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KOPPERS

Via UPS Overnight Mail

June 3, 2024

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

RE: Koppers Inc., Stickney Plant
ID Number: 031300AAJ
Permit Number: 96030134
Periodic Report for Reporting Period of October 8, 2023 through April 7, 2024 as Required by the SOCMI NESHAP Subparts F, G and H

Dear Mr. Marr:

Koppers Inc., Stickney Plant is submitting this Periodic Report to the Illinois Environmental Protection Agency (IEPA) and United States Environmental Protection Agency (USEPA) to fulfill the requirements of Title 40 Code of Federal Regulations (CFR) Part 63, Subpart G, Section §63.152(c) and Subpart H Section §63.182.

This Periodic Report covers the period of October 8, 2023 through April 7, 2024. Koppers is complying with the NESHAP standards for SOCMI industries Subpart G for process vents, storage tanks, and transfer operations and Subpart H for equipment leaks. All of the required reporting information is included in Attachments 1 through 7 to this letter.

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

Sincerely,

L. Seth Herring
Plant Manager CMC NA

Copy:

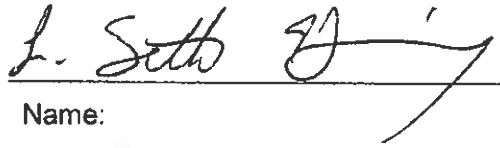
USEPA, Region 5
Air and Radiation Division
77 West Jackson Boulevard (AR-17J)
Chicago, Illinois 60604-3507

Mr. Tom Kolokythas
Environmental Protection Engineer
Illinois Environmental Protection Agency
FOS Section, Bureau of Air
9511 W. Harrison Street
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



Name:

L. Seth Herring

Official Title:

Plant Manager CMC NA

Telephone No:

708-556-9984

USEPA Response to Periodic Report Requirements in 40 CFR Part 63 Section 152(c)

Attachment 1 – Periodic Report Information Subpart G

This Attachment provides all information required under 40 CFR 63.152(c) and referenced regulations. Information is organized by regulatory reference. Regulatory requirements for this periodic report are listed in italics, followed by Koppers' comments addressing each element or providing the required information.

40 CFR 63.152(c) – HON MACT Periodic Reporting Provisions Under Subpart G

40 CFR 63.152(c) The owner or operator of a source subject to this subpart shall submit Periodic Reports.

***(c)**(1) Except as specified under paragraphs (c)(5) and (c)(6) of this section, a report containing the information in paragraphs (c)(2), (c)(3), and (c)(4) of this section shall be submitted semiannually no later than 60 calendar days after the end of each 6-month period. The first report shall be submitted no later than 8 months after the date the Notification of Compliance Status is due and shall cover the 6-month period beginning on the date the Notification of Compliance Status is due.*

> Koppers Comments: The periodic report will be submitted within 60 days of the 6-month period.

***(c)**(2) Except as provided in paragraph (c)(2)(iv) of this section, for an owner or operator of a source complying with the provisions of §§63.113 through 63.147 for any emission points, Periodic Reports shall include all information specified in §§63.117 and 63.118 for process vents, §63.122 for storage vessels, §§63.129 and 63.130 for transfer operations, and §63.146 for process wastewater, including reports of periods when monitored parameters are outside their established ranges.*

> Koppers Comments: The process vent information is included in attachment 2 and storage tank information is included in attachment 3. There are no Group 1 transfer operations nor Group 1 process wastewater streams in the Naphthalene Plant CMPU; therefore, no information in §§63.129 and 63.130 for transfer operations, and §63.146 for process wastewater is required in this Periodic Report.

***(c)(2)**(i) For each parameter or parameters required to be monitored for a control device, the owner or operator shall establish a range of parameter values to ensure that the device is being applied, operated and maintained properly. As specified in paragraph (b)(2) of this section, these parameter values and the definition of an operating day shall be approved as part of and incorporated into the source's Notification of Compliance Status or operating permit, as appropriate.*

> Koppers Comments: The target temperatures for TO-5 for Group 1 process vents and Tar TO1-4 for Group 1 storage tanks were established and documented in the NOCSR to ensure 98% control efficiency. The operating day is midnight to midnight.

(c)(2)*(ii) The parameter monitoring data for Group 1 emission points and emission points included in emissions averages that are required to perform continuous monitoring shall be used to determine compliance with the required operating conditions for the monitored control devices or recovery devices. For each excursion, except for excused excursions, the owner or operator shall be deemed to have failed to apply the control in a manner that achieves the required operating conditions.*

Koppers Comments: All excursions are listed in Attachment 5.

(c)(2)*(iii) Periodic Reports shall include the daily average values of monitored parameters for both excused and unexcused excursions, as defined in paragraph (c)(2)(ii)(A) of this section. For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected shall be specified.*

Koppers Comments: All the daily average values for each excursion are included in Attachment 5.

