrene	1.05E-05	C
Pyrene	4.25E-06	C
OCDD	3.10E-09[c]	E

[a] Data are for residual oil fired boilers, Source Classification Codes (SCCs) 1-01-004-01/04.

[b] References 64-72. To convert from $lb/10^3$ gal to $kg/10^3$ L, multiply by 0.12.

[c] Based on data from one source test (Reference 67).

[d] The formaldehyde number presented here is based only on data from utilities using No. 6 oil. The number presented in Table 1.3-7 is based on utility, commercial, and industrial boilers.

Table 1.3-10. EMISSION FACTORS FOR TRACE ELEMENTS FROM DISTILLATE FUEL OIL COMBUSTION SOURCES[a]

EMISSION FACTOR RATING: E

Firing Configuration (SCC)	Emission Factor ($lb/10^{12}$ Btu)										
	As	Be	Cd	Cr	Cu	Pb	Hg	Mn	Ni	Se	Zn
Distillate oil fired (1-01-005-01, 1-02-005-01, 1-03-005-01)	4	3	3	3	6	9	3	6	3	15	4

[a] Data are for distillate oil fired boilers, SCC codes 1-01-005-01, 1-02-005-01, and 1-03-005-01. References 29-32, 40-44 and 83. To convert from $lb/10^{12}$ Btu to pg/J, multiply by 0.43.

Table 1.3-11. EMISSION FACTORS FOR METALS FROM UNCONTROLLED NO. 6 FUEL OIL COMBUSTION[a]

Metal	Average Emission Factor[b, d] ($lb/10^3$ Gal)	EMISSION FACTOR RATING
Antimony	5.25E-03[c]	E
Arsenic	1.32E-03	C
Barium	2.57E-03	D
Beryllium	2.78E-05	C
Cadmium	3.98E-04	C
Chloride	3.47E-01	D
Chromium	8.45E-04	C
Chromium VI	2.48E-04	C
Cobalt	6.02E-03	D
Copper	1.76E-03	C
Fluoride	3.73E-02	D
Lead	1.51E-03	C
Manganese	3.00E-03	C
Mercury	1.13E-04	C
Molybdenum	7.87E-04	D
Nickel	8.45E-02	C
Phosphorous	9.46E-03	D
Selenium	6.83E-04	C
Vanadium	3.18E-02	D
Zinc	2.91E-02	D

[a] Data are for residual oil fired boilers, Source Classification Codes (SCCs) 1-01-004-01/04.

[b] References 64-72. 18 of 19 sources were uncontrolled and 1 source was controlled with low efficiency ESP. To convert from $lb/10^3$ gal to $kg/10^3$ L, multiply by 0.12.

[c] References 29-32,40-44.

[d] For oil/water mixture, reduce factors in proportion to water content of the fuel (due to dilution). To adjust the listed values for water content, multiply the listed value by 1-decimal fraction of water (ex: For fuel with 9 percent water by volume, multiply by 1-0.9=.91).

Table 1.3-12. DEFAULT CO_2 EMISSION FACTORS FOR LIQUID FUELS[a]

EMISSION FACTOR RATING: B

Fuel Type	%C[b]	Density[c] (lb/gal)	Emission Factor ($lb/10^3$ gal)
No. 1 (kerosene)	86.25	6.88	21,500
No. 2	87.25	7.05	22,300
Low Sulfur No. 6	87.26	7.88	25,000
High Sulfur No. 6	85.14	7.88	24,400

[a] Based on 99% conversion of fuel carbon content to CO_2. To convert from lb/gal to $gram/cm^3$, multiply by 0.12. To convert from $lb/10^3$ gal to kg/m^3, multiply by 0.12.

[b] Based on an average of fuel carbon contents given in references 73-74.

[c] References 73, 75.

