BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

KOPPERS INC.,)	
)	
Petitioner,)	
)	
V.)	PCB 21
		(Permit Appeal – Air)
)	
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

NOTICE OF ELECTRONIC FILING

TO:

Don Brown, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601 Don.Brown@Illinois.Gov Division of Legal Counsel Illinois Environmental Protection Agency 1021 North Grand Avenue, East P.O. Box 19276 Springfield, IL 62794-9276

PLEASE TAKE NOTICE that we have today filed with the Office of the Clerk of the Pollution Control Board, the APPEARANCE OF STEPHANIE SEBOR and APPEAL OF DENIAL OF LIFETIME OPERATING PERMIT, copies of which are herewith served upon you.

Respectfully Submitted,

By: /s/Stephanie Sebor

Stephanie Sebor Petitioner's Counsel

Dated: September 14, 2021

Stephanie Sebor Winston & Strawn LLP 35 West Wacker Drive Chicago, Illinois 60601 Phone: (312) 558-7341

Phone: (312) 558-7341 Fax: (312) 558-5700

E-Mail: ssebor@winston.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

KOPPERS INC.,)	
)	
Petitioner,)	
)	
V.)	PCB 21-
		(Permit Appeal – Air)
)	
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

I, Stephanie Sebor, hereby file my appearance in this proceeding on behalf of Koppers Inc.

APPEARANCE

Respectfully Submitted,

By: /s/ Stephanie Sebor
Stephanie Sebor

Petitioner's Counsel

Dated: September 14, 2021

Stephanie Sebor Winston & Strawn LLP 35 West Wacker Drive Chicago, Illinois 60601 Phone: (312) 558-7341

Fax: (312) 558-5700

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REFORE THE ILLINOIS POLILITION

DEI OILE	THE IEEE TOTAL	I OLLO IIOI
	CONTROL BO	ARD
KOPPERS INC.,)	
)	
Petitioner,)	
)	
v.)	PCB 21
		(Permit Appeal – Air)
)	
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

APPEAL OF DENIAL OF LIFETIME OPERATING PERMIT

NOW COMES Petitioner, Koppers Inc. ("Koppers"), by and through its attorneys, WINSTON & STRAWN LLP, pursuant to Section 40 of the Illinois Environmental Protection Act (the "Act") (415 ILCS 5/40) and 35 Ill. Adm. Code § 105.200 *et seq.*, and requests a hearing before the Illinois Pollution Control Board (the "Board") to appeal the Illinois Environmental Protection Agency's ("IEPA") denial of a Lifetime Operation Permit (the "Permit Denial") on August 10, 2021 pursuant to Section 39 of the Act (415 ILCS 5/39) and attached hereto as Exhibit 1. Pursuant to Section 40(a)(1) of the Act and 35 Ill. Adm. Code § 105.206, this Petition is timely filed with the Board. In support of its Petition to appeal the Illinois Environmental Protection Agency's Permit Denial, Petitioner states as follows:

I. Background

1. Koppers is an integrated global producer of carbon compounds, chemicals, and treated wood products for the aluminum, railroad, specialty chemical, utility, rubber, steel, residential lumber, and agriculture industries. Koppers operates a wooden railroad crosstie and switch tie manufacturing plant located at 1291 State Route 41 in Galesburg, Knox County, Illinois ("the Plant").

2. The Plant, IEPA Identification Number 095804AAI, has been permitted for decades as a true minor source of air emissions pursuant to 35 Ill. Adm. Code 201.169(a) and has never been required to hold a federally enforceable state operating permit or a Clean Air Act Permit Program ("CAAPP") permit under Section 39 or Section 39.5 of the Act.

3. On March 8, 2021, Koppers applied for a construction and operating permit for a Lifetime Source, ¹ attached hereto as Exhibit 2, requesting approval from the IEPA Division of Air Pollution Control for the construction and operation of two boilers at the Plant. The Plant currently operates a Cleaver Brooks natural gas boiler, with a heat input of 33.474 million British thermal units ("MMBtu"). Ex. 2 at 1. The application indicated Koppers' intent to remove the current boiler and to re-install two boilers (29.3 MMBtu and 33.48 MMBtu), equipped with low NOx burners and flue gas circulation, which were previously permitted and used at the Plant. *Id*. The previously permitted boilers were removed due to the deterioration of the concrete building they were housed in, and following reinforcement of the building, Koppers sought to reinstall the boilers.

4. In its application, Koppers indicated that the two boilers would never be operated simultaneously, except during the warm-up period when a planned shutdown of the primary boiler was to be scheduled. *Id.* Koppers additionally confirmed the run time would be split between the two boilers for the year. *Id.* As part of its application, Koppers submitted emissions calculations demonstrating that the Plant would remain a true minor source of air emissions after the completion of the proposed project. *Id.* at 28 – 33. Prior to the removal of the two boilers Koppers now seeks to reinstall, the Plant was permitted as a true minor source of air emissions under a Lifetime Operating Permit in the same configuration Koppers now seeks to return to.

¹ Application No. 21030024; received by IEPA on March 15, 2021.

- 5. On August 10, 2021, the IEPA granted Koppers' permit to construct the two boilers. Ex. 1. The construction permit was issued subject to the standard conditions, as well as several special conditions. Id. at 1-5. Koppers does not contest the special conditions.
- 6. On August 10, 2021, the IEPA also denied Koppers' request for a Lifetime Operating Permit, stating that "the Agency shall not issue an operating permit unless the applicant submits proof to the Agency that the emission unit(s) at the source or air pollution control equipment operated at the source so as not to cause a violation of the Act or of regulations hereunder." *Id.* at 5. The IEPA did not request further information or ask Koppers any questions regarding its Lifetime Operating Permit application or emissions calculations prior to denying the Lifetime Operating Permit.
- 7. The IEPA's Permit Denial encouraged further discussion in person or by telephone to resolve this matter. Ex. 1 at 5. Koppers contacted IEPA to initiate discussions in good faith on September 2, 2021, but IEPA refused to meet with Koppers, stating that IEPA is "not currently authorized to enter a discussion with Koppers regarding [its] permitting status" due to a pending Notice of Violation and Finding of Violation ("NOV/FOV") that was issued by U.S. EPA Region V on April 1, 2021. *See* Exhibit 3. Koppers denies the allegations in the NOV/FOV and maintains that the Plant is properly permitted as a true minor source. Koppers is working cooperatively with U.S. Environmental Protection Agency ("U.S. EPA") Region V to resolve the NOV/FOV and is currently waiting for U.S. EPA Region V's response following a June 10, 2021 meeting regarding the NOV/FOV.
 - 8. Petitioner now timely appeals the denial of its Lifetime Operating Permit.

II. Issues on Appeal

9. The IEPA's denial was based on a determination that Koppers did not demonstrate it is a true minor source of air emissions eligible for the Lifetime Operating Permit program ("If it can't

be demonstrated that the source is eligible for an operating permit pursuant to 35 Ill. Adm. Code

201.169(a) . . . the Permittee shall apply for a Clean Air Act Permit Program (CAAPP) permit.") Id.

10. The IEPA's Permit Denial is not supported by the record. Koppers' application

contains calculations demonstrating the Plant's continued status as a true minor source after the re-

installation of the two boilers. See Ex. 2 at 28 - 33. IEPA has permitted the Plant as a true minor

source of air emissions for decades. In fact, IEPA previously permitted the Plant in the same

configuration with the two previously permitted boilers as a true minor source. Therefore, IEPA's

denial of the Lifetime Operating Permit is arbitrary, capricious, and an abuse of IEPA's discretion.

WHEREFORE, for the reasons set forth above, Petitioner appeals IEPA's denial of a Lifetime

Operating Permit for the Plant on August 10, 2021 and requests the Board order the IEPA to find

Petitioner has demonstrated eligibility as a true minor source and grant the request for a Lifetime

Operating Permit.

Respectfully Submitted,

By: /s/ Stephanie Sebor

Stephanie Sebor Petitioner's Counsel

Dated: September 14, 2021

Stephanie Sebor

Winston & Strawn LLP

35 West Wacker Drive

Chicago, Illinois 60601

Phone: (312) 558-7341 Fax: (312) 558-5700

E-Mail: ssebor@winston.com

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Exhibit 1

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397 JOHN J. KIM, DIRECTOR JB PRITZKER, GOVERNOR

217/785-1705

CERTIFIED MAIL 7013 2630 0001 4702 9348

CONSTRUCTION PERMIT GRANT AND LIFETIME OPERTING PERMIT DENIAL NSPS SOURCE

PERMITTEE

Koppers, Inc. Attn: Jim Evans 436 7th Avenue Pittsburgh, PA 15219

Application No.: 21030024 I.D. No.: 095804AAI

Date Received: March 15, 2021 Applicant's Designation:

Subject: Two Natural Gas Fired Boilers

Date Issued: August 10, 2021

Location: 1291 State Route 41, Galesburg, Knox County

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of one (1) 33.48 mmBtu/hr and one (1) 29.3 mmBtu/hr natural gas fired boilers (the boilers) equipped with Low-NOx burners and flue gas circulation, pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- The boilers are subject to the New Source Performance Standard (NSPS) la. for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States Environmental Protection Agency (USEPA) under a delegation agreement. Pursuant to 40 CFR 60.40c(a), except as provided in 40 CFR 60.40c(d), (e), (f), and (g), the affected facility to which 40 CFR 60 Subpart Dc applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (mmBtu/hr)) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr)
 - Pursuant to 40 CFR 60.11(d), at all times, the Permittee shall, to the b. extent practicable, maintain and operate the boilers, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
 - The Permittee shall comply with the applicable recordkeeping and reporting requirements of 40 CFR Part 60.7 and 60.48c.
- The boilers are subject to 35 Ill. Adm. Code Part 216 Subpart B (Fuel 2. Combustion Emission Sources). Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with

