217/782-2113 CERTIFIED MAIL

PERMIT DENIAL

July 18, 2000

Koppers Industries, Inc.
Attn: Plant Manager
3900 South Laramie Avenue
Stickney, Illinois 60807

Application No.:	00040051
I.D. No.:	031300AAJ
Applicant's Designation:	IPTHERMOXD
Received:	April 19, 2000
Construction of:	Thermal Oxidizer
Location:	3900 South Laramie Avenue, Stickney

The Illinois EPA has reviewed your Application for Construction Permit for the above referenced project. The permit application is DENIED because Section 9 of the Illinois Environmental Protection Act, 35 IAC, Part 203 and 40 CFR 52 might be violated.

The following are specific reasons why the Act and the Rules and Regulations may not be met:

1a. The application did not provide sufficient information addressing the proposed increase in emissions from this project, given that the potential to emit may be increased. The Illinois EPA's review of your application indicates that the thermal oxidizer may be in violation of 35 IAC, Part 203 for NSR (New Source Review) and/or 40 CFR 52 (PSD), because the emission data may have the potential to emit more than the allowable tons of criteria pollutants per year.

b. The applicant did not provide information required for NSR and PSD, such as the contemporaneous emissions increases and decreases as well as any increase in potential to emit over the last five years.

The Illinois EPA will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.152, this reapplication may incorporate by reference the data and information submitted to the Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

If you have any questions on this, please call Robin Helmerichs at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RBH:psj

cc: Region 1

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Koppers Industries, Inc.
Attn: Plant Manager
3900 South Laramie Avenue
Stickney, Illinois 60804

Application No.: 00040051 I.D. No.: 031300AAJ
Applicant's Designation: IPTHERMOXD Date Received: May 21, 2001
Subject: Thermal Oxidizer
Date Issued: July 30, 2001
Location: 3900 South Laramie Avenue, Stickney

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a new thermal oxidizer as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This permit allows the Permittee to construct and operate a new thermal oxidizer to controls odors emission from the fume system #1 and #2, which are existing scrubbers, and to serve as the principle control for the distillation units in place of the existing flare, which will become a backup device. Accordingly, the oxidizer would be the preferred control for the distillation units when their exhausts are not being used as combustion air for the tube heaters associated with distillation units.

b. This permit allows continue operation of the fume scrubber in their current configuration, as could occur during maintenance or other outage of the thermal oxidizer.

2a. This permit is issued based upon no increase in emissions of organic material (OM), because the new thermal oxidizer will further control OM emissions from the fume system #1 and #2. The thermal oxidizer is equal to or more efficient in reducing OM emissions than the existing flare.

b. Only natural gas shall be burned as fuel for the new thermal oxidizer.

c. Emissions of carbon monoxide (CO) and nitrogen oxide (NO_x) from the thermal oxidizer shall not exceed the following limits. These limits are based on the maximum input to the oxidizer including both fuel (up to 14 million Btu/hr) and waste gases.

CO		NO_x	
(Lb/Hour)	(Tons/year)	(Lb/Hour)	(Tons/Year)
0.5	2.19	0.8	3.5

d. At all times, the Permittee shall to the extent practicable, maintain and operate the thermal oxidizer, in a manner consistent with good air pollution control practice for minimizing emissions. For this purpose destruction efficiency for OM shall be at least 98%.

e. The Permittee shall monitor the temperature of the combustion chamber of the thermal oxidizer in accordance with the manufacturer's specifications.

f. The Permittee shall keep records of:

i. Period of time when a fume scrubber operates without further control by the thermal oxidizer; and

ii. Period of time when the distillation unit is controlled by the thermal oxidizer.

3. This permit does not revise or relax any other requirements contained in the CAAPP Permit 96030134 for the units controlled by the fume system #1 and #2 and the units controlled by the flare when the new thermal oxidizer operate as a back up or any associated requirements for monitoring, recordkeeping or reporting for this modification.

a. In particulate the emission and destruction efficiency of the thermal oxidizer shall be tested upon request by the Illinois EPA in accordance with Condition 7.4.7 of the CAAPP permit.

b. This permit does not provide any change in the emission determination methodology established for VOM emissions for purpose f the Emission Reduction Market System (ERMS). Any change to established methodology to account for the operator of the thermal oxidizer would required performance of emission testing and re-issuance of a revised construction permit by the Illinois EPA.

4. The Permittee shall notify the Illinois EPA within 30 days when the new thermal oxidizer begins initial operation.

5. With the Annual Emission Reports following one year of the initial startup of the thermal oxidizer, the Permittee shall submit a performance report to the Illinois EPA discussing the effects on VOM and odors emissions.

6. The thermal oxidizer may be operated for 180 days under this construction permit.

Please note that this permit also acknowledge the elimination of the steam stripper on decanted wastewater, as the steam stripper is not needed to control odors from this stream in part due to the odors control program.

Please note that the Permittee should seek to amend their CAAPP permit to include the construction and/or modification covered under this permit through the administrative amendment process by submitting an application that includes the information contained in form 273-CAAPP. This application must also identify and address any changes from the associated construction permit application. Note that information previously submitted in the construction permit application may be incorporated by reference into the application to amend the CAAPP permit. The Permittee must also provide updated information on fees as contained in form 292-CAAPP, "Fee Determination for CAAPP Permit."

If you have any questions on this, please call Ricardo Ng at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RNG:psj

cc: Region 1

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

BRUCE RAUNER, GOVERNOR LISA BONNETT, DIRECTOR

217/785-1705

CONSTRUCTION PERMIT

PERMITTEE

Koppers Industries, Inc.
Attn: Stephanie Flynn
3900 South Laramie Avenue
Cicero, Illinois 60804

Application No.: 15080025 I.D. No.: 031300AAJ
Applicant's Designation: Date Received: August 25, 2015
Construction of: Changes to Tube Heater for Tar Distillation System #1
Date Issued: May 12, 2016
Source Location: 3900 South Laramie Avenue, Cicero, Cook County

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emissions source(s) and/or air pollution control equipment consisting of changes to the tube heater for Tar Distillation System #1 as described in the above referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Introduction

   a. This permit authorizes changes to the natural gas-fired tube heater for Tar Distillation System #1 (the affected system) that will not constitute routine maintenance and repair, including installation of new burners, new economizer and a new shell. This heater would continue to serve as the reboiler for the affected system, heating the feed to the distillation column and as an afterburner control device for waste gases from the distillation column in the affected system.

   b. This permit does not authorize any changes to the affected system that would increase its production capacity.

   c. For purpose of this permit, the "affected unit" is the tube heater for the affected system after it resumes operation following the changes addressed by this permit.

2. Coordination with Existing Clean Air Act Permit Program (CAAPP) Permit

   a. The affected unit shall be operated to comply with applicable emission standards, as set forth in the CAAPP permit for the plant, CAAPP Permit 96030134.

   b. This permit does not revise or relax requirements for recordkeeping and reporting for the affected unit, as established in Conditions 7.4.9 and 7.4.10, respectively, of CAAPP Permit 96030134.

3. Non-Applicability Provisions

a. This permit is issued based on this project not being subject to the state rules for Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203. This is because the volatile organic material (VOM) and nitrogen oxide (NO_x) emissions as permitted in this construction permit are not significant.

b. This permit is issued based on this project not being subject to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. For carbon monoxide (CO) and particulate matter (PM/PM_{10}) emissions, this is because the projected future emissions of the affected unit are not significant, at 57.3 and 2.61 tons/year respectively. For sulfur dioxide (SO_2) emissions, this is because the projected increase in emissions is less than 40 tons/year, which is not significant. (See Attachment 1.)

4. Operational Requirements

a. i. Only natural gas and waste gas from the affected system shall be burned in the affected unit.

ii. The total rated capacity of the natural gas nozzles in the affected unit shall not exceed 13.0 mmBtu/hour.

b. i. During operation of the affected unit, other than startup or shutdown, the combustion chamber temperature of the affected unit, on an hourly average, shall be maintained above 1,000°F or at a temperature that is consistent with the manufacturer's recommended minimum operating temperature or, once testing has been conducted demonstrating compliance with applicable requirements, the minimum operating temperature during emission testing.

ii. Prior to burning waste gas in the affected unit, the combustion chamber of the affected unit shall be heated with natural gas to the manufacturer's recommended temperature or to the temperature established in the Permittee written procedures for startup of the affected system.

c. The Permittee shall operate and maintain the affected system in accordance with written procedures developed and maintained by the Permittee. These procedures shall provide for good air pollution control practices to minimize emissions and shall include the Permittee's standard operating procedures for startup, normal operation, and shutdown of the affected system and address likely malfunction and upsets events for the affected system.

5. Emission Limits

a. The emissions of affected unit shall not exceed the following limits. Compliance with these annual limits shall be determined from a running total of 12 months of data.

Pollutant	Limit	
	Lbs/Hour	Tons/Year
NO_x	7.27	31.86
VOM	3.07	13.45

6. Testing Requirements

a. The Permittee shall have emission testing performed for the affected unit as follows:

i. A. Within one year after resuming the operation of the affected unit, the Permittee shall have emissions of NO_x, CO, SO_2 and VOM from affected unit measured. These tests shall be performed by a qualified testing service at the Permittee's expense during conditions that are representative of maximum emissions.

B. In conjunction with measurement of emissions required above, the Permittee shall also: 1) Have representative samples of the waste gas from the affected system, which is burned in the affected unit, taken and analyzed in accordance with Condition 8 and report the results of this analysis with the Final Report for this emission testing; and 2) Perform observation of opacity from the affected unit.

ii. In addition to the emission testing required above, within 90 days of a written request by the Illinois EPA or such later date agreed to by the Illinois EPA, emission testing shall be performed for the affected unit for pollutants and fuel(s) specified by Illinois EPA in its request.

b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the USEPA or Illinois EPA. Refer to 40 CFR 60, Appendix A, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Sulfur Dioxide	USEPA Method 6
Nitrogen Oxides	USEPA Method 7
Carbon Monoxide	USEPA Method 10
Volatile Organic Material	USEPA Methods 18 or 25/25A

c. The Permittee shall submit a written test plan to the Compliance Section of the Division of Air Pollution Control for review at least 45 days prior to the scheduled date of testing. This plan shall describe the specific procedures for testing, including as a minimum:

i. The person(s) who will be performing sampling and analysis and their experience with similar tests.

ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and any changes in the means or manner by which the operating parameters for the emission unit and any control equipment will be determined.

iii. The specific determinations of emissions and operation that is intended to be made, including sampling and monitoring locations.

iv. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods.

d. The Permittee shall notify the Illinois EPA prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.

e. The Permittee shall submit copies of the Final Reports for these tests to the Illinois EPA within 14 days after the test results are compiled and finalized but no later than 45 days after completion of sampling. The Final Report shall include as a minimum:

i. A summary of results.

ii. General information.

iii. Operating data for the affected system during testing, including data for the combustion chamber temperature of the affected unit, data for the firing rates for natural gas and waste gas and for data for other parameters that are needed to more fully describe operating conditions during testing.

iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.

v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

f. The Permittee shall retain copies of emission test reports for at least three years after the date that an emission test is superseded by a more recent test.

7-1. Monitoring Requirements

a. The affected unit shall be equipped with a continuous monitoring device for combustion chamber temperature. This device shall be installed, calibrated and maintained according to vendor's specifications, and operated at all times that the unit is in use. This monitoring device shall measure and record the combustion temperature at 15-minutes intervals. This monitoring device shall also record the combustion chamber temperature on a block hourly average basis, calculated as the average value of the individual measurements during each one hour period.

7-2. Instrumentation Requirements

a. Notwithstanding the requirements of Condition 6, as an alternative to testing of SO_2 emissions, the Permittee may install, maintain and operate a metering system for the flow of waste gas to the affected unit. The Permittee shall keep records for the amount of waste gas burned on at least a monthly basis.

8. Sampling and Analysis of Waste Gas Requirements

a. The Permittee shall take representative samples of the waste gas burned in the affected unit on a regular basis and have samples analyzed for sulfur content (ppm by volume, for H_2S, COS, CS_2 and total sulfur) by a qualified laboratory using appropriate ASTM or equivalent methods.

b. For this purpose, samples shall be taken as follows:

i. On at least a monthly basis, until six consecutive samples have been taken. For this purpose, a sample shall be taken for calendar months in which the affected system operated for more than 10 days.

ii. On at least a semi-annual basis, thereafter.

iii. Within 30 days of a written request from the Illinois EPA.

c. The Permittee shall keep records for the results of these analyses and the collection of samples.

9. Recordkeeping Requirements

a. The Permittee shall maintain the following records for the affected unit:

i. The rated heat input of the natural gas burners in the affected unit, mmBtu/hour, with supporting documentation.

ii. Design data for the maximum and typical rates at which waste gas is burned (scf/hour and mmBtu/hour), and typical gross and net heat content of the waste gas.

b. The Permittee shall maintain the following operating records for the affected unit:

i. The natural gas usage of the affected unit (scf/month and scf/year).

ii. The amount of waste gas generated by the affected system (scf/month and scf/year), with supporting calculations. This data and the data required by condition 9(b)(iii) may be determined directly or indirectly, being calculated from operating hours and/or operation data recorded for the affected system.

iii. If different than the data in Condition 9(b)(ii), the amount of waste gas sent to the affected unit (scf/month and scf/year).

c. The Permittee shall maintain the following logs or other records for the affected unit:

i. Operating log(s) that, at a minimum, shall include the following information:

A. Information identifying periods when unit was not in service.

B. For periods when unit was in service and operating normally, relevant process information to generally confirm normal operation.

C. For periods when unit was in service and not operating normally, identification of each such period, with detailed information describing the operation of the unit and the potential consequences for additional emissions from the unit, with explanation.

ii. Inspection, maintenance and repair log(s) that, at minimum, shall include the following information:

A. Identification of equipment, with date, time, responsible employee and type of activity.

B. For inspections, a description of the inspection, findings, and any recommended actions, with reason.

C. For maintenance and repair activity, a description actions taken, reason for action, e.g., preventative measure or corrective action as a result of inspection, and the condition of equipment following completion of the activity.

d. The Permittee shall maintain the following records related to emissions of the affected unit:

i. A. The SO_2 emission factor and maximum hourly emission rates used by the Permittee to determine SO_2 emissions from the affected unit, with supporting documentation and calculations.

B. The hourly emission rates or emission factors, and maximum hourly emission rates for emissions of pollutants other than SO_2 used by the Permittee to determine emissions of the affected unit, with supporting documentation and calculations.

ii. Monthly and annual emission of CO, NO_x, PM, SO_2, and VOM (tons) from the affected unit based on appropriate emission rates or factors and operating data, with supporting calculations.

e. For this project for emissions of SO_2, the Permittee shall fulfill the recordkeeping requirements of 40 CFR 52.21(r)(6) to confirm that this project is not a major modification.

f. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

10. Other Requirements

a. This permit does not relieve the Permittee of the responsibility to comply with all Local, State and Federal Regulations which are part of the applicable Illinois State Implementation Plan, as

well as all other applicable Federal, State and Local requirements.

b. In particular, this permit does not excuse the Permittee from the obligation to undertake further actions for the affected system as may be needed to eliminate air pollution, including operational or physical and/or changes to the unit, e.g., discontinuing burning of waste gas in the affected unit, installation of a waste gas treatment system to remove sulfur prior to burning the waste gas or installation of add-on control for the affected unit.

11. Reporting Requirements

a. If there is a deviation from the requirements of this permit, the Permittee shall submit a report to the Illinois EPA within 30 days after the deviation or such later time as specified in the CAAPP permit at the source. The report shall describe the deviation, the probable cause of deviation, the corrective actions that were taken, and any action taken to prevent future occurrences.

b. The Illinois EPA shall be notified in writing of the date of resumption of operation for the affected unit. This notification shall be submitted within 30 days of resuming the operation of the affected unit.

c. For this project for emissions of SO_2, the Permittee shall fulfill reporting requirements of 40 CFR 52.21(r)(6) if they become applicable.

12. Addresses

Two copies of required reports shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one copy shall be sent to the Illinois EPA's regional office:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

13. Authorization to Operate

The Permittee may operate the affected unit and system under this construction permit until a CAAPP permit is revised to address the unit

provided that the Permittee performs the emission testing required by Condition 6 in a timely manner and the Permittee submits a timely application for a revised CAAPP permit for the plant that addresses the requirements of this construction permit. This condition supersedes Standard Condition 6.

If you have any questions on this permit, please contact Minesh Patel at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MVPjws

Attachment 1:

Summary of Changes in the SO_2 Emissions of the Affected Unit

Scenario	Emissions (Tons/Year)
Projected Future Actual Emissions	312.33
Baseline Actual Emissions	290.90
Projected Increase	21.43
PSD Significant Emission Rate	40.0
Significant	No

Explanation:

The increase in SO_2 emissions is based on information provided in the application for the projected future emission of the affected unit (312.33 tons/year) and the past actual emissions of the unit (290.90 tons/year) The baseline emissions are the annual average of actual SO_2 emissions for the two-year period from April 2011 To March 2013.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.

2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act, and Regulations adopted by the Illinois Pollution Control Board.

3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.

4. The Permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:

   a. to enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,

   b. does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,

   c. does not release the Permittee from compliance with the other applicable statues and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,

   d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.

   b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.

7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:

   a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or

   b. upon finding that any standard or special conditions have been violated, or

   c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

10.9906

031300 AAJ
10K

KOPPERS
Koppers Inc.
Carbon Materials and Chemicals
3900 South Laramie Avenue
Cicero, IL 60804-4523
Tel 708 222 3483
Fax 708 656 6079
www.koppers.com

10/6/2023

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney. under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements. Koppers is providing this notification of a recent series of limited-duration events involving the temporary inoperability of components of air pollution control systems at the Stickney plant. With respect to each event, Attached Table 1 describes the event and the cause, and identifies corrective actions.