(c)(2)*(iv) The provisions of paragraphs (c)(2), (c)(2)(i), (c)(2)(ii), and (c)(2)(iii) of this section do not apply to any storage vessel for which the owner or operator is not required, by the applicable monitoring plan established under §63.120(d)(2), to keep continuous records. If continuous records are required, the owner or operator shall specify, in the monitoring plan, whether the provisions of paragraphs (c)(2), (c)(2)(i), (c)(2)(ii), and (c)(2)(iii) of this section apply.*

Koppers Comments: continuous records are required and therefore provisions of paragraphs (c)(2), (c)(2)(i), (c)(2)(ii), and (c)(2)(iii) are applicable and provided above.

(c)*(3) If any performance tests are reported in a Periodic Report, the following information shall be included:*

(c)(3)*(i) One complete test report shall be submitted for each test method used for a particular kind of emission point tested. A complete test report shall contain the information specified in paragraph (b)(1)(ii) of this section.*

(c)(3)*(ii) For additional tests performed for the same kind of emission point using the same method, results and any other information required in §63.117 for process vents, §63.129 for transfer, and §63.146 for process wastewater shall be submitted, but a complete test report is not required.*

Koppers Comments: No performance test was conducted during this reporting period.

(c)*(4) Periodic Reports shall include the information in paragraphs (c)(4)(i) through (c)(4)(iv) of this section, as applicable:*

(c)(4)*(i) For process vents, reports of process changes as required under §63.118(g), (h), (i), and (j) of this subpart,*

Koppers Comments: No process changes occurred during the reporting period.

(c)(4)*(ii) Any supplements required under §63.151(i) and (j) of this subpart,*

Koppers Comments: Not applicable - no emission averaging is used.

(c)(4)*(iii) Notification if any Group 2 emission point becomes a Group 1 emission point, including a compliance schedule as required in §63.100 of subpart F of this part, and*

Koppers Comments: No Group 2 emission points became Group 1 emission points during the reporting period.

(c)(4)*(iv) For gas streams sent for disposal pursuant to §63.113(i) or for process wastewater streams sent for treatment pursuant to §63.132(g), reports of changes in the identity of the transferee.*

Koppers Comments: Not applicable – no gas streams sent for disposal or wastewater streams sent for treatment pursuant to 63.132(g)

(c)(5) The owner or operator of a source shall submit quarterly reports for all emission points included in an emissions average.

Koppers Comments: Quarterly reports are not required, as Koppers is not using the emissions averaging option.

(c)(6) The owner or operator of a source shall submit reports quarterly for particular emission points not included in an emissions average under the circumstances described in paragraphs (c)(6)(i) through (c)(6)(v) of this section.

Koppers Comments: There were no triggering events for quarterly reports during the reporting period.

ATTACHMENT 2

Koppers' Response to Periodic Report Requirements in 40 CFR Part 63 Sections 117 and 118 for Process Vents

40 CFR 63.117(a)(3) If any subsequent TRE determinations or performance tests are conducted after the Notification of Compliance Status has been submitted, report the data in paragraphs (a)(4) through (a)(8) of this section in the next Periodic Report as specified in §63.152(c) of this subpart.

Koppers Comments: No new TRE, performance tests determinations, or process changes were conducted at the CMPU during the reporting period.

40 CFR 63.118(f) Each owner or operator who elects to comply with the requirements of §63.113 of this subpart shall submit to the Administrator Periodic Reports of the following recorded information according to the schedule in §63.152 of this subpart.

(f)(1) Reports of daily average values of monitored parameters for all operating days when the daily average values recorded under paragraphs (a) and (b) of this section were outside the ranges established in the Notification of Compliance Status or operating permit.

Koppers' Response: All process vents at the Naphthalene Plant are controlled by the Naphthalene Plant TO. The daily average values outside the established range for the Naphthalene TO are shown in Table 4 in Attachment 5

(f)(2) For Group 1 points, reports of the duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data as defined in §63.152(c)(2)(ii)(A) of this subpart.

Koppers' Response: None during reporting period

(f)(3) Reports of the times and durations of all periods recorded under paragraph (a)(3) of this section when the gas stream is diverted to the atmosphere through a bypass line.

Koppers Comments: See Table 5 in Attachment 5

(f)(4) Reports of all periods recorded under paragraph (a)(4) of this section in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out.

Koppers Comments: See Table 5. in Attachment 5

(f)(5) Reports of the times and durations of all periods recorded under paragraph (a)(2) of this section in which all pilot flames of a flare were absent.

Koppers Comments: No flare is employed for control of HAP emissions at the Naphthalene Plant.

(f)(6) Reports of all carbon bed regeneration cycles during which the parameters recorded under paragraph (b)(2)(v) of this section were outside the ranges established in the Notification of Compliance Status or operating permit.

Koppers Comments: No flare is employed for control of HAP emissions at the Naphthalene Plant.