2125 S. First Street, Champaign, IL 61820 (217) 278-5800 1101 Eastport Plaza Dr., Suite 100, Collinsville, iL 62234 (618) 346-5120 9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000 595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200 412 SW Washington Street, Suite D, Peorla, IL 61602 (309) 671-3022 4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

PLEASE PRINT ON RECYCLED PAPER

- actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- 3a. This permit is issued based on the boilers at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11195(e), a gas-fired boiler as defined in 40 CFR 63 Subpart JJJJJJ are not subject to 40 CFR 63 Subpart JJJJJJ and to any requirements in 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11237, gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.
- b. This permit is issued based on the boilers at this source not being subject to the 35 Ill. Adm. Code Part 217, Subpart D (NOx General Requirements). This is because the boilers are located at a source that has the potential to emit NOx in an amount less than 100 tons/yr, pursuant to 35 Ill. Adm. Code 217.150(a)(1)(A) and each boiler emits NOx in an amount less than 15 tons/yr and less than 5.0 tons/yr per ozone season, pursuant to 35 Ill. Adm. Code 217.150(a)(1)(B).
- 4a. In the event that the operation of the emission unit(s) results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic inspections and maintenance on the equipment covered under this permit such that the equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- 5a. Emissions from and operation of the two boilers shall not exceed the following limits:

Natural Gas Usage: 27.0 mmscf/month, 270 mmscf/year

P-11 / /		Emission Factor	Emiss	3ions
Pollutant		(lbs/mmscf)	(Tons/Mo)	(Tons/Yr)
Nitrogen Oxides (NOx)		32	0.43	4.31
Carbon Monoxide (CO)		84	1.13	11.32
Particulate Matter (PM)		7.6	0,.10	1.02
	(VOM)	5.5	0.07	0.74
Sulfur Dioxide (SO ₂)		0.6	0.01	0.08

These limits are based on the maximum operating rate and standard emission factors for small (<100 mmBtu/hr) natural gas fired boiler equipped with low NOx burners and flue gas recirculation (AP-42,

Page 3

- Section 1.4) and continuous operation (8,760 hours/yr).
- b. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12-month total).
- 6a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for purposes of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Condition 7 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 8. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source

Page 4

category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regards to the relevant standard or any other requirements. If relevant, the analysis must be performed in accordance with the applicable requirements established in relevant subparts of 40 CFR Part 63 for purposes of specific category of stationary sources. relevant, the analysis should be performed in accordance with USEPA quidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 9. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 10a. The Permittee shall maintain monthly records of the following items for the boilers so as to demonstrate compliance with the conditions of this permit::
 - Records addressing use of good operating practices for the boilers.
 - ii. Natural gas usage for each boiler(mmscf/month, mmscf/year);
 - iii. NOx, CO, PM, SO₂, VOM, and HAPs emissions from the boilers with supporting documentation and calculations (tons/month, tons/year).
 - b. All records and logs required by Condition 6(a) of this permit shall be retained at a readily accessible location at the source for at least three (3) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

Page 5

- 11. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 12a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit or otherwise, the Permittee shall submit a report to the Illinois EPA's Bureau of Air Compliance Section in Springfield, Illinois within thirty (30) days after the exceedance or deviation. The report shall identify the duration and the emissions impact of the exceedance or deviation, a copy of the relevant records and information to resolve the exceedance or deviation, and a description of the efforts to reduce emissions from, and the duration of exceedance or deviation, and to prevent future occurrences of any such exceedance or deviation.
 - b. One (1) copy of required reports and notifications shall be sent to:

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

It should be noted that the request for the lifetime operating permit is denied. Pursuant to 35 Ill. Adm. Code 201.160 and Section 39(a) of the Act, the Agency shall not issue an operating permit unless the applicant submits proof to the Agency that the emission unit(s) at the source or air pollution control equipment operated at the source so as not to cause a violation of the Act or of regulations hereunder.

If it can't be demonstrated that the source is eligible for an operating permit pursuant to 35 Ill. Adm. Code 201.169(a), (e.g., PTE calculations result in potential emissions of criteria pollutants and/or HAPs exceeding major source threshold levels (i.e., 100 tons/year for criteria pollutants, 10 tons/year for a single HAP and 25 tons/year for total HAPs)), the Permittee shall apply for a Clean Air Act Permit Program (CAAPP) permit.

The Illinois EPA welcomes and in fact encourages discussions, either in person or by telephone, with persons proposing projects which may be subject to the above regulations. Such discussions may explain and resolve issues much more effectively than written correspondence, to the benefit of both the Illinois EPA and an applicant. Please contact us if you believe such discussions would be helpful.

The Illinois EPA will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. The reapplication will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this

Page 6

information must be submitted and should reference the application and I.D. numbers assigned above.

If you have any questions on this, please call Jason Selling at 217/785-1705.

William D. Marr

Manager, Permit Section

Bureau of Air

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P. O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

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

July 1, 1985

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

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

- Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
- The construction or development covered by this permit shall be done in compliance with applicable provisions of the 2. Illinois Environmental Protection Act, and Regulations adopted by the Illinois Pollution Control Board.
- There shall be no deviations from the approved plans and specifications unless a written request for modification, 3. along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
- The Permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - to enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - to have access to and copy any records required to be kept under the terms and conditions of this permit,
 - to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - to obtain and remove samples of any discharge or emission of pollutants, and
 - to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
- 5. The issuance of this permit:
 - shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - does not release the Permittee from any liability for damage to person or property caused by or resulting from construction, maintenance, or operation of the proposed facilities,
 - does not release the Permittee from compliance with the other applicable statues and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - does not take into consideration or attest to the structural stability of any units or parts of the project, and

- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
- 6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
 - b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
- 7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
 - a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

Exhibit 2

Plant Manager

Koppers Inc.

Railroad Products and Services

P.O. Box 1189

Galesburg, IL 61401

Tel 309 343 5157

Fax 309 343 3501

www.koppers.com

Date:

3/8/2021

To:

Illinois EPA, Division of Air Pollution Control

Re:

Request for a Revised Construction/Operating Permit

Koppers Galesburg (the site) is requesting a construction/operating permit to operate two new boilers on site. Currently, we are operating under a Cleaver Brooks Natural Gas boiler (heat input of 33.474 MMBTU) that we will be removing, and our plan is to re-install our previously permitted boilers (the boilers). These boilers were removed due to the deterioration of the concrete building they were housed in. The building has been re-enforced and we are now looking to re-install the boilers. Both boilers are Cleaver Brooks Natural Gas boilers with one having a heat input of 29.3 MMBTU and the other at 33.48 MMBTU. It's important to note that these boilers will never be operated simultaneously, except during the warm-up period when a planned shutdown of the primary boiler is scheduled. The run time will be split between the two boilers for the year.

All necessary information/applications will be provided along with this letter request. The check for application 197-FEE for a total of \$1,000 is attached along with the following paperwork:

- 1. Project Narrative (described above)
- 2. Permit Application Forms (page 2 through 14)
- 3. Site Map with Property and Boundary Lines and Emission Source Location (Page 15)
- 4. Process Flow Diagram (Page 16 through Page 27)
- 5. Description of Existing Emission Units (described above)
- 6. Anticipated Maximum Potential to Emit and Estimated Actual Emissions (Page 28 and Page 29)
- 7. Most Recent 12 Month Rolling Totals Emission Summary (Page 30 through 33)

If you have any questions, concerns or if you need additional information, please don't hesitate to ask.

Thanks,

James R. Evans Plant Manager

cc: Kevin Rapsack, Koppers Environmental SHE Manager

Electronic Filing: Received, Clerk's Office 09/14/2021 **PCB 2022-005** Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

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Sc	ource Informati	on				
1.	Source Name:	Koppers Inc.				
2.	Project Name:	Boiler Re-Installation	3.	Source ID#: (if appl	licable) (095804AAI
4.	Contact Name:	James R. Evans	 -	Contact Phone #:	309-343	
Fe	e Determinatio	ın	· · · · · · · · · · · · · · · · · · ·		•	
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Se	ction 1: Status	of Source/Purpose of	Submittal			Grand Total
1.	Your application v Proceed to applic	will fall under only one of th cable sections. For purpose	e following five categories	described below. Che	eck the bo	ox that applies.
			uired to obtain a CAAPP p			
	requireme	ents (e.g.,FESOP).	e that has taken limits on po	otential to emit in a pe	ermit to av	oid CAAPP permit
			is not a major or synthetic r	minor source.		
√	Existing source	without status change or w Proceed to Section 2.	rith status change from syn	thetic minor to major	source	
Ш	Existing non-ma	ajor source that will become	synthetic minor to major s	ource. Proceed to Se	ection 4.	
	New major or sy	ynthetic minor source. Prod	ceed to Section 4.			\$0.00
	New non-major	source. Proceed to Section	n 3.			Section 1 Subtotal
	agency error and	d if the request is received	st to correct an issued perr within the deadline for a pe Proceed directly to Section	rmit appeal to the Po	an Ilution	
app	iication being deniet	ed to require and you must dis d and penalties under 415 ILC d by the forms management co	close this information under 41 S 5 ET SEQ. It is not necessa enter.	5 ILCS 5/39. Failure to ry to use this form in pro	do so cou oviding this	ld result in the information. This
Sec	tion 2: Special	Case Filing Fee				
8. I	Filing Fee. If th	e application only addre	sses one or more of the	following, check the	e approp	riate boxes, skip
`			Section 5. Otherwise, p		3 or 4 as	appropriate.
			devices on permitted ur	nits.		
		ects/trial burns by a perm	nitted unit			
		ediation projects				
			or timing for emission te	sting		
	Minor adm	ninistrative-type change	to a permit			