As shown in Table 1, with limited exceptions that are otherwise being addressed, the majority of the recent events were associated with the commissioning of back-up pollution control systems. Koppers is working diligently to complete the commissioning process and thereby eliminate the cause of the events.

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

Seth Herring
Plant Manager

yas

Table 1: Summary of Deviations
Reporting Period: September 8, 2023 through October 7, 2023

Date of Deviation	Duration of Deviation			Summary of Deviation				Cause of the Event	Corrective/Preventive Action Taken
	Start (hh:mm)	Finish (hh:mm)	Total deviation Period (Minutes)	Total Deviation Period (hours)	Regulation/Permit Conditions (see footnote)	Emission Rate (lb/hr)	Estimated Emissions (lbs)		
September 8, 2023	1:55 PM	2:06 PM	11	0.183	2,5	58.98	10.8	Malfunction of Tubeheater Waste Gas Burning System Components	Complete Commissioning of back-up control system
September 9, 2023	3:27 AM	3:32 AM	5	0.083	5	58.98	4.9	Malfunction of Tubeheater Waste Gas Burning System Components	Complete Commissioning of back-up control system
September 11, 2023	9:55 AM	9:59 AM	4	0.067	5	58.98	3.9	Malfunction of Tubeheater Waste Gas Burning System Components	Complete Commissioning of back-up control system
September 12, 2023	3:03 AM	3:08 AM	5	0.083	1,3	60.54	5.0	Operational Upsets	Complete Commissioning of back-up control system
September 12, 2023	3:12 AM	3:17 AM	5	0.083	1,3	60.54	5.0	Operational Upsets	Complete Commissioning of back-up control system
September 12, 2023	3:20 AM	3:30 AM	10	0.167	1,2,3	60.54	10.1	Operational Upsets	Complete Commissioning of back-up control system
September 12, 2023	2:00 PM	2:08 PM	8	0.133	1,2,3	60.54	8.1	Operational Upsets	Complete Commissioning of back-up control system
September 14, 2023	12:17 AM	12:26 AM	9	0.150	1,2,3	60.54	9.1	Operational Upsets	Complete Commissioning of back-up control system
September 14, 2023	9:41 AM	9:44 AM	3	0.050	1,3,5	119.52	6.0	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system
September 14, 2023	9:49 AM	9:55 AM	6	0.100	1,2,3,5	119.52	12.0	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system
September 14, 2023	2:39 PM	2:42 PM	3	0.050	1,3,5	119.52	6.0	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system
September 14, 2023	2:50 PM	2:54 PM	4	0.067	1,3,5	119.52	8.0	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system
September 14, 2023	3:02 PM	3:09 PM	7	0.117	1,2,3,5	119.52	13.9	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system
September 15, 2023	7:59AM	8:07 AM	8	0.133	1,2,3	60.54	8.1	Operational Upsets	Complete Commissioning of back-up control system
September 16, 2023	12:28 AM	12:33 AM	5	0.083	1,5	60.54	5.0	Shutting Down Units, Operator Error	Training & corrective action with employee.
September 16, 2023	1:33 AM	3:20 AM	107	1.783	1	1.56	2.8	Mechanical failure of #2 Vent Circulation Pumps	Fix the Pump and put it back in operation
September 16, 2023	3:20AM	6:40 AM	200	3.333	1	1.26	4.2	Mechanical failure of #2 Vent Circulation Pumps	Fix the Pump and put it back in operation
September 17, 2023	4:14 PM	4:19 PM	5	0.083	1,5	60.54	5.0	Operator Error ceused low loop flow and tripped the Tubeheater while bringing the unit up to production	Training & corrective action with employee.
September 18, 2023	9:38 AM	9:41 AM	3	0.050	1,5	60.54	3.0	Operational Upsets	Complete Commissioning of back-up control system
September 20, 2023	4:50 PM	4:56 PM	6	0.100	1,5	60.54	6.1	Operational Upsets	Complete Commissioning of back-up control system
September 20, 2023	5:49 PM	5:52 PM	3	0.050	1	60.54	3.0	Starting Up the unit, Operator Error	Training & corrective action with employee.
September 21, 2023	1:49 PM	1:53 PM	4	0.067	1,5	59.28	4.0	Operational Upsets	Complete Commissioning of back-up control system
September 24, 2023	4:33 PM	4:53 PM	20	0.333	1,2,5	60.54	20.2	Operational Upsets	Complete Commissioning of back-up control system
September 25, 2023	7:37 AM	7:57 AM	20	0.333	1	1.56	0.5	PLC Communication Issues	Complete Commissioning of back-up control system
September 26, 2023	11:02 AM	11:07 AM	5	0.083	1,5	60.54	5.0	Operational Upsets	Complete Commissioning of back-up control system
September 26, 2023	11:39 AM	11:43 AM	4	0.067	1,5	60.54	4.0	Operational Upsets	Complete Commissioning of back-up control system
October 2, 2023	1:58 AM	2:03 AM	4	0.067	1	1.56	0.1	Operational Upsets	Complete Commissioning of back-up control system
October 5, 2023	10:05 AM	10:11 AM	6	0.100	1,5	60.54	6.1	Operational Upsets	Complete Commissioning of back-up control system

Table 1: Summary of Deviations
Reporting Period: September 8, 2023 through October 7, 2023

Date of Deviation	Duration of Deviation			Summary of Deviation				Cause of the Event	Corrective/Preventive Action Taken
	Start (hh:mm)	Finish (hh:mm)	Total deviation Period (Minutes)	Total Deviation Period (hours)	Regulation/Permit Conditions (see footnote)	Emission Rate (lb/hr)	Estimated Emissions (lbs)		
October 5, 2023	11:31 AM	11:34 AM	3	0.050	1	60.54	3.0	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system
October 5, 2023	11:44 AM	11:49 AM	5	0.083	1,3	60.54	5.0	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system
October 5, 2023	12:09 PM	12:12 PM	3	0.050	1	60.54	3.0	Interruption of environmental controls due to commissioning of back-up control system	Complete Commissioning of back-up control system

Footnotes
Regulation/Permit Conditions

1 CP#14100012 - Permit condition 2.2.1.a (Naphthalene Plant Tanks)
2 IAC 35, § 218.301 (VOM emissions <8 lbs/hr)
3 CP#15080025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4 CP# 08040005 - Permit condition 1a. (Pitch Tanks)
5 CP#11100041 - Permit condition 1.a and/or 5.b (Tube Heater #2 emission limit)

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CC: Illonr

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11/2/2023

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney. under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements. Koppers is providing this notification of a recent series of limited-duration events involving the temporary inoperability of components of air pollution control systems at the Stickney plant. With respect to each event, Attached Table 1 describes the event and the cause, and identifies corrective actions.

As shown in Table 1, with limited exceptions that are otherwise being addressed, the majority of the recent events were associated with the commissioning of back-up pollution control systems. Koppers is working diligently to complete the commissioning process and thereby eliminate the cause of the events.

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

Seth Herring
Plant Manager

Table 1: Summary of Deviations
Reporting Period: October 6, 2023 Through November 1, 2023

Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see Footnote)	Emission Rate (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
10/6/23 9:36 AM	10/6/23 1:14 PM	162	4	3.8	10.3	Hardware for the Natural Gas Controller Failer	Switched to PSB, Replaced Hardware and Restart TO
10/6/23 9:59 AM	10/6/23 11:37 AM	98.00	6	3.0	4.9	Leak on the Unit forced poduction to shutoff Tubeheater/waste gas burning, shutting down the process but hold vacuum until leak stopped.	
10/9/23 3:40 AM	10/9/23 3:43 AM	3.00	2,5	57.4	2.9	Operational Upset	Complete Commissioning of back-up control system
10/10/23 8:23 AM	10/10/23 9:20 AM	57.00	6	3.0	2.8	Operational Upset	Complete Commissioning of back-up control system
10/10/23 10:34 AM	10/10/23 10:48 AM	14.00	2,5	57.4	13.4	Operational Upset	Complete Commissioning of back-up control system
10/15/23 8:24 PM	10/16/23 12:20 AM	236.00	6	3.0	11.7	Glitch in the PLC prevented #2 vent fumes going to TO	Field Troubleshooting and clearing the alarms
10/16/23 8:12 AM	10/16/23 8:14 AM	2.00	6	3.0	0.1	Operational Upset	Complete Commissioning of back-up control system
10/16/23 11:24 AM	10/16/23 1:11 PM	107.00	6	3.8	6.8	Leak on the South Circulation pump, caused combustion chamber temp to exceed 1625F and tripped TO	Switched to North Pump and restarted TO
10/17/23 9:14 AM	10/17/23 9:16 AM	2.00	6	3.0	0.1	Operational Upset	Complete Commissioning of back-up control system
10/18/23 9:19 AM	10/18/23 9:22 AM	3.00	6	3.0	0.1	Operational Upset	Complete Commissioning of back-up control system
10/19/23 3:03 AM	10/19/23 3:27 AM	24.00	6	3.0	1.2	Operational Upset	Complete Commissioning of back-up control system
10/19/23 7:25 PM	10/19/23 7:28 PM	3.00	5	78.9	3.9	Operational Upset	Complete Commissioning of back-up control system
10/20/23 9:51 PM	10/20/23 9:55 PM	4.00	5	76.2	5.1	Operational Upset	Complete Commissioning of back-up control system
10/24/23 5:26 PM	10/24/23 5:30 PM	4.00	5	57.4	3.8	Operational Upset	Complete Commissioning of back-up control system
10/27/23 8:46 PM	10/27/23 8:55 PM	9.00	2,5	57.4	8.6	Operational Upset	Complete Commissioning of back-up control system
10/30/23 4:22 AM	10/30/23 4:26 AM	4.00	5	78.9	5.3	Operational Upset	Complete Commissioning of back-up control system
10/31/23 9:56 AM	10/31/23 12:02 PM	126.00	2,3	4.8	10.1	Nitrogen Purge Failure	Repair Solenoid valve
10/31/23 5:05 PM	10/31/23 5:09 PM	4.00	3	57.4	3.8	Operational Upset	Complete Commissioning of back up control system
11/1/23 4:17 PM	11/1/23 4:24 PM	7.00	3	57.4	6.7	Operational Upset	Complete Commissioning of back-up control system

Footnotes
Regulation/Permit Conditions

1 CP#14180012 - Permit condition 2 2.1 a. (Naphthalene Plant Tanks)
2 IAC 35, § 218 301 (VOM emissions <8 lbs/hr)
3 CP#15080029 - Permit condition 1 a. and/or 5 a. (Tube Heater #1 emission limit)
4 CP# 08040005 - Permit condition 1a (Pitch Tanks)
5 CP#11180041 - Permit condition 1 a and/or 5 b. (Tube Heater #2 emission limit)
6 CP#09040054 - Permit condition 2 d. (Fume system Ter TO requirement)

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11/30/2023

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney. under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements. Koppers is providing this notification of a recent series of limited-duration events involving the temporary inoperability of components of air pollution control systems at the Stickney plant. With respect to each event, Attached Table 1 describes the event and the cause, and identifies corrective actions.

As shown in Table 1, with limited exceptions that are otherwise being addressed, the majority of the recent events were associated with the commissioning of back-up pollution control systems. Koppers is working diligently to complete the commissioning process and thereby eliminate the cause of the events.

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

Seth Herring
Plant Manager

yas

Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission Rate (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
11/4/23 9:27 AM	11/4/23 10:00 AM	28.00	1,6	3.6	1.7	Instrument air failure to TO lead to safety permissives shutting down TO	Restore instrument air and restart TO
11/4/23 9:27 AM	11/4/23 9:46 AM	19.00	1,6	0.1	0.0		
11/5/23 7:42 AM	11/5/23 8:51 AM	69.00	1,2,5,6,7	58.7	67.5	Lost waste gas on Unit 2 while switching feeds, followed by steam eductor pressure instrument malfunction	Recalibrate instrument and restore waste gas burning
11/7/23 8:27 AM	11/7/23 12:16 AM	229.00	1,6	3.5	13.2	Lost power to Tar TO control panel due to human error, followed by solenoid valve failure on #2 vent system	Restore power, restart TO and replace solenoid valve
11/8/23 5:12 PM	11/8/23 5:18 PM	6.00	1,3,6,7	75.2	7.5	Operational Upsets	Complete Commissioning of back-up control system
11/9/23 8:01 PM	11/9/23 8:03 PM	2.00	1,6	59.2	2.0	Operational Upsets	Complete Commissioning of back-up control system
11/10/23 12:17 PM	11/10/23 12:21 PM	4.00	1,3,6,7	87.2	5.8	Operational Upsets	Complete Commissioning of back-up control system
11/10/23 3:43 PM	11/10/23 3:47 PM	4.00	1,3,6,7	87.2	5.8	Operational Upsets	Complete Commissioning of back-up control system
11/10/23 5:52 PM	11/10/23 5:57 PM	5.00	1,3,6,7	81.2	6.8	Operational Upsets	Complete Commissioning of back-up control system
11/11/23 9:21 AM	11/11/23 9:23 AM	2.00	1,6	62.6	2.1	Operational Upsets	Complete Commissioning of back-up control system
11/13/23 9:25 AM	11/13/23 9:27 AM	2.00	1,6	62.6	2.1	Programming Glitch, while handing over Unit 1 PWG to Ops	Fix PLC code and handed over Unit 1 Waste Gas Backup Control System
11/13/23 9:28 AM	11/13/23 9:40 AM	12.00	1,6	12.9	2.6	Programming Glitch, while handing over Unit 1 PWG to Ops	Fix PLC code and handed over Unit 1 Waste Gas Backup Control System
11/13/23 8:48 PM	11/13/23 8:51 PM	3.00	1,5,6,7	98.9	4.9	Operational Upsets	Complete Commissioning of back-up control system for Unit 2
11/14/23 11:32 PM	11/14/23 11:36 PM	4.00	1,5,6,7	88.5	5.9	Operational Upsets	Complete Commissioning of back-up control system for Unit 2

Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission Rate (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
11/16/23 11:41 AM	11/16/23 12:12 PM	31.00	1,2,5,6,7	58.0	29.9	Lost tubeheater while seal change is in progress, operators could not shut off vacuum pumps due to communication glitch	Complete Commissioning of back-up control system for Unit 2
11/16/23 12:31 PM	11/16/23 12:33 PM	2.00	1,5,6,7	66.5	2.2	Lost tubeheater while seal change is in progress, operators could not shut off vacuum pumps due to communication glitch	Complete Commissioning of back-up control system for Unit 2
11/17/23 1:41 AM	11/17/23 1:56 AM	15.00	1,2,5,6,7	58.6	14.6	Operational upsets	Complete Commissioning of back-up control system for Unit 2
11/22/23 6:17 AM	11/22/23 6:27 AM	10.00	2,5,6,7	57.4	9.6	Shutting Down Unit 2 to circulation, lost tubeheater when BOC setpoint was changed	Complete Commissioning of back-up control system for Unit 2

Footnotes

Regulation/Permit Conditions

1	CP#14100012 - Permit condition 2.2.1.a. (Naphthalene Plant Tanks)
2	IAC 35, § 218.302 (TO control if VOM emissions are >8 lbs/hr)
3	CP#15080025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4	CP# 08040005 - Permit condition 4(b) (Pitch Tanks. 98% control)
5	CP#11100041 - Permit condition 1.a and/or 5.b. (Tube Heater #2 emission limit)
6	CP#00040051 - Permit condition 2.d. (Tar TO. 98% Control Requirement requirement)
7	35 Ill. Adm. Code 218.986(a) (81% control. Tar Distillation Process)

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12-13-23 cc: Mail

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: MACT Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois which includes the Naphthalene Plant subject to the Synthetic Organic Chemical Manufacturing Industry: Organic National Emission Standards for Hazardous Air Pollutants (NESHAP) - 40 CFR 63 Subparts F,G,H,I otherwise known as the Hazardous Organic NESHAP (HON) as well as the General Provisions under 40 CFR 63 Subpart A. The General Provisions under 63.6(e)(3)(iv) requires Koppers to report to the administrator (IEPA) Startup, Shutdown, and Malfunction (SSM) events when the SSM plan procedures were not followed. The initial report is due within 2 working days (phone or fax) and a letter within 7 working days.

The reports are required to contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction (SSM) plan, describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions), and actions taken to minimize emissions. Table 1 in Attachment 1 summarizes the event as required under 63.10(d)(5)(ii).

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

L. Seth Herring
Plant Manager CMC NA

yes

Attachment 1 – MACT SSM Events

Table 1. Summary of Deviations
7-Day Report

Event Number	Event Cause	Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken	Reason for not following the SSM Plan
1	Naph TO	4/20/23 5:29 AM	4/20/23 5:52 AM	33.00	8,9	1.2	Server disruption shutdown the plant again. Vacuum pumps were left off for most of the duration. However, one of the pumps was turned on 33 minutes prior to getting the PWG lined up. TO was running but atmospheric valve was still open. Emissions only occurred for 33 minutes.	Vacuum pump started up out of sequence to align with the plan. Action taken was to get the PWG lined up and atmospheric valve closed. Retraining for all applicable parties to be completed.	Operator error in not following the plan and/or lack of training. Process will automatically shutdown down in the future and eliminate these types of events.
2	Naph TO	7/3/23 10:13 PM	7/4/23 6:21 AM	488.00	8,9	20.9	Unknown cause as to why TO kicked out. Remained offline for an extended period. Vacuum pump remained running for 4 hours, 9 minutes after losing TO. Pulled vacuum for an additional 1 hour, 9 minutes past the time limit while still bypassing the TO. After getting the TO running the vacuum pump was restarted before lining up PWG, scrubbing atmosphere valve was left open, XV-36718. Pulled vacuum for 34 minutes before getting PWG lined up properly. Acid washer was not shutdown during this period. Ran acid washer for 5 hours, 8 minutes while PWG was not lined up.	Vacuum pump started up out of sequence to align with the plan. Action taken was to get the PWG lined up and atmospheric valve closed and restart Naph TO. Engineering Department has been assigned to implement automatic shutdown controls when time limit expires.	Operator error in not following the plan and/or lack of training. Process will automatically shutdown down in the future and eliminate these types of events.
3	Naph TO	8/18/23 10:07 AM	8/18/23 1:23 PM	196.00	8,9	6.9	While troubleshooting scrubber blower, B-693A, the running fan, B-6938, kicked out. The TO stayed online but PWG did not remain lined up through the scrubber and bypassed. The acid washer was shutdown prior to the 3 hour bypass time limit. The vacuum pump was never shutoff during this time. Vacuum was pulled for 16 minutes before PWG was lined back up.	Lined up PWG through scrubber. Engineering department plans to install programming to kick out pumps and acid washer after time expires.	Operator error in not following the plan and/or lack of training. Process will automatically shutdown down in the future and eliminate these types of events.
4	Naph TO	9/16/23 11:30 AM	9/16/23 2:54 PM	204.00	8,9	7.1	The seal oil tank overflowed into the TO K/O pot which kicked out the TO. Vacuum pumps were left running the entire time. Pulled vacuum for 24 minutes after timer expired.	Restarted TO and lined up PWG through the scrubber. Engineering department to install programming	Operator error in not following the plan and/or lack of training. Process will automatically shutdown down in the future and eliminate these types of events.