(g) Whenever a process change, as defined in §63.115(e) of this subpart, is made that causes a Group 2 process vent to become a Group 1 process vent, the owner or operator shall submit a

report within 180 calendar days after the process change as specified in §63.151(j) of this subpart. The report shall include:

(g)(1) A description of the process change; (g)(2) The results of the recalculation of the flow rate, organic HAP concentration, and TRE index value required under §63.115(e) of this subpart and recorded under paragraph (c), (d), or (e) of this section; and (g)(3) A statement that the owner or operator will comply with the provisions of §63.113 of this subpart for Group 1 process vents by the dates specified in subpart F of this part.

Koppers Comments: No change to group status occurred during this reporting period.

(h) Whenever a process change, as defined in §63.115(e) of this subpart, is made that causes a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, the owner or operator shall submit a report within 180 calendar days after the process change. The report may be submitted as part of the next periodic report. The report shall include:

(h)(1) A description of the process change, (h)(2) The results of the recalculation of the TRE index value required under §63.115(e) of this subpart and recorded under paragraph (c) of this section, and (h)(3) A statement that the owner or operator will comply with the requirements specified in §63.113(d) of this subpart.

Koppers Comments: There are no Group 2 process vents with a TRE greater than 4.0 in the Naphthalene Plant CMPU.

(i) Whenever a process change, as defined in §63.115(e) of this subpart, is made that causes a Group 2 process vent with a flow rate less than 0.005 standard cubic meter per minute to become a Group 2 process vent with a flow rate of 0.005 standard cubic meter per minute or greater and a TRE index value less than or equal to 4.0, the owner or operator shall submit a report within 180 calendar days after the process change. The report may be submitted as part of the next periodic report. The report shall include:

(i)(1) A description of the process change, (i)(2) The results of the recalculation of the flow rate and the TRE determination required under §63.115(e) of this subpart and recorded under paragraph (d) of this section, and (i)(3) A statement that the owner or operator will comply with the requirements specified in §63.113(d) of this subpart.

Koppers Comments: There are no Group 2 process vents in the Naphthalene Plant CMPU.

(j) Whenever a process change, as defined in §63.115(e) of this subpart, is made that causes a Group 2 process vent with an organic HAP concentration less than 50 parts per million by volume to become a Group 2 process vent with an organic HAP concentration of 50 parts per million by volume or greater and a TRE index value less than or equal to 4.0, the owner or operator shall submit a report within 180 calendar days after the process change. The report may be submitted as part of the next periodic report. The report shall include:

(j)(1) A description of the process change, (j)(2) The results of the recalculation of the organic HAP concentration and the TRE determination required under §63.115(e) of this subpart and recorded under paragraph (e) of this section, and (j)(3) A statement that the owner or operator will comply with the requirements specified in §63.113(d) of this subpart.

Koppers Comments: There are no Group 2 process vents in the Naphthalene Plant CMPU.

(k) The owner or operator is not required to submit a report of a process change if one of the conditions listed in paragraph (k)(1), (k)(2), (k)(3), or (k)(4) of this section is met.

(k)(1) The process change does not meet the definition of a process change in §63.115(e) of this subpart, or (k)(2) The vent stream flow rate is recalculated according to §63.115(e) of this subpart and the recalculated value is less than 0.005 standard cubic meter per minute, or (k)(3) The organic HAP concentration of the vent stream is recalculated according to §63.115(e) of this subpart and the recalculated value is less than 50 parts per million by volume, or (k)(4) The TRE index value is recalculated according to §63.115(e) of this subpart and the recalculated value is greater than 4.0.

Koppers Comments: No response in this Periodic Report is required by this condition.

ATTACHMENT 3

Koppers' Response to Periodic Report Requirements in 40 CFR Part 63 Sections 122 for Storage Vessels

40 CFR §63.122(a)(4) The owner or operator shall submit Periodic Reports as required by §63.152(c) of this subpart and shall submit as part of the Periodic Reports the information specified in paragraphs (d), (e), (f), and (g) of this section.

(d) An owner or operator who elects to comply with §63.119(b) of this subpart by using a fixed roof and an internal floating roof or with §63.119(d) of this subpart by using an external floating roof converted to an internal floating roof shall submit, as part of the Periodic Report required under §63.152(c) of this subpart, the results of each inspection conducted in accordance with §63.120(a) of this subpart in which a failure is detected in the control equipment.

> Koppers' Response: Koppers is using a closed vent system and control device to control HAPs from storage vessels, therefore, not applicable.

(e) An owner or operator who elects to comply with §63.119(c) of this subpart by using an external floating roof shall meet the periodic reporting requirements specified in paragraphs (e)(1), (e)(2), and (e)(3) of this section.

> Koppers' Response: Koppers is using a closed vent system and control device to control HAPs from storage vessels, therefore, not applicable.