Electronic Filing: Received, Clerk's Office 09/14/2021 **PCB 2022-005** Section 3: Fees for Current or Projected Non-Major Sources 9. This application consists of a single new emission unit or no more than two modified \$0.00 emission units. (\$500 fee) This application consists of more than one new emission unit or more than two modified 10. units. (\$1,000 fee) \$1,000.00 This application consists of a new source or emission unit subject to 11. Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator 11. \$0.00 or a municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or an emission unit designated as a complex source by agency rulemaking. (\$15,000 fee) A public hearing is held (see instructions). (\$10,000 fee) 12. 12. \$0.00 13. Section 3 subtotal. (lines 9 through 12 - entered on page 1) 13. \$1,000.00 Section 4: Fees for Current or Projected Major or Synthetic Minor Sources 14. For the first modified emission unit, enter \$2,000. Application contains 15. Number of additional modified emission modified emission units = x \$1,000. units only 16. Line 14 plus line 15, or \$5,000, whichever is less. 16. \$0.00 17. For the first new emission unit, enter \$4,000. Application contains 18. Number of additional new and/or modified emission new and/or modified emission units units = x \$1,000. 19. Line 17 plus line 18, or \$10,000, whichever is less. 19 \$0.00 20. Number of individual pollutants that rely on a netting exercise or Application contains contemporaneous emissions decrease to avoid application of PSD 20. \$0.00 netting exercise or nonattainment area NSR = x \$3,000. 21. If the new source or emission unit is subject to Section 39.2 of the Act (i.e. siting); a commercial incinerator or other municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or one or more other emission units designated as a complex source by Agency rulemaking, enter \$25,000. Additional 22. If the source is a new major source subject to PSD, enter \$12,000. Supplemental 23. If the project is a major modification subject to PSD, enter \$6,000. Fees 24. If this is a new major source subject to nonattainment area (NAA) NSR, enter \$20,000. 25. If this is a major modification subject to NAA NSR, enter \$12,000. 26. If the application involves a determination of MACT for a pollutant and the project is not subject to BACT or LAER for the related pollutant under PSD or NSR (e.g., VOM for organic HAP), enter 26. \$0.00 \$5,000 per unit for which a determination is requested or otherwise required. x \$5,000. 27. If a public hearing is held (see instructions), enter \$10,000. 28. Section 4 subtotal (line 16 and lines 19 through 28) to be entered on page1 \$0.00 28. **Section 5: Certification** NOTE: Applications without a signed certification will be deemed incomplete. 29. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the information contained in this fee application form is true, accurate and complete. by: Plant Manager Signature Title of Signatory James R. Evans Mar 8, 2021 Typed or Printed Name of Signatory Date



Illinois Environmental Protection Agency Division Of Air Pollution Control -- Permit Section P.O. Box 19506 Springfield, Illinois 62794-9506

For Illinois EPA use only

	Application for a	Date Received:	BOA ID	Number:		
ا ر	Construction and/or Operating Permit for a		Applicat	ion. Number:		
	Lifetime Source*		ACESII	Number:		
	(F 1 D0000)		AOLO IE	Jirdinibei.		
	(Form APC629)		Constru	ction Fee Check Am	ount Rec'd:	
and	DTE: This form is intended to be used by all 201.152, 201.157, 201.159, 201.160, and I/or an Operating Permit. Please attach oth propriate.	201.169 necessary to obtain a C	Construction Pe	rmit a Joint Construction	and Operating Permit	
	l. Propo	sed Project Addres	sed By Ar	oplication		
1.	Working Name of Proposed Proje Boiler Re-Installation	ect:		***		
2.	Is the Project occurring at a source ☐ No ☐ Yes If Yes, prov	ce that already has a permide BOA ID Number: 0958	it from the E 04AAI	Bureau of Air (BOA)?	
3.	Does this application request a re ☐ No ☐ Yes If Yes, prov	vision to an existing permide Application Number:8	it issued by 3070034	the Bureau of Air (Be	OA)?	
4.	Do you request a new or modified	Construction Permit?	☐ New	☐ Modified	⊠ N/A	
5.	Do you request a new or modified ☐ New ☐ Modified ☐ N		perating Pe	rmit?		
6.	Do you request a new or modified	Operating Permit?	☐ New		□ N/A	
7.						
8.	If this application incorporates by Information-Incorporation by Refe	reference a previously gra rence" been submitted?[nted permit	(s), has form APC-2′ No ⊠ N/A	10, "Data and	
asini)						
		II. Source Inforn	nation			
1. 2.	Source name:* Koppers Inc.					
3.	Source street address:* 1291 Stat City:* Galesburg					
	information different than previous	4. County:* Knox	- 52	5. Zip code:* 6140	11	
If ye	es, then explain what is different ar	information? Ye nd why/when changed.	s 🔼	No		
	This Agency is authorized to require and you m being denied and penalties under 415 ILCS 5 e approved by the forms management center.	ust disclose this information under 4 t seq. It is not necessary to use this	5 ILCS 5/39. Fa form in providing	ilure to do so could result in t this information. This form h	he application as been	
	IL 532-2866 APC629 9/07	Printed on Recycled P	aper		Page 1 of 5	

Page 1 of 5

	. Source Info	ormation	n (continued)
ONLY COMPLETE THE FOLLO INFORMATION HAS CHANGE	WING FOR A S	OURCE W	WITHOUT AN EXISTING ID NUMBER OR IF
6. Is the source located within city I If No, provide Township name:	imits? 🔲 ` Galesburg	Yes	⊠ No
Description of source and product Wood Treatment	ct(s) produced:		
8. Primary Classification Code of so	ource: SIC:	2491	<u>or</u> NAICS: <u>321114</u>
9. Latitude (DD:MM:SS.SSSS): 90	°23'27.7"W		
10. Longitude (DD:MM:SS.SSSS): 4	0°53'52.3"N		
	III. Applic	ant Info	rmation
Who is the applicant?	2. All corres ⊠ Owne		e to: (check only one) Operator
 Applicant's FEIN: 25-1588399 			
Name: Koppers Inc.	IV. Owne	er Inform	nation*
2. Address: 436 7th Avenue	·	<u></u> .	
3. City: Pittsburgh	4. State: P	———— А	5. Zip code: 15219
* If this information different than previous info	mation, then include	a Request fo	
V. Operal	or Informatic	n (If Diff	fferent from Owner)*
Name: Koppers Inc.	en kan kurupit un it <u>u un july</u> juserkus <u>k</u> s	ast the grade to test	
2. Address: 1291 State Route 41			
3. City: Galesburg	4. State: IL		5. Zip code: 61401
* If this information different than previous infor	mation, then include	a Request for	or Operator Change.
W .:	Technical Co	ntacts fo	or Application
Preferred technical contact: (che	DE PARTICIA PER PARTICIO POR PORTO	<u>. Zurter di</u> Siraya ———	plicant's contact
2. Applicant's technical contact pers			·
Contact person's telephone number: 412-227-2883 RapsackKG@koppers.com			act person's email address:
5. Applicant's consultant for applicat	ion: 🛛 N/A	·	
6. Consultant's telephone number:	⊠ N/A	7. Consi	sultant's email address: 🛛 N/A

IL 532-2866 APC629 9/07

Printed on Recycled Paper

O	NLY COMPLETE FOLLOWING FOR FORMATION HAS CHANGED.	R A SOURCE WITH	OUT AN EXIST	ING ID NUI	MBER OR IF
1.		e source: Source	ce 🗌 Other	r (provide be	elow):
Ac	ddress:				
Ci	ty:	State:		Zip Code	:
2.	Contact person for Site Fees:	3. Contact pers	on's telephone r	number:	
4.	Address for Annual Emission Repo	ort for the source:	Source [Other (pr	ovide below):
Ad	dress:				
Cit	y:	State:		Zip Code:	
5.	Contact person for Annual Emission	n Report:	6. Contact per	son's teleph	none number:
					and the first section of the section
	NOTE: ANSWERING "NO" TO THES	y/Review Of Co	IN THE APPLICAT		
1.	Does the application include a detail project, and if for an existing source new/modified emission units/equipmemission units/equipment at the existing	e, does the application	otion of the prop	the	⊠ Yes □ No
2.	Does the application contain a list are units and air pollution control equipmed application includes a request for a reor of all the emission units/equipment that address?	nent that are part of revised operating pa	the project, and emit, a list and c	if the lescription	⊠ Yes □ No
3.	Does the application include a proce new/modified emission units/equipm relates to existing emission units/equ	ent. and if for an ex	isting source, bo	nowing ow it	⊠ Yes □ No
4.	If the project is at a source that has i BOA, does the application include a	not previously receiv source description,	ed a permit fron	n the e map?	☐ Yes ☐ No ☒ N/A
	Does the application identify and add performance and emissions standard a. State emission standards (35 IAC b. Federal New Source Performance c. Federal standards for Hazardous 63)?	ds, including: CChapter I, Subtitle e Standards (40 CFI	B); R Part 60\:		☐ Yes ☐ No ☒ N/A ☐ Yes ☐ No ☒ N/A ☐ Yes ☐ No ☒ N/A
; ; ;	Does the application include a listing annual emissions (tons/year) of the pemission units for the pollutants to be and/or individual and combined HAPs how the new emissions correlate to the source?	proposed project for e emitted (CO, NOx, s), and if for an exis	the new and/or in PM/PM10, SO2 ting permitted so	modified 2, VOM,	Yes No N/A* * Project does not involve an increase in emissions from new or modified emission units.