Footnote
Regulation/Permit Conditions
8 CP#14100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)
9 35 Ill. Adm. Code 218.986(a) (Naphthalene TO, 81% control requirement)
* Naphthalene Plant tank emissions will be included in the 30 day report

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KOPPERS

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12-20-23

Illinois Environmental Protection Agency
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PO Box 19276
Springfield, IL 62794-9276

RE: MACT Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois which includes the Naphthalene Plant subject to the Synthetic Organic Chemical Manufacturing Industry: Organic National Emission Standards for Hazardous Air Pollutants (NESHAP) - 40 CFR 63 Subparts F,G,H,I otherwise known as the Hazardous Organic NESHAP (HON) as well as the General Provisions under 40 CFR 63 Subpart A. The General Provisions under 63.6(e)(3)(iv) requires Koppers to report to the administrator (IEPA) Startup, Shutdown, and Malfunction (SSM) events when the SSM plan procedures were not followed. The initial report is due within 2 working days (phone or fax) and a letter within 7 working days.

The reports are required to contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction (SSM) plan, describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions), and actions taken to minimize emissions. Table 1 in Attachment 1 summarizes the event as required under 63.10(d)(5)(ii).

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

L. Seth Herring
Plant Manager CMC NA

yas

Attachment 1 – MACT SSM Events

Table 1. Summary of Deviations
7-Day Report

Event Number	Event Cause	Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken	Reason for not following the SSM Plan
1	Naph TO	12/15/23 11:58 PM	12/16/23 3:42 AM	224.00	8,9	7.8	TO kicked out for reasons unknown, alarm history indicates a low low-oil flow condition, unable to verify. Able to get TO restarted and up to temperature; however, the process waste gas (PWG) was not lined up properly for a total of 224 minutes. Vacuum pumps were running the entire time as well as the acid washer.	Restarted TO and lined up PWG. Retraining for all applicable parties to be completed.	Operator error in not following the plan and/or lack of training. Process will automatically shut down in the future and eliminate these types of events.

Footnotes
Regulation/Permit Conditions
8 CP814100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)
9 35 Ill. Adm. Code 218.986(a) (Naphthalene TO, 81% control requirement)

Notes
1 Naphthalene Plant tank emissions will be included in the 30 day report

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CC: Mohr

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12/28/2023

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements.

The reports are to describe the event, the probable cause of the deviations, any corrective actions or preventive measures taken, and steps to avoid future deviations. The attached Table(s) summarize deviations from a requirement of the CAAPP permit or another requirement as noted.

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

Seth Herring
Plant Manager

yas

Table 1: Naphthalene Plant Summary of Deviations

30-Day Report

Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission Rate (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
12/1/23 6:08 AM	12/1/23 7:33 AM	85	8,9	2.1	3.0	High level switch on the drop out leg kicked out the TO	Emptied the drop out leg into a drum, restarted TO, and lined up PWG
12/3/23 1:56 PM	12/4/23 11:50 PM	202	8,9	2.1	7.1	High level in KO pot, T-675, kicked out TO. Event happened several times.	Pumped T-675 empty. Restarted TO and lined up PWG
12/4/23 12:34 AM	12/4/23 1:59 AM	85	8,9	2.1	3.0	TO kicked out due to low DP across the oil heater, loss of oil flow.	Restored oil flow through the heater, restarted TO, and lined up PWG
12/9/23 12:00 PM	12/9/23 1:20 PM	80	8,9	2.1	2.8	High level in KO pot, T-675, kicked out TO and V-640 reboiler.	Pumped T-675 empty. Restarted TO and lined up PWG
12/10/23 11:26 PM	12/11/23 1:27 AM	121	8,9	2.1	4.2	Hot oil pump, P-672B, kicked out. Loss of oil flow interlocked the reboiler and TO off. Had to switch to hot oil pump, P-672A	Restarted hot oil pump, restarted TO, and lined up PWG
12/16/23 12:08 AM	12/16/23 3:52 AM	224.00	8,9	2.1	7.8	TO kicked out for reasons unknown, alarm history indicates a low low-oil flow condition, unable to verify. Able to get TO restarted and up to temperature; however, the process waste gas (PWG) was not lined up properly for a total of 224 minutes. Vacuum pumps were running the entire time as well as the acid washer.	Restarted TO and lined up PWG. Retraining for all applicable parties to be completed.

Footnotes

Regulation/Permit Conditions

8 CP#14100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)

9 35 Ill. Adm. Code 218.965(a) (Naphthalene TO 81% control requirement)

Table 2: Tar Plant Summary of Deviations

30-Day Report

Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission Rate (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
11/30/23 10:07 PM	11/30/23 10:10 PM	3.00	1,5,6,7	98.9	4.9	Complete Commissioning of back-up control system for Unit 2.	Bypass vent was closed, and emissions were routed to thermal oxidizer

Footnotes

Regulation/Permit Conditions

1 CP#14100012 - Permit condition 2.2.1.a. (Naphthalene Plant Tanks)
2 IAC 35, § 218.302 (TO control if VOM emissions are >8 lbs/hr)
3 CP#15060025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4 CP# 06040005 - Permit condition 4(b) (Pitch Tanks, 98% control)
5 CP#11100041 - Permit condition 1.a and/or 5.b. (Tube Heater #2 emission limit)
6 CP#00040051 - Permit condition 2.d. (Tar TO, 98% Control Requirement requirement)
7 35 Ill. Adm. Code 218.986(a) (81% control, Tar Distillation Process)

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cc: Mohr

Koppers Inc.
Carbon Materials and Chemicals
3900 South Laramie Avenue
Cicero, IL 60804-4523
Tel 708 222 3483
Fax 708 656 6079
www.koppers.com

1/23/2024

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements.

The reports are to describe the event, the probable cause of the deviations, any corrective actions or preventive measures taken, and steps to avoid future deviations. The attached Table(s) summarize deviations from a requirement of the CAAPP permit or another requirement as noted.

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

Seth Herring
Plant Manager

yas

Table 1: Naphthalene Plant Summary of Deviations
30-Day Report

Start Time	End Time	Deviation Period (Minutes)	Duration Period (Hours)	Regulation/Permit Condition (see footnote)	Emission Rate[2] (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
1/4/24 9:03 AM	1/4/24 9:24 AM	21.00	0.35	8,9	2.1	0.7	TO was running but atmospheric valve, XV-36718, opened to bypass to atmosphere. Unsure why the valve opened but we were quickly able to close the valve.	Lined up process waste gas (PWG) through the scrubber
1/10/24 10:41 AM	1/10/24 12:45 PM	124.00	2.07	8,9	2.1	4.3	Attempted to fix the TO drop out leg level indicator by steaming it out. This caused the float to get stuck at 100%, which kicked out the TO. Got the TO to start and back up to temperature, but unable to line up PWG. After 124 minutes of being unable to line up PWG the vacuum pumps were shutoff. Acid washer was already down at this time.	Shutdown and did not start up until PWG was lined up
1/12/24 7:54 AM	1/12/24 10:08 AM	134.00	2.23	8,9	2.1	4.7	TO shutdown to pull positioner off of the cooling air damper to use to repair the Tar TO.	Restarted the TO and lined up PWG
1/13/24 1:12 PM	1/13/24 6:45 PM	333.00	5.55	8,9	2.1	11.7	TO kicked out due to low DP across the velocity section	Restarted the TO and lined up PWG
1/15/24 10:53 PM	1/16/24 2:19 AM	206.00	3.43	8,9	2.1	7.2	TO kicked out due to low DP across the velocity section	Kept the vacuum pump off until TO issues are resolved
1/19/24 4:38 PM	1/20/24 4:40 AM	722.00	12.033	8,9	2.1	25.3	TO kicked out from a high level in the KO pot, T-675. Once restarted, the TO struggled to get up to temperature so PWG could be lined up.	Shutdown the vacuum pump. Programming to automatically shutdown when the timer expires has been activated.

Footnotes
Emissions are based on September 2020 stack test assuming 98% control.

Regulation/Permit Conditions

1	CP#14100012 - Permit condition 2.2.1.a. (Naphthalene Plant Tanks)
2	IAC 35, § 218.302 (TO control if VOM emissions are >6 lbs/hr)
3	CP#15080025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4	CP# 08040005 - Permit condition 4(b) (Pitch Tanks, 98% control)
5	CP#11100041 - Permit condition 1.a and/or 5.b. (Tube Heater #2 emission limit)
6	CP#00040051 - Permit condition 2.d. (Tar TO, 98% Control Requirement requirement)
7	35 Ill. Adm. Code 218.966(a) (81% control, Tar Distillation Process)

Table 2: Tar Plant Summary of Deviations
30-Day Report

Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission Rate (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Actions Taken
12/24/23 7:18 AM	12/24/23 8:42 AM	84.00	1,6	1.7	2.4	Lost emergency fire suppression steam supply	For process safety reasons TO was shutdown, Tar and Napthalene and Acid Washer units were shutdown
1/7/24 8:14 AM	1/7/24 8:49 AM	35.00	6	3.2	1.9	Malfunction of pressure instrument on Unit 1 caused vent valve on #2 fume system open to ATM	Repair the instrument, updated the PLC logic
1/10/24 11:58 AM	1/10/24 5:02 PM	304.00	2,6	9.3	47.1	Malfunction of control valve on Tar TO resulted in Tar TO shutdown. Barge unloading to T-101 was underway when the Tar TO shutdown. Barge loading had to continue to avoid other environmental impacts.	Complete project to Automatically Shutdown of Tar Units when Tar TO shutsdown
1/10/24 9:29 PM	1/10/24 10:14 PM	45.00	6	3.1	2.4	Malfunction of pressure instrument on Unit 1 caused vent valve on #2 fume system open to ATM	Repair the instrument, updated the PLC logic
1/10/24 11:00 PM	1/10/24 11:51 PM	51.00	6	4.6	3.9	Malfunction of control valve on Tar TO resulted in Tar TO shutdown	Complete project to Automatically Shutdown of Tar Units when Tar TO shutsdown
1/12/24 6:30 AM	1/12/24 6:32 AM	2.00	6	6.6	0.2	Malfunction of control valve on Tar TO resulted in Tar TO shutdown	Complete project to Automatically Shutdown of Tar Units when Tar TO shutsdown

Footnotes

Regulation/Permit Conditions

1 CP#14100012 - Permit condition 2.2.1.a. (Naphthalene Plant Tanks)
2 IAC 35, § 218.302 (TO control if VOM emissions are >8 lbs/hr)
3 CP#15080025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4 CP# 08040005 - Permit condition 4(b) (Pitch Tanks. 98% control)
5 CP#11100041 - Permit condition 1.a and/or 5.b. (Tube Heater #2 emission limit)
6 CP#00040051 - Permit condition 2.d. (Tar TO, 98% Control Requirement requirement)
7 35 Ill. Adm. Code 218.986(a) (81% control, Tar Distillation Process)
8 CP#14100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)
9 35 Ill. Adm. Code 218.986(a) (Naphthalene TO, 81% control requirement)
10 CAAPP 96030134 - Permit Condition 7.7.9(f) Total sulfur content of naphthalene feed based on daily sampling.

Table 3: PAA Plant Summary of Deviations
30-Day Report

Date	Regulation/Permit Condition (see footnote)	Description	Cause of the Event	Corrective/Preventive Action Taken	Comments
11/30/2023	10	The naphthlene feed sample was not taken.	Operator error - sample was not taken.	Operators are instructed to take a sample at midnight and the lab/environmental will follow up if a sample is not received allowing more time remaining in the day for a daily sample.	Emissions of SO2 from the process were well below the permit limit as measured by the SO2 CEMS. Naphthlane feed from the storage tanks to the reactors was not sampled on 11/30/2023, however, sample results from the Naphalene Plant to storage show the wt% sulfur was less than 0.8 wt%. Baased on the CEMS aand the Naphthalene Plant sampling the SO_2 permitted emission limit was not exceeded.

Footnotes
Regulation/Permit Conditions

1	CP#14100012 - Permit condition 2.2.1.a. (Naphthalene Plant Tanks)
2	IAC 35, § 218.302 (TO control if VOM emissions are >8 lbs/hr)
3	CP#15080025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4	CP# 08040005 - Permit condition 4(b) (Pitch Tanks. 98% control)
5	CP#11100041 - Permit condition 1.a and/or 5 b. (Tube Heater #2 emission limit)
6	CP#00040051 - Permit condition 2.d. (Tar TO. 98% Control Requirement requirement)
7	35 Ill. Adm. Code 218.986(a) (81% control, Tar Distillation Process)
8	CP#14100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)
9	35 Ill. Adm. Code 218.986(a) (Naphthalene TO. 81% control requirement)
10	CAAPP 96030134 - Permit Condition 7 7 9(f) Total sulfur content of naphthalene feed based on daily sampling.

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CC: Mohr

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1/23/24

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: MACT Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois which includes the Naphthalene Plant subject to the Synthetic Organic Chemical Manufacturing Industry: Organic National Emission Standards for Hazardous Air Pollutants (NESHAP) - 40 CFR 63 Subparts F,G,H,I otherwise known as the Hazardous Organic NESHAP (HON) as well as the General Provisions under 40 CFR 63 Subpart A. The General Provisions under 63.6(e)(3)(iv) requires Koppers to report to the administrator (IEPA) Startup, Shutdown, and Malfunction (SSM) events when the SSM plan procedures were not followed. The initial report is due within 2 working days (phone or fax) and a letter within 7 working days.

The reports are required to contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction (SSM) plan, describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions), and actions taken to minimize emissions. Table 1 in Attachment 1 summarizes the event as required under 63.10(d)(5)(ii).

If there are any questions concerning this report, please contact Sidney Lipp of Koppers at (708) 427-6980.

Sincerely,

Seth Herring
Plant Manager CMC NA

yas

Attachment 1 – MACT SSM Events

Table 1. Summary of Deviations
7-Day Report

Event Number	Event Cause	Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken	Reason for not following the SSM Plan
1	Naph TO	1/15/24 10:53 PM	1/16/24 2:19 AM	206.00	8,9	7.2	TO kicked out due to low DP across the velocity section	Kept the vacuum pump off until TO issues are resolved	Operator error in not following the SSM plan to shutdown the plant.
2	Naph TO	1/19/24 4:38 PM	1/20/24 4:40 AM	722.00	8,9	25.3	TO kicked out from a high level in the KO pot, T-675. Once restarted, the TO struggled to get up to temperature so PWG could be lined up.	Shutdown the vacuum pump. Programming to automatically shutdown safely was activated on 1/22/2024.	Operator error in not following the SSM plan to shutdown the plant.

Footnotes

Regulation/Permit Conditions

8 CP#14100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)

9 35 Ill. Adm. Code 218.986(a) (Naphthalene TO, 81% control requirement)

Notes

$ Naphthalene Plant tank emissions will be included in the 30 day report

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KOPPERS
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02/22/2024

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements.

The reports are to describe the event, the probable cause of the deviations, any corrective actions or preventive measures taken, and steps to avoid future deviations. The attached Table(s) summarize deviations from a requirement of the CAAPP permit or another requirement as noted.

If there are any questions concerning this report, please contact Kerry Grigsby of Koppers at (708) 209-9462.

Sincerely,

Seth Herring
Plant Manager

yes

Table 1: Naphthalene Plant Summary of Deviations

30-Day Report

Start Time	End Time	Emission Unit(s)	Deviation Period (Minutes)	Duration Period (Hours)	Regulation/Permit Condition (see footnote)	Emission Rate[1] (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
2/7/24 6:48 AM	2/7/24 7:48 AM	V610 (Dehydrator Column) V620 (Solvent Column) V630 (Naphthalene Column)	60.00	1.00	8.9	2.1	2.1	Hot oil pump, P-672B, kicked out on HMI temperature. This interlocked the TO and reboiler to shutdown. Got the hot oil system running on P-672A, restarted the TO, and lined up PWG.	Got the hot oil system running, restarted the TO, and lined up PWG.

Footnotes

Emissions are based on September 2020 stack test assuming 99% control.