(f) An owner or operator who elects to comply with §63.119(d) of this subpart by using an external floating roof converted to an internal floating roof shall comply with the periodic reporting requirements of paragraph (d) of this section.

> Koppers' Response: Koppers is using a closed vent system and control device to control HAPs from storage vessels, therefore, not applicable.

(g) An owner or operator who elects to comply with §63.119(e) of this subpart by installing a closed vent system and control device shall submit, as part of the next Periodic Report required by §63.152(c) of this subpart, the information specified in paragraphs (g)(1) through (g)(3) of this section.

(g)(1) As required by §63.120(d)(4) and §63.120(e)(3) of this subpart, the Periodic Report shall include the information specified in paragraphs (g)(1)(i) and (g)(1)(ii) of this section for those planned routine maintenance operations that would require the control device not to meet the requirements of §63.119(e)(1) or (e)(2) of this subpart, as applicable.

(g)(1)(i) A description of the planned routine maintenance that is anticipated to be performed for the control device during the next 6 months. This description shall include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods.

> Koppers' Response: All planned maintenance operations during the next 6 months will meet the requirements of *§63.119(e)(1).*

(g)(1)(ii) A description of the planned routine maintenance that was performed for the control device during the previous 6 months. This description shall include the type of maintenance performed and the total number of hours during those 6 months that the control device did not meet the requirements of §63.119(e)(1) or (e)(2) of this subpart, as applicable, due to planned routine maintenance.

Koppers' Response: All planned routine maintenance operations during the previous 6 months meets the requirements of *§63.119(e)(1).*

(g)(2) If a control device other than a flare is used, 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 §63.120(d)(3)(i) of this subpart. The description shall include the information specified in paragraphs (g)(2)(i) and (g)(2)(ii) of this section.

Koppers' Response: All of the storage tanks containing volatile organic materials in the process are vented to the Tar Plant Thermal Oxidizer

(g)(2)(i) Identification of the control device for which the measured parameters were outside of the established ranges, and
(g)(2)(ii) Cause for the measured parameters to be outside of the established ranges.

Koppers' Response: See Table 1 in Attachment 5

(g)(3) If a flare is used, the Periodic Report shall describe each occurrence when the flare does not meet the general control device requirements specified in §63.11(b) of subpart A of this part and shall include the information specified in paragraphs (g)(3)(i) and (g)(3)(ii) of this section.

Koppers' Response: Koppers is using a thermal oxidizer, not a flare for compliance, therefore, not applicable.

ATTACHMENT 4

Koppers' Response to Periodic Report Requirements in 40 CFR Part 63 Section 104 for Heat Exchangers

(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.

Koppers' response: Not applicable - no delay of repair provisions were invoked

(f)(2)(i) The owner or operator shall report the presence of the leak and the date that the leak was detected.

(f)(2)(ii) The owner or operator shall report whether or not the leak has been repaired.

(f)(2)(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.

(f)(2)(iv) If the leak remains unrepaired, the owner or operator shall report the expected date of repair.

(f)(2)(v) If the leak is repaired, the owner or operator shall report the date the leak was successfully repaired.

ATTACHMENT 5

Koppers' Response to Periodic Report Requirements in 40 CFR Part 63 Sections 118(f) for Process Vents

Koppers' Response to Periodic Report Requirements in 40 CFR Part 63 Sections 122(g)(2) for Storage Vessels

Table 1: Tar Thermal Oxidizer Parameter Excursions

Date	Tar TO Temperature (°F)	Cause of Excursion	SSM Event
11/4/2023	1399	Instrument air failure, safety controls closed fume valves and disturbed stability of chamber temp, pushing daily average slight below 1400F	No
11/7/2023	1278	Lost Power to Tar TO, human error, while working near local power disconnect	No
12/24/2023	1216	Lost Emergency Fire Suppression Steam , for safety reasons TO was shutdown	NO

Table 2: Tar TO Bypass Events

Start Time	End time	Duration (min)	SSM Plan Followed
11/4/2023	11/4/2023	28	Yes
11/4/2023	11/4/2023	19	Yes
11/5/2023	11/5/2023	69	Yes
11/7/2023	11/7/2023	229	Yes
11/8/2023	11/8/2023	6	Yes
11/9/2023	11/9/2023	2	Yes
11/10/2023	11/10/2023	4	Yes
11/10/2023	11/10/2023	4	Yes
11/10/2023	11/10/2023	5	Yes
11/11/2023	11/11/2023	2	Yes
11/13/2023	11/13/2023	2	Yes
11/13/2023	11/13/2023	12	Yes
11/13/2023	11/13/2023	3	Yes
11/14/2023	11/14/2023	4	Yes
11/16/2023	11/16/2023	31	Yes
11/16/2023	11/16/2023	2	Yes
11/17/2023	11/17/2023	15	Yes
11/22/2023	11/22/2023	10	Yes
11/30/2023	11/30/2023	3	Yes
12/24/2023	12/24/2023	84	Yes