Table 1.3-13. POSTCOMBUSTION SO_2 CONTROLS FOR FUEL OIL COMBUSTION SOURCES

Control Technology	Process	Typical Control Efficiencies	Remarks
Wet scrubber	Lime/limestone	80-95+%	Applicable to high-sulfur fuels, Wet sludge product
	Sodium carbonate	80-98%	5-430 MMBtu/hr typical application range, High reagent costs
	Magnesium oxide/hydroxide	80-95+%	Can be regenerated
	Dual alkali	90-96%	Uses lime to regenerate sodium-based scrubbing liquor
Spray drying	Calcium hydroxide slurry, vaporizes in spray vessel	70-90%	Applicable to low-and medium-sulfur fuels, Produces dry product
Furnace injection	Dry calcium carbonate/hydrate injection in upper furnace cavity	25-50%	Commercialized in Europe, Several U.S. demonstration projects underway
Duct injection	Dry sorbent injection into duct, sometimes combined with water spray	25-50+%	Several R&D and demonstration projects underway, Not yet Commercially available in the U.S.

Table 1.3-14. NO_x CONTROL OPTIONS FOR OIL-FIRED BOILERS[a]

Control Technique	Description Of Technique	NO_x Reduction Potential (%)		Range Of Application	Commercial Availability/ R&D Status	Comments
		Residual Oil	Distillate Oil			
Low Excess Air (LEA)	Reduction of combustion air	0 to 28	0 to 24	Generally excess O_2 can be reduced to 2.5% representing a 3% drop from baseline	Available for boilers with sufficient operational flexibility.	Added benefits included increase in boiler efficiency. Limited by increase in CO, HC, and smoke emissions.
Staged Combustion (SC)	Fuel-rich firing burners with secondary combustion air ports	20 to 50	17 to 44	70-90% burner stoichiometries can be used with proper installation of secondary air ports	Technique is applicable on packaged and field-erected units. However, not commercially available for all design types.	Best implemented on new units. Retrofit is probably not feasible for most units, especially packaged ones.
Burners Out of Service (BOOS)	One or more burners on air only. Remainder of burners firing fuel-rich	10 to 30	ND	Most effective on boilers with 4 or more burners in a square pattern.	Available.	Requires careful selection of BOOS pattern and control of air flow. May result in boiler de-rating unless fuel delivery system is modified.
Flue Gas Recirculation (FGR)	Recirculation of portion of flue gas to burners	15 to 30	58 to 73	Up to 25-30% of flue gas recycled. Can be implemented on most design types.	Available. Best suited for new units.	Requires extensive modifications to the burner and windbox. Possible flame instability at high FGR rates.
Flue Gas Recirculation Plus Staged Combustion	Combined techniques of FGR and staged combustion	25 to 53	73 to 77	Maximum FGR rates set at 25% for distillate oil and 20% for residual oil.	Available for boilers with sufficient operational flexibility.	May not be feasible on all existing boiler types. Best implemented on new units.

Table 1.3-14 (cont.).

Control Technique	Description Of Technique	NO_x Reduction Potential (%)		Range Of Application	Commercial Availability/ R&D Status	Comments
		Residual Oil	Distillate Oil			
Load Reduction (LR)	Reduction of air and fuel flow to all burners in service	33% decrease to 25% increase in No_x	31% decrease to 17% increase in NO_x	Applicable to all boiler types and sizes. Load can be reduced to 25% of maximum.	Available in retrofit applications.	Technique not effective when it necessitates an increase in excess O_2 levels. LR possibly implemented in new designs as reduced combustion intensity (i. e., enlarged furnace plan area).
Low NO_x Burners (LNB)	New burner designs with controlled air/fuel mixing and increased heat dissipation	20 to 50	20 to 50	New burners described generally applicable to all boilers.	Commercially available.	Specific emissions data from industrial boilers equipped with LNB are lacking.
Reduced Air Preheat (RAP)	Bypass of combustion air preheater	5 to 16	ND	Combustion air temperature can be reduced to ambient conditions.	Available.	Application of this technique on new boilers requires installation of alternate heat recovery system (e. g., an economizer).
Selective Noncatalytic Reduction (SNCR)	Injection of NH_3 or urea as a reducing agent in the flue gas	40 to 70	40 to 70	Applicable for large packaged and field-erected watertube boilers. May not be feasible for fire-tube boilers.	Commercially offered but not widely demonstrated on large boilers.	Elaborate reagent injection, monitoring, and control system required. Possible load restrictions on boilers and air preheater fouling when burning high sulfur oil. Must have sufficient residence time at correct temperature.
Conventional Selective Catalytic Reduction (SCR)	Injections of NH_3 in the presence of a catalyst (usually upstream of air heater).	Up to 90% (estimated)	Up to 90% (estimated)	Typically large boiler designs	Commercially offered but not widely demonstrated.	Applicable to most boiler designs as a retrofit technology or for new boilers.