Regulation/Permit Conditions

1	CP0141 00012 - Permit condition 2.2.1.a (Naphthalene Plant Tanks)
2	IAC 35, § 218.382 (TO control if VOM emissions are >8 lbs/hr)
3	CP0139 0023 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4	CP0 0004008 - Permit condition 4(b) (Flash Tanks, 99% control)
5	CP0111 00041 - Permit condition 1.a and/or 5.b (Tube Heater #2 emission limit)
6	CP0200 0061 - Permit condition 2.d. (Tar TO, 99% Control Requirement requirement)
7	35 Ill. Adm. Code 218.302(e) @1% control Tar Distillation Process)

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KOPPERS

Via UPS Overnight Mail

Koppers Inc.
Carbon Materials and Chemicals
3900 South Laramie Avenue
Cicero, IL 60804-4523
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Fax 708 656 6079
www.koppers.com

February 28, 2024

Mr. Bill Marr, Manager Compliance Section
Illinois Environmental Protection Agency
Bureau of Air- Compliance Section (MC 40)
1021 N. Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

RE: Koppers Inc., Stickney Plant
ID Number: 031300AAJ
Permit Number: 96030134
MON MACT Semi-Annual Compliance Report,
July 1, 2023 – December 31, 2023 Reporting Period
40 CFR Part 63, Subpart FFFF, Section §63.2520(e).

Dear Mr. Marr:

Attached is Koppers Inc., Stickney Plant MON MACT Semi-Annual Compliance Report for the July 1, 2023 – December 31, 2023, reporting period.

A portion of the Stickney Plant operations is subject to the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (MON MACT), 40 CFR Part 63, Subpart FFFF. Koppers Stickney Plant is submitting the Semi-Annual Compliance Report to fulfill the requirements of 40 CFR Part 63, Subpart FFFF, Section §63.2520(e) for the MON-affected Miscellaneous Chemical Processing Units (MCPUs).

The facility is an existing source with three miscellaneous organic chemical production units (MCPUs) subject to this standard: Crude Tar Distillation process, Modified Pavement Sealer Base (MPSB) process, and Carbon Pitch process.

During this reporting period, the Crude Tar Distillation process exhaust points were routed to the two tube heaters (F-101 and F-201) for fuel value. As stated in 40 CFR 63.2550(i), a gas stream transferred for fuel value is exempt from the MON definition of a continuous process vent by the exemption in 63.107(h)(6), as referenced in 63.2550(i). Accordingly, Koppers considers the vent from the Crude Tar Distillation process subject to Group 1 continuous process vent requirements only when it is being routed to the thermal oxidizer.

The Compliance Report consists of the following attached tables:

Table 1: Summary of Routine Maintenance on Storage Vessels Controlled by Flare or Control Device
Table 2: Flare Pilot Flame/Flare Flame Summary
Table 3: Summary of Deviations - Units Operated Without a Continuous Monitoring System (CMS)

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Table 4: Summary of Deviations - MCPUs and Storage Vessels Operated with a Continuous Monitoring System (CMS)
Table 5: Summary of MCPU With Group 2 Process Vents with HAP Usage <10,000 lbs/year that Exceeded a HAP Threshold for the Reporting Period
Table 6: Summary of Process Additions or Revisions from NOCSR
Table 7: Summary of New Operating Scenarios Not Listed in the NOCSR
Table 8: Summary of Heat Exchange System Leaks with Delayed Repair
Table 9: Vent Stream Bypass Summary for Closed Vent Systems
Table 10: SSM Event Resulting in Excess Emissions
Table 11: Semi-Annual Fugitive Emission Report

The MCPUs at Koppers's Stickney Plant facility have no Group 1 Process Wastewater Streams, Group 1 Transfer Racks, or Group 1 storage tanks so reporting information is not required in those categories.

Should you have any questions or require further information, please contact Kerry Grigsby at 708-209-9462.

Sincerely,

L. Seth Herring
Plant Manager CMC NA

Attachments:

Tables 1-11

Copy:
USEPA, Region 5
Air and Radiation Division
77 West Jackson Boulevard (A-18J)
Chicago, Illinois 60604-3507

Illinois EPA – Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 W. Harrison St.
Des Plaines, IL 60016

Certification by a Responsible Official:

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

Signature: L. Seth Herring

Name:
L. Seth Herring

Official Title:
Plant Manager CMC NA

Telephone No.:
708-556-9984

Date Signed:

ATTACHMENT 1 – COMPLIANCE REPORT INFORMATION

This Attachment provides all information required under 40 CFR §63.2520 and referenced regulations. Information is organized by regulatory reference. Regulatory requirements for this compliance report are listed below in italics, followed by Koppers' comments addressing each element or providing the required information.

40 CFR §63.2520 – MON MACT COMPLIANCE REPORTING PROVISIONS

§63.2520(e). Compliance report. The compliance report must contain the information specified in paragraphs (e)(1) through (17) of this section.

§63.2520(e)(1). Company name and address.

Koppers Comments: Koppers, Inc.
3900 South Laramie Avenue
Cicero, Illinois 60804

§63.2520(e)(2). Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.

Koppers Comments: This information is provided on the signature page of this letter.

§63.2520(e)(3). *Date of report and beginning and ending dates of the reporting period.*

Koppers Comments: The date of the report is February 28, 2024. The reporting period begins on July 1, 2023, through December 31, 2023.

§63.2520(e)(4). *For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.*

Koppers Comments: As applicable for each SSM event, Attachment 2 Table 10 indicates whether actions taken were consistent with the procedures specified in the SSM Plan for affected units. This no longer applies on or after August 12, 2023.

§63.2520(e)(5). The compliance report must contain the information on deviations, as defined in §63.2550, according to paragraphs (e)(5)(i), (ii), (iii), and (iv) of this section.

§63.2520(e)(5)(i). If there are no deviations from any emission limit, operating limit or work practice standard specified in this subpart, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

Koppers Comments: Deviations during the reporting period are addressed in *§63.2520(e)(5)(iii) below.*

§63.2520(e)(5)(ii). For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where you are not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in this subpart, you must include the information in paragraphs (e)(5)(ii)(A) through (C) of this section. This includes periods of SSM.

- *(A) The total operating time of the affected source during the reporting period.*
- *(B) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.*
- *(C) Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.*

Koppers Comments: None during reporting period

§63.2520(e)(5)(iii). For each deviation from an emission limit or operating limit occurring at an affected source where you are using a CMS to comply with an emission limit in this subpart, you must include the information in paragraphs (e)(5)(iii)(A) through (L) of this section. This includes periods of SSM.

Koppers Comments: The required information is included in Attachment 2 Table 4.

§63.2520(e)(5)(iv). If you documented in your notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by §63.2525(e) that exceeds an applicable HAP usage or emissions threshold.

> Koppers Comments: Not applicable there are no Group 2 batch process vents established by the criteria above.

§63.2520(e)(6) If you use a CEMS, and there were no periods during which it was out-of-control as specified in §63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.

> Koppers Comments: Not applicable - Koppers does not use CEMS at any MON affected units.

§63.2520(e)(7) Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, you must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario.

> Koppers Comments: Not applicable. No new operating scenarios were implemented during the reporting period.

§63.2520(e)(8). *Records of process units added to a PUG as specified in §63.2525(i)(4) and records of primary product redeterminations as specified in §63.2525(i)(5).*

> Koppers Comments: Koppers does not use PUGs, therefore not applicable.

. Applicable records and information for periodic reports as specified in referenced subparts F, G, H, SS, UU, WW, and GGG of this part and subpart F of 40 CFR part 65.

Koppers Comments: Information required by Subpart UU is contained in the Equipment Leak section of this report. Subparts F, G, H, WW, and GGG are not applicable. The information required by Subpart SS is provided below.

Per 40 CFR 63.999(c)(1) (Subpart SS), the compliance report is required to contain the information described in paragraphs 40 CFR 63.999(c)(1) through (7), as applicable.

(1) Periodic reports shall include the reporting period dates, the total source operating time for the reporting period, and, as applicable, all information specified in this section and in the referencing subpart (40 CFR Part 63, Subpart FFFF), including reports of periods when monitored parameters are outside their established ranges.

Koppers Comments: The reporting period as provided above is July 1, 2023, through December 31, 2023. The source operating times are provided in Attachments 2. Reports of the periods when monitored parameters are outside their established ranges are addressed in these tables as well.

(2) For closed vent systems subject to the requirements of 40 CFR 63.983, the owner or operator shall submit as part of the periodic report the information specified in paragraphs 40 CFR 63.999(c)(2)(i) through (iii) as applicable.

(i) For information recorded in 40 CFR 63.998(d)(1)(iii)(B) through (E);

(B) The date the leak was detected and the date of the first attempt to repair the leak.

Koppers Comments: If applicable, this information will be included in Attachment 3

(C) The date of successful repair of the leak.

Koppers Comments: If applicable, this information will be included in Attachment 3

(D) *The maximum instrument reading measured by the procedures in 40 CFR 63.983(C) after the leak is successfully repaired or determined to be nonrepairable.*

Koppers Comments: If applicable, this information will be included in Attachment 3.

(E) *"Repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. The owner or operator may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.*

Koppers Comments: If applicable, this information is included in Attachment 3.

(ii) *Reports of the times of all periods recorded under 40 CFR 63.998(d)(1)(ii)(A) when the vent stream is diverted from the control device through a bypass line; and*

(iii) *Reports of all times recorded under 40 CFR 63.998(d)(1)(ii)(B) when maintenance is performed in car-sealed valves, when the seal is broken, when the bypass line valve position is changed, or the key for a lock-and-key type configuration has been checked out.*

Koppers Comments: Bypass events are included in Attachment 2 Table 9.

(3) *For flares subject to 40 CFR 63.999, report all periods when all pilot flames were absent or the flare flame was absent as recorded in 40 CFR 63.998(a)(1)(i)(C).*

Koppers Comments: Not applicable – there are no flares

(4) *For storage vessels, the owner or operator shall include in each periodic report the information specified in 40 CFR 63.999(c)(4)(i) though (iii).*

(i) *For the 6-month period covered by the periodic report, the information recorded in 40 CFR 63.998(d)(2)(ii)(A) through (C).*

(A) *The first time of day and date of the requirements of 40 CFR 63.983(a), 63.985(a), or 63.987(a), as applicable, were not met at the beginning of the planned routine maintenance, and*

(B) *The first time of day and date the requirements of 63.983(a), 63.985(a), or 63.987(a), as applicable, were met at the conclusion of the planned routine maintenance.*

Koppers Comments: Not applicable – there are no MON Group 1 storage vessels

(ii) *For the time period covered by the periodic report and the previous periodic report, the total number of hours that the control system did not meet the requirements of 40 CFR 63.983(a), 63.985(a), or 63.987(a) due to planned routine maintenance.*

Koppers Comments: Not applicable – there are no MON Group 1 storage vessels

(iii) *A description of the planned routine maintenance during the next 6-month periodic reporting period that is anticipated to be performed for the control system when it is not expected to meet the required control efficiency. This description shall include the type of maintenance necessary, planned frequency of maintenance, and expected lengths of maintenance periods.*

Koppers Comments: Not applicable – there are no MON Group 1 storage vessels

(5) *If a control device other than a flare is used to control emissions from storage vessels or low throughput transfer racks, the*

periodic report shall describe each occurrence when the monitored parameters were outside of the parameter ranges documented in the Notification of Compliance Status in accordance with paragraph 40 CFR 63.999(b)(3). The description shall include the information specified in 40 CFR 63.999(c)(5)(i) and (ii).

(i) Identification of the control device for which the measured parameters were outside of the established ranges, and

(ii) The cause for the measured parameters to be outside of the established ranges.

Koppers Comments Not applicable – there are no MON Group 1 storage vessels or transfer racks

(6) For process vents and transfer racks (except low throughput transfer racks), periodic reports shall include the information specified in 40 CFR 63.999(c)(6)(i) through (iv).

(i) Periodic reports shall include the daily average values of monitored parameters, calculated as specified in 40 CFR 63.998(b)(3)(i) for any days when the daily average is outside the bounds as defined in 40 CFR 63.998(c)(2)(iii) or (c)(3)(iii), or the data availability requirements defined in paragraphs 40 CFR 63.999(c)(6)(i)(A) through (D) are not met, whether these excursions are excused or unexcused excursions. For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected shall be specified. An excursion means any of the cases listed in 40 CFR 63.999(c)(6)(i)(A) through (C). If the owner or operator elects not to retain the daily average values pursuant to 40 CFR 63.998(b)(5)(ii)(A), the owner or operator shall report this in the Periodic Report.

(A) When the daily average value of one or more monitored parameters is outside the permitted range.

(B) When the period of control or recovery device operation is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a

valid hour of data for at least 75 percent of the operating hours.

(C) *When the period of control or recovery device operation is less than 4 hours in an operating day and more than one of the hours during the period of operation does not constitute a valid hour of data due to insufficient monitoring data.*

(D) *Monitoring data are insufficient to constitute a valid hour of data as used in 40 CFR 63.999(c)(6)(i)(B) and (C), if measured values are unavailable for any of the 15-minute periods within the hour.*

Koppers Comments: This information required above is provided in Attachment 2 Table 4.

(ii) *Report all carbon-bed regeneration cycles during which the parameters recorded under 40 CFR 63.998(a)(2)(ii)(C) were outside the ranges established in the Notification of Compliance Status or in the operating permit.*

Koppers Comments: Not Applicable as Koppers does not operate a carbon bed at any MCPUs.

(iii) *The provisions of 40 CFR 63.999(c)(6)(i) and (ii) do not apply to any low throughput transfer rack for which the owner or operator has elected to comply with 40 CFR 63.985 or to any storage vessel for which the owner or operator is not required, by the applicable monitoring plan established under 40 CFR 63.985(c)(1), to keep continuous records. If continuous records are required, the owner or operator shall specify in the monitoring plan whether the provisions of 40 CFR 63.999(c)(6)(i) and (ii) apply.*

Koppers Comments: Not Applicable as Koppers does not operate any units identified above at the MON MCPUs.

(iv) *If the owner or operator has chosen to use the alternative recordkeeping requirements of 40 CFR 63.998(b)(5), and has not notified the Administrator in the Notification of*

Compliance Status that the alternative recordkeeping provisions are being implemented as specified in 40 CFR 63.999(b)(5), the owner or operator shall notify the Administrator in the Periodic Report submitted immediately preceding implementation of the alternative. The notifications specified in 40 CFR 63.998(b)(5)(ii) shall be included in the next Periodic Report following the identified event.

Koppers Comments: Koppers included notification of all alternative recordkeeping in the Notification of Compliance Status report.

(7) *As specified in 40 CFR 63.997(c)(3), if an owner or operator at a facility not required to obtain a Title V permit elects at a later date to replace an existing control or recovery device with a different control or recovery device, then the Administrator shall be notified by the owner or operator before implementing the change. This notification may be included in the facility's periodic reporting.*

Koppers Comments: Koppers is required to obtain a Title V permit; therefore, this statement is not applicable.

§63.2520(e)(10) *Notification of process change.*

§63.2520(e)(10)(i) *Except as specified in paragraph (e)(10)(ii) of this section, whenever you make a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, you must document the change in your compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the information in paragraphs (e)(10)(i)(A) through (C) of this section.*

(A) A description of the process change.
(B) Revisions to any of the information reported in the original notification of compliance status report under paragraph (d) of this section.
(C) Information required by the notification of compliance status report under paragraph (d) of this section for changes involving the addition of processes or equipment at the affected source.

Koppers Comments: No process changes in this reporting period.

§63.2520(e)(10)(ii) *You must submit a report 60 days before the scheduled implementation date of any of the changes identified in paragraph (e)(10)(ii)(A), (B), or (C) of this section.*

(A) Any change to the information contained in the precompliance report.
(B) A change in the status of a control device from small to large.
(C) A change from Group 2 to Group 1 for any emission point except for batch process vents that meet the conditions specified in §63.2460(b)(6)(i).

Koppers Comments: No changes during this reporting period, therefore, not applicable.

(11) For each flare subject to the requirements in § 63.2450(e)(5), the compliance report must include the items specified in paragraphs (e)(11)(i) through (vi) of this section in lieu of the information required in § 63.999(c)(3) of subpart SS.

Koppers Comments: Not Applicable as Koppers does not operate a flare at the MON MCPUs.

(12) For bypass lines subject to the requirements § 63.2450(e)(6), the compliance report must include the start date, start time, duration in hours, estimate of the volume of gas in standard cubic feet, the concentration of organic HAP in the gas in parts per million by volume and the resulting mass emissions of organic HAP in pounds that bypass a control device. For periods when the flow indicator is not operating, report the start date, start time, and duration in hours.

Koppers Comments: Bypass events are included in Attachment 2 Table 9. This requirement is only required on or after August 12, 2023.

(13) For each nonregenerative adsorber and regenerative adsorber that is regenerated offsite subject to the requirements in § 63.2450(e)(7), you must report the date of each instance when breakthrough, as defined in § 63.2550(i), is detected between the first and second adsorber and the adsorber is not replaced according to § 63.2450(e)(7)(iii)(A).

Koppers Comments: Not Applicable as Koppers does not operate an absorber at the MON MCPUs.

(14) For any maintenance vent release exceeding the applicable limits in § 63.2450(v)(1), the compliance report must include the information specified in

paragraphs (e)(14)(i) through (iv) of this section. For the purposes of this reporting requirement, if you comply with § 63.2450(v)(1)(iv) then you must report each venting event conducted under those provisions and include an explanation for each event as to why utilization of this alternative was required.

Koppers Comments: Not applicable – there are no maintenance vents.

(15) Compliance reports for pressure relief devices subject to the requirements § 63.2480(e) must include the information specified in paragraphs (e)(15)(i) through (iii) of this section.

(i) For pressure relief devices in organic HAP gas or vapor service, pursuant to § 63.2480(e)(1), report the instrument readings and dates for all readings of 500 ppmv or greater.

Koppers Comments: There were no readings above 500 ppmv during the reporting period.

(ii) For pressure relief devices in organic HAP gas or vapor service subject to § 63.2480(e)(2), report the instrument readings and dates of instrument monitoring conducted.

Koppers Comments: Not applicable – there was no pressure release during the reporting period.

