Regulatory Applicable Requirements
Koppers Inc., Follansbee Tar Plant, Follansbee, West Virginia

Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
FACILITY				
CSR 45-4	To Prevent and Control the Discharge of Air Pollutants into the Open Air which Causes or Contributes to an Objectionable Odor or Odors	The discharge of an objectionable odor at any location occupied by the public is prohibited.	Yes	Records of odor complaints will be maintained
CSR 45-11	Prevention of Air Pollution Emergency Episodes	If required, standby plans to reduce the emissions of air pollutants must be submitted.	Yes	Will submit plans, if required.
CSR 45-13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation	Must submit appropriate application forms or notification when constructing a new source, or modifying an existing source.	Yes	Submission of this application demonstrates compliance with this section.
CSR 45-14	Permits for Construction and Modification of Major Sources of Air Pollution for the Prevention of Significant Deterioration	Must comply with this rule for any major construction or modification.	No	Title V Renewal - no proposed changes to the plant in this application that would trigger applicability to this rule.
CSR 45-19	Permits for Construction and Modification of Major Sources of Air Pollution Which Cause or Contribute to Non-Attainment for the Prevention of Significant Deterioration	Must comply with this rule for any major construction or modification.	No	Title V Renewal - no proposed changes to the plant in this application that would trigger applicability to this rule.
CSR 45-20	Good Engineering Practices as Applicable to Stack Heights	Applicable to "Good Engineering Practice" stacks	No	The height of all stacks at the facility are below 65 meters.
CSR 45-21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds	Applies to sources in Putnam, Kanawha, Cabell, Wayne and Wood counties	No	The facility resides in Brooke County.
CSR 45-22	Air Quality Management Fee Program	This rule outlines the program for fee collection for construction and operating permits.	Yes	
CSR 45-27	**To Prevent and Control the Emissions of Toxic Air Pollutants**		Yes	Facility emits benzene in excess of 1,000 pounds per year.
45-27-3	Chemical Processing Units	Must employ BAT for chemical processing units in TAP service.	Yes	BAT employed
45-27-4	Fugitive Emissions of Toxic Air Pollutants	Must prevent and control equipment leaks for equipment in TAP service (greater than 10% of a TAP).	Yes	LDAR for equipment in benzene service being implemented in accordance with the HON. PAL requested.
45-27-5	Tanks	Must employ BAT for tanks in TAP service.	Yes	BAT employed
45-27-6	Wastewater from Chemical Processing Units	Must employ BAT for wastewater treatment systems.	Yes	BAT employed
45-27-7	Loading and Unloading Railcars and Tank Trucks	Must employ BAT for the unloading and loading of railcars and tank trucks with TAPs	Yes	BAT employed
45-27-10.1	Reports, Records and Testing	If required, testing may be necessary to demonstrate compliance with this rule.	Yes	Testing will completed if required
45-27-10.3	Reports, Records and Testing	Written records must be maintained for all equipment in TAP service, results of monitoring and inspection events, emission control measures applied, and the nature, timing and results of repair efforts.	Yes	LDAR results maintained
45-27-10.4	Reports, Records and Testing	Abnormal releases or spill in excess of the quantities listed in the rule must be reported to the Director within 24-hours of knowledge.	Yes	Emission to the air of any toxic air pollutant resulting from an abnormal release or spill in excess of the following amounts shall be reported to the Director or his authorized representative not later than 24-hours after the chemical processing unit owner/operator has knowledge of such emission: For all other toxic air pollutants, fifty (50) pounds. Koppers - Benzene.
CSR 45-29	Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions	Applies to sources in Putnam, Kanawha, Cabell, Wayne, Wood and Greenbrier counties. If applicable, must submit emission statements before July 1 of each year.	No	Facility does not reside in one of those counties.
CSR 45-30	Requirements for Operating Permits	Major sources must submit Title V Permit Applications	Yes	
WV Code 22-5-4(a)(14)	Emissions Inventory – Power of Director	Must submit an emissions inventory if requested by the Director.	Yes	