Table 1.3-14 (cont.).

Control Technique	Description Of Technique	NO_x Reduction Potential (%)		Range Of Application	Commercial Availability/ R&D Status	Comments
		Residual Oil	Distillate Oil			
Air Heater (SCR)	Catalyst-coated baskets in the air heater.	40-65 (estimated)	40-65 (estimated)	Boilers with rotating-basket air heaters	Available but not widely demonstrated	Design must address pressure drop and maintain heat transfer.
Duct SCR	A smaller version of conventional SCR is placed in existing ductwork	30 (estimated)	30 (estimated)	Typically large boiler designs	Available but not widely demonstrated.	Location of SCR in duct is temperature dependent.
Activated Carbon SCR	Activated carbon catalyst, installed downstream of air heater.	ND	ND	Typically large boiler designs	Available but not widely demonstrated.	High pressure drop.
Oil/Water Emulsified Fuel[a,b]	Oil/water fuel with emulsifying agent	41	ND	Firetube boilers	Available but not widely demonstrated	Thermal efficiency reduced due to water content

[a] ND = no data.

[b] Test conducted by EPA using commercially premixed fuel and water (9 percent water) containing a petroleum based emulsifying agent. Test boiler was a 2400 lb/hr, 15 psig Scotch Marine firetube type, fired at 2×10^6 Btu/hr.

Table 1.3-15. EMISSION FACTORS FOR NO. 6 OIL/WATER EMULSION IN INDUSTRIAL/COMMERCIAL/INSTITUTIONAL BOILERS[a]

Pollutant	Emission Factor ($lb/10^3$ gal)	Factor Rating	Comments
CO	1.90	C	33% Reduction from plain oil
NO_x	38.0	C	41% Reduction
PM	14.9	C	45% Reduction

[a] Test conducted by EPA using commercially premixed fuel and water (9 percent water) containing a petroleum based emulsifying agent. Test boiler was a 2400 lb/hr, 15 psig Scotch Marine firetube type, fired at 2×10^6 Btu/hr.

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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.

Permit Issued: JUN - 6 1997

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Dwight Wyli

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires 1st day of June, 2002

Permit No. 1680-00020

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.

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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning ISSUANCE DATE, and lasting until June 1, 2002, 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.

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."

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.

EMISSION INVENTORY -- GENERAL

County ID: 1680 Facility ID: 00020 Date: 03-Jun-97

Facility Name: Kerr-McGee Chemical Corporation

Mailing Address: Street: P.O. BOX 25861
City: Oklahoma City
State: OK
Zip code: 73125

Site Address: Street: 2300 14th Ave. & 20th St.
City: Columbus
Zip code: 39703
County: Lowndes