(iii) For pressure relief devices in organic HAP service subject to § 63.2480(e)(3), report each pressure release to the atmosphere, including the start date, start time, and duration in minutes of the pressure release and an estimate of the mass quantity in pounds of each organic HAP released; the results of any root cause analysis and corrective action analysis completed during the reporting period, including the corrective actions implemented during the reporting period; and, if applicable, the implementation schedule for planned corrective actions to be implemented subsequent to the reporting period.

Koppers Comments: Not applicable – there was no pressure release during the reporting period.

(16) For each heat exchange system subject to § 63.2490(d), beginning no later than the compliance dates specified in § 63.2445(g), the reporting requirements of § 63.104(f)(2) no longer apply; instead, the compliance report must include the information specified in paragraphs (e)(16)(i) through (v) of this section.

Koppers Comments: Not Applicable all MON affected heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

(17) For process vents and storage tanks in ethylene oxide service subject to the requirements of § 63.2493, the compliance report must include information specified in paragraphs (e)(17)(i) through (iii) of this section.

Koppers Comments: Not Applicable as Koppers does not have equipment in ethylene oxide service at the MON MCPUs.

40 CFR §63.1039 – Equipment Leak Reporting

§63.1039(b) *Periodic Reports. The owner or operator shall report the information specified in paragraphs (b)(1) through (b)(8) of this section, as applicable, in the Periodic Report specified in the referencing subpart.*

§63.1039(b)(1) For the equipment specified in paragraphs (b)(1)(i) through (b)(1)(v) of this section, report in a summary format by equipment type, the number of components for which leaks were detected and for valves, pumps and connectors show the percent leakers, and the total number of components monitored. Also include the number of leaking components that were not repaired as required by §63.1024, and for valves and connectors, identify the number of components that are determined by §63.1025(c)(3) to be nonrepairable.

- *(i) Valves in gas and vapor service and in light liquid service pursuant to §63.1025(b) and (c).*
- *(ii) Pumps in light liquid service pursuant to §63.1026(b) and (c).*
- *(iii) Connectors in gas and vapor service and in light liquid service pursuant to §63.1027(b) and (c).*
- *(iv) Agitators in gas and vapor service and in light liquid service pursuant to §63.1028(c).*
- *(v) Compressors pursuant to §63.1031(d).*

Koppers Comments: This information is included in Attachment 3.

§63.1039(b)(2) *Where any delay of repair is utilized pursuant to §63.1024(d), report that delay of repair has occurred and report the number of instances of delay of repair.*

Koppers Comments: This information is provided in Attachment 3.

§63.1039(b)(3) *If applicable, report the valve subgrouping information specified in §63.1025(b)(4)(iv).*

Koppers Comments: No valves were reassigned between subgroups during the reporting period.

§63.1039(b)(4) *For pressure relief devices in gas and vapor service pursuant to §63.1030(b) and for compressors pursuant to §63.1031(f) that are to be operated at a leak detection instrument reading of less than 500 parts per million, report the results of all monitoring to show compliance conducted within the semiannual reporting period.*

Koppers Comments: This information is included in Attachment 3

§63.1039(b)(5) *Report, if applicable, the initiation of a monthly monitoring program for valves pursuant to §63.1025(b)(3)(i).*

Koppers Comments: This information is included in Attachment 3

§63.1039(b)(6). *Report, if applicable, the initiation of a quality improvement program for pumps pursuant to §63.1035.*

Koppers Comments: Not applicable.

§63.1036(b)(7) *Where the alternative means of emissions limitation for batch processes is utilized, report the information listed in §63.1036(f).*

Koppers Comments: Koppers has not chosen to use the alternative emission limitations in §63.1036(b)(7), therefore the information in §63.1036(f) is not required.

§63.1039(b)(8) *Report the information listed in paragraph (a) of this section for the Initial Compliance Status Report for process units or affected facilities with later compliance dates. Report any revisions to items reported in an earlier Initial Compliance Status Report if the method of compliance has changed since the last report.*

Koppers Comments: No changes in compliance methods have been made since the previous report.

40 CFR §63.104 – Heat Exchange System Reporting

§63.104(f)(2). *Reports. If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by §63.152(c) of subpart G of this part. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported.*

(i) The owner or operator shall report the presence of the leak and the date that the leak was detected.

(ii) The owner or operator shall report whether or not the leak has been repaired.

(iii) The owner or operator shall report the reason(s) for delay of repair. If delay of repair is invoked due to the reasons described in paragraph (e)(2) of this section, documentation of emissions estimates must also be submitted.

(iv) If the leak remains unrepaired, the owner or operator shall report the expected date of repair.

(v) If the leak is repaired, the owner or operator shall report the date the leak was successfully repaired.

Koppers Comments: The heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. As provided in 40 CFR §63.104(a)(1), these heat exchangers are not subject to the monitoring requirements of 40 CFR §63.104.

40 CFR §63.10 – General Provisions Periodic Reporting

§63.10(e)(1) *General. When more than one CEMS is used to measure the emissions from one affected source (e.g., multiple breechings, multiple outlets), the owner or operator shall report the results as required for each CEMS.*

Koppers Comments: Not applicable - Koppers does not use a CEMS at any MCPU.

§63.10(e)(2) *Reporting results of continuous monitoring system performance evaluations.*

The owner or operator of an affected source required to install a CMS by a relevant standard shall furnish the Administrator a copy of a written report of the

results of the CMS performance evaluation, as required under §63.8(e), simultaneously with the results of the performance test required under §63.7, unless otherwise specified in the relevant standard.

Koppers Comments: Reports of CMS performance evaluation results are only required for CEMS of the MON. Koppers does not use a CEMS in any MON affected MCPU. Therefore, this provision is not applicable.

ATTACHMENT 2 – COMPLIANCE REPORT TABLES

Descriptions of MCPUs and Associated CMS
Reporting Period: July 01, 2023 through December 31, 2023
[40 CFR 63.2520(e)(5)(iii)(G), (H), (I) & (J)]

MCPU	MCPU Description (H)	HAP (G)	Associated CMS (I)	Monitored Parameter (I)	Date of Last Certification or Audit (J)
Crude Tar Distillation	The Crude Tar Distillation process consists of raw crude tar being distilled to achieve various refined products for sale or use in other processes at the facility. The combined exhaust point is routed to two tube heaters (F-101 and F-201) for fuel value or to the Tar TO as a back up.	benzene, xylenes, toluene, naphthalene, phenol, styrene, ethylbenzene, cresols, quinoline, biphenyl, dibenzofuran and polyaromatic hydrocarbons (PAHs).	None	None	N/A
Modified Pavement Sealer Base (MPSB)	The Modified Pavement Sealer Base (MPSB) process is a batch operation consisting of four blending tanks. Petroleum tar and pavement sealer base are blended together to produce MPSB. The vents do not require control under the MON. Koppers currently controls three of the four tanks with the existing Tar thermal oxidizer and tube heaters (F-101 and F-201).	naphthalene, quinoline, biphenyl, dibenzofuran and polyaromatic hydrocarbons (PAHs).	None	None	N/A
Carbon Pitch Production	The Type A Carbon Pitch process is a batch operation consisting of five blending tanks. Petroleum pitch and coal tar pitch are blended together to produce Type A Carbon Pitch. The vents are routed to the pitch thermal oxidizer for control.	naphthalene and polyaromatic hydrocarbons (PAHs).	Pitch thermal oxidizer	Thermal oxidizer temperature	9/6/2023

TABLE 1: Summary of Routine Maintenance on Storage Vessels Controlled By Flare or Control Device
[40 CFR 63.999(c)(4)]
Reporting Period: July 01, 2023 through December 31, 2023

MCPU	Tank Identification	Description of Maintenance Event	Duration of Maintenance Event[1]					Planned Maintenance For Next 6-Month Period[2]		
			Date	Start Time	Date Event Concluded	Time Of Day Event was Concluded	Duration (hours)	Description of Maintenance Event	Planned Frequency	Expected Duration (hours)
Not applicable - There are no Group 1 MON storage tanks and therefore no controls are required										

NOTES:
1) Provide this information as required at §63.998(d)(2)(ii).
2) Provide this infomration when planned maintenance may cause the control device to not meet the required control efficiency [§63.999(c)(4)(iii)].

TABLE 2: Flare Pilot Flame / Flare Flame Summary
[40 CFR 63.999(c)(3)]
Reporting Period: July 01, 2023 through December 31, 2023

MCPU	Flare Unit Identification	Duration of Deviation[1]			
		Date	Start Time	End Time	Duration (hours)
Not applicable - The flare has been removed from service					

NOTES:

1) List all periods during the reporting period when pilot flame(s) are absent or, if only the flare flame is monitored, all periods when the flare flame is absent

TABLE 3: Summary of Deviations - Units Operated without Continuous Monitoring System
Reporting Period: July 01, 2023 through December 31, 2023

For each deviation from an emission limit, operating limit, or work practice standard, complete the following information [40CFR 63.2520(e)(5)(ii)]:

List MCPU Where Deviation Occurred	Total Operating Time Of MCPU During this Reporting Period (hours, minutes)	Date of Deviation[1]	MON Compliance Value?	Deviation Occurred During SSM Event? (yes/no)	Duration of Deviation?		Cause of Deviation?	Corrective Action Taken?
					Start (mm/dd/yy hh:mm:ss)	Finish (mm/dd/yy hh:mm:ss)		
None during reporting period								

NOTES:
1) For MCPUs with batch vents, attach operating logs of batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks (LDAR) (40 CFR 63.2520(e)(5)(ii)(C).

N/A = Not Applicable

TABLE 4: Summary of Deviations - MCPUs Operated with Continuous Monitoring System[1]
Reporting Period: July 01, 2023 through December 31, 2023

For each deviation from an emission limit or operating limit in an MCPU with a CMS, complete the following information [40CFR 63.2520(e)(5)(iii)]:

List MCPU or Storage Vessel Where Deviation Occurrd[2]	Identification of Control Device (if applicable)	Date of Deviation	Duration of Deviation[3,4]		Summary of Deviation		Deviation Occurred During SSM Event? (yes/no)	If not SSM Event, List One of these Categories for the Deviation:Control Equipment problem (CEP); Process Problem (PP); Other Known Cause (OKC): or Unknown Cause (UC)
			Start (mm/dd/yy hh:mm:ss)	Finish (mm/dd/yy hh:mm:ss)	Total Deviation Period (hours)	Total Deviation as % of Total MCPU Operating Time in this Reporting Period (%)		
Carbon Ptich	Pitch TO	July 5, 2023	05-Jul-23 13:45:00	05-Jul-23 14:45:00	1.00	0.02%	Yes	
Carbon Ptich	Pitch TO	July 7, 2023	07-Jul-23 08:15:00	07-Jul-23 09:00:00	0.75	0.02%	Yes	
Carbon Ptich	Pitch TO	July 22, 2023	22-Jul-23 00:30:00	22-Jul-23 04:15:00	3.75	0.08%	Yes	
Carbon Ptich	Pitch TO	July 23, 2023	23-Jul-23 15:15:00	23-Jul-23 16:15:00	1.00	0.02%	Yes	
Carbon Ptich	Pitch TO	July 25, 2023	25-Jul-23 09:17:00	25-Jul-23 09:53:00	0.60	0.01%	Yes	
Carbon Ptich	Pitch TO	August 8, 2023	08-Aug-23 19:36:00	08-Aug-23 20:00:00	0.40	0.01%	Yes	
Carbon Ptich	Pitch TO	August 14, 2023	14-Aug-23 11:23:00	14-Aug-23 12:00:00	0.62	0.01%	N/A	
Carbon Ptich	Pitch TO	August 18, 2023	18-Aug-23 17:02:00	18-Aug-23 17:34:00	0.53	0.01%	N/A	
Carbon Ptich	Pitch TO	October 6, 2023	06-Oct-23 08:45:00	06-Oct-23 17:15:00	8.50	0.19%	N/A	
Total duration of Deviations due to SSM events and the total duration as a percent of the total operating time:					17.15	0.39%		
Total duration of Deviations due to Control Equipment Problems (CEP) and total duration as a percent of the total operating					17.15	0.39%		
Total duration of Deviation due to Process Problems (PP) and total duration as a percent of the total operating time:								
Total duration of Deviations due to Other Known Causes (OKC) and total duration as a percent of the total operating time:								
Total duration of Deviations due to Unknown Causes (UC) and total duration as a percent of the total operating time:								
Total duration of CMS downtime and total duration of CMS downtime as a percent of the total operating time:								

NOTES:

1) Reporting requirements of 63.10(c)(8) for continuous emission monitoring systems (CEMS) are not required for CMS under the MON (40CFR 63.2520(e)(5)(iii)(B).

2) For CMS deviation, duration does not include times for zero (low-level) and high-level checks(40 CFR 63.2520(e)(5)(iii)(A).

3) The duration of deviation may include times when the temperature is above 1400 °F, however, the period ends when a stable temperature is achieved. The total deviation period includes only those times when the measured value is below 1400 °F.

N/A = Not Applicable

TABLE 5: Summary of MCPUs With Group 2 Process Vents With HAP Usage <10,000 lbs/year that Exceeded a HAP Threshold for the Reporting Period

Reporting Period: July 01, 2023 through December 31, 2023

MCPU Where Exceedance of Usage Threshold Occurred	Was each Batch a Standard Batch? (yes/no)	Estimated Emissions For Non-Standard Batch (lbs HAP/Batch)		Records of Daily 365-Day Rolling Summation Attached?[1] (Yes/No)
		Uncontrolled	Controlled	
Not applicable - HAP usage <10,000 lb/yr is not used to determine group status				

NOTES:

1) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly [40 CFR 63.2520(e)(5)(iv)].

TABLE 6: Summary of Process Additions or Revisions from NOCSR
[40 CFR 63.2520(e)(10)]

Reporting Period: July 01, 2023 through December 31, 2023

Description of New or Revised Process	Required NOCSR Information Attached? (yes/no)[1]
None during reporting period	N/A

NOTES:

1) Attach information required by the notification of compliance status report (NOCSR) for changes involving the addition or revision of processes or equipment at the affected source.

TABLE 7: Summary of New Operating Scenarios not Listed in the NOCSR [40 CFR 63.2520(e)(7)][1]
Reporting Period: July 01, 2023 through December 31, 2023

MCPU	Operating Scenario		Were Operating Conditions of Control/Treatment Exceeded During Reporting Period? (yes/no)	Required Calculations and Engineering Analyses Performed? (yes/no)
	NONE DURING THE REPORTING PERIOD			

NOTES:

1) For purposes of listing a new operating scenario, a revised operating scenario for an existing process is considered to be a new operating scenario.

TABLE 8: Summary of Heat Exchange System Leaks with Delayed Repair [40 CFR 63.104]
Reporting Period: July 01, 2023 through December 31, 2023

MCPU	Leaking Heat Exchanger ID	Date Leak Detected	Reasons for Delay of Repair (attach documentation)	Estimated Emissions due to Delay[1]	Expected Date of Repair (attach a schedule)	Date of First Repair Attempt	Date of Repair Completion	Date of Repair Confirmation
			Not Applicable					

NOTES:

1) An emission estimate is required when a delay of repair is invoked for reasons specified in 40 CFR 63.104(e)(2) which states:

(e)(2) If a shutdown is not expected within the next 2 months, the owner or operator may delay repair as provided in paragraph (e)(2)(i) or (e)(2)(ii) of this section. Documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as practical.

(e)(2)(i) If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, the owner or operator may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. The owner or operator shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as specified in paragraphs (e)(2)(i)(A) and (e)(2)(i)(B) of this section.

(e)(2)(i)(A) The owner or operator shall calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in table 4 of this subpart in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. The owner or operator may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in table 4 of this subpart.

(e)(2)(i)(B) The owner or operator shall determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

(e)(2)(ii) If repair is delayed for reasons other than those specified in paragraph (e)(2)(i) of this section, the owner or operator may delay repair up to a maximum of 120 calendar days. The owner shall demonstrate that the necessary parts or personnel were not available.