Table 3: Tar Thermal Oxidizer Lack of Monitoring Data

None during the reporting period

Table 4: Naphthalene Plant TO Daily Average Teperatures less than 760 C

Start Time	Average TO Temperature (C)	SSM Plan Followed
01-Dec-23 00:00	756.19	Yes
09-Dec-23 00:00	759.38	Yes
15-Dec-23 00:00	758.82	Yes
13-Jan-24 00:00	756.39	Yes
19-Jan-24 00:00	678.61	Yes

Table 5: Naphthalene Bypass Events

Start Time	End time	Duration (min)	SSM Plan Followed
01-Dec-23 06:08	01-Dec-23 07:33	85	Yes
03-Dec-23 13:56	04-Dec-23 23:50	202	Yes
15-Dec-23 00:34	15-Dec-23 01:59	85	Yes
09-Dec-23 12:00	09-Dec-23 13:20	80	Yes
10-Dec-23 23:26	11-Dec-23 01:27	121	Yes
15-Dec-23 23:58	16-Dec-23 03:42	224.00	Yes
04-Jan-24 09:03	04-Jan-24 09:24	21.00	Yes
10-Jan-24 10:41	10-Jan-24 12:45	124.00	Yes
12-Jan-24 07:54	12-Jan-24 10:08	134.00	Yes
13-Jan-24 13:12	13-Jan-24 18:45	333.00	Yes
15-Jan-24 22:53	16-Jan-24 02:19	206.00	Yes
19-Jan-24 16:38	20-Jan-24 04:40	722.00	Yes
07-Feb-24 06:48	07-Feb-24 07:48	60.00	Yes

Table 6: Excursions due to insufficant data

Start Time	End time

None during the reporting period

ATTACHMENT 6

Koppers' Response to Periodic Report Requirements in 40 CFR Part 63 Section 182(d) for Equipment Leaks

Attachment 6 – Periodic Report Information for Subpart H

This Attachment provides all information required under 40 CFR 63.182(d) and referenced regulations. Information is organized by regulatory reference. Monitoring was conducted in accordance with the USEPA Title 40, CFR, Part 60, Appendix A, Testing Method 21. TVA-1000B and TVA-2020 Flame Ionized Detectors (FID) were used to monitor the equipment.

Regulatory requirements for this periodic report are listed in italics, followed by Koppers' comments addressing each element or providing the required information.

40 CFR 63.182(d) – HON MACT Periodic Reporting Provisions Under Subpart H

40 CFR 63.182(d) The owner or operator of a source subject to this subpart shall submit Periodic Reports.

(d)(1) A report containing the information in paragraphs (d)(2), (d)(3), and (d)(4) of this section shall be submitted semiannually starting 6 months after the Notification of Compliance Status, as required in paragraph (c) of this section. The first periodic report shall cover the first 6 months after the compliance date specified in §63.100(k)(3) of subpart F. Each subsequent periodic report shall cover the 6 month period following the preceding period.

(d)(2) For each process unit complying with the provisions of §63.163 through §63.174 of this subpart, the summary information listed in paragraphs (i) through (xvi) of this paragraph for each monitoring period during the 6-month period.

(d)(2)(i) The number of valves for which leaks were detected as described in §63.168(b) of this subpart, the percent leakers, and the total number of valves monitored;

(d)(2)(ii) The number of valves for which leaks were not repaired as required in §63.168(f) of this subpart, identifying the number of those that are determined nonrepairable;

(d)(2)(iii) The number of pumps for which leaks were detected as described in §63.163(b) of this subpart, the percent leakers, and the total number of pumps monitored;

(d)(2)(iv) The number of pumps for which leaks were not repaired as required in §63.163(c) of this subpart;

(d)(2)(v) The number of compressors for which leaks were detected as described in §63.164(f) of this subpart;

(d)(2)(vi) The number of compressors for which leaks were not repaired as required in §63.164(g) of this subpart;

(d)(2)(vii) The number of agitators for which leaks were detected as described in §63.173(a) and (b) of this subpart;

ATTACHMENT 7

Summary of USEPA Method 21 Monitoring Results as Required by 40 CFR 63.182(d)(2)

Semiannual Fugitive Emissions Data for Naphthalene Plant (HON [40 CFR 63.182(d)(2)])
September 1, 2023 to April 8, 2024