Telephone N 405 270-2394

Telephone N (601) 328-7551

Contact & Title: Nicholas E. Bock, Mgr., Environmental & Regulatory Affairs

Facility / Plant Type: Principal processes include wood preserving and framing

SIC Code: 2491

EMISSION SUMMARY (TOTAL FOR EACH POLLUTANT FROM ALL SOURCE

POLLUTANT	ACTUAL TPY	POTENTIAL TPY	NOTES
PARTICULATE MATTER		6.46	
PM (10)		3.57	
SO2		7.88	
NOx		29.61	
CO		7.40	
VOC		0.98	
TRS			
LEAD			
HAP (TOTAL FOR ALL)			
HAP > 10 TPY (LIST BELOW)			
OTHER:			
OTHER:			

REGULATION APPLICABILITY

(X) SIP ONLY
( ) PSD ONLY
( ) NESHAP: SUBPART :

( ) NSPS SUBPART:
( ) MACT CATEGORY:
( ) OTHER:

DEQ ENGINEER: BGH 03-Jun-97

EMISSION INVENTORY -- SOURCES

COUNTY ID: 1680 FACILITY ID: 00020

AQCR: 135 UTM ZONE: 16

UTM EAST: 629267.66 UTM NORTH: 1397847

SOURCES		UTM COORDINATES		STACK PARAMETERS			
ID #	DESCRIPTION	EAST	NORTH	HEIGHT (FT.)	DIAMETER (FT.)	VELOCITY (FT/SEC)	TEMP (° F)
AA-001	Cleaver Brooks D-6 Boiler			40	2.5	46	500
AA-002	Vogt 14435 Woodwaste Boiler			120	5	16.83	575
AA-003	Framing Mill w/ two cyclones : 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	78,000 gallon creosote storage tank			30	18	na	180
AA-006	57,000 gallon creosote storage tank			30	18	na	180
AA-007	57,000 gallon creosote storage tank			30	18	na	180
AA-008	Switch Tie Unloader w/ cyclone						
AA-009	Cross Tie Unloader w/ cyclone						
AA-010	Retort, Retort Doors, and Corresponding Vacuum System						
AA-011	Hot Tank						
AA-012	Sap and Vacuum Seal Water Tank						
AA-013	Primary Oil/Water Separators						
AA-014	Aeration Basins						
AA-015	Reclaim Tank						
AA-016	Building Sump						
AA-017	Secondary Oil/Water Separator						
AA-018	Groundwater Oil/Water Separator						
AA-019	SOW Surge Tank						
END							

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	34	24	7	52	0.2	0.50	0.2	0.50	7.1	7.84	4.76	20.85	1.19	5.21	0.095	0.42				
AA-002	14.3	24	7	52	0.036	0.16	0.036	0.16	0.009	0.04	2	8.76	0.5	2.19	0.04	0.18				
AA-003		24	7	52	0.73	3.20	0.365	1.60												
AA-004		24	7	52											0.026	0.11				
AA-005		24	7	52											0.026	0.11				
AA-006		24	7	52											0.026	0.11				
AA-007		24	7	52											0.0098	0.04				
AA-008		24	7	52	0.213	0.93	0.107	0.47												
AA-009		24	7	52	0.381	1.67	0.192	0.84												
AA-010		24	7	52																
AA-011		24	7	52																
AA-012		24	7	52																
AA-013		24	7	52																
AA-014		24	7	52																
AA-015		24	7	52																
AA-016		24	7	52																
AA-017		24	7	52																
AA-018		24	7	52																
AA-019		24	7	52																
END																				
TOTALS						6.46		3.57		7.88		29.61		7.40		0.98				

Program version date : December 14, 1994

06/03/97

DELEGATED PERMIT RECOMMENDATION

Company Name: Kerr - McGee

Facility No.: 1680-00020

County: Lowndes County

Permit type(s): TVOP / TVOP mod. / (SMOP) / SMOP mod. / PTC / PTC mod. *(circle type(s))*
Other (describe):

Review Engineer: B. HALL

Date: 6/2/97

Delegation of Authority Constraints :