TABLE 9 Vent Stream Bypass Summary For Closed Vent Systems [40 CFR 63.999(c)(2)(ii) and (iii)]
Reporting Period: July 01, 2023 through December 31, 2023

MCPU	Date	Start Time	End Time	Duration (hours)	Gas Volume (scf)	HAPs (PPMv)	HAP emissions (lbs)	Duration of Maintenance or Other Action: Date	Time	End Time	Duration (hours)
Carbon Pitch	7/19/2023	9:17:00 AM	9:53:00 AM	0.60	1444	77100	0.1	Not Applicable			
Carbon Pitch	7/26/2023	10:22:00 AM	10:39:00 AM	0.28	380	77100	0.0				
Carbon Pitch	7/26/2023	10:31:00 AM	10:33:00 AM	0.03	85	77100	0.0				
Carbon Pitch	8/8/2023	7:36:00 PM	8:00:00 PM	0.40	983	77100	0.1				
Carbon Pitch	8/8/2023	7:37:00 PM	8:00:00 PM	0.38	921	77100	0.1				
Carbon Pitch	8/10/2023	10:06:00 AM	11:30:00 AM	1.40	3360	77100	0.4				
Carbon Pitch	8/10/2023	10:35:00 AM	11:33:00 AM	0.96	3360	77100	0.4				
Carbon Pitch	8/11/2023	9:06:00 AM	10:27:00 AM	1.34	3168	77100	0.4				
Carbon Pitch	8/14/2023	11:23:00 AM	11:50:00 AM	0.82	1444	77100	0.2				
Carbon Pitch	8/16/2023	5:02:00 PM	5:34:00 PM	0.53	1283	77100	0.2				
Carbon Pitch	10/2/2023	12:15:00 PM	1:14:00 PM	0.98	2366	77100	0.3				
Carbon Pitch	10/4/2023	12:23:00 PM	12:34:00 PM	0.02	40	77100	0.0				
Carbon Pitch	10/4/2023	12:00:00 PM	12:31:00 PM	0.18	441	77100	0.1				
Carbon Pitch	10/4/2023	11:25:00 AM	11:58:00 AM	0.55	1323	77100	0.2				
Carbon Pitch	10/4/2023	8:36:00 AM	10:34:00 AM	0.97	1326	77100	0.3				
Carbon Pitch	10/4/2023	11:23:00 AM	1:14:00 PM	1.80	4432	77100	0.5				
Carbon Pitch	10/18/2023	11:24:00 AM	1:11:00 PM	1.78	4291	77100	0.5				
Coal Tar Distillation	7/1/2023	11:01:00 AM	11:04:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	7/1/2023	4:01:00 PM	4:08:00 PM	0.12	350	23794	1.6				
Coal Tar Distillation	7/1/2023	1:59:00 PM	2:04:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	7/1/2023	4:49:00 PM	4:54:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	7/3/2023	10:45:00 AM	10:50:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	7/3/2023	3:27:00 PM	3:34:00 PM	0.12	350	23794	1.6				
Coal Tar Distillation	7/6/2023	11:53:00 PM	11:57:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	7/7/2023	12:58:00 AM	1:03:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	7/7/2023	11:00:00 AM	11:55:00 AM	0.92	2750	23794	12.7				
Coal Tar Distillation	7/7/2023	6:12:00 PM	6:17:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	7/7/2023	7:05:00 PM	7:12:00 PM	0.12	350	23794	1.6				
Coal Tar Distillation	7/7/2023	9:42:00 PM	9:50:00 PM	0.13	400	23794	1.9				
Coal Tar Distillation	7/7/2023	9:54:00 PM	10:04:00 PM	0.17	500	23794	2.3				
Coal Tar Distillation	7/8/2023	1:29:00 AM	1:54:00 AM	0.33	1000	23794	4.6				
Coal Tar Distillation	7/8/2023	3:04:00 PM	3:52:00 PM	0.80	2400	23794	11.1				
Coal Tar Distillation	7/8/2023	11:38:00 PM	11:54:00 PM	0.27	800	23794	3.7				
Coal Tar Distillation	7/9/2023	12:23:00 AM	12:30:00 AM	0.12	350	23794	1.6				
Coal Tar Distillation	7/9/2023	1:08:00 AM	1:29:00 AM	0.35	1050	23794	4.9				
Coal Tar Distillation	7/9/2023	9:29:00 PM	9:34:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	7/10/2023	12:41:00 PM	1:03:00 PM	0.37	950	23794	4.4				
Coal Tar Distillation	7/10/2023	1:05:00 PM	1:26:00 PM	0.35	1050	23794	4.9				
Coal Tar Distillation	7/10/2023	1:40:00 PM	1:59:00 PM	0.32	950	23794	4.4				
Coal Tar Distillation	7/10/2023	5:06:00 PM	5:11:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	7/11/2023	8:01:00 AM	9:11:00 AM	1.17	3500	23794	16.2				
Coal Tar Distillation	7/12/2023	4:45:00 PM	5:07:00 PM	0.38	1150	23794	5.3				
Coal Tar Distillation	7/13/2023	6:21:00 PM	8:31:00 PM	2.20	6600	23794	30.6				
Coal Tar Distillation	7/13/2023	12:23:00 AM	12:28:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	7/13/2023	2:26:00 AM	2:31:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	7/13/2023	5:22:00 AM	5:28:00 AM	0.10	300	23794	1.4				
Coal Tar Distillation	7/13/2023	10:22:00 PM	11:50:00 PM	1.47	4400	23794	20.4				
Coal Tar Distillation	7/14/2023	1:10:00 PM	1:50:00 PM	0.67	2000	23794	9.3				
Coal Tar Distillation	7/16/2023	3:17:00 AM	3:47:00 AM	0.58	1750	23794	8.1				
Coal Tar Distillation	7/17/2023	2:24:00 PM	2:32:00 PM	0.13	400	23794	1.9				
Coal Tar Distillation	7/18/2023	4:14:00 AM	4:24:00 AM	0.17	500	23794	2.3				
Coal Tar Distillation	7/24/2023	9:30:00 AM	10:06:00 AM	0.60	1800	23794	8.3				
Coal Tar Distillation	7/24/2023	11:48:00 AM	12:08:00 PM	0.33	1000	23794	4.6				
Coal Tar Distillation	7/25/2023	9:55:00 AM	10:15:00 AM	0.33	1000	23794	4.6				
Coal Tar Distillation	7/26/2023	5:39:00 PM	5:45:00 PM	0.10	300	23794	1.4				
Coal Tar Distillation	7/27/2023	1:42:00 PM	1:48:00 PM	0.10	300	23794	1.4				
Coal Tar Distillation	7/28/2023	7:53:00 AM	7:56:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	7/28/2023	5:02:00 PM	5:06:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	7/29/2023	12:06:00 PM	2:01:00 PM	1.92	5750	23794	26.6				
Coal Tar Distillation	7/31/2023	4:51:00 PM	4:54:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/2/2023	11:18:00 AM	12:39:00 PM	1.35	4050	23794	18.8				
Coal Tar Distillation	8/2/2023	1:42:00 PM	1:58:00 PM	0.27	800	23794	3.7				
Coal Tar Distillation	8/2/2023	10:29:00 PM	10:31:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	8/3/2023	8:03:00 AM	8:12:00 AM	0.15	450	23794	2.1				
Coal Tar Distillation	8/4/2023	1:16:00 AM	1:21:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	8/4/2023	6:55:00 PM	6:59:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	8/7/2023	9:08:00 AM	9:35:00 AM	0.45	1350	23794	6.3				
Coal Tar Distillation	8/8/2023	8:47:00 AM	8:50:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	8/8/2023	12:47:00 PM	12:55:00 PM	0.13	400	23794	1.9				
Coal Tar Distillation	8/9/2023	8:58:00 AM	11:13:00 AM	2.25	6750	23794	31.3				
Coal Tar Distillation	8/10/2023	9:52:00 AM	10:24:00 AM	0.53	1600	23794	7.4				
Coal Tar Distillation	8/10/2023	10:48:00 AM	10:51:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	8/10/2023	11:25:00 AM	11:27:00 AM	0.03	100	23794	0.5				
Coal Tar Distillation	8/10/2023	11:58:00 AM	11:59:00 AM	0.02	50	23794	0.2				
Coal Tar Distillation	8/10/2023	12:00:00 PM	12:03:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/10/2023	12:51:00 PM	12:53:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	8/10/2023	4:11:00 PM	5:03:00 PM	0.87	2600	23794	12.0				
Coal Tar Distillation	8/10/2023	5:05:00 PM	5:15:00 PM	0.17	500	23794	2.3				
Coal Tar Distillation	8/10/2023	6:41:00 PM	6:43:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	8/10/2023	6:50:00 PM	6:53:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/10/2023	6:55:00 PM	6:57:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	8/10/2023	9:50:00 PM	9:55:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	8/11/2023	3:20:00 AM	4:41:00 AM	1.35	4050	23794	18.8				
Coal Tar Distillation	8/11/2023	11:31:00 AM	12:17:00 PM	0.43	1300	23794	6.0				
Coal Tar Distillation	8/11/2023	4:37:00 PM	5:33:00 PM	0.93	2800	23794	13.0				
Coal Tar Distillation	8/11/2023	4:37:00 PM	5:32:00 PM	0.92	2750	23794	12.7				
Coal Tar Distillation	8/11/2023	5:45:00 PM	5:47:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	8/11/2023	5:55:00 PM	5:57:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	8/12/2023	5:25:00 PM	6:22:00 PM	0.95	2850	23794	13.2				
Coal Tar Distillation	8/13/2023	7:44:00 PM	8:16:00 PM	0.53	1600	23794	7.4				
Coal Tar Distillation	8/14/2023	3:51:00 PM	3:55:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	8/16/2023	2:29:00 AM	2:32:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	8/16/2023	6:09:00 AM	6:36:00 AM	0.45	1350	23794	6.3				
Coal Tar Distillation	8/16/2023	8:25:00 AM	8:53:00 AM	0.47	1400	23794	6.5				
Coal Tar Distillation	8/16/2023	11:56:00 AM	12:18:00 PM	0.37	1100	23794	5.1				
Coal Tar Distillation	8/16/2023	1:59:00 PM	2:09:00 PM	0.17	500	23794	2.3				
Coal Tar Distillation	8/16/2023	6:58:00 PM	7:05:00 PM	0.12	350	23794	1.6				
Coal Tar Distillation	8/17/2023	1:18:00 AM	1:22:00 AM	0.07	200	23794	0.9				
Coal Tar Distillation	8/17/2023	10:10:00 AM	10:13:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	10:19:00 AM	10:22:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	10:27:00 AM	10:30:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	11:24:00 AM	11:27:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	1:39:00 PM	1:42:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	2:37:00 PM	2:40:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	2:41:00 PM	2:44:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	2:46:00 PM	2:49:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/17/2023	3:04:00 PM	4:36:00 PM	1.53	4600	23794	21.3				
Coal Tar Distillation	8/18/2023	12:17:00 AM	12:22:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	8/18/2023	1:20:00 PM	1:23:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/18/2023	3:41:00 PM	3:44:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/20/2023	10:04:00 AM	10:19:00 AM	0.25	750	23794	3.5				
Coal Tar Distillation	8/21/2023	10:32:00 AM	10:37:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	8/21/2023	6:15:00 PM	6:43:00 PM	0.47	1400	23794	6.5				
Coal Tar Distillation	8/22/2023	7:20:00 AM	7:25:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	8/23/2023	4:20:00 AM	4:28:00 AM	0.13	400	23794	1.9				
Coal Tar Distillation	8/23/2023	6:05:00 AM	6:11:00 AM	0.12	350	23794	1.6				

MCPU	Date	Start Time	End Time	Duration (hours)	Gas Volume (scf)	HAPs (PPMv)	HAP emissions (lbs)	Duration of Maintenance or Other Action[2] Date	Time	End Time	Duration (hours)
Coal Tar Distillation	8/23/2023	8:12:00 AM	8:16:00 AM	0.07	200	23794	0.9				
Coal Tar Distillation	8/26/2023	3:05:00 PM	3:11:00 PM	0.10	300	23794	1.4				
Coal Tar Distillation	8/26/2023	3:39:00 PM	3:44:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	8/28/2023	5:08:00 PM	5:16:00 PM	0.13	400	23794	1.9				
Coal Tar Distillation	8/29/2023	10:59:00 AM	11:11:00 AM	0.20	600	23794	2.8				
Coal Tar Distillation	8/29/2023	11:59:00 AM	12:08:00 PM	0.15	450	23794	2.1				
Coal Tar Distillation	8/29/2023	5:20:00 PM	5:23:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	8/29/2023	5:39:00 PM	5:45:00 PM	0.10	300	23794	1.4				
Coal Tar Distillation	8/29/2023	5:50:00 PM	5:52:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	8/29/2023	6:16:00 PM	6:25:00 PM	0.15	450	23794	2.1				
Coal Tar Distillation	8/31/2023	5:27:00 PM	5:33:00 PM	0.10	300	23794	1.4				
Coal Tar Distillation	8/31/2023	6:39:00 PM	6:47:00 PM	0.13	400	23794	1.9				
Coal Tar Distillation	9/2/2023	2:03:00 PM	2:08:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	9/4/2023	3:25:00 PM	4:02:00 PM	0.12	350	23794	1.6				
Coal Tar Distillation	9/4/2023	6:31:00 PM	6:35:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	9/7/2023	5:30:00 AM	5:35:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	9/9/2023	1:55:00 PM	2:06:00 PM	0.18	550	23794	2.5				
Coal Tar Distillation	9/9/2023	1:27:00 AM	1:32:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	9/11/2023	9:55:00 AM	9:59:00 AM	0.07	200	23794	0.9				
Coal Tar Distillation	9/11/2023	3:03:00 AM	3:08:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	9/11/2023	3:12:00 AM	3:17:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	9/11/2023	3:20:00 AM	3:30:00 AM	0.17	500	23794	2.3				
Coal Tar Distillation	9/12/2023	7:50:00 PM	7:58:00 PM	0.13	400	23794	1.9				
Coal Tar Distillation	9/14/2023	12:17:00 AM	12:26:00 AM	0.15	450	23794	2.1				
Coal Tar Distillation	9/14/2023	9:41:00 AM	9:44:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	9/14/2023	9:48:00 AM	9:54:00 AM	0.10	300	23794	1.4				
Coal Tar Distillation	9/14/2023	2:39:00 PM	2:42:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	9/14/2023	2:50:00 PM	2:54:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	9/14/2023	3:02:00 PM	3:09:00 PM	0.12	350	23794	1.6				
Coal Tar Distillation	9/15/2023	7:59:00 AM	8:07:00 AM	0.13	400	23794	1.9				
Coal Tar Distillation	9/16/2023	12:28:00 AM	12:33:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	9/16/2023	1:33:00 AM	3:20:00 AM	1.78	5350	23794	24.8				
Coal Tar Distillation	9/16/2023	3:20:00 AM	6:40:00 AM	3.33	10000	23794	46.3				
Coal Tar Distillation	9/17/2023	4:14:00 PM	4:19:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	9/18/2023	9:38:00 AM	9:41:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	9/20/2023	4:30:00 PM	4:36:00 PM	0.10	300	23794	1.4				
Coal Tar Distillation	9/22/2023	5:49:00 PM	5:52:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	9/23/2023	1:49:00 PM	1:53:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	9/24/2023	4:33:00 PM	4:53:00 PM	0.33	1000	23794	4.6				
Coal Tar Distillation	9/25/2023	7:37:00 AM	7:57:00 AM	0.33	1000	23794	4.6				
Coal Tar Distillation	9/26/2023	11:32:00 AM	11:37:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	9/28/2023	11:39:00 AM	11:43:00 AM	0.07	200	23794	0.9				
Coal Tar Distillation	10/2/2023	1:58:00 AM	2:03:00 AM	0.07	200	23794	0.9				
Coal Tar Distillation	10/3/2023	10:05:00 AM	10:11:00 AM	0.10	300	23794	1.4				
Coal Tar Distillation	10/3/2023	11:31:00 AM	11:34:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	10/5/2023	11:44:00 AM	11:49:00 AM	0.08	250	23794	1.2				
Coal Tar Distillation	10/7/2023	12:09:00 PM	12:12:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	10/8/2023	9:53:00 AM	11:33:00 AM	1.63	4900	23794	22.7				
Coal Tar Distillation	10/9/2023	3:40:00 AM	3:43:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	10/10/2023	8:23:00 AM	9:20:00 AM	0.95	2850	23794	13.2				
Coal Tar Distillation	10/10/2023	10:34:00 AM	11:09:00 AM	0.58	1750	23794	8.1				
Coal Tar Distillation	10/13/2023	8:34:00 PM	12:30:00 AM	3.93	11800	23794	54.7				
Coal Tar Distillation	10/16/2023	8:12:00 AM	8:14:00 AM	0.03	100	23794	0.5				
Coal Tar Distillation	10/17/2023	9:14:00 AM	9:16:00 AM	0.03	100	23794	0.5				
Coal Tar Distillation	10/18/2023	6:19:00 AM	6:22:00 AM	0.05	150	23794	0.7				
Coal Tar Distillation	10/18/2023	3:03:00 AM	3:27:00 AM	0.40	1200	23794	5.6				
Coal Tar Distillation	10/19/2023	7:25:00 PM	7:28:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	10/20/2023	9:51:00 PM	9:55:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	10/24/2023	5:26:00 PM	5:30:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	10/27/2023	8:46:00 PM	8:55:00 PM	0.15	450	23794	2.1				
Coal Tar Distillation	10/30/2023	4:22:00 AM	4:26:00 AM	0.07	200	23794	0.9				
Coal Tar Distillation	10/31/2023	9:56:00 AM	12:02:00 PM	2.10	6300	23794	29.2				
Coal Tar Distillation	10/31/2023	5:03:00 PM	5:07:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	11/1/2023	4:37:00 PM	4:44:00 PM	0.12	350	23794	1.6				
Coal Tar Distillation	11/4/2023	9:37:00 AM	10:05:00 AM	0.47	1400	23794	6.5				
Coal Tar Distillation	11/4/2023	9:27:00 AM	9:46:00 AM	0.32	950	23794	4.4				
Coal Tar Distillation	11/5/2023	7:42:00 AM	8:51:00 AM	1.15	3450	23794	16.0				
Coal Tar Distillation	11/7/2023	8:37:00 AM	12:26:00 PM	3.82	11450	23794	53.1				
Coal Tar Distillation	11/8/2023	5:12:00 PM	5:18:00 PM	0.10	300	23794	1.4				
Coal Tar Distillation	11/9/2023	8:01:00 PM	8:03:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	11/10/2023	12:17:00 PM	12:21:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	11/10/2023	3:43:00 PM	3:47:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	11/10/2023	5:52:00 PM	5:57:00 PM	0.08	250	23794	1.2				
Coal Tar Distillation	11/11/2023	9:21:00 AM	9:23:00 AM	0.03	100	23794	0.5				
Coal Tar Distillation	11/13/2023	9:25:00 AM	9:27:00 AM	0.03	100	23794	0.5				
Coal Tar Distillation	11/13/2023	9:28:00 AM	9:40:00 AM	0.20	600	23794	2.8				
Coal Tar Distillation	11/13/2023	6:48:00 PM	6:51:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	11/14/2023	11:32:00 PM	11:36:00 PM	0.07	200	23794	0.9				
Coal Tar Distillation	11/16/2023	11:41:00 AM	12:12:00 PM	0.52	1550	23794	7.2				
Coal Tar Distillation	11/16/2023	12:31:00 PM	12:33:00 PM	0.03	100	23794	0.5				
Coal Tar Distillation	11/17/2023	1:41:00 AM	1:56:00 AM	0.25	750	23794	3.5				
Coal Tar Distillation	11/12/2023	6:17:00 AM	6:27:00 AM	0.17	500	23794	2.3				
Coal Tar Distillation	11/30/2023	10:07:00 PM	10:10:00 PM	0.05	150	23794	0.7				
Coal Tar Distillation	12/26/2023	7:18:00 AM	8:42:00 AM	1.40	4200	23794	19.5				