VIII. Summary/Review Of Contents of the Application (c	ontinued)
7. Does the application include a listing and summary of the requested permitted production, throughput, fuel, or raw material usage limits that correspond to the annual emissions limits of the proposed project in 6 above, and if for an existing permitted source, how they correlate to the proposed usage limits for the entire source?	Yes No No N/A* * Project does not involve an increase in emissions from new or modified emission units.
8. Does the application include the calculations and methodology (emission factors, test results, etc.) used to develop the emission estimations and the requested permitted annual emission limits in 6 above based on the requested usage limits in 7 above?	Yes No N/A* * Project does not involve an increase in emissions from new or modified emission units.
9. Does the application identify and list the emission units and activities at the source that are claimed to be exempt from permitting per 35 IAC 201.146 including a reference to the specific exemption in 35 IAC 201.146 along with justification for the claimed exemption(s)?	☐ Yes ☐ No ☒ N/A* * No exemptions claimed.
10. Does the application include the calculations and methodology (emission factors, regulatory-based emission/material throughput limitations, physical emission/material throughput limitations, maximum allowable pollutant content of materials to be processed, etc.) used to calculate the potential to emit (PTE) for the proposed project and for the entire source for the pollutants to be emitted (CO, NOx, PM/PM10, SO2, VOM, and/or individual and combined HAPs) to demonstrate that the source is eligible for a lifetime operating permit pursuant to 35 IAC 201.169(a)?	⊠ Yes □ No
Potential to emit (PTE), as defined at 35 IAC 211.4970, means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restriction on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable.	
Please note that emissions from emission units/activities claimed as exempt per 35 IAC 201.146 in 9 above need to be included in the PTE emission calculations and totals for the source.	
If it can not be demonstrated that the source is eligible for a lifetime operating permit pursuant to 35 III. Adm. Code 201.169(a), (e.g., PTE calculations result in potential emissions of criteria pollutants and/or HAPs exceeding major source threshold levels (i.e., 100 tons/year for criteria pollutants, 10 tons/year for a single HAP and 25 tons/year for total HAPs)), the Permittee should apply for a Clean Air Act Permit Program (CAAPP) permit. To avoid the CAAPP permitting requirements, if applicable, the Permittee may want to consider applying for a Federally Enforceable State Operating Permit (FESOP). A FESOP is an operating permit that contains federally enforceable limits in the form of permit conditions, which effectively restrict the potential emissions of a source to below major source threshold, thereby excluding the source from the CAAPP.	
11. If the application contains information that is considered a TRADE SECRET, has such information been properly marked and claimed and other requirements to perfect such a claim been satisfied in accordance with 35 IAC Part 130?	☐ Yes ☐ No ☒ N/A* * No information in the application is claimed to be a
Note: "Claimed information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information.	TRADE SECRET

From the test sense payments of the section of the payment and the section of the						
VIII. Sun	imary/Review Of Contents	s of the Application (co	ntinue	1)		
12a. If the source is locate complete copies of the	12a. If the source is located in a county other than Cook County, have two separate Yes No complete copies of this application been submitted?					
this application been			Yes	☐ No	⊠ N/A	
CONSTRUCTION PER	clude a completed "FEE DETER RMIT APPLICATION," Form 197- ment for which a permit for consi	-FEE, for the emission	⊠ Yes	□No	□ N/A	
Does the application in Construction permit ap	clude a check in the proper amo plication fee as identified in the F	unt for payment of the form 197-FEE?	⊠ Yes	☐ No	☐ N/A	
The second standards of the second				- <u>-</u>		
	IX. Signatu	re Block				
or the source, or their author	 all applications and supplemer orized agent, and shall be accom ithout a signed certification will b 	panied by evidence of author	the owne ity to sign	r and op the	perator	
	Authorized Age	ent Listing				
0	 			-	***	
agents for this project; which	ource certifies that the listing below h shall have the authority to sign	ow shall be considered as evi	dence for ents.	our autl	horized	
Consulting Company Name	ource certifies that the listing below h shall have the authority to sign	ow shall be considered as evi	dence for ents.		horized	
agents for this project; which	ource certifies that the listing below h shall have the authority to sign	ow shall be considered as evi	dence for ents.		-	
Consulting Company Name	ource certifies that the listing below h shall have the authority to sign	ow shall be considered as evi	dence for ents.		⊠ N/A	
Consulting Company Name Legal Firm Name:	ource certifies that the listing below h shall have the authority to sign	ow shall be considered as evi	dence for ents.	- in the second	⊠ N/A	
Consulting Company Name: Legal Firm Name: Testing Company Name:	ource certifies that the listing below h shall have the authority to sign	ow shall be considered as evi the application and supplem	dence for ents.	- in the second	⊠ N/A ⊠ N/A ⊠ N/A	
Consulting Company Name: Legal Firm Name: Testing Company Name: Other: I certify under penalty of law and information contained ir person identified above is an	ource certifies that the listing belong the shall have the authority to sign	ow shall be considered as eving the application and supplement ource Signature belief formed after reasonable and complete. In addition, would and complete and complete and complete.	e inquiry,	the state	N/A N/A N/A N/A N/A N/A	
Consulting Company Name: Legal Firm Name: Testing Company Name: Other: I certify under penalty of law and information contained ir person identified above is an	Owner, Operator, or S that, based on information and in this application are true, accurate the true of the control of the co	ow shall be considered as eving the application and supplement ource Signature belief formed after reasonable and complete. In addition, would and complete and complete and complete.	e inquiry, the techriny supple	the state	N/A N/A N/A N/A N/A N/A	
Consulting Company Name: Legal Firm Name: Testing Company Name: Other: I certify under penalty of law and information contained in person identified above is an information related to this approximation related to this approximation.	Owner, Operator, or S that, based on information and in this application are true, accurate the true of the control of the co	ow shall be considered as eving the application and supplementary ource Signature belief formed after reasonable and complete. In addition, y and/or by electronic copy) a by the Illinois EPA.	e inquiry, the techr ny supple	the state	⊠ N/A ⊠ N/A ⊠ N/A ⊠ N/A	
Consulting Company Name: Legal Firm Name: Testing Company Name: Other: I certify under penalty of law and information contained ir person identified above is an information related to this agents. BY:	Owner, Operator, or S of that, based on information and in this application are true, accurate the true application that may be requested.	ource Signature belief formed after reasonable and complete. In addition, y and/or by electronic copy) a by the Illinois EPA.	e inquiry, the techriny supple	the state	⊠ N/A ⊠ N/A ⊠ N/A ⊠ N/A	

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 1021 NORTH GRAND AVENUE, EAST CDDINGERED BUT BLOOD

	SPRINGFIELD, ILLINOIS 02/02		Page 9 of
* DATA AND INFORMATION	1		
FUEL COMBUSTION EMISSION SC	DURCE		
* THIS INFORMATION FORM IS TO BE COMPLETED FOR A PRODUCING HEAT OR POWER BY INDIRECT HEAT TRAI AND EMISSION SOURCE USING DIRECT HEATING. IS ETI	NSFER. AN EMISSION SOURCE	THAT DOES NOT FIT THIS DES	E PRIMARY PURPOSE OF SCRIPTION, INCLUDING

NAME OF PLANT OWNER: Koppers Inc.	NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
3. STREET ADDRESS OF EMISSION SOURCE: 1291 State Route 41	CITY OF EMISSION SOURCE: Galesburg, IL

	NFORMATION	-		
5. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: *See A	ttached Paperwork for Flow Dia	gram		
6. MANUFACTURER; Cleaver Brooks	7. MODEL NUMBER: CB200700200	8. SERIAL NUMBER: OLO96745		
9. AVERAGE OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 6 DAYS/WK 26 WKS/YR 10. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 7 DAYS/WK 26 WKS/YR				
11. PERCENT OF ANNUAL HEAT INPUT: DEC-FEB 50 % MAR-MAY 50 % JU	jn-aug 50 % sept-no	v <u>5</u> 0 %		

INSTRUCTIONS

- COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
- COMPLETE THE APPROPRIATE FUEL SECTION OR SECTIONS. IF MORE THAN ONE FUEL IS FIRED OR IF THE CAPABILITY EXISTS TO FIRE MORE THAN ONE FUEL, THE ACTUAL USAGE OF FUELS AND THE RELATIONSHIP BETWEEN FUELS, SIMULTANEOUS FIRING, ALTERNATE FIRING, RESERVE FUEL, ETC., MUST BE MADE CLEAR.
- EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
- FIRING RATES AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES
- FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF HEAT PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.

AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME

AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FOR THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST HEAT PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.

MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.

MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039 Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

	Page 10 of
GAS FIRING	
*11. ORIGIN OF GAS: DISTILLATE FUEL OTHER LIQUID FUEL SOLID FUEL BYPROD	DUCT
12. ARE YOU ON AN INTERRUPTABLE GAS SUPPLY: YES NO	SOURCE
IF "YES", SPECIFY ALTERNATE FUEL:	
13. ANNUAL CONSUMPTION: *14. HEAT CONTENT: *15. SULFUR CONTENT: *15. SUL	
16 AVED OF PURPOSE	% BY WT.
29,300,000 BTU/HR 29,300,000	BTU/HR
* IF THE GAS FIRED IS NATURAL GAS, THESE ITEMS NEED NOT BE COMPLETED.	
OIL FIRING	
18. TYPE OF OIL:	
GRADE NUMBER: 1 2 3 4 5 6 OTHER: SPECIFY 19. ANNUAL CONSUMPTION:	
19. ANNUAL CONSUMPTION: GALLONS GALLONS 20. HEAT CONTENT:	BTU/LB BTU/GAL
21. SULFUR CONTENT: 22. ASH CONTENT:	% BY WT
23. DIRECTION OF FIRING:	76 BY WI
HORIZONTAL TANGENTIAL OTHER: SPECIFY	
24. AVERAGE FIRING RATE: 25. MAXIMUM FIRING RATE:	
BTU/HR	BTU/HR
SOLID FUEL FIRING	
26. TYPE OF SOLID FUEL	
SUB-BITUMINOUS COAL BITUMINOUS COAL ANTHRACITE COAL OTHER: SPECIFY	Y
27. ANNUAL CONSUMPTION: 28. HEAT CONTENT AS FIRED:	
29. MOISTURE CONTENT AS FIRED: 30. ASH CONTENT AS FIRED: 31. ON THE CONTEN	BTU/LB
31. SULFUR CONTE	
% BY WT. % BY WT. 32. TYPE OF FIRING:	% BY WT.
DKI BOTTOM,	
	
SPREADER STOKER: % REINJECTION OTHER: SPECIFY	
33. AVERAGE FIRING RATE: 34. MAXIMUM FIRING RATE:	
SUBMIT CODIES OF THOSE PORTIONS OF COAL OR OTHER SOLVE	BTU/HR
SUBMIT COPIES OF THOSE PORTIONS OF COAL OR OTHER SOLID FUEL CONTRACTS WHICH SET FORTH THE SPECIFIC AND THE DURATION OF THE CONTRACT. IF THE ACTUAL FUEL FIRED IS A BLEND OF SOLID FUELS, SUBMIT APPROPRIES.	CATIONS OF THE FUEL
A ODD CONTRACTO AND BELLOKTH THE MANNER IN WHICH THE FIFTS ARE BLENDED AND ACTUALLY RIVED. DEPT	RIATE PORTIONS OF ALL
INFORMATION TO THIS FORM.	JULION THIS

			<u> </u>		Page 11 of
				SION INFORMAT	TON
35. NUMBER OF ID	ENTICAL SOURCE	S (DESCRIBE	AS REQUIRED)): Two (2) NO	Boilers - See Calculation Attachmt
				RAGE OPERATIO	N
CONTAMINANT	CONCENTRAT SOURCE	TION <u>OR</u> EMIS	SION RATE PE	ER IDENTICAL	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	36a.	GR/SCF	b.	☐ LB/106 BTU	c.
CARBON MONOXIDE	37a.	PPM (VOL)	b.	LB/10 ⁶ BTU	c.
NITROGEN OXIDES	38a.	PPM (VOL)	b.	LB/10 ⁶ BTU	c.
ORGANIC MATERIAL	39a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU	c.
SULFUR DIOXIDE	40a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU	c.
	·		MAX	IMUM OPERATIO	N
CONTAMINANT	CONCENTRAT SOURCE	ION <u>ÓR</u> EMIS	SION RATE PE	R IDENTICAL	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	41a.	GR/SCF	Ъ,	☐ LB/10 ⁶ BTU ☐ LB/HR	C.
CARBON MONOXIDE	42a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU ☐ LB/HR	C.
NITROGEN OXIDES	43a.	PPM (VOL)	b.	LB/10° BTU	c.
ORGANIC MATERIAL	44a.	PPM (VOL)	b.	☐ LB/106 BTU	C.
SULFUR DIOXIDE	45a.	PPM (VOL)	b.	☐ LB/106 BTU ☐ LB/HR	С.

		<u> </u>			
**EXI	HAUST POI	NT INFORMATION			
46. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT:	See Flo	w Diagram Attachment			
47. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELAT	47. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.): Exhausts through roof in boiler room.				
48. EXIT HEIGHT ABOVE GRADE: ~27 feet 50. EXIT DIAMETER: 24 inch					
49. GREATEST HEIGHT OF NEARBY BUILDINGS: 42.5 feet 51. EXIT DISTANCE FROM NEAREST PLANT BOUN 521 feet			FT		
AVERAGE OPERATION		MAXIMUM OPERATION			
52. EXIT GAS TEMPERATURE: 370	۰F	54. EXIT GAS TEMPERATURE: 440	۰F		
53. GAS FLOW RATE THROUGH EACH EXIT: ~6100	ACFM	55. GAS FLOW RATE THROUGH EACH EXIT: ~6100	ACFM		

FI EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT, OR IF NATURAL GAS IS THE FUEL FIRED, ITEMS 36 THROUGH 47 NEED NOT BE COMPLETED.

^{**} IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT THIS SECTION SHOULD NOT BE COMPLETED.

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 1021 NORTH GRAND AVENUE, EAST SPRINGFIELD, ILLINOIS 62702

			Page 12 of
		-	
* DATA AND INFORMATION			
FUEL COMBUSTION EMISSION SOURCE			
* THIS INFORMATION FORM IS TO BE COMPLETED FOR A FURN PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER AND EMISSION SOURCE USING DIRECT HEATING, IS EITHER A	AN EMISSION SOURCE	THAT DOES NOT FIT THIS DES	E PRIMARY PURPOSE OF SCRIPTION, INCLUDING
NAME OF PLANT OWNER:	2. NAME OF C	CORPORATE DIVISION OR PLA	ANT (IF DIFFERENT FROM

Koppers Inc.	OWNER):			
STREET ADDRESS OF EMISSION SOURCE: 1291 State Route 41	4. CITY OF EMISSION SOURCE: Galesburg, IL			
GENERAL INFORMATION				
5. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE	E			

GENERAL INFORMATION			
5. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: *See Attached Paperwork for Flow Diagram			
6. MANUFACTURER: Cleaver Brooks	7. MODEL NUMBER: CB200800200	8. SERIAL NUMBER: OLO95228	
9 AVERAGE OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 6 DAYS/WK 26 WKS/YR	10. MAXIMUM OPERATING TIME O 24 HRS/DAY 7	F EMISSION SOURCE; DAYS/WK <u>26</u> WKS/YR	
11. PERCENT OF ANNUAL HEAT INPUT: DEC-FEB 50 % MAR-MAY 50 % JU	in-aug <u>50</u> % sept-no	v <u>50</u> %	

INSTRUCTIONS

- 1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
- COMPLETE THE APPROPRIATE FUEL SECTION OR SECTIONS. IF MORE THAN ONE FUEL IS FIRED OR IF THE CAPABILITY EXISTS TO FIRE MORE THAN ONE FUEL, THE ACTUAL USAGE OF FUELS AND THE RELATIONSHIP BETWEEN FUELS, SIMULTANEOUS FIRING, ALTERNATE FIRING, RESERVE FUEL, ETC., MUST BE MADE CLEAR.
- EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
- 4. FIRING RATES AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES
- 5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201

DEFINITIONS

AVERAGE - THE VALUE THAT <u>SUMMARIZES</u> OR <u>REPRESENTS</u> THE <u>GENERAL CONDITION</u> OF THE <u>EMISSION SOURCE</u>, OR THE GENERAL STATE OF HEAT PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.

AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.

AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE <u>GREATEST</u> VALUE <u>ATTAINABLE</u> OR <u>ATTAINED</u> FOR THE <u>EMISSION SOURCE</u>, OR THE PERIOD OF GREATEST OR UTMOST HEAT PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.

MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.

MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

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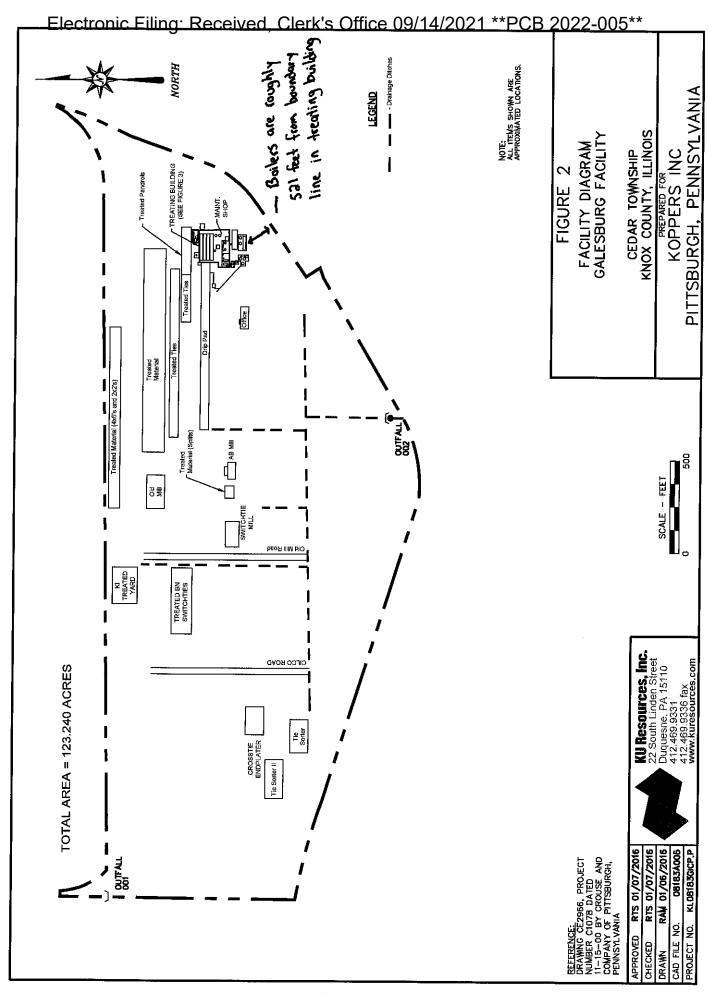
	Page 13 of		
GA	AS FIRING		
*11. ORIGIN OF GAS: DISTILLATE FUEL OTHER LIQU	ID FUEL SOLID FUEL BYPRODUCT		
PIPELINE OIL GASIFICATION GASIFICATIO			
12. ARE YOU ON AN INTERRUPTABLE GAS SUPPLY: YES IF "YES", SPECIFY ALTERNATE FUEL:	⊠ NO		
13. ANNUAL CONSUMPTION: *14. HEAT CONTEN	T: *15. SULFUR CONTENT:		
97682823.53 SCF	BTU/SCF % BY WT.		
16. AVERAGE FIRING RATE: 33,480,000 BTU/H			
* IF THE GAS FIRED IS NATURAL GAS, THESE ITEMS NEED NOT BE CO	DMPLETED.		
	FIRING		
18. TYPE OF OIL: GRADE NUMBER: 1 2 3 4 5 6	OTHER: SPECIFY		
19. ANNUAL CONSUMPTION: GALLONS	20. HEAT CONTENT: BTU/LB		
21. SULFUR CONTENT: % BY WT	22. ASH CONTENT:		
23. DIRECTION OF FIRING:	% BY WT		
	SPECIFY		
24. AVERAGE FIRING RATE:	25. MAXIMUM FIRING RATE:		
BTU/HR	BTU/HR		
SOLIDE	UEL FIRING		
26. TYPE OF SOLID FUEL.	OLD FIGURE		
SUB-BITUMINOUS COAL BITUMINOUS COAL	ANTHRACITE COAL OTHER: SPECIFY		
27. ANNUAL CONSUMPTION:	28. HEAT CONTENT AS FIRED:		
TONS	BTU/LB		
29. MOISTURE CONTENT AS FIRED: 30. ASH CONTENT A % BY WT.	S FIRED: 31. SULFUR CONTENT AS FIRED: % BY WT.		
32. TYPE OF FIRING:			
CYCLONE PULVERIZED WET BOTTOM OR			
[HORIZONTALLY C	OPPOSED OR OTHER: SPECIFY		
SPREADER STOKER: % REINJECTION	OTHER: SPECIFY		
33. AVERAGE FIRING RATE:	34. MAXIMUM FIRING RATE:		
BTU/HR	BTU/HR		
SUBMIT COPIES OF THOSE PORTIONS OF COAL OR OTHER SOLID FUEL CONTRACTS WHICH SET FORTH THE SPECIFICATIONS OF THE FUEL AND THE DURATION OF THE CONTRACT. IF THE ACTUAL FUEL FIRED IS A BLEND OF SOLID FUELS, SUBMIT APPROPRIATE PORTIONS OF ALL FUEL CONTRACTS AND SET FORTH THE MANNER IN WHICH THE FUELS ARE BLENDED AND ACTUALLY FRIED. REFERENCE THIS INFORMATION TO THIS FORM.			