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Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
40 CFR 60 Subpart NNN	Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations	This rule applies to affected facilities that are part of a process unit that produces any of the chemicals listed in the subpart as a product, co-product, by-product.	No	There are no chemicals at this facility listed in the subpart. Therefore, this rule does not apply.
40 CFR 61 Subpart J	National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene	Applies to equipment in benzene service (greater than 10% benzene by weight)	Yes	Equipment in Debenzolizer Overheads service would be applicable to this rule because benzene concentrations would be greater than 10% by weight. The facility complies with the LDAR requirements contained in 40 CFR Part 63, Subpart H, per R13-2274F, dated 3/9/2009.
40 CFR 61 Subpart Y	National Emission Standard for Benzene Emissions from Benzene Storage Vessels	Applies to storage vessels that store benzene having specific gravity within the range specified in ASTM D836-84, ASTM D835-85, ASTM D2359-85a or ASTM D4734-87	No	Facility does not store benzene meeting requirements of the rule. Therefore, the facility is not applicable to this requirement.
40 CFR 61 Subpart BB	National Emission Standard for Benzene Emissions from Benzene Transfer Operations.	Applies to loading racks in which benzene is loaded into tanks, trucks, railcars or marine vessels at benzene production facilities and bulk terminals.	No	This rule does not apply to facilities that receive benzene-laden liquid from coke by-products recovery plants. The raw materials used to derive the feed into the Debenzolizer come from coke by-product recovery plants. Therefore, this rule does not apply.
40 CFR 61 Subpart FF	National Emission Standard for Benzene Waste Operations	Facilities whose total benzene annual quantity from facility waste is less than 10 Mg/yr, but greater than 1 Mg/yr, must comply with the recordkeeping requirements of 61.356 and reporting requirements of 61.357. The total annual benzene quantity must be determined annually or whenever there is a process change.	Yes	The facility complies with the provisions of this rule and will continue to demonstrate that the total benzene annual quantity is less than 10 Mg/yr and keep the appropriate records and reports.
40 CFR 61 Subpart M	National Emission Standard for Asbestos	Requirements when asbestos is encountered during demolition or renovation of property.	Yes	The facility must follow the provisions of this rule should any asbestos be encountered during the demolition or renovation of property.
40 CFR 63 Subpart F	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	Applicable to major HAP sources that manufactures as a primary product a chemical listed in Table 1 of the rule and uses or manufacturers a chemical listed in Table 2 of the rule.	Yes - Naphthalene Distillation Unit (#32 Column, BFO & Naphthalene Tanks, Naphthalene Loading Racks)	This rule applies to chemical manufacturing process units (CMPU's) that manufacture as a primary product one or more of the chemicals listed in the rule. Naphthalene is the primary product of the Naphthalene Distillation Unit and is listed in the rule. The associated tanks and transfer operations are also subject.
40 CFR 63 Subpart G	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations and Wastewater	Process vent requirements, storage tank requirements, transfer operation requirements, wastewater requirements for sources subject to Subpart F	Yes - Naphthalene Distillation Unit (#32 Column, BFO & Naphthalene Tanks, Naphthalene Loading Racks)	The subject process vents, storage vessels, and transfer racks have been designated as Group 2 unit, which do not require add-on controls. Koppers will continue to comply with the recordkeeping and reporting requirements.
40 CFR 63 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	Employment of an LDAR program for applicable equipment for sources subject to F&G	Yes - Naphthalene Distillation Unit (#32 Column, BFO & Naphthalene Tanks, Naphthalene Loading Racks)	This section applies to equipment associated with the Naphthalene Distillation Unit. The facility implements a Leak Detection and Repair (LDAR) program in accordance with this rule and will continue to conduct the appropriate monitoring, recordkeeping and reporting to maintain compliance with the rule.
40 CFR 63 Subpart Y	National Emission Standards for Marine Tank Vessel Loading Operations	Applicable to marine loading operations of commodities greater than 1.5 psia at standard conditions.	No	The facility does not load commodities with a vapor pressure equal to or greater than 1.5 psia at standard conditions into barges.
40 CFR 63 Subpart EEEE	National Emission Standards for Organic Liquid Distribution (Non-gasoline)	Applicable organic liquid distribution facilities at major HAP facilities	No	The organic liquids are either stored and transferred in units subject to a different Part 63 NESHAP, or the organic liquids meet the vapor pressure cut-off.
40 CFR 63 Subpart FFFF	National Emission Standards for Miscellaneous Organic Chemical Production and Processes (MON)	Applicable to miscellaneous chemical processing units that process, use or produce HAPs under facilities designated by certain SIC codes at major HAP facilities	No	The facility is a minor source of HAP's. Therefore this rule does not apply.
40 CFR Part 63, Subpart VVVVVV	National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Source Categories	Applicable to area source of HAPS that operate numerous chemical manufacturing processing units (CMPUs) that process, use, produce, or generate one of the “Table 1 HAPS” listed in the rule	Yes	The facility will comply with the rule by the compliance date of October 29, 2012.

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Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
40 CFR Part 68, Subpart B	Risk Management Plans		No	The facility does store sulfuric acid, but in concentrations less than 65% by weight. Therefore, this rule does not apply.
40 CFR Part 82, Subpart F	Protection of Stratospheric Ozone, Recycling and Emission Reduction		Yes	The facility will only use certified technicians to perform maintenance on any applicable equipment.
R13-2274F, March 9, 2009				
Condition 4.1.9		Emissions from the 4 tube heaters, the pencil pitch hot oil heater, and the pencil pitch dryer combined shall not exceed the following: PM - 0.52 lbs/hr; 2.27 tpy NOx - 6.8 lbs/hr; 29.9 tpy SO2 - 0.040 lbs/hr; 0.18 tpy CO - 5.71 lbs/hr; 25.12 tpy VOC - 0.37 lbs/hr; 1.65 tpy Total HAPs - 0.13 lbs/hr, 0.57 tpy		Compliance demonstrated by the use of natural gas and not solid fuels.
Condition 4.1.22, 4.4.5		Annual emissions from the entire facility shall not exceed the following: VOC - 44 tpy Benzene - 3.4 tpy Naphthalene - 6.0 tpy Total POM - 9.9 tpy Total HAPs - 24.2 tpy		The facility must calculate actual emissions on a monthly basis and calculate annual emissions on a 12-month rolling total.
Group 001 - Boilers				
CSR 45-2	**To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers**			
45-2-3	Visible Emissions of Smoke and/or Particulate Matter Prohibited and Standards of Measurement	Opacity limit of 10% based on a six minute block average.	Yes	Monthly Method 22-like visible emissions checks per R13-2274F permit for Boiler #3. Use of liquid fuel or natural gas for all boilers.
45-2-4	Weight Emission Standards	Particulate emissions are limited to 0.09 lb/MMBtu.	Yes	The facility will demonstrate compliance with this section combusting only liquid fuel or natural gas. Boiler 3 limit in R13-2274F more stringent.
45-2-5	Control of Fugitive Particulate Matter	Can not operate a source of fugitive particulate emissions in without a control system.	No	These units are fired with natural gas or solvent fuel oil. Negligible ash results from the combustion of these fuels.
45-2-8	Testing, Monitoring, Recordkeeping, and Reporting	Refer to CSR 45-2A	Yes	Refer to the regulatory review for CSR45-2A
45-2-9	Start-up, Shutdown and Malfunctions	The visible emission standards in 45-2-3 do not apply during periods of start-up, shutdown, or malfunction. The owner must report any malfunction which results in excess particulate matter or visible emissions in accordance with the rule.	Yes	The facility will report any malfunctions which result in excess particulate matter or visible emissions in accordance with this section.
45-2-11	Exemptions	Fuel burning units with heat input less than 10 MMBtu/hr are exempt sections 4, 5, 6, 8, and 9.	No	Does not apply to the boilers; heat inputs greater than 10 MMBtu/hr.
CSR 45-2A	**Testing, Monitoring, Recordkeeping, and Reporting Requirements under 45CSR2**			
45-2A-3	Applicability	This rule applies to fuel burning units with heat input over 10 MMBtu/hr. Exempt from Section 5 and 6 if unit combusts only natural gas or has a heat input of less than 100 MMBtu/hr	Yes	Section 5 and 6 does not apply to units that burn only natural gas or to units are less than 100 MMBtu/hr. Boilers 2 and 3 are less than 100 MMBtu/hr; Boiler 5 is greater than 100 MMBtu/hr and burns only natural gas. Therefore, these units are not subject to Section 5 and 6.
45-2A-7.1	Recordkeeping and Reporting Requirements - Recordkeeping	For natural gas units, must keep records on the date and time of start-up and shutdown, and the monthly fuel consumption. For residual/alternative fuel units, records must be kept on the date and time of start-up and shut down and the fuel quantity analysis as approved by the Director. These records must be kept for period of at least 5 years.	Yes	For natural gas units, the facility will keep the following records: date and time of start-up and shutdown and monthly fuel consumption. For alternative fuel fired units, the facility will keep the following records: date and time of start-up and shutdown and the fuel quality analysis. The fuel quality analysis is performed on a quarterly basis for the liquid fuel to determine BTU content, % ash, % moisture and % sulfur.