NOTES
1) For closed vent systems (CVS) under positive pressure subject to 40 CFR 63.983
2) Report times of a CVS under positive pressure subject to 40 CFR 63.983 when maintenance is performed on a car-sealed valve, when the seal is broken, when the bypass line valve position is changed, or when the key for a lock-and-key type configuration has been checked out

Table 10: SSM Event Resulting in Excess Emissions
Reporting Period: July 01, 2023 through December 31, 2023

MCPU	Event Date	Description of Malfunction	Plan Followed? (Y/N)[1]	Plan Not Followed?[2] Description of Actions Taken
Carbon Pitch	7/25/2023	Pitch TO kicked out for undetermined reason	Yes	
Carbon Pitch	7/26/2023	Fan speed and amps drop off	Yes	
Carbon Pitch	7/26/2023	Fan speed and amps drop off	Yes	
Carbon Pitch	8/8/2023	Fan Amps had extremely high oscillation followed by trip	Yes	
Carbon Pitch	8/8/2023	Fan Amps had extremely high oscillation followed by trip	Yes	
Carbon Pitch	8/10/2023	Fan Amps and speed had step change, followed by sharp increase and trip, before resetting at normal range	Yes	
Carbon Pitch	8/10/2023	Fan Amps and speed had step change, followed by sharp increase and trip, before resetting at normal range	Yes	
Carbon Pitch	8/11/2023	Fan Amps and speed had step change, followed by sharp increase and trip, before resetting at normal range	Yes	
Coal Tar Distillation	7/1/2023	Reboiler south pump on Unit 1 was having issues	Yes	
Coal Tar Distillation	7/1/2023	Reboiler south pump on Unit 1 was having issues	Yes	
Coal Tar Distillation	7/2/2023	Reboiler south pump on Unit 1 was having issues	Yes	
Coal Tar Distillation	7/2/2023	Reboiler south pump on Unit 1 was having issues	Yes	
Coal Tar Distillation	7/3/2023	Reboiler south pump on Unit 1 was having issues	Yes	
Coal Tar Distillation	7/3/2023	Reboiler south pump on Unit 1 was having issues	Yes	
Coal Tar Distillation	7/6/2023	Issues when bringing up unit for HCP from circulation and setting set point pressure the level went down too quick and tripped the tubeheater	Yes	
Coal Tar Distillation	7/7/2023	Issues when bringing up unit for HCP from circulation and setting set point pressure the level went down too quick and tripped the tubeheater	Yes	
Coal Tar Distillation	7/7/2023	Issues when bringing up unit for PSB from circulation and setting set point pressure the level went down too quick and tripped the tubeheater	Yes	
Coal Tar Distillation	7/7/2023	Seal oil change done to both units due to spec issues	Yes	
Coal Tar Distillation	7/7/2023	Seal oil change done to both units due to spec issues	Yes	
Coal Tar Distillation	7/7/2023	Seal oil change done to both units due to spec issues	Yes	
Coal Tar Distillation	7/7/2023	Seal oil change done to both units due to spec issues	Yes	
Coal Tar Distillation	7/8/2023	Seal oil change done to both units due to spec issues	Yes	
Coal Tar Distillation	7/8/2023	Flow issues switching from PSB to HCP	Yes	
Coal Tar Distillation	7/8/2023	South Tar Vacuum pump sprung a leak	Yes	
Coal Tar Distillation	7/9/2023	South Tar Vacuum pump sprung a leak	Yes	
Coal Tar Distillation	7/9/2023	South Tar Vacuum pump sprung a leak	Yes	
Coal Tar Distillation	7/9/2023	undetermined issue, no issues on trends	Yes	
Coal Tar Distillation	7/10/2023	water in unit 1 issues from feed	Yes	
Coal Tar Distillation	7/10/2023	water in unit 1 issues from feed	Yes	
Coal Tar Distillation	7/10/2023	water in unit 1 issues from feed	Yes	
Coal Tar Distillation	7/10/2023	water in unit 1 issues from feed	Yes	
Coal Tar Distillation	7/11/2023	Thermocoupler was removed from the TO by electricians	Yes	
Coal Tar Distillation	7/12/2023	Storm caused electrical issues, blower fan went offline, electrical blips throughout the evening and night	Yes	
Coal Tar Distillation	7/12/2023	Storm caused electrical issues, blower fan went offline, electrical blips throughout the evening and night	Yes	
Coal Tar Distillation	7/13/2023	Issues when bringing up unit for HCP from circulation and setting set point pressure the level went down too quick and tripped the tubeheater	Yes	
Coal Tar Distillation	7/13/2023	Issues when bringing up unit for HCP from circulation and setting set point pressure the level went down too quick and tripped the tubeheater	Yes	
Coal Tar Distillation	7/13/2023	Issues when bringing up unit for HCP from circulation and setting set point pressure the level went down too quick and tripped the tubeheater	Yes	
Coal Tar Distillation	7/13/2023	Issues pumping out KO pots, tubeheater keeps kicking out.	Yes	
Coal Tar Distillation	7/14/2023	Issues pumping out KO pots, tubeheater keeps kicking out due to possible leaks and valve issues	Yes	
Coal Tar Distillation	7/16/2023	Issues pumping out KO pots, tubeheater keeps kicking out due to possible leaks and valve issues	Yes	
Coal Tar Distillation	7/16/2023	Issues pumping out KO pots, tubeheater keeps kicking out due	Yes	
Coal Tar Distillation	7/18/2023	turned off tubeheater before turning off the vaccum.	No	tubeheater was reset
Coal Tar Distillation	7/24/2023	Switched to north reboiler pump after issues with south reboiler pump	Yes	

ATTACHMENT 3 – LDAR INFORMATION

TABLE 11: Semiannual Fugitive Emission Report For MON [40 CFR 63.1039(b)]
Reporting Period: July 01, 2023 through December 31, 2023

Equipment Type	No. of Components Subject to Requirements[1]	No. of Leaking Components Detected	No. of Components Monitored[2]	Percent of Leaking Components	No. of Leaking Components Not Repaired	No. of Leaking Components Determined to be Nonrepairabl	No. of Instances Utilizing Delay of Repair	Monthly Monitoring of Valves Initiated? (yes/no)	Quality Improvement Program Initaited for Pumps? (yes/no)
Valves in Gas/Vapor & LL Service	112*	0	98	0.0%	0	0	0	N/A, No LL Valves	N/A
Pumps in LL Service	0	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A
Connectors in Gas/Vapor & LL Service	245*	0	210	0.0%	0	0	0	N/A	N/A
Agitators in Gas/Vapor & LL Service	8*	0	8	0.0%	0	0	0	N/A	N/A
Compressors	4	0	4	0.0%	0	0	0	N/A	N/A
Pressure Release Devices Gas/Vapor Service	4*	0	4	0.0%	0	0	0	N/A	N/A

NOTES:

1) Represents counts as of the end of the report period. Excludes heavy liquid service components and components designated for no detectable emissions. Identify with an astersk (*) if there are any * components added due to startup of Tank-101

2) Several MON Components were not monitored during this reporting period due to being out of service

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031300AAJ
10k

UPS Overnight Mail

February 28, 2024

Koppers Inc.
Carbon Materials and Chemicals
3900 South Laramie Avenue
Cicero, IL 60804-4523
Tel 708 222 3483
Fax 708 656 6079
www.koppers.com

Mr. Bill Marr, Manager, Compliance Section
Illinois Environmental Protection Agency
Bureau of Air – Compliance Section (MC 40)
1021 N. Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

RE: Koppers Inc., Stickney, Cook County, Illinois
ID Number: 031300AAJ
Permit Number: 96030134
Periodic Report for Reporting Period of July 1, 2023 through December 31, 2023 as Required by the Pesticide Active Ingredient (PAI) NESHAP, Section 63.1368(g).

Dear Mr. Marr:

Koppers, Inc. (Koppers) operates a chemical manufacturing facility in Stickney, Illinois. Three creosote blend tanks are subject to the National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (the PAI MACT) in 40 CFR Part 63, Subpart MMM.

With this letter, Koppers is submitting the semiannual Report of Malfunctions required under 40 CFR §63.1368(i) and the PAI MACT periodic report required under 40 CFR §63.1368(g). The required elements of each report are addressed below.

REPORT OF MALFUNCTIONS

Following revisions to the PAI MACT in March of 2014, affected pesticide active ingredient process units subject to the PAI MACT are no longer covered by the Startup, Shutdown and Malfunction provisions of the MACT. Rather, affected units are subject to 40 CFR §63.1368(i) *Reports of Malfunctions* as follows:

If a source fails to meet an applicable standard, report such events in the Periodic Report. Report the number of failures to meet an applicable standard. For each instance, report the date, time, and duration of each failure. For each failure the report must include a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.

These failures to meet the applicable emission standards in this reporting period are reflected in Attachment 1.

yas

PAI MACT PERIODIC REPORT

This periodic report covers the period from July 1, 2023 through December 31, 2023, and provides all information required under 40 CFR §63.1368, §63.1363, §63.146, and the 40 CFR Part 63 General Provisions. Periodic Report information is included in Attachments 2, 3, and 4.

Based on reasonable inquiry, the information submitted in this submittal is, to the best of my knowledge and belief, true, accurate, and complete. Should you have any questions or require further information, please contact Kerry Grigsby, at 708-209-9462.

Sincerely,

L. Seth Herring
Plant Manager CMC NA

Attachment 1 – Report of Malfunctions
Attachment 2 – Periodic Report Information
Attachment 3 – Periodic Report Records
Attachment 4 – LDAR Results

Copy:

Illinois EPA – Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 W. Harrison Street
Des Plaines, IL 60016

USEPA, Region 5
Air and Radiation Division
77 West Jackson Boulevard (A-18J)
Chicago, Illinois 60604-3507

Certification by a Responsible Official:

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

Signature: L. Seth Herring

Name:
L. Seth Herring

Official Title:

Plant Manager CMC NA

Telephone No.:

708-556-9984

Date Signed:

12/22/2024

ATTACHMENT 1 – REPORT OF MALFUNCTIONS

Bypass Events

Start Time	End Time	Duration (Hr)	VOC Emissions (lbs)
7/3/23 10:45	7/3/23 10:50	0.08	0.36
7/7/23 0:58	7/7/23 1:03	0.08	0.36
7/7/23 11:00	7/7/23 11:55	0.92	4.01
7/7/23 18:12	7/7/23 18:17	0.08	0.36
7/8/23 23:38	7/8/23 23:54	0.27	1.17
7/9/23 0:23	7/9/23 0:30	0.12	0.51
7/9/23 1:08	7/9/23 1:29	0.35	1.53
7/16/23 19:24	7/16/23 20:39	1.25	5.46
7/16/23 20:39	7/16/23 20:49	0.17	0.73
7/16/23 20:49	7/16/23 20:50	0.02	0.07
7/18/23 4:14	7/18/23 4:24	0.17	0.73
7/24/23 9:30	7/24/23 10:06	0.60	2.62
7/24/23 11:48	7/24/23 12:00	0.20	0.87
7/25/23 9:55	7/25/23 10:15	0.33	1.46
8/16/23 6:09	8/16/23 6:36	0.45	1.97
8/18/23 15:20	8/18/23 15:23	0.05	0.22
8/29/23 17:20	8/29/23 17:23	0.05	0.22
8/29/23 17:39	8/29/23 17:45	0.10	0.44
8/29/23 17:50	8/29/23 17:52	0.03	0.15
8/29/23 18:19	8/29/23 18:28	0.15	0.66
9/15/23 7:59	9/15/23 8:07	0.13	0.58
9/16/23 0:28	9/16/23 0:33	0.08	0.36
9/16/23 1:33	9/16/23 1:44	0.18	0.80
9/24/23 16:33	9/24/23 16:45	0.20	0.87

Emissions are based on vapor displacement calculations.
Source of the emissions are from the creosote blending tanks.

ATTACHMENT 2 – PERIODIC REPORT INFORMATION

This Attachment provides all information required under 40 CFR §63.1368, §63.1363, §63.146, and the 40 CFR Part 63 General Provisions. Information is organized by regulatory reference. Regulatory requirements for this periodic report are listed below in italics, followed by Koppers' comments addressing each element or providing the required information.

40 CFR §63.1368 – PAI MACT PERIODIC REPORTING PROVISIONS

§63.1368(g)(2). Content of periodic report. The owner or operator shall include the information in paragraphs (g)(2)(i) through (xii) of this section, as applicable.

§63.1368(g)(2)(i). Each Periodic report must include the information in §63.10(e)(3)(vi)(A) through (M) of subpart A of this part, as applicable.

Koppers Comments: The periodic report information required by §63.1368(g)(2)(i) is provided in Table 2-1

TABLE 2-1. PERIODIC REPORT INFORMATION IN §63.10(E)(3)(VI)(A) THROUGH (M) - "SUMMARY REPORT—GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE"

Reg. Reference	Description	Required Information
§63.10(e)(3)(vi)(A	The company name and address of the affected source;	Koppers, Inc. 3900 South Laramie Avenue Cicero, Illinois 60804
§63.10(e)(3)(vi)(B)	An identification of each hazardous air pollutant monitored at the affected source;	Hazardous air pollutants monitored are: Creosote (which consists most of polycyclic organic matter)
§63.10(e)(3)(vi)(C)	The beginning and ending dates of the reporting period;	July 1, 2023 through December 31, 2023

Reg. Reference	Description	Required Information
§63.10(e)(3)(vi)(D)	A brief description of the process units;	The PAI process units consist of three creosote blend tanks, specifically Tanks 301, 302, 303.
§63.10(e)(3)(vi)(E)	The emission and operating parameter limitations specified in the relevant standard(s);	Emission limitations required at §63.1362 is 98% reduction of HAPs. Operating parameter limitations required at §63.1366 are listed in Attachment 3.
§63.10(e)(3)(vi)(F)	The monitoring equipment manufacturer(s) and model number(s);	• Tar Oxidizer temperature monitor: Lesman Type K
§63.10(e)(3)(vi)(G)	The date of the latest CMS certification or audit;	• Tar Oxidizer temperature monitor: 9-6-2023
§63.10(e)(3)(vi)(H)	The total operating time of the affected source during the reporting period;	This information is provided in Attachment 3.
§63.10(e)(3)(vi)(I)	An emission data summary;	This information is provided in Attachment 3.
§63.10(e)(3)(vi)(J)	A CMS performance summary;	This information is provided in Attachment 3.
§63.10(e)(3)(vi)(K)	A description of any changes in CMS, processes, or controls since the last reporting period;	No changes in this reporting period.
§63.10(e)(3)(vi)(L)	The name, title, and signature of the responsible official who is certifying the accuracy of the report; and	This information is provided on the signature page of this letter.
§63.10(e)(3)(vi)(M)	The date of the report.	This information is provided on the signature page of this letter.

§63.1368(g)(2)(ii). If the total duration of excess emissions, parameter exceedances, or excursions for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total continuous monitoring system downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the Periodic report must include the information in paragraphs (g)(2)(ii)(A) through (D) of this section.

Koppers Comments: This information is provided in Attachment 3.

§63.1368(g)(2)(iii). For each vapor collection system or closed vent system with a bypass line subject to §63.1362(j)(1), records required under §63.1366(f) of all periods when the vent stream is diverted from the control device through a bypass line. For each vapor collection system or closed vent system with a bypass line subject to §63.1362(j)(2), records required under §63.1366(f) of all periods in which the seal mechanism is broken, the bypass valve position has changed, or the key to unlock the bypass line valve was checked out.

Koppers Comments: Koppers elected not to meet the pollution prevention alternative requirement under §63.1362(g) and therefore HAP and VOM factors under 63.1366(f) are not applicable.

§63.1368(g)(2)(iv). The information in paragraphs (g)(2)(iv)(A) through (D) of this section shall be stated in the Periodic report, when applicable.

- *(A) No excess emissions.*
- *(B) No exceedances of a parameter.*
- *(C) No excursions.*
- *(D) No continuous monitoring system has been inoperative, out of control, repaired, or adjusted.*

Koppers Comments: There are no excursions and no continuous monitoring system has been inoperative, out of control, repaired, or adjusted.

§63.1368(g)(2)(v). For each storage vessel subject to control requirements:

- *(A) Actual periods of planned routine maintenance during the reporting period in which the control device does not meet the specifications of §63.1362(c)(5); and*
- *(B) Anticipated periods of planned routine maintenance for the next reporting period.*

Koppers Comments: Not applicable – no storage vessels at this PAI process unit is subject to control requirements. Tanks 301, 302, and 303 are process vessels, not storage vessels.

§63.1368(g)(2)(vi). For each PAI process unit that does not meet the definition of primary use, the percentage of the production in the reporting period produced for use as a PAI.

Koppers Comments: Not applicable – The only PAI process unit is the creosote process unit and this PAI process unit meets the definition of primary use as stated in the NOCSR.

§63.1368(g)(2)(vii). [Reserved]

§63.1368(g)(2)(viii). Updates to the corrective action plan.

Koppers Comments: A corrective action plan is required under §63.1368(e)(6) for fabric filters monitored with bag leak detectors. Since there are no fabric filters monitored with bag leak detectors in the affected source, the corrective action plan requirements are not applicable to Koppers.

§63.1368(g)(2)(ix). Records of process units added to each process unit group, if applicable.

Koppers Comments: Koppers has not elected to develop process unit groups under the PAI MACT. Therefore, process unit group records are not applicable.

§63.1368(g)(2)(x). Records of redetermination of the primary product for a process unit group.

Koppers Comments: The PAI process unit produces a single pesticide active ingredient which is creosote. Therefore, process unit group records are not applicable.