Equipment Type	No. of Leaking Components Detected	No. of Components Monitored	Percent of Leaking Components	No. of Leaking Components Not Repaired	No. of Leaking Components Determined to be Nonrepairable	No. of Instances Utilizing Delay of Repair	Monthly Monitoring of Valves Initiated? (yes/no)	Quality Improvement Program Initiated for Pumps? (yes/no)
Monitoring Results for 40 CFR 63 Subpart H for Napthalene Project Adams								
Pumps	0	0	0.0%	0	0	0	N/A	N/A
Connectors	0	0	0.0%	0	0	0	N/A	N/A
Agitators	0	0	0.0%	0	0	0	N/A	N/A
Compressors	0	0	0.0%	0	0	0	N/A	N/A
Valves	0	0	0.0%	0	0	0	N/A	N/A
Pressure Release Devices	0	0	0.0%	0	0	0	N/A	N/A
Flange	0	0	0.0%	0	0	0	N/A	N/A
Intrument	0	0	0.0%	0	0	0	N/A	N/A
Open Ended Line	0	0	0.0%	0	0	0	N/A	N/A

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10/C

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

8/8/2024

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 Sidney Lipp of Koppers at (708) 427-6980

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
7/16/24 1:50 PM	7/16/24 1:51 PM	1.00	6	57.4	0.96	#2 fume system vent valve opened to due to high pressure spike in the Unit 1 Dehydrator column during start up.	Tar and Acid Washer plants auto tripped to cease production immediately
7/16/24 7:30 AM	7/16/24 9:23 AM	113.00	2	7.7	14.5	#2 fume system circulation pump malfunctioned and opened vent valve. Raw CCOT was loaded into storage tank at this time	Tar and Acid Washer plants auto tripped to cease production immediately.

Footnotes

Regulation/Permit Condtions

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 218.966(a) (81% control Tar Distillation Process)
8 CP#14100012 - Permit condition 2.1.5(a) (Naphthalene Plant Emission Limit)
9 35 Ill. Adm. Code 218.986(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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KOPPERS

UPS Overnight Mail

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

August 22, 2024

Yasmine Keppner-Bauman, Interim 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: Semi-Annual Monitoring Report – January 1, 2024 – June 30, 2024
Koppers Inc., Stickney Plant
ID Number; 031300AAJ
CAAPP Permit Number: 96030134

Dear Yasmine Keppner-Bauman:

Per section 8.6.1 of the CAAPP Permit #96030134, the following correspondence is to serve as the semi-annual monitoring report for the period of January 1, 2024, through June 30, 2024, for the above referenced facility.

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.

Should you have any questions or require further information, please contact Sidney Lipp at 708-222-3111.

Sincerely,

L. Seth Herring
Plant Manager CMC NA

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:

8/22/24

Attachment 1 - List of Required Records in Accordance With Permit Condition 8.6.1

8.6.1 Monitoring Reports
If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]: All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

Permit Condition	Plant	Unit	Unit Description	Requirement	Deviation	Summary of Monitoring Results
7.4.8	Tar Plant	TPDS1 &TPDS2	Tar Plant distillation stills	Perform quarterly visual inspections of the affected stills to detect any leaking components which may need repair	No	Quarterly visual inspection were completed and no leaking components were detected.
7.6.8	PAA Plant	PAA-NT & PP-OXT	Naphthalene and o-xylene storage tanks	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148.	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.
7.7.8a	PAA Plant	A, B, C, & D-Trains	Phthalic Anhydride Reactor Trains	Continuous monitor and record TO temperature.	No	Temperature was continuously monitored and recorded during the reporting period and no daily average TO temperatures were below limit except when PAA process was offline C & D Trains never built
7.7.8b	PAA Plant	A, B, C, & D-Trains	Phthalic Anhydride Reactor Trains	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148.	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover. C & D Trains never built
7.7.8c	PAA Plant	A, B, C, & D-Trains	Phthalic Anhydride Reactor Trains	Continuous monitor and record TO temperature.	No	Temperature was continuously monitored and recorded during the reporting period and no daily average TO temperatures were below limit except when PAA process was offline C & D Trains never built

Permit Condition	Plant	Unit	Unit Description	Requirement	Deviation	Summary of Monitoring Results
7 7.8d	PAA Plant	A, B, C, & D-Trains	Phthalic Anhydride Reactor Trains	Continuous monitor and record SO2 with CEMS	No	The SO2 CEMS was available during entire reporting period. C & D Trains never built
7.8.8	PAA Plant	MF-106	Vaporizer Bottoms Tank	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.
7.9.8	PAA Plant	PAA-SCT and PAA-RST	Intermediate Crude and Refined Phthalic Anhydride Storage Tanks	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148.	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.
7.10.8	PAA Plant	MF-311 & MS-303	Refined Phthalic Anhydride Storage Tanks	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.
7.11.8a	PAA Plant	PAA-R	Phthalic Anhydride Refining	The Permittee shall fulfill all the applicable monitoring requirements as specified by 40 CFR 63.114. 40 CFR 63.114 – TO temperature monitoring device equipped with a continuous recorder is required	No	Temperature was continuously monitored and recorded during the reporting period and no daily average TO temperatures were below limit except when PAA process was offline C & D Trains never built
7.11 8b	PAA Plant	PAA-R	Phthalic Anhydride Refining	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.
7.11.8c	PAA Plant	PAA-R	Phthalic Anhydride Refining	Continuous monitor and record TO temperature	No	Temperature was continuously monitored and recorded during the reporting period and no daily average TO temperatures were below limit except when PAA process was offline C & D Trains never built
7.13.8	PAA Plant	MS-414	Flaked Phthalic Anhydride Storage Remelt Tank	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.
7.14.8	PAA Plant	PAA-L	Refined Phthalic Anhydride Tank Wagon and Railcar Loading	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.