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Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
CSR 45-10	**To Prevent and Control Particulate Air Pollution from the Emissions of Sulfur Dioxide**			
45-10-3	Sulfur Dioxide Weight Emission Standards for Fuel Burning Units.	The Follansbee Tar Plant resides in a Priority I region, therefore, sulfur dioxide emissions are limited to 3.1 lb/MMBtu.	Yes	The facility will demonstrate compliance with this section by combusting only liquid fuel or natural gas.
45-10-5	Combustion of Refinery or Process Gas Streams	Combustion of refinery gas or any other process gas stream with a hydrogen sulfide concentration greater than 50 grains per 100 cubic feet of gas is not permitted unless operating with a control.	No	The boilers combust only natural gas and/or liquid fuel and therefore are not subject to this section.
45-10-8	Testing , Monitoring, Recordkeeping and Reporting	Refer to CSR 45-10A	Yes	These requirements are detailed in CSR 45-10A.
45-10-10	Exemptions	Fuel burning units with heat input less than 10 MMBtu/hr are exempt from this requirement.	No	Does not apply to the boilers; heat inputs greater than 10 MMBtu/hr.
CSR 45-10A	**Testing, Monitoring, Recordkeeping, and Reporting Requirements under 45CSR10**			
45-10A-3	Applicability	Fuel burning units with capacities less than 10 MMBtu/hr and fuel burning units which combusts natural gas, wood or distillate oil are exempt from this rule.	Yes	Boilers 2 and 3 combust liquid fuel, and therefore must comply with this section. Boiler 5 combusts natural gas only and is exempt.
45-10A-5.1	Testing Requirements - Fuel Burning Units	Weight emission tests are to be conducted at a frequency established in the rule to demonstrate compliance with CSR 45-10-3.	Yes	Testing frequency is dependent on the "Factor", as defined in the rule to be the total SO2 permitted to be discharged at the plant from fuel burning units, expressed in lbs/hr. Since the percent of the factor is less than 50 % for the applicable boilers, testing is not required.
45-10A-6.1, R13-2274F, Condition 4.2.5	Monitoring Plan Requirements - Fuel Burning Units	A monitoring plan must be submitted detailing method of demonstrating compliance with CSR 45-10-3.	Yes	The facility has submitted this plan and will perform the analysis on a quarterly basis for liquid fuel to determine BTU content, % ash, % moisture and % sulfur.
45-10A-7.1	Recordkeeping and Reporting Requirements - Recordkeeping	The following records must be kept: date and time of start-up and shutdown, daily fuel consumption, and periodic fuel analysis at a frequency set forth in the rule. These records must be kept for period of at least 5 years.	Yes	Since the percent of the "Factor" is less than 90%, for each applicable boiler, the facility must conduct a fuel analysis per shipment. This facility produces the liquid fuel on site and does not receive shipments of liquid fuel thus the facility performs a quarterly fuel quality analysis to determine BTU content, % ash, % moisture and % sulfur.
40 CFR Part 60, Subpart Db	Standards of Performance for Industrial, Commercial, Institutional Steam Generating Units	Applies to boilers that were installed or modified after June 19, 1984 with heat inputs greater than 100 MMBtu/hr.	No	Boiler 2 was installed in 1941 and therefore, not applicable to this rule. Boiler 3 was installed in 1988, but is less than 100 MMBtu, and therefore not applicable to the rule. Boiler 5 was installed 1977, modified in October 1987, where the burners were converted from coal to natural gas burners. The total cost of the modification was less than 50% of the original capital cost of the boiler. Therefore, the modification did not trigger applicability to the rule.
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units	Applies to boilers that were installed or modified after June 9, 1989 with heat inputs less than 100 MMBtu/hr, but greater than or equal to 10 MMBtu/hr.	No	Boilers 2 and 3 have heat inputs less than 100 MMBtu/hr, but were installed in 1941and 1988, respectively, and therefore, not applicable to the rule. Boiler #5 has a heat input > 100 MMBtu/hr and was installed in 1977, and therefore, not applicable to the rule.
R13-2274F, March 9, 2009				
Condition 4.1.7, 4.1.8, 4.4.5		Emissions from the combined boilers must not exceed the following: PM - 11.93 lbs/hr; 38.24 tpy NOx - 73.8 lbs/hr; 246.4 tpy SO2 - 35.89 lbs/hr; 109.4 tpy CO - 19.2 lbs/hr; 84.15 tpy VOC - 1.24 lbs/hr; 5.43 tpy Total HAPS - 0.52 lbs/hr, 2.09 tpy Hexane - 1.64 tons/yr	Yes	The facility will demonstrate compliance by combusting only liquid fuel or natural gas.
Condition 4.1.13, 4.2.1.5, 4.4.5.1 &2		Boiler 3 fuel limits: natural gas at 657 mmcf/yr; liquid fuel at 2,357,143 gal/yr, and combination total limited to 123 y + 63 x = 148,500, where y is annual gas consumption and x is liquid fuel consumption.	Yes	The facility will maintain the following records on a monthly basis: fuel type, usage/consumptions, and operating hours.
Condition 4.1.27		Boiler 5 - Shall only fire natural gas or fuel oil with a sulfur content of 1% or less.	Yes	The boiler combusts only natural gas.