Will this action affect a commercial hazardous waste management facility ?		Yes	✓	No
Will this action affect a municipal solid waste landfill ?		Yes	✓	No
Will this action affect a municipal solid waste incinerator ?		Yes	✓	No
Have **ANY** comments been received concerning this project ?		Yes	✓	No
Are any other permits required from another division ?		Yes	✓	No
If so, which permit(s) are required and what is the status of those permit(s) ?				
From the above answers, Is the Executive Director or a delegated authority allowed to issue, deny, modify, or revoke the permit(s) required for this action ?	✓	Yes		No

Recommendation :

Permit Issuance

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39289-0385
Telephone No. (601) 961-5171
Friday, May 2, 1997

Public Notice No. 97A-SM-008

Kerr-McGee Chemical Corporation (Facility No. 1680-00020) located at 2300 14th Avenue & 20th Street, Columbus, Mississippi, (601) 328-7551, has applied to the Mississippi Department of Environmental Quality for a Permit to Operate an existing wood preserving facility. The applicant's operations fall within SIC Code 2491.

The application has been evaluated and the staff of the Department believes that, with the facility's currently applied emissions controls and the proposed operational constraints and limitations on Kerr-McGee Chemical Corporation, this facility will operate within all State and Federal air pollution control laws and standards, will maintain emissions below Title V major source levels, and will protect health and welfare. Therefore, the staff of the Board has developed a draft Permit to Operate containing emissions and operational regulatory constraints specifically stated in the draft permit.

Before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments. Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Bobby Hall at the above Permit Board address no later than thirty (30) days from the date of publication of this notice. All comments received by that date will be considered in the formulation of final determinations regarding the proposed permit. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

Additional details about the application, including a copy of the draft permit, are available by writing or calling Bobby Hall at the above Permit Board address and telephone number. This information is also available for review at the following location(s) during normal business hours.

Mississippi Department of Environmental Quality
Air Division
101 West Capitol Street
Jackson, MS 39201

Columbus Public Library
314 Seventh Street, North
Columbus, MS 39701

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

MESSAGE CONFIRMATION

04/29/97 10:39

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538	TX		

DATE/TIME	TIME	DISTANT STATION ID	PAGES	RESULT	ERROR PAGES	S.CODE
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STATE OF MISSISSIPPI,

County of Lowndes

PERSONALLY CAME before me, the undersigned, a notary public in and for Lowndes County, Mississippi, the CLERK of the Commercial Dispatch, a newspaper published in the City of Columbus, who, being duly sworn, deposes and says that the COMMERCIAL DISPATCH is a newspaper as defined and prescribed in Section 13-3-31 of the Mississippi Code of 1972, as amended effective July 1, 1976, and that the publication of a notice, of which the annexed is a copy, in the matter of

Bobby Smd
Kerr-McGee
1680-20

Notice

has been made in said paper 1 times consecutively, to-wit:

On the 02 day of May, 19 97

On the ____ day of ____, 19 __

On the ____ day of ____, 19 __

On the ____ day of ____, 19 __

On the ____ day of ____, 19 __

On the ____ day of ____, 19 __

Leigh Nichols
Clerk

SWORN TO and subscribed before me, this

02 day of May, 19 97

Mary L Hossley
Notary Public

MISSISSIPPI STATEWIDE NOTARY PUBLIC
MY COMMISSION EXPIRES JAN. 23, 2000

PROOF OF PUBLICATION
CHECK LIST

____ TO FILE
____ TO SHERRY
____ TO MARSHA
____ TO TONYAH

PUBLIC NOTICE
Mississippi Environmental Quality
Permit Board
P.O. Box 10385
Jackson, MS 39289-0385
Telephone No. (601) 961-5171
Friday, May 2, 1997

Public Notice No. 97A-SM-008
Kerr-McGee Chemical Corporation (Facility No. 1680-00020) located a 2300 14th Avenue & 20th Street, Co lumbus, Mississippi, (601) 328 7551, has applied to the Mississipp Department of Environmental Qua ity for a Permit to Operate an exis ing wood preserving facility. The a plicant's operations fall within SI Code 2491.