Permit Condition	Plant	Unit	Unit Description	Requirement	Deviation	Summary of Monitoring Results
7.20.8	Terminal	OL-23	Stickney Terminal O-Xylene tank	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148	No	Demolished
7.21.8a	PAA Plant	PAA-RE	Phthalic Anhydride Recovery Exhausters	The Permittee shall fulfill all the applicable monitoring requirements as specified by 40 CFR 63.114. 40 CFR 63.114 – TO temperature monitoring device equipped with a continuous recorder is required	No	Temperature was continuously monitored and recorded during the reporting period and no daily average TO temperatures were below limit except when PAA process was offline C & D Trains never built
7.21.8b	PAA Plant	PAA-RE	Phthalic Anhydride Recovery Exhausters	The Permittee shall fulfill all the applicable leak inspection provisions as specified by 40 CFR 63.148	No	Koppers performs leak inspections of affected equipment in accordance with 40 CFR 63 Subpart H which are reported under separate cover.
7.21.8c	PAA Plant	PAA-RE	Phthalic Anhydride Recovery Exhausters	Continuous monitor and record TO temperature	No	Temperature was continuously monitored and recorded during the reporting period and no daily average TO temperatures were below limit except when PAA process was offline C & D Trains never built

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Koppers Inc.
Carbon Materials and Chemicals
3900 South Laramie Avenue
Cicero, IL 60804-4523
Tel 708 222 3483
Fax 708 656 6079
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114097

9/10/2024

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 Sidney Lipp of Koppers at (708) 427-6980

Sincerely,

Seth Herring
Plant Manager

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 (lb/hr)	Emission (lbs)	Cause of the Event	Corrective Actions Taken	Preventive Actions
8/12/24 5:19 AM	8/12/24 5:26 AM	7.60	0.127	6	57.37	7.28	#2 fume system vent valve opened to due to high pressure spike in the Unit 2 Dehydrator column, feed CCOT had high water and flashed in the dehydrator column.	Naphthalene Distillation, Acid Washer units were already down, Tar Plant (both units) auto tripped and vacuum pumps in the Tar units were shutdown manually from control room.	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
8/12/24 12:32 PM	8/12/24 12:33 PM	1.00	0.017	6	57.37	0.96	#2 fume system vent valve opened to due to high pressure spike in the Unit 2 Tar Column when electrician were inspecting and troubleshooting intrumentation	Naphthalene Distillation, Acid Washer units were already down, Tar Plant (both units) auto tripped	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
8/12/24 12:39 PM	8/12/24 12:40 PM	0.67	0.011	6	57.37	0.64	#2 fume system vent valve opened to due to high pressure spike in the Unit 2 Tar Column when electrician were inspecting and troubleshooting intrumentation	Naphthalene Distillation, Acid Washer units were already down, Tar Plant (both units) auto tripped	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
8/12/24 12:44 PM	8/12/24 12:44 PM	0.65	0.011	6	57.37	0.62	#2 fume system vent valve opened to due to high pressure spike in the Unit 2 Tar Column when electrician were inspecting and troubleshooting intrumentation	Naphthalene Distillation, Acid Washer units were already down, Tar Plant (both units) auto tripped	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
8/23/24 5:14 AM	8/23/24 5:14 AM	0.67	0.011	6	57.37	0.64	#2 fume system vent valve opened due to high pressure spike in the Unit 1 Tar Column	Naphthalene Distillation, Acid Washer units , Tar Plant (both units) Auto tripped and vacuum pumps in the Tar units were shutdown manually from control room.	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
8/24/24 4:24 PM	8/24/24 4:26 PM	1.63	0.027	6	57.37	1.56	#2 fume system vent valve opened due to high pressure spike in the Unit 1 Dehydrator Column	Naphthalene Distillation, Acid Washer units were already down, Tar Plant (both units) auto tripped and vacuum pumps in the Tar units were shutdown manually from control room.	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
8/24/24 10:19 PM	8/24/24 10:21 PM	2.47	0.041	6	57.37	2.36	#2 fume system vent valve opened due to high pressure spike in the Unit 1 Dehydrator Column	Naphthalene Distillation, Acid Washer units were already down, Tar Plant (both units) auto tripped and vacuum pumps in the Tar units were shutdown manually from control room.	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
9/1/2024 7:24PM	9/1/2024 7:25PM	1.00	0.017	6	57.37	0.96	#2 fume system vent valve opened due to high pressure spike in the Unit 1 Tar Column	Naphthalene Distillation, Acid Washer units , Tar Plant (both units) Auto tripped and vacuum pumps in the Tar units were shutdown manually from control room.	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve
9/3/24 12:27 PM	9/3/24 12:30 PM	3.00	0.050	6	57.37	2.87	#2 fume system vent valve opened due to high pressure spike in the Unit 1 Dehydrator Column	Naphthalene Distillation, Acid Washer units were already down, Tar Plant (both units) auto tripped and vacuum pumps in the Tar units were shutdown manually from control room.	Revise PLC logic to contain the waste gas in the units and not release through #2 fume system vent valve