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Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
Condition 4.2.2, 4.4.4		Boiler 3 - Monthly Method 22 like visible emissions checks. If visible emissions are identified, Method 9 observations are required within 24 hours unless visible emissions are corrected before hand.	Yes	Monthly checks are conducted. Records must be maintained and must include the following: date, time, name of emission unit, applicable visible emissions requirements, the result of the observation, name of observer, any maintenance or corrective actions taken.
Group 003 and Group 005 - Tube Heaters #1, #2, #4 and #31				
CSR 45-2	**To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers**			
45-2-3	Visible Emissions of Smoke and/or Particulate Matter Prohibited and Standards of Measurement	Opacity limit of 10% based on a six minute block average.	Yes	The facility will demonstrate compliance by combusting only gaseous fuels.
45-2-4	Weight Emission Standards	Particulate emissions are limited to 0.09 lb/MMBtu.	Yes	The facility will demonstrate compliance by combusting only gaseous fuels.
45-2-5	Control of Fugitive Particulate Matter	Can not operate a source of fugitive particulate emissions in without a control system.	Yes	These units are fired with natural gas. Negligible ash results from the combustion of natural gas.
45-2-8	Testing, Monitoring, Recordkeeping, and Reporting	Refer to CSR 45-2A	Yes	This section applies to all fuel burning units. Refer to CSR 45-2A
45-2-9	Start-up, Shutdown and Malfunctions	The visible emission standards in 45-2-3 do not apply during periods of start-up, shutdown, or malfunction. The owner must report any malfunction which results in excess particulate matter or visible emissions in accordance with the rule.	Yes	The facility will report any malfunctions which result in excess particulate matter or visible emissions in accordance with this section.
45-2-11	Exemptions	Fuel burning units with heat input less than 10 MMBtu/hr are exempt from this requirement.	No	Does not apply to the tube heaters.
CSR 45-2A	**Testing, Monitoring, Recordkeeping, and Reporting Requirements under 45CSR2**			
45-2A-3	Applicability	This rule applies to fuel burning units with heat input over 10 MMBtu/hr. Exempt from Section 5 and 6 if unit combusts only natural gas or has a heat input of less than 100 MMBtu/hr	Yes	Section 5 and 6 does not apply to units that burn only natural gas or to units are less than 100 MMBtu/hr. All the tube heaters are burn only natural gas and are less than 100 MMBtu/hr.
45-2A-5	Testing Requirements	Must conduct periodic visible emission and weight emission tests.	No	Tube Heaters are exempt from this section
45-2A-6	Visible Emission Monitoring Plan Requirements	Must submit a monitoring plan that describes the method used to comply with CSR 45-2-3.	No	Tube Heaters are exempt from this section
45-2A-7.1	Recordkeeping and Reporting Requirements - Recordkeeping	For natural gas units, must keep records on the date and time of start-up and shutdown, and the monthly fuel consumption.	Yes	The facility will maintain the required records to demonstrate compliance with this section.
CSR 45-6	**To Prevent and Control Air Pollution from Combustion of Refuse**	Applies to units combusting refuse. Refuse is defined as "the useless and/or unwanted or discarded solid, liquid, and/or gaseous waste materials resulting from community, industrial, or citizen activities."	No	No heaters combust refuse, only natural gas.
CSR 45-10	**To Prevent and Control Particulate Air Pollution from the Emissions of Sulfur Dioxide**			
45-10-3	Sulfur Dioxide Weight Emission Standards for Fuel Burning Units.	The Follansbee Tar Plant resides in a Priority I region, therefore, sulfur dioxide emissions are limited to 3.1 lb/MMBtu.	Yes	The facility will demonstrate compliance by combusting only natural gas.
45-10-5	Combustion of Refinery or Process Gas Streams	Combustion of refinery gas or any other process gas stream with a hydrogen sulfide concentration greater than 50 grains per 100 cubic feet of gas is not permitted unless operating with a control.	No	These heaters do not fire refinery or other process gas streams.
45-10-8	Testing , Monitoring, Recordkeeping and Reporting	Refer to CSR 45-10A	No	These requirements are detailed in CSR 45-10A.
45-10-10	Exemptions	Fuel burning units with heat input less than 10 MMBtu/hr are exempt from this requirement.	No	Does not apply to the tube heaters.