The application has been evaluate and the staff of the Department be lieves that, with the facility's cu rently applied emissions contro and the proposed operational cor straints and limitations on Ker McGee Chemical Corporation, th facility will operate within all Stat and Federal air pollution control law and standards, will maintain emis sions below Title V major source lev els, and will protect health and we fare. Therefore, the staff of the Boar has developed a draft Permit to Op erate containing emissions and op erational regulatory constraints spe cifically stated in the draft permit.

Before proceeding further with th staff evaluation, public commen are being solicited. The staff recom mendation to the Board, as well a the Board decision, will be mad only after a thorough consideratio of all public comments. Person wishing to comment upon or objec to the proposed determinations ar invited to submit comments in wri ing to Bobby Hall at the above Pe mit Board address no later than thir (30) days from the date of publica tion of this notice. All comments re ceived by that date will be consi ered in the formulation of final dete minations regarding the propose permit. A public hearing will be hel if the Permit Board finds a significar degree of public interest in the pro posed permit. The Permit Board limited in the scope of its analysis t environmental impact. Any com ments relative to zoning or econom and social impacts are within the ju risdiction of local zoning and pla ning authorities and should be ad dressed to them.

Additional details about the app cation, including a copy of the dra permit, are available by writing calling Bobby Hall at the above Pe mit Board address and telephon number. This information is als available for review at the followi location(s) during normal busines hours.

Mississippi Department of
Environmental Quality
Air Division
101 West Capitol
Jackson, MS 39201

Columbus Public Library
314 Seventh Street, North
Columbus, Ms 39701

Please bring the foregoing to the a tention of persons whom you kno will be interested.
05-02-97

File

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39289-0385
Telephone No. (601) 961-5171
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Public Notice No. 97A-SM-008

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The application has been evaluated and the staff of the Department believes that, with the facility's currently applied emissions controls and the proposed operational constraints and limitations on Kerr-McGee Chemical Corporation, this facility will operate within all State and Federal air pollution control laws and standards, will maintain emissions below Title V major source levels, and will protect health and welfare. Therefore, the staff of the Board has developed a draft Permit to Operate containing emissions and operational regulatory constraints specifically stated in the draft permit.

Before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments. Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Bobby Hall at the above Permit Board address no later than thirty (30) days from the date of publication of this notice. All comments received by that date will be considered in the formulation of final determinations regarding the proposed permit. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

Additional details about the application, including a copy of the draft permit, are available by writing or calling Bobby Hall at the above Permit Board address and telephone number. This information is also available for review at the following location(s) during normal business hours.

Mississippi Department of Environmental Quality
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101 West Capitol Street
Jackson, MS 39201

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314 Seventh Street, North
Columbus, MS 39701

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

97A-SM-008.1

1997 File

Permit Review Summary

Company Name: Kerr-McGee Chemical Corporation

Source Number: 1680-00020

County: Lowndes

FACILITY DESCRIPTION

Kerr-McGee Chemical Corporation operates a wood preserving facility at 2300 14th Avenue & 20th Street in Columbus, Mississippi.

EMISSIONS EVALUATION & SYNTHETIC MINOR LIMITATIONS

This facility is currently a major source as defined by the Mississippi Title V Program (Regulation APC-S-6) for the pollutants particulate matter and sulfur dioxide.

In order to limit potential uncontrolled emissions of these pollutants below the Title V major source thresholds, the draft synthetic minor operating permit contains the following emission and/or operational restrictions:

- Emission Point AA-001 - fuel oil usage will be limited to 216,000 gallons per year.

PUBLIC PARTICIPATION

The 30-day comment period began with the publication of a public notice in the Commercial Dispatch on May 2,1997 and ends June 2, 1997.

RECOMMENDATION

The staff has preliminarily decided to recommend issuance of the permit to the Mississippi Environmental Quality Permit Board as shown in the draft permit. However, the staff recommendation to the Board will be made only after a thorough consideration of all public comments.