§63.1368(g)(2)(xi). For each inspection conducted in accordance with §63.1366(h)(2) or (3) during which a leak is detected, the records specify in §63.1366(h)(4) must be included in the next Periodic report.

Koppers Comments: This information is provided in Attachment 4

§63.1368(g)(2)(xii). If the owner or operator elects to comply with the provisions of §63.1362(c) by installing a floating roof, the owner or operator shall submit the information specified in §63.122(d) through (f)as applicable. References to §63.152 in §63.122 shall not apply for the purposes of this subpart.

> Koppers Comments: Koppers did not elect to install a floating roof to comply with the storage tank requirements. Therefore, the information specified in §63.122(d) through (f) is not required to be included in this report.

§63.1368(h). Notification of process change.

§63.1368(h)(1). Except as specified in paragraph (h)(2) of this section, whenever a process change is made, or any of the information submitted in the Notification of Compliance Status report changes, the owner or operator shall submit the information specified in paragraphs (h)(1)(i) through (iv) of this section with the next Periodic report required under paragraph (g) of this section. For the purposes of this section, a process change means the startup of a new process, as defined in §63.1361.

> Koppers Comment: There have been no process changes in this reporting period.

§63.1368(j). Reports of equipment leaks. The owner or operator of an affected source subject to the standards in §63.1363, shall implement the reporting requirements specified in §63.1363(h). Copies of all reports shall be retained as records for a period of 5 years, in accordance with the requirements of §63.10(b)(1) of subpart A of this part.

> Koppers Comments: This information is provided in Attachment 4

§63.1368(l). Reports of heat exchange systems. The owner or operator of an affected source subject to the requirements for heat exchange systems in §63.1362(f) shall submit information about any delay of repairs as specified in §63.104(f)(2) of subpart F of this part, except that when the phrase "periodic reports required by §63.152(c) of subpart G of this part" is referred to in §63.104(f)(2) of subpart F of this part, the periodic reports required in paragraph (g) of this section shall apply for the purposes of this subpart.

> Koppers Comments: Not applicable - there are no heat exchange systems in the creosote processing unit.

40 CFR §63.1363 – Equipment Leak Reporting

§63.1363(e)(5)(iii). The owner or operator shall determine every 6 months if the overall performance of total valves in the applicable group of processes is less than 2 percent leaking valves and so indicate the performance in the next Periodic report.

Koppers Comments: There were no leaking valves during this reporting period.

§63.1363(e)(5)(vi). Semiannual reports. In addition to the information required by paragraph (h)(3) of this section, the owner or operator shall submit in the Periodic reports the information specified in paragraphs (e)(5)(vi)(A) and (B) of this section.

(A) Valve reassignments occurring during the reporting period, and

(B) Results of the semiannual overall performance calculation required by paragraph (e)(5)(iii) of this section.

Koppers Comments: No valves were reassigned or leaking during the reporting period.

§63.1363(h)(3). Periodic reports. The owner or operator of a source subject to this section shall submit Periodic reports.

§63.1363(h)(3)(i). A report containing the information in paragraphs (h)(3)(ii), (iii), and (iv) of this section shall be submitted semiannually. The first Periodic report shall be submitted no later than 240 days after the date the Notification of Compliance Status report is due and shall cover the 6-month period beginning on the date the Notification of Compliance Status report is due. Each subsequent Periodic report shall cover the 6-month period following the preceding period.

§63.1363(h)(3)(ii). For equipment complying with the provisions of paragraphs (b) through (g)of this section, the Periodic report shall contain the summary information listed in paragraphs (h)(3)(ii)(A) through (L) of this section for each monitoring period during the 6-month period.

Koppers Comments: The results of the LDAR monitoring are reported in Attachment 4.

§63.1363(h)(3)(iii). For owners or operators electing to meet the requirements of §63.178(b) of subpart H of this part, the Periodic report shall include the

information listed in paragraphs (h)(3)(iii)(A) through (E) of this section for each process.

> Koppers Comments: Koppers has not chosen to use the alternative emission limitations in §63.178, the information in §63.178(h)(3)(iii)(A) through (E) is not required.

§63.1363(h)(3)(iv) Any change in the information submitted under paragraph (h)(2) of this section shall be provided in the next Periodic report.

> Koppers Comments: No changes to information provided under paragraph (h)(2).

40 CFR §63.146 – WASTEWATER REPORTING

§63.1362 (d) Wastewater. The owner or operator of each affected source shall comply with the requirements of §§63.132 through 63.147, with the differences noted in paragraphs (d)(1) through (16) of this section for the purposes of this subpart.

§63.1362 (d)(6) When the Periodic report requirements contained in §63.152(c) of subpart G of this part are referred to in §§63.146 and 63.147 of subpart G of this part, the Periodic report requirements contained in §63.1368(g) shall apply for the purposes of this subpart.

§63.146(c). For each waste management unit that receives, manages, or treats a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream, the owner or operator shall submit as part of the next Periodic Report required by §63.152(c) of this subpart the results of each inspection required by §63.143(a) of this subpart in which a control equipment failure was identified. Control equipment failure is defined for each waste management unit in §§63.133 through 63.137of this subpart. Each Periodic Report shall include the date of the inspection, identification of each waste management unit in which a control equipment failure was detected, description of the failure, and description of the nature of and date the repair was made.

> Koppers Comments: Not applicable – no Group 1 wastewater stream at the creosote processing unit.

§63.146(d). Except as provided in paragraph (f) of this section, for each treatment process used to comply with §63.138(b)(1), (c)(1), (d), (e), (f), or (g), the owner or

operator shall submit as part of the next Periodic Report required by §63.152(c) the information specified in paragraphs (d)(1), (2), and (3) of this section for the monitoring required by §63.143(b), (c), and (d).

Koppers Comments: No treatment processes are used for PAI wastewater. Therefore, this provision is not applicable.

§63.146(e). Except as provided in paragraph (f) of this section, for each control device used to comply with §§63.133 through 63.139 of this subpart, the owner or operator shall submit as part of the next Periodic Report required by §63.152(c) of this subpart the information specified in either paragraph (e)(1) or (e)(2) of this section.

§63.146(e)(1). The information specified in table 20 of this subpart, or

Koppers Comments: Not applicable – No affected wastewater stream.

§63.146(e)(2). If the owner or operator elects to comply with §63.143(e)(2) of this subpart, i.e., an organic monitoring device installed at the outlet of the control device, the owner or operator shall submit the monitoring results for each operating day during which the daily average concentration level or reading is outside the range established in the Notification of Compliance Status or operating permit.

Koppers Comments: Not applicable – No affected wastewater stream.

§63.146(g). If an extension is utilized in accordance with §63.133(e)(2) or §63.133(h) of this subpart, the owner or operator shall include in the next periodic report the information specified in §63.133(e)(2) or §63.133(h).

Koppers Comments: Not applicable – No affected wastewater stream.

40 CFR §63.10 – General Provisions Periodic Reporting

§63.10(e)(3). Excess emissions and continuous monitoring system performance report and summary report.

§63.10(e)(3)(i). Excess emissions and parameter monitoring exceedances are defined in relevant standards. The owner or operator of an affected source required to install a CMS by a relevant standard shall submit an excess emissions and continuous monitoring system performance report and/or a summary report to the Administrator semiannually…

Koppers Comments: The summary report information is included in Table 2-1.

§63.10(e)(3)(vii). If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Administrator.

Koppers Comments: The excess emissions and CMS performance reports are included in Attachments 1 and 3.

§63.10(e)(3)(viii). If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

Koppers Comments: The excess emissions and CMS performance reports are included in Attachments 1 and 3.

ATTACHMENT 3 – PERIODIC REPORT RECORDS

CMS Malfunction Summary

Date	Equipment Description	Malfunction Description 63.10(C)(10)	Duration (hours)	Caused or may have caused excess emissions?	Corrective Action Taken 63.10(C)(11)	Repairs/Adjustment to CMS 63.10(C)(12)
	None during the reporting period					

Records of PAI Process Operating Hours
Under §63.10(e)(3)(vi)(H) & 63.10(c)(13)

Date	July 1, 2023 through December 31, 2023
Creosote Process Unit	665.9

PAI MACT Periodic Report

Control System Performance Summary Required Under §63.10(e)(3)(vi)(J)

	Downtime Hours
Control System Downtime Causes	
Monitoring equipment malfunctions	0
Nonmonitoring equipment malfunctions	6.07
QA/QC calibrations	0
Other known causes (power failures)	0
Other unknown causes	0.00
Total Control System Downtime for Reporting Period (hr)	6.07
Control System Downtime (% of total operating time)	0.9%

Total operating time for reporting period:

Creosote Processing Unit Total: 665.88 hours

Emissions Data Summary Under §63.10(e)(3)(vi)(I)

	Total duration of excess emissions:	**6.07** **0.9**	**hours** **% of total operating time**
Duration of excess emissions due to:			
	Startup/shutdown 63.10(c)(7)	0.0	hours
	Control equipment problems	6.07	hours
	Process problems	0.0	hours
	Other known causes	0.0	hours
	Other unknown causes	0.0	hours

PAI MACT Periodic Report
Excess Emissions and CMS Performance Report

CMS Information Summary

Parameter	Tar Thermal Oxidizer
Excess Emissions Duration (hours)	6.07
Parameter Exceedances (% of total operating time)	0.0%
Excursions (% of total operating time)	0.0%
CMS Downtime (% of total operating time)[a]	0.0%

[a] Total CMS downtime includes the duration of power failures plus monitoring

Duration of Excursions Required Under §63.1368(g)(2)(ii)(B)

Parameter	Tar Thermal Oxidizer
Duration of Excursions (hours)	0.00

Monitoring Data Required Under §63.1368(g)(2)(ii)(D)

When a continuous monitoring system is used, the information listed in §63.10(c)(5) through (13) of subpart A is required. The applicable information is provided below.

Listing of Inoperative CMS Periods Required Under §63.10(c)(5)

None during reporting period

(c)(6) The date and time identifying each period during which the CMS was out of control, as defined in §63.8(c)(7);

None during reporting period

PAI MACT Periodic Report
Control Device Operating Parameter Exceedances

The following information is provided regarding the operating parameter exceedances:

Reg.	Information:
§63.1368(g)(2)(ii)(A)	Daily average values of monitored parameters for all operating days when the average values were outside the ranges established in the Notification of Compliance Status Report (NCS)
§63.1368(g)(2)(ii)(C)	Operating logs and operating scenarios for all operating days when the values are outside the levels established in the NCS.
§63.10(c)(7)	The specific identification of each time period of parameter monitoring exceedances that occurs during SSM events.
§63.10(c)(8)	The specific identification of each time period of parameter monitoring exceedances that occurs during periods other than SSM events.

Operating days when the average values were outside the ranges established in the NCS.

Parameter Exceeded[1]	Start Time	End Time	Block Average (F)	Minimum Allowable Value (F)	Operating Scenario
None					

[1] A parameter exceedance is anytime the average Tar TO temperature during a blending operation is less than 1350F [40 CFR §63.1366(b)(6)(i)]. Excess emission may only occur during a portion of the parameter exceeda

ATTACHMENT 4 – LDAR RESULTS

PAI - LDAR Testing Summary for July 2023 through December 2023

LDAR Test Date	Valves in gas/vapor or light liquid service		Pumps in light liquid service		Connectors in gas/vapor or light liquid service		Agitators in gas/vapor or light liquid service		Compressors [1]	
	Monitored	Leakers	Monitored	Leakers	Monitored	Leakers	Monitored	Leakers	Monitored	Leakers
Totals:	0	0	0	0	0	0	0	0	NA	NA
Percent Leakers:	0.0%		0.0%		0.0%		0.0%		NA	

[1] The process did not contain any compressors requiring monitoring during the reporting period.

Compliance Monitoring Results for Pressure Relief Devices in Gas and Vapor Service

Date	Tag ID	Result Value (ppmv)

111980

031300AAJ
10k

Koppers Inc.
Carbon Materials and Chemicals
3900 South Laramie Avenue
Cicero, IL 60804-4523
Tel 708 222 3483
Fax 708 656 6079
www.koppers.com

cc: Mohr

03/19/2024

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements.

The reports are to describe the event, the probable cause of the deviations, any corrective actions or preventive measures taken, and steps to avoid future deviations. The attached Table(s) summarize deviations from a requirement of the CAAPP permit or another requirement as noted.

If there are any questions concerning this report, please contact Kerry Grigsby of Koppers at (708) 209-9462.

Sincerely,

Seth Herring
Plant Manager

YAJ

Table 1: Tar Plant Summary of Deviations
30-Day Report

Start Time	End Time	Deviation Period (Minutes)	Duration Period (Hours)	Regulation/Permit Condition (see footnote)	Emission Rate[3] (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Action Taken
2/28/24 7:10 AM	2/28/24 7:27 AM	17.00	0.28	4	0.74	0.2	Lost Pitch TO, field Horn that alerts the operator to stop loading from Pitch Tanks, in this case TK47 did not work, due to bug in the PLC program	Fixed PLC program and tested for proper function of field Horn
3/7/24 5:44 PM	3/7/24 6:52 PM	68.00	1.13	6	1.26	1.1	Lost power to entire plant, after power restored operator started acid washer right away before Tar TO online	Stopped Acid Washer immediately and programmed further to interlock to prevent starting up Acid Washer Feed Pumps when TO is down

Footnotes

Regulation/Permit Conditions

1 CP#14100012 - Permit condition 2.2.1.a. (Naphthalene Plant Tanks)
2 IAC 35, § 218.302 (TO control if VOM emissions are >8 lbs/hr)
3 CP#15080025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4 CP# 08040005 - Permit condition 4(b) (Pitch Tanks, 98% control)
5 CP#11100041 - Permit condition 1.a and/or 5.b. (Tube Heater #2 emission limit)
6 CP#00040051 - Permit condition 2.d. (Tar TO, 98% Control Requirement requirement)
7 35 Ill. Adm. Code 218.988(a) (81% control, Tar Distillation Process)

031300AAJ
10K

112304

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04/25/2024

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Deviation Report
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements.

The reports are to describe the event, the probable cause of the deviations, any corrective actions or preventive measures taken, and steps to avoid future deviations. The attached Table(s) summarize deviations from a requirement of the CAAPP permit or another requirement as noted.

Koppers hereby waives the enforcement process under 415 ILCS 5/31 with respect to any deviations identified in this report. Koppers, by this waiver, is not admitting liability and expressly reserves its rights and any defenses with respect to any alleged violations.

If there are any questions concerning this report, please contact Kerry Grigsby of Koppers at (708) 209-9462.

Sincerely,

Seth Herring
Plant Manager

Table 1: Tar Plant Summary of Deviations
30-Day Report

Start Time	End Time	Deviation Period (Minutes)	Regulation/Permit Condition (see footnote)	Emission Rate (lb/hr)	Emission (lbs)	Cause of the Event	Corrective/Preventive Actions Taken
3/30/24 1:09 AM	3/30/24 2:09 AM	60.00	6	65.2	65.2	Inappropriate operator response following brief power outage	As soon as safely possible Tar Units were shut down, added additional informational display graphics on the HMI screens.
3/30/24 2:49 AM	3/30/24 3:28 AM	39.00	4	0.4	0.3	Delay in in shutting down loading operation following brief power outage	Retraining for all applicable parties to be completed. Implementation of a automatic loading pump shut off.
3/30/24 3:34 AM	3/30/24 4:43 AM	69.00	6	0.1	0.1	Power Blip caused us to lose the Tar TO & the #2 Vent. Communication lost between PLC's causing interlocks to fail.	Retraining for all applicable parties to be completed, modified the PLC interlock logic, added valve interlock notification on HMI screens

Footnotes

Regulation/Permit Conditions

1 CP#14100012 - Permit condition 2.2.1.a. (Naphthalene Plant Tanks)
2 IAC 35, § 218.302 (TO control if VOM emissions are >8 lbs/hr)
3 CP#15080025 - Permit condition 1.a. and/or 5.a. (Tube Heater #1 emission limit)
4 CP# 05040005 - Permit condition 4(b) (Pitch Tanks, 98% control)
5 CP#11100041 - Permit condition 1.a and/or 5.b. (Tube Heater #2 emission limit)
6 CP#00040051 - Permit condition 2.d. (Tar TO, 98% Control Requirement requirement)
7 35 Ill. Adm. Code 218.966(a) (81% control, Tar Distillation Process)
8 CP#14100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)
9 35 Ill. Adm. Code 218.966(a) (Naphthalene TO, 81% control requirement)
10 CAAPP 96030134 - Permit Condition 7.7.9(f) Total sulfur content of naphthalene feed based on daily sampling.

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04/25/2024
Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
PO Box 19276
Springfield, IL 62794-9276

RE: Previously Submitted Deviation Reports
Koppers Inc., Stickney Plant
ID Number: 031300AAJ

To Whom It May Concern:

Koppers Inc. (Koppers) operates a chemical manufacturing plant in Stickney, Illinois under Clean Air Act Permit Program (CAAPP) Permit # 96030134. Condition 5.7 of the CAAPP permit requires Koppers to provide prompt notice to the Illinois Environmental Protection Agency (IEPA) of deviations from CAAPP permit requirements. Koppers previously submitted reports of such deviations to IEPA on the following dates:

10/6/2023
11/2/2023
11/30/2023
12/28/2023
12/13/2023
12/20/2023
1/23/2024
1/23/2024
2/22/2024
2/28/2024
3/19/2024

Koppers hereby waives the enforcement process under 415 ILCS 5/31 with respect to any deviations identified in the reports submitted by Koppers on the above referenced dates. Koppers, by this waiver, is not admitting liability and expressly reserves its rights and any defenses with respect to any alleged violations.

If there are any questions concerning letter, please contact Kerry Grigsby of Koppers at (708) 209-9462.

Sincerely,

Seth Herring
Plant Manager