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Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
CSR 45-10A	**Testing, Monitoring, Recordkeeping, and Reporting Requirements under 45CSR10**			
45-10A-3	Applicability	Fuel burning units with capacities less than 10 MMBtu/hr and fuel burning units which combusts natural gas, wood or distillate oil are exempt from this rule.	No	Tube Heaters only combust natural gas and therefore are not subject to this section.
R13-2274F, March 9, 2009				
Condition 4.4.5.1 & 2		Records of fuel consumption must be maintained for the process heaters.		The facility will keep the required records.
Group 002 - Tar Distillation (#1 Column, #2 Column, #4 Column, Pitch Flash Columns, Decanters, Melt Pot)				
CSR 45-7	**To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations**			
45-7-3	Emissions of Smoke and/or Particulate Matter Prohibited and Standards of Measurement.	Opacity from any process source operation is limited to less than or equal to 20%, or less than 40% for any period aggregating no more than 5 minutes in an hour.	Yes - Melt Pot; Solid Addition	The access hatch will be kept in the closed position when not in use.
45-7-4	Control and Prohibition of Particulate Emissions by Weight from Manufacturing Process Source Operations.	Limits particulate matter emissions for process source operations.	No - Melt Pot; Solid Addition	Fugitive Emissions - not stack emissions
45-7-5	Control of Fugitive Particulate Matter	Fugitive particulate matter from manufacturing processes or storage structures must be operated with a system to minimize fugitive particulate matter emissions.	Yes - Melt Pot; Solid Addition	The access hatch will be kept in the closed position when not in use.
CSR 45-17	**To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter**			
45-17-3	No person shall cause, suffer, allow or permit fugitive particulate matter to be discharged beyond the boundary lines of the property	Where practicable use water or chemicals to control particulate. Cover material transports. Install hoods, fans, fabric filters, where necessary	Yes - Melt Pot; Solid Addition	The access hatch will be kept in the closed position when not in use.
R13-2274F, March 9, 2009				
Condition 4.1.1		The following sources must be controlled by the Thermal Oxidizer or Flare at all times: #1 Column, #2 Column, #4 Column, #4 Pitch Flash Tank, Decanters 63, 64, 65, Melt Pot.	Yes	These sources will be controlled at all times and verified through LDAR monitoring and recordkeeeping as required in R13-2274F.
Condition 4.1.14, 4.1.15, 4.2.1.6, 4.4.5.5		Melt Pot - Maximum liquid throughput must not exceed 1,000,000 gal/yr; maximum solid throughput must not exceed 5,000 tons/yr. The hatch of the melt pot must be kept in the closed position at all times except during introduction of solids materials through hatch.	Yes	The facility will maintain monthly records of throughput to the Melt Pot.
Condition 4.4.5.2		Records of the operating hours of the #1, #2, #4 columns, #1 and #4 Pitch Flash Columns, and decanters must be maintained on a monthly basis.	Yes	The facility will keep the required records.
Group 003 - Debenzolizer Unit				
R13-2274F, March 9, 2009				
Condition 4.1.1		The Debenzolizer Unit must be controlled by the Thermal Oxidizer or Flare at all times.	Yes	This source will be controlled at all times and verified through LDAR monitoring and recordkeeeping as required in R13-2274F.
Condition 4.2.1.4, 4.4.5.2		Records of the average feed rate of RCO to the Debenzolizer and operating hours of the Debenzolizer must be maintained on a monthly basis.	Yes	The facility will keep the required records.

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Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
Group 005 - Naphthalene Distillation Unit (#32 Column)				
R13-2274F, March 9, 2009				
Condition 4.1.1		The #32 Column must be controlled by the Thermal Oxidizer or Flare at all times.	Yes	This source will be controlled at all times and verified through LDAR monitoring and recordkeeeping as required in R13-2274F.
Condition 4.4.5.2		Records of the operating hours of the #32 Column must be maintained on a monthly basis.	Yes	The facility will keep the required records.
Group 006 - Base Plant				
No specific requirements				
Group 007 - Equipment Leaks				
R13-2274F, March 9, 2009				
Condition 4.1.26, 4.2.6, 4.4.6		For all equipment not subject to 40 CFR Part 63, Subparts H and MMM, a plant wide leak detection and repair program must be implemented in accordance with R13-2274F. Monitoring shall be conducted in accordance with Method 21 of 40 CFR Part 60. Must keep required records of monitoring, including list of leaking equipment, repair dates, corrective actions; date and results of all subsequent monitoring, results of PLE calculations.	Yes	The facility implements the plant wide LDAR program and keeps required records..
Group 008 - Pencil Pitch Area				
CSR 45-2	**To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers**		No	The rule does not apply to units with rated capacities less than 10 MMBtu/hr. Therefore, the Hot Oil Heater is exempt from this rule. The rule also does not apply to the Pencil Pitch Dryer because the dryer is a direct heat transfer unit, where this rule applies to only indirect heat transfer units.
CSR 45-2A	**Testing, Monitoring, Recordkeeping, and Reporting Requirements under 45CSR2**		No	This rule does not apply to the Hot Oil Heater or the Pencil Pitch Dryer because 45 CSR 2 does not apply.
CSR 45-7	**To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations**			
45-7-3	Emissions of Smoke and/or Particulate Matter Prohibited and Standards of Measurement.	Opacity from any process source operation is limited to less than or equal to 20%, or less than 40% for any period aggregating no more than 5 minutes in an hour.	Yes	Method 22-like visible emission inspections will be conducted in accordance with R13-2274F.
45-7-4	Control and Prohibition of Particulate Emissions by Weight from Manufacturing Process Source Operations.	Limits particulate matter emissions for process source operations.	Yes	This section applies only to the Pencil Pitch Dryer. The consent order is more stringent than this requirement.
45-7-5	Control of Fugitive Particulate Matter	Fugitive particulate matter from manufacturing processes or storage structures must be operated with a system to minimize fugitive particulate matter emissions.	Yes	This section applies only to the Pencil Pitch Dryer. The pencil pitch dryer is vented to a baghouse and fugitive emissions are negligible.