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(b) (Naphthalene TO, 81% control requirement)
10	CAAPP 96030134 - Permit Condition 7.7.9(f) Total sulfur content of naphthalene feed based on daily sampling.

031300 AAJ
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KOPPERS

Via UPS Overnight Mail

Koppers Inc.
Carbon Materials and Chemicals
3900 South Laramie Avenue
Cicero, IL 60804-4523
Tel 708 222-3483
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August 28, 2024

113878

Yasmine Keppner-Bauman, Interim 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 Yasmine Keppner- Bauman:

Attached is Koppers Inc., Stickney Plant MON MACT Semi-Annual Compliance Report for the January 1, 2024 – June 30, 2024, 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)

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.

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.

Should you have any questions or require further information, please contact Sidney Lipp at 708-222-3111.

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: 8/28/24

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
Stickney, 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 August 28, 2024. The reporting period begins on January 1, 2024, through June 30, 2024.

§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: 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 January 1, 2024, through June 30, 2024. 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.

(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: January 01, 2024 through June 30, 2024
[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: January 01, 2024 through June 30, 2024

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: January 01, 2024 through June 30, 2024

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: January 01, 2024 through June 30, 2024

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: January 01, 2024 through June 30, 2024

For each deviation from an emission limit or operating limit in an MCPU with a CMS, complete the following information [40CFR 63

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	
			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	February 28, 2024	2/28/2024 7:10	2/28/2024 7:27	0.28	0.01%
Carbon Ptich	Pitch TO	March 30, 2024	3/30/2024 2:49	3/30/2024 3:28	0.65	0.01%
Total duration of Deviations due to SSM events and the total duration as a percent of the total operating time:					0.93	0.02%
Total duration of Deviations due to Control Equipment Problems (CEP) and total duration as a percent of the total operating					0.93	0.02%
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: January 01, 2024 through June 30, 2024

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: January 01, 2024 through June 30, 2024

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: January 01, 2024 through June 30, 2024

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: January 01, 2024 through June 30, 2024

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: January 01, 2024 through June 30, 2024

MCPU	Date	Start Time	End Time	Duration (hours)	Gas Volume (scf)	HAPs (PPMv)	HAP emissions (lbs)	Duration of Maintenance or Other Action[2]			
								Date	Start	End Time	Duration (hours)
Carbon Pitch	2/28/2024	2/28/2024 7:10	2/28/2024 7:27	0.28	682	985400	0.20	Not Applicable			
Carbon Pitch	3/30/2024	3/30/2024 2:49	3/30/2024 3:28	0.65	1564	985400	0.30				
Crude Tar Distillation	3/30/2024	3/30/2024 1:09	3/30/2024 2:09	1.00	3000	23794	13.90				
Crude Tar Distillation	5/1/2024	5/1/2024 13:35	5/1/2024 13:37	0.03	100	23794	0.46				
Crude Tar Distillation	5/8/2024	5/8/2024 7:41	5/8/2024 7:44	0.05	150	23794	0.70				

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
3) Crude Tar Distillation HAP emissions based on #2 cube heater 2012 stack test inlet results
4) Carbon Pitch HAP emission based on 30 day reports and 98.54% hapa in vapor composition calculated based on liquid composition data.

ATTACHMENT 3 – LDAR INFORMATION

TABLE 11: Semiannual Fugitive Emission Report For MON [40 CFR 63.1039(b)]
Reporting Period: January 01, 2024 through June 30, 2024

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 Nonrepairable	No. of Instances Utilizing Delay of Repair	Monthly Monitoring of Valves Initiated? (yes/no)	Quality Improvement Program Initiated for Pumps? (yes/no)
Valves In Gas/Vapor & LL Service	112	0	0	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	0	0.0%	0	0	0	N/A	N/A
Agitators In Gas/Vapor & LL Service	8	0	1	0.0%	0	0	0	N/A	N/A
Compressors	4	0	0	0.0%	0	0	0	N/A	N/A
Pressure Release Devices Gas/Vapor Service	4	0	0	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 astensk (*) if there are any revisions to these values since last Compliance Report.

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