Regulatory Applicable Requirements
Koppers Inc., Follansbee Tar Plant, Follansbee, West Virginia

Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
CSR 45-10	**To Prevent and Control Particulate Air Pollution from the Emissions of Sulfur Dioxide**			
45-10-3	Sulfur Dioxide Weight Emission Standards for Fuel Burning Units.	Sulfur dioxide emissions are limited to 3.1 lb/MMBtu.	No	The rule does not apply to units with rated capacities less than 10 MMBtu/hr. Therefore, the Hot Oil Heater is exempt from this rule. The rule also does not apply to the Pencil Pitch Dryer because the dryer is a direct heat transfer unit, where this rule applies to only indirect heat transfer units.
45-10-4	Standards for Manufacturing Process Source Operations	Sulfur dioxide emissions are 2000 ppm, unless otherwise restricted in the rule	No	Pencil Pitch Dry. If potential emissions are less than 500 lb/yr, then the source is not applicable to the rule. The SO2 potential emissions from the pencil pitch dryer are less than 500 lbs/yr, therefore this rule does not apply.
CSR 45-10A	**Testing, Monitoring, Recordkeeping, and Reporting Requirements under 45CSR10**		No	The rule does not apply to units with rated capacities less than 10 MMBtu/hr. Therefore, the Hot Oil Heater is exempt from this rule. The rule also does not apply to the Pencil Pitch Dryer because the dryer has potential SO2 emissions less than 500 lbs/yr.
R13-2274F, March 9, 2009				
Condition 4.1.28, 4.1.29		Pencil Pitch Dryer - Total particulate matter emissions limited to 1.88 lb/hr and PM-10 emissions to 0.59 lb/hr. Must install and maintain a baghouse and meet the visible emissions limitations in 45 CSR 3.1 and 2 and emission limitations.	Yes	The facility installed a baghouse in 1993 in accordance with the order and performed the required performance tests in June 1993. The results of the tests demonstrated that the emissions were below the allowable limit. The facility will demonstrate on-going compliance by monitoring the hours of operation of the dryer and using the stack tests results to arrive at actual emissions.
Condition 4.2.2, 4.4.4		Pencil Pitch Baghouse - Monthly Method 22 like visible emissions checks. If visible emissions are identified, Method 9 observations are required within 24 hours unless visible emissions are corrected before hand.	Yes	Monthly checks are conducted. Records must be maintained and must include the following: date, time, name of emission unit, applicable visible emissions requirements, the result of the observation, name of observer, any maintenance or corrective actions taken.
Condition 4.4.5.2		Records of the operating hours of the Pencil Pitch Dryer must be maintained on a monthly basis.	Yes	The facility will keep the required records.
Group 009 - Product Loading				
R13-2274F, March 9, 2009				
Condition 4.1.5		The following loading racks must be controlled by Scrubber E: LR 4-5, LR 5-4, LR 5-5.	Yes	The racks will be controlled at all times and verified through LDAR monitoring and recordkeeeping as required in R13-2274F.
Condition 4.1.17		The following materials must be loaded from loading racks controlled by the thermal oxidizer or flare: petro tar, PSB, MPSB, refined tar, naphthalene, creosote. Pitch, either off the still or blended, must be loaded from loading racks controlled by Scrubber E.	Yes	Recordkeeping as required by R13-2274F.
Conditions 4.1.11, 4.1.12, 4.1.18, 4.2.1.2 & 3		The maximum quantity of CCOT loaded on the barges must not exceed 3,125,000 gal/yr and the average fill rate must not exceed 700 gpm. Not permitted to load barges and tank trucks/railcars simultaneously. The barges must be loaded by submerged fill.	Yes	The facility will maintain the following records on a monthly basis: total hours of operation of the barge, tank truck and rail car loading system when loading CCOT, & total gallons of CCOT loaded by the barge, tank truck, and railcar loading system
Condition 4.4.5.4		Records of the quantity of materials loaded at the loading racks must be maintained on a monthly basis.	Yes	The facility will keep the required records.

Regulatory Applicable Requirements
Koppers Inc., Follansbee Tar Plant, Follansbee, West Virginia

Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
Group 00A - Storage Tanks				
40 CFR 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978		Yes	Tanks 58, 806, 59 and 153 were installed within the dates specified. Tank 153 is less than 40,000 gallons and therefore is not subject to the rule. Tank 58, 806, and 59 have potential to store a petroleum liquid (petro tar or petro tar derivative). Vapor pressures of materials are currently less than 1.5 psia, therefore, must meet monitoring requirements in§60.113, which is to maintain records of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of the liquid.
40 CFR 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984		No	The facility does not have any tanks installed after May 18, 1978 and prior to July 23, 1986.
40 CFR 60 Subpart Kb	Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Applicable to tanks constructed or modified after July 23, 1984. Applies to storage tanks greater than or equal to 39,890 gallons storing a liquid with a vapor pressure greater than 0.51 psia, or tanks with capacity greater than or equal to 19,812 gallons storing liquid with vapor pressure greater than 2.18 psia	Yes	Tanks 9, 15, 48, 49, 50, 83, 100, 541 and 808 were (or will be) built after 1984. Tanks 48, 49 and 83 are subject to the rule; these tanks must comply with monitoring requirements contained in §60.116b, which requires facility to keep records showing dimension of the storage vessel; maintain records of VOL stored, period of storage, and the maximum true vapor pressure of the VOL; and notify the Administrator within 30 days when storing a VOL with maximum true vapor pressure in excess of vapor pressures specified in the control criteria in 60.112b. The other tanks were found not subject to the rule because the vapor pressures are less than the threshold in the rule.
R13-2274F, March 9, 2009				
Condition 4.1.5		The following tanks must be controlled by Scrubber E: 801, 802, 804, 805, 806, 808	Yes	The tanks will be controlled at all times and verified through LDAR monitoring and recordkeeeping as required in R13-2274F.
Condition 4.1.10, 4.2.1.1		The annual throughput of solvent through Tank 11 is not to exceed 980,000 gallons per year.	Yes	The facility must maintain the throughput of benzene in Tank 11 on a monthly basis.
Condition 4.1.16		The following materials must be stored or blended in tanks controlled by the thermal oxidizer or flare: crude tar, petro tar, crude petro blend, RCO, crude and petro distillate off of the columns, PSB, MPSB, refined tar, benzene free oil, liquid fuel, naphthalene, creosote, petroleum creosote solution, correction oil. Pitch, either off the still or blended, must be stored in tanks controlled by Scrubber E.	Yes	Recordkeeping as required by R13-2274F.
Condition 4.4.5.3		Records of the content and throughput for the tanks must be maintained on a monthly basis.	Yes	The facility will keep the required records.
Group 00C - Effluent Plant				
R13-2274F, March 9, 2009				
Condition 4.1.19		The API Separator, DAF Separator, Tanks 510, 511, 540 and 541 must be enclosed and the off-gases directed to the Aeration Basin at the wastewater treatment plant.	Yes	These sources are enclosed and off-gases are directed to the Aeration Basin.
Group 00D - Barge and Tankcar Heating				
R13-2274F, March 9, 2009				
Condition 4.1.1		RCO Tankcar Heating must be controlled by the Thermal Oxidizer or Flare at all times.	Yes	This source will be controlled at all times and verified through LDAR monitoring and recordkeeeping as required in R13-2274F.
Condition 4.4.5.6		Records of the quantity of materials unloaded from incoming vehicles requiring heat up must be maintained on a monthly basis.	Yes	The facility will keep the required records.
Group 00E - Tankcar Cleaning Group				
Condition 4.4.5.7		Records of the quantity of tankcars cleaned must be maintained on a monthly basis.		The facility will keep the required records.

Regulatory Applicable Requirements
Koppers Inc., Follansbee Tar Plant, Follansbee, West Virginia

Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
Group 00F - Creosote Processing Unit				
40 CFR 63 Subpart MMM	National Emission Standards for Pesticide Active Ingredient Production	Requirements for PAI Process Units.	Yes - Creosote Processing Unit	The PAI process units include Tank 221, 222, 223, and 224. The PAI process units meet Group 2 thresholds for process vents. Therefore, no controls are required on the applicable units, but emissions must be calculated on a 365-day rolling summation to ensure HAP emissions below 330 lbs/yr. The facility will monitor daily throughput to ensure compliance and use AP-42 emissions methodologies to calculate emissions from the PAI process units.
R13-2274F, March 9, 2009				
Condition 4.1.1		Tanks 221, 222, 223, 224 must be controlled by the Thermal Oxidizer or Flare at all times.	Yes	This source will be controlled at all times and verified through LDAR monitoring and recordkeeeping as required in R13-2274F.
Condition 4.4.5.3		Records of the content and throughput for the tanks must be maintained on a monthly basis.	Yes	The facility will keep the required records.
Group 00G- Slop Conveying and Recycling Group				
Condition 4.4.5.8		Records of the slop throughput to the slop conveyor must be maintained on a monthly basis.	Yes	The facility will keep the required records.
Flare and Thermal Oxidizer				
CSR 45-6	**To Prevent and Control Air Pollution from Combustion of Refuse**			
45-6-4.1	Emission Standards for Incinerators and Incineration - Particulate Emissions	This section limits particulate matter from incinerators.	Yes	The refuse incinerated are gaseous emissions from process and tanks, and are typically considered VOC emissions for reporting purposes.
45-6-4.2	Emission Standards for Incinerators and Incineration - Incinerator Operation	The operation of an incinerator is not permitted starting one hour before sunset and extending two (2) hours after sunrise.	No	The facility is located in Brooke County, but this subsection does not apply to the operation of industrial incinerators. Therefore, this section does not apply.
45-6-4.3 & 4	Emission Standards for Incinerators and Incineration - Visible Emissions	Opacity is limited to 20% at all times, but does not apply to smoke which is less than 40% opacity for a period aggregating no more than 8 minutes per startup or 6 minutes in any 1-hour period for stoking operations.	Yes	Applies to all incinerators. The facility only burns gaseous refuse, minimizing visible emissions. Monthly Method 22-like visible emissions observations will be conducted.
45-6-4.5	Emission Standards for Incinerators and Incineration - Visible Emissions	This section does not permit the emissions of particles of unburned or partially burned refuse or ash which are large enough to be individually distinguished in the open air.	Yes	Applies to all incinerators. However, the facility burns only gaseous refuse.
45-6-4.6	Emission Standards for Incinerators and Incineration - Objectionable Odors	Incinerators must be designed, operated and maintained to prevent emission of objectionable odors.	Yes	Applies to all incinerators.
45-6-4.7	Emission Standards for Incinerators and Incineration - Incineration of Residues and Hazardous Materials	Facilities must give the utmost care and consideration to the potential harmful effects of the emissions resulting from incineration.	Yes	Applies to all incinerators burning hazardous materials.
45-6-4.8	Emission Standards for Incinerators and Incineration - Air Curtain Incinerators	Specific requirements are outlined for these types of incinerators.	No	The facility does not operate any air curtain incinerators.
45-6-7	Reporting and Testing	At the request of the Director, stack testing to determine particulate matter loading shall be required.	Yes	Applies to all incinerators. The facility will perform the necessary tests, if required.
R13-2274F, March 9, 2009				
Condition 4.1.2, 4.1.3, 4.1.4, 4.1.20, 4.4.5, 4.2.3, 4.2.4		Emissions from the Thermal Oxidizer/Flare, including SO2 from naphthalene and tar distillation, combined shall not exceed the following: PM - 0.28 lbs/hr and 1.25 tpy, NOx - 4.85 lbs/hr and 21.29 tpy, SO2 - 52.3 lbs/hr and 229.3 tpy, CO - 5.72 lbs/hr and 25.11 tpy, VOCs - 9.93 lbs/hr and 8.32 tpy, Total HAPs - 7.42 lbs/hr and 6.17 tpy, Benzene - 2.47 lbs/hr and 1.95 tpy, Naphthalene - 2.19 lbs/hr and 2.45 tpy	Yes	Compliance with the hourly emissions limitations is demonstrated through control device monitoring as detailed below. Compliance with the annual emission limitations is demonstrated by comparing the 12-month rolling average emission calculation results with the limitations.

Regulatory Applicable Requirements
Koppers Inc., Follansbee Tar Plant, Follansbee, West Virginia

Regulation	Title	Requirement	Applicable Regulation?	Compliance Method/Comments
Condition 4.1.20.1, 4.2.3		The Thermal Oxidizer shall be designed, maintained and operated so as to achieve a destruction efficiency of 98% for VOC and HAPs. The combustion temperature of the thermal oxidizer (based on 24-hour average) must not be lower than the results from most recent performance test (1,308 F in October 2008).	Yes	Combustion temperature of the thermal oxidizer is monitored continuously, recorded at least once every 15 minutes, and a daily 24 hour average temperature is calculated.
Condition 4.1.20, 4.2.4.1, 4.2.4.2		The Flare shall be designed, maintained and operated so as to achieve a destruction efficiency of 98% for VOC and HAPs.	Yes	Monitoring for the presence of a flare flame is conducted continuously by temperature monitoring using a thermocouple. Results are recorded at least once every hour. Net heating value and exit velocity also determined (see below).
Condition 4.1.20.2. 4.1.20.3, 4.2.4.3, 4.2.4.4, 4.2.4.5		A net heating value of the gas burned at the flare must be at least 200 Btu/cf with an exit velocity of less than 60 feet per second.	Yes	Continuous natural gas and waste gas flow monitoring is conducted to ensure 25% natural gas volume using the calculated hourly fuel flow values o the waste and natural gas. Exit velocity is determined by a one time only calculation showing the maximum velocity could never exceed 60 feet per second. Flow meters are calibrated at least annually. Pitot tubes measuring the waste gas flow are inspected quarterly (no pluggage, can be reduced to semi-annually).
Condition 4.1.21		The flares must be operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.	Yes	Monthly Method 22-like visible emissions observations will be conducted.
Condition 4.2.2, 4.4.4		Thermal Oxidizer and Flare- Monthly Method 22 like visible emissions checks. If visible emissions are identified, Method 9 observations are required within 24 hours unless visible emissions are corrected before hand.	Yes	Monthly checks are conducted. Records must be maintained and must include the following: date, time, name of emission unit, applicable visible emissions requirements, the result of the observation, name of observer, any maintenance or corrective actions taken.
Condition 4.1.31		The piggyback flare must either be taken out of service by March 31, 2009, or it shall be subject to all of the standards, monitoring, recordkeeping and reporting as the Main Flare	Yes	The Piggyback flare was taken out of service prior to March 31, 2009.
Condition 4.4.2, 4.4.3		Must keep records of air pollution control equipment inspections and preventative maintenance procedures, and the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment.		The facility will keep the required records.
Scrubber E				
Condition 4.1.6, 4.2.7, 4.4.7		Emissions from Scrubber E shall not exceed the following: VOC - 5.82 lbs/hr and 4.46 tpy; Total HAPs - 4.99 lbs/hr and 3.80 tpy.	Yes	Compliance with the hourly emissions limitations is demonstrated through monthly monitoring of the outlet gas temperature of Scrubber E at the stack testing port. Records of the results are recorded. Compliance with the annual emission limitations is demonstrated by comparing the 12-month rolling average emission calculation results with the limitations.
Condition 4.2.2, 4.4.4, 4.3.1		Scrubber E- Monthly Method 22 like visible emissions checks. If visible emissions are identified, Method 9 observations are required within 24 hours unless visible emissions are corrected before hand.	Yes	Monthly checks are conducted. Records must be maintained and must include the following: date, time, name of emission unit, applicable visible emissions requirements, the result of the observation, name of observer, any maintenance or corrective actions taken. If the outlet temperature exceeds the limit, must perform a stack test within 60 days of the exeedance.
Condition 4.4.2, 4.4.3		Must keep records of air pollution control equipment inspections and preventative maintenance procedures, and the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment.		The facility will keep the required records.