		#173 ATC		****
*EMISSION INFORMATION				
35. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): Two (2) NG Boilers - See Calculation Attachmt				
				
CONCENTRATION SOURCE	ON <u>OR</u> EMIS	SION RATE PÉ	R IDENTICAL	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
36a.	GR/SCF	b.	=	c.
37a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU ☐ LB/HR	c.
38a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU ☐ LB/HR	C.
39a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU ☐ LB/HR	C.
40a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU ☐ LB/HR	c.
		MAX	IMUM OPERATIO	N .
CONCENTRATION SOURCE	ON <u>OR</u> EMIS	SION RATE PE	R IDENTICAL	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
41a.	GR/SCF	b.	□ LB/10 ⁶ BTU □ LB/HR	c.
42a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU ☐ LB/HR	c.
43 a.	PPM (VOL)	b.	LB/106 BTU	C.
44a.	PPM (VOL)	b.	☐ LB/10 ⁶ BTU ☐ LB/HR	C.
45a.	PPM (VOL)	b.	LB/10 ⁶ BTU	C.
	CONCENTRATION SOURCE 36a. 37a. 38a. 39a. 40a. CONCENTRATION SOURCE 41a. 42a. 43a. 44a.	CONCENTRATION OR EMIS SOURCE 36a. GR/SCF 37a. PPM (VOL) 38a. PPM (VOL) 40a. PPM (VOL) CONCENTRATION OR EMIS SOURCE 41a. GR/SCF 42a. PPM (VOL) 43a. PPM (VOL) 44a. PPM (VOL) 45a. PPM (VOL)	AVE CONCENTRATION OR EMISSION RATE PE SOURCE 36a.	AVERAGE OPERATION CONCENTRATION OR EMISSION RATE PER IDENTICAL

	INT INFORMATION				
46. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: See Fig.	ow Diagram Attachment				
47. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO B Exh	47. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.): Exhausts through roof in boiler room.				
48. EXIT HEIGHT ABOVE GRADE: ~27 feet 50. EXIT DIAMETER: 24 inch					
49. GREATEST HEIGHT OF NEARBY BUILDINGS: 42.5 feet	51. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: 521 feet FT				
AVERAGE OPERATION MAXIMUM OPERATION					
52. EXIT GAS TEMPERATURE: 370 °F	54. EXIT GAS TEMPERATURE: 440 °F				
53. GAS FLOW RATE THROUGH EACH EXIT: ~6100 ACFM	55. GAS FLOW RATE THROUGH EACH EXIT: ~6100 ACFM				

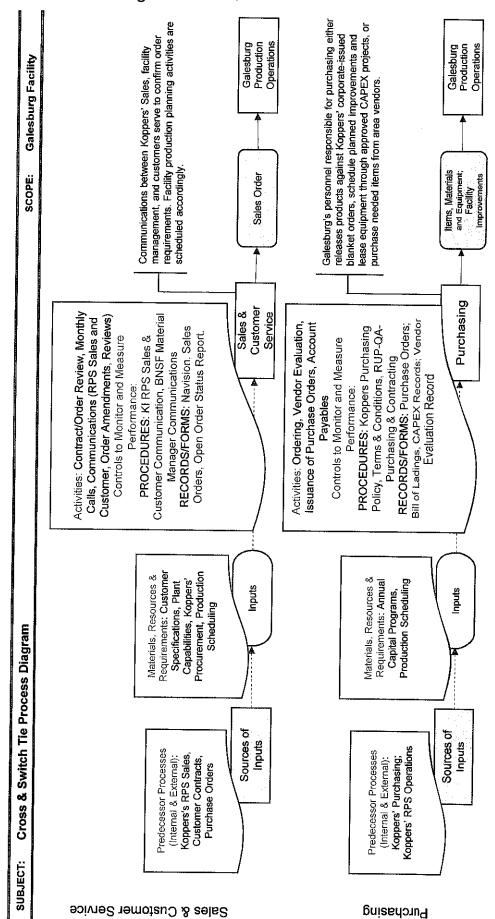
^{*} IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT, OR IF NATURAL GAS IS THE FUEL FIRED, ITEMS 36 THROUGH 47 NEED NOT BE COMPLETED.

^{**} IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT THIS SECTION SHOULD NOT BE COMPLETED.





KOPPERS



QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

Issue Date: June 25, 2020 Revision: 0

Written By: Nick Ward Approved By: Jim Evans

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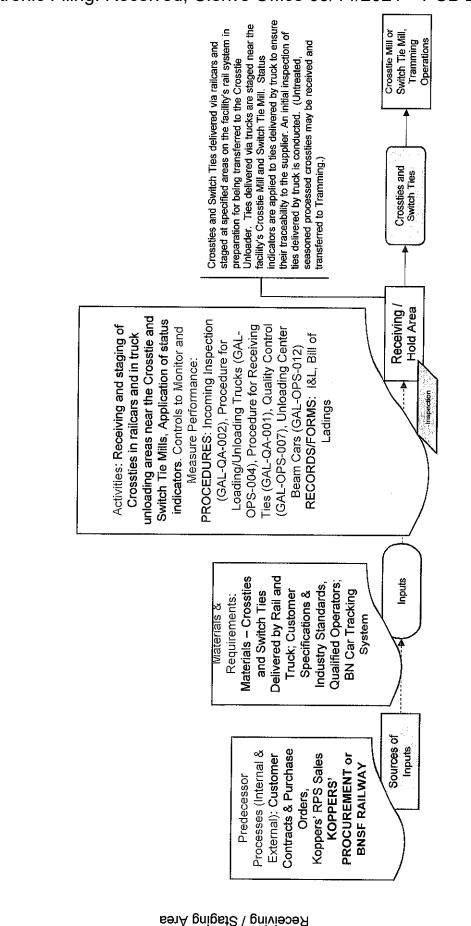


SUBJECT:

box is not blue, DO NOT cedure - see your supen

Galesburg Facility

SCOPE



QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

Issue Date: June 25, 2020 Revision: 0

Written By: Nick Ward Approved By: Jim Evans

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SUBJECT:



Galesburg Facility

SCOPE

classified as culls, removed to a holding area and marked Seasoning Yard where they are air seasoned. Processed Crossties may also be transferred directly to Tramming. Air Seasoning Yard or Tramming Crossties not meeting applicable specifications are accordingly. Crosstie inspections are conducted by Crossties are processed and transferred to the Air Qualified Tie Inspectors. Processed Crossties Crosstie Mill and Metallurgical Certifications); Bill of (GAL-QA-008), Status Indicator Matrix applied. Nail End Plates are received Performance: PROCEDURES: RPS-QA-In-Process Inspection Procedure, Crosstie Inspection Report; Nail End stacked before being transferred to 001), Tie Inspector (GALESORTER. Incoming Inspection (GAL-QA-002) Crane Operations (GALESORTER-Plates (Certificates of Conformance (GAL-OPS-029), Status Indicators RECORDS/FORMS: Controls to Monitor and Measure Activities: Crossties are trimmed, Framming. Kerf marks are also GALESORTER-003), Car Puller Records, NTS QC Checklist (GAL (GALESORTER-005), Lift Truck branded, sorted per grade, and Ladings, Operator Qualification inspected, incised, end-plated the Air Seasoning Yard or to Tape Measure Calibrations. 002), End Piate Operator QA-FORM 001) - Galesburg Materials, Resources Materials – Crossties Delivered by Rail and Plates; Qualified Tie nspectors; Customer ndustry Standards & Requirements: and Switch Ties Truck; Nail End Specifications & Inputs Sources of Processes (Internal & Koppers's RPS Sales; Contracts & Inquiries; Inputs Koppers' Purchasing RECEIVING / HOLD External): Customer Procurement; Predecessor Koppers's AREA Crosstie Mill

QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram – Galesburg Facility

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SUBJECT:

Galesburg Facility

SCOPE

Seasoning Yard. They may also be transferred directly to Tramming. Switch Ties not meeting applicable specifications may be cut to a usable length, processed Air Seasoning Yard or as a crosstie, or culled. Switch Ties are inspected by Switch Ties are processed for transferring to the Air Tramming Qualified Tie Inspectors, Processed Switch Ties Switch Tie GAL-QA-008), Status Indicator Matrix QA-In-Process Inspection Procedure, Switch Tie Inspection (GAL-SWITCH-Performance: PROCEDURES: RPS-001), Incoming Inspection (GAL-QAfrimmed, incised, 100% end-plated Plates are received. Application of ≣ transfer to the Air Seasoning Yard. Status Indicators. Tape Measure (GAL-OPS-021), Status Indicators sorted by length, and stacked for Kerf marks are applied. Nail End Controls to Monitor and Measure Mobile Hydraulic Loader Operator Galesburg, RECORDS/FORMS; Unloading Report, Switch Mill QC FORM-013), Switch Tie Mill Daily 002), Lit Truck (GAL-OPS-029), Inspection Worksheet (GAL-QA-INLs, Switch Tie Receiving and Checklist (GAL-QA-FORM 003), Report (GAL-QA-FORM 014), Activities: Ties are inspected, Calibrations. Materials -Switch Ties Materials, Resources Delivered by Rail and Inputs Plates, Qualified Tie nspectors, Customer ndustry Standards & Requirements: Truck, Nail End Specifications & Processes (Internal & sources of Contracts & Inquiries, Koppers' Purchasing External): Customer Koppers' RPS Sales, RECEIVING / HOLD Inputs Procurement, Predecessor Koppers' AREA Switch Tie Unloader

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

ssue Date: June 25, 2020 Revision: 0

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SUBJECT:

CONTROLLED DOCUME fithis box is not blue, DO NOT procedure - see your supery

Galesburg Facility

SCOPE

sampled for moisture content testing. They are allowed to each row of Crossties and Switch Ties. Ties are randomly Crosstie and Switch Ties are placed in the Air Seasoning maintained per customer specifications, industry standards and the RPS-QA-Air Seasoning and Moisture Content Testing Procedure. Yard for air seasoning. Status indicators are applied to air season until specified, maximum allowable moisture Tramming contents are attained. The Air Seasoning Yard is Seasoned Crossties and Switch Ties Processed Air Seasoning Operations, Increment Core Sampling Methods Procedure, Status Indicators Improvement), Application of Status Process Inspection Procedure, RPS-Indicator Matrix, RECORDS/FORMS: Yard Purchase Order - Vegetation Control Contract; RPS-QA-Moisture Content Indicators Controls to Monitor and QA-Process Capability & Statistical Activities, Yard Maintenance (i.e. (GAL-QA-008), RPS-QA-Status Testing Procedure, RPS-QA-In-Fest Record; Powered Industrial Vegetation Control, Aggregate Seasoning & Moisture Content Activities: Air Seasoning Yard Truck Performance Evaluation PROCEDURES: RPS-QA-Air Application, Storm Water Measure Performance: Materials – Processed Laboratory; Sampling Materials, Resources Crossties and Switch Equipment; Customer **Qualified Operators** ndustry Standards, & Requirements: Ties; Vegetation Control Contract Specifications & Inputs CAPEX - Yard Improvement; Sources of Processes (Internal & Contracts & Inquiries; Inputs Koppers' RPS Sales; Koppers' Purchasing, External): Customer CROSSTIE MILL & SWITCH TIE MILL Procurement; Predecessor Koppers' Air Seasoning Yard

QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

Revision: 0 ssue Date: June 25, 2020

Approved By: Jim Evans Written By: Nick Ward

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Galesburg Facility

SCOPE

Cross & Switch Tie Process Diagram

SUBJECT:

KOPPERS



to Tramming. The ties are placed in trams using hydraulic loader that has been staged near tracks and is poised to seasoned ties received at the facility are also transferred segregated and marked. Tram Tickets are completed for ties may be transferred from the Crosstie Mill and Switch Treating Processed Air Seasoned Crossties and Switch Ties are loaders. Ties are inspected during Tramming activities. load frams (i.e., Tramming). Non-seasoned processed transferred from the Air Seasoning Yard to a hydraulic Those not conforming to customer requirements are Tie Mill to Tramming as well. Untreated, processed, Charges for Treatment each charge. Tramming QA-In-Process Inspection Procedure, 008), RPS-QA-Status Indicator Matrix, Performance: PROCEDURES: RPS-Inspection, Receiving of End Plates. Mobile Hydraulic Loader (GAL-OPS. RECORDS/FORMS: Certificates of Fickets; A&B Tram Report (GAL-QA Activities: Mobile Hydraulic Loader Controls to Monitor and Measure Preventative Action (GAL-ADMIN-021), Status Indicators (GAL-QA-006), Status Indicators (GAL-QA-Operations, Building of Charges, Certifications, KI-F-91 A&B Tram Application of Status Indicators Charge Count Verification, Tie Nonconformance Corrective & 004), Lift Truck (GAL-OPS-029) Conformance, Metallurgical FORM 024) Materials, Resources Seasoned Crossties Material – Green or ndustry Standards; Seasoning Report Specifications & Inputs & Requirements: and Switch Ties; Scheduling; Air Production Customer Sources of Processes (Internal & Inputs External): Koppers' Purchasing; Sales SWITCH TIE MILL AIR SEASONING CROSSTIE MILL, Predecessor RECEIVING YARD, or Orders; DrimmerT

QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram – Galesburg Facility

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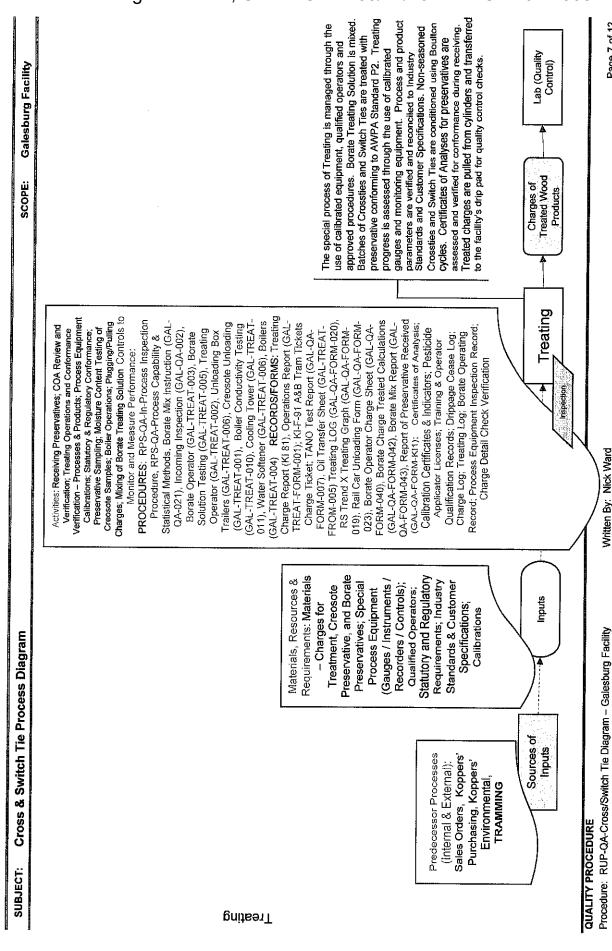
Approved By: Jim Evans

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Cross & Switch Tie Process Diagram

SUBJECT:

KOPPERS



preservative penetration. Inspections of each charge are calibration status of the lab's equipment is maintained as damage, or treating damage is present. Various lab test conducted to ensure no excessive exudate, mechanical Representative samples of increment cores are pulled Charges of Treated Wood Products are staged on the reating, Treated Storage Yard; Load Out facility's drip pad per environmental regulations. are conducted to ensure process and product conformance. Test results are communicated. Galesburg Facility from the charges for the purpose of assessing well as various quality control records. Conformance, Material and Product Test Data Verification of SCOPE Lab (Quality Control) Procedure, RPS-QA-Process Capability & Air Seasoning & Moisture Content Testing Procedure (GAL-QA-014), Quality Control TANO% Concentration, Increment Core Performance PROCEDURES: RPS-QA-Statistical Methods Procedure, RPS-QA-Creosote Preservative, RUP-QA-Analysis Boron Solution Analysis, Boring Sample QA-FORM-039), QA-RPS-Water Content Activities: Moisture Testing - Creosote TANO Test Report (GAL-QA-FORM-007) (GAL-OPS-007), Final Inspection (GAL-QA-003), Calibration of Thermometers Borate Solution Analysis Record (GAL-Penetration, BAE% Concentrations, In-Content Testing - Staging Yards, Lab Chemical Maintenance, Application of (GAL-QA-021), Lab Scale Calibrations in Creosote Preservative Record, RPS-Method for Determination of Water in of Borate in Wood Samples, RUP-QA. Preservative, BAE% Concentration, (GAL-QA-012), RECORDS/FORMS: Assessment, Calibrations, Moisture Controls to Monitor and Measure QA-Moisture Content Test Record, Use Preservative Analyses, Scale Increment Cores - Preservative Status Indicators, QC Records Management Calibrations Materials, Resources & Specifications & Industry Calibrations, Koppers Chemicals, Customer Inputs Global Technology Center, Qualified Personnel, Lab Requirements: Laboratory & Instruments, Standards Customer Specifications Predecessor Processes Sources of (Internal & External): Customer Contracts, Inputs TREATING Lab (Quality Control)

QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

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Written By: Nick Ward

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SUBJECT:

segregated and marked. The storage yard is maintained per AWPA Standard M4. Treated sills and appropriate Visual observations are conducted during the transfer of Crossties and Switch Ties to the Treated Wood Storage Yard from the Drip Pad. Non-conforming products are Load Out dunnage is used to store the products. Vegetation control and yard maintenance activities take place. Galesburg Facility Treated products are packaged per customer requirements and industry standards. Treated Wood SCOPE Products reated Wood Storage Yard Operator Qualification, Treated Wood QA-In-Process Inspection Procedure, Metallic and Non-Metallic Strapping, Performance: PROCEDURE: RPS-Lift Trucks (GAL-OPS-029), Treated Banding/Packaging, Application of Incoming Inspection (GAL-QA-002) Hydraulic Loaders (GAL-OPS-021) Controls to Monitor and Measure Banding (GAL-OPS-005), Mobile Wood Storage Yard Contingency Status Indicators (GAL-QA-008), Status Indicators, Receiving of Plan, RECORDS/FORMS: PIT Storage Yard Inspection Sheet, Activities: Storage, Inventory Verification and Control Yard Maintenance Strapping BOLs Specifications & Industry Materials, Resources & Requirements: Material Operators, Vegetation Purchasing; Customer Equipment, Storage Control Contractor; Inputs Yard, Qualified Treated Ties, Standards Cross & Switch Tie Process Diagram

QUALITY PROCEDURE

Sources of

AB (Quality Control Customer Contracts; (Internal & External): Koppers' RPS Sales

Inputs

Predecessor Processes

Treated Wood Storage Yard

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

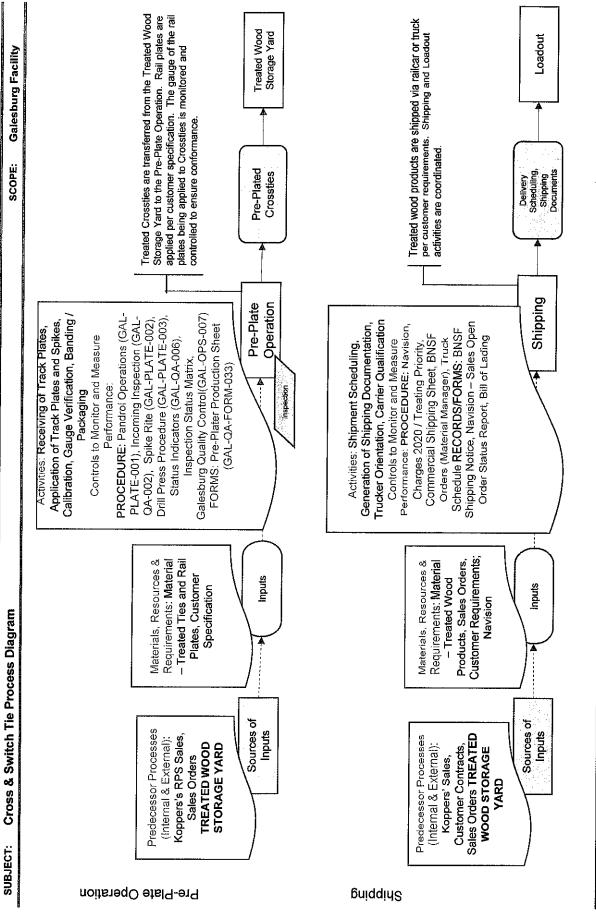
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OPPERS



QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

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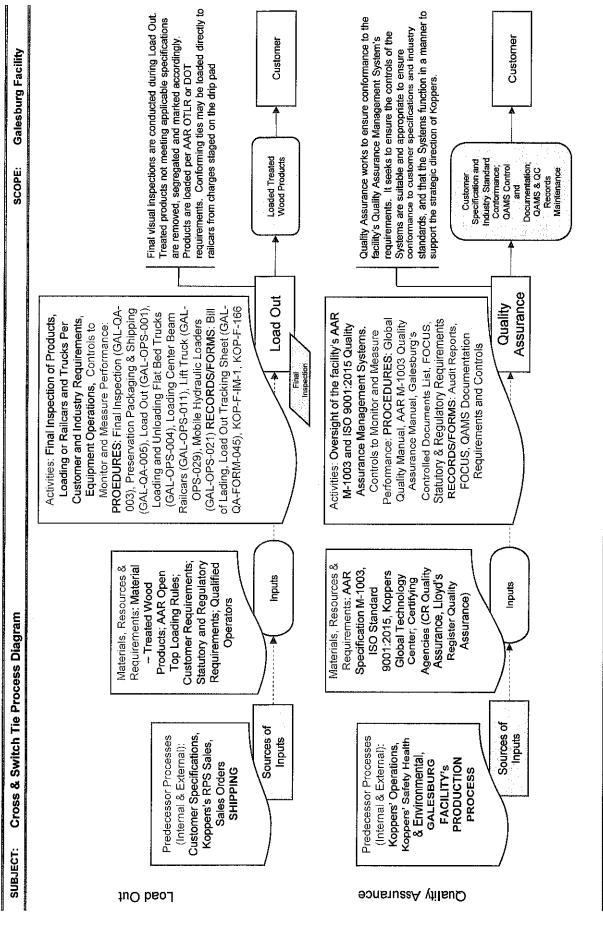
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SOPPERS



QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility Issue Date: June 25, 2020

Revision: 0

Approved By: Jim Evans Written By: Nick Ward

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KOPPERS

Galesburg Facility SCOPE: Output Action / Tasks; Receivers of Outputs **A**-----Information Flow Cross & Switch Tie Process Diagram Inputs Sources, Procedures, Documents & Records Material Flow Legend SUBJECT:

Summary of Change	Initial issue of standard procedure	
Date	06/25/20	
Revision	0	

QUALITY PROCEDURE

Procedure: RUP-QA-Cross/Switch Tie Diagram - Galesburg Facility

Issue Date: June 25, 2020

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Tonne CO2e/yr

Potential To Emit (PTE) for 29.3 mmbtu boiler

Pollutant	.∵Nox	≤ Sox	S 00	PM	NOC	∞ 201	_ bp	203	N2O	CH2
10 ⁴⁹	32	90	84	9.2	5.5		0.0005	120000	2.2	23
lb/mmbtu	0.92	0.02	2.41	0.22	0.16	0.32	0.00	3,447.06	90.0	0.0
· ib/ķī	4,026.16	75.5	10,569	956.2	692.0	1,384.0	90.0	15,098,118	276.8	7887
TPY	2.01	0.04	5.28	0.48	0.35	69:0	0.00	7,549.06	0.14	0.14

1. Emission Factors (Ib/SCFx10^6: USEPA AP-42, %th Edition, Chapter 1.4 Natural Gas Combustion for Small Boilers (<100MMBTU/hr) with low NOX burners and flue gas

Tonne CO2e/yr

6,889.09

15187838.21 3467.54297

recirculation.

operated half of the year.

Potential To Emit (PTE) for 33.48 mmbtu boiler

2 880°	Ιm	- Lo	T 6
	3962.22998	17354567.3	7,871.90
2.3	0.08	330.66	0.17
2.2	0.07	316.29	0.16
120000	3,938.82	17,252,047.06	8,626.02
0.0005	0.00	0.07	00:00
ŢĘ.	0.36	1,581.44	0.79
5.5	0.18	790.72	0.40
9.4	0.25	1,092.63	0.55
84	2.76	12,076.43	6.04
ê 0.6	0.02	86.26	0.04
. 35	1.05	4,600.55	2.30
: EF(I)	lb/mmbtu	lb/yr	TPY
	EF ^{III} 32 0.6 84 7.6 5.5 11 0.0005 2.2 23	32 0.6 84 7.6 5.5 11 0.0005 120000 2.2 2.3 1.3 1 1.05 0.02 2.76 0.25 0.18 0.36 0.00 3,938.82 0.07 0.08	3.32 366 84 7.6 5.5 11 0.0005 120000 2.2 1 1.05 0.02 2.76 0.25 0.18 0.36 0.00 3,938.82 0.07 4,600.55 86.26 12,076.43 1,092.63 790.72 1,581.44 0.07 17,252,047.06 316.29

1. Emission Factors (Ib/SCFx10^6: USEPA AP 42, %th Edition, Chapter 1.4 Natural Gas Combustion for Small Boilers (<100MIMBTU/hr) with low NOX burners and flue gas

recirculation. 2. The hours of operations for this boiler is half of total years hours because this boiler will be operated half of the year.

Potential to Emit (PTE) for both Boilers

Pollutant	Nox	Sox	ြင္	P	NOC	Toc Toc	Pb		N20 CH4	CH4	COZe
lb/yr	8,626.71	161.75	71 161.75 22,645.12 2,048.84 1,482.72 2,965.43	2,048.84	1,482.72	2,965.43	0.13	0.13 32,350,164.71 593.09	593.09	62	32.542.405.56
TPY	4.31	0.08	11.32	1.02	0.74	1.48	0.00	16,175.08	0.30	0.31	

125.8176471

// Operation

Mft3 NG/hr ft3 NG/hr

29,300,000 28725.4902 0.02872549

Cleaver Brooks

BT0/hr

0.032823529 143.7670588

VIMITE NG/hr 4/7 Operation

ft3 NG/hr

4,380

Hours Operated (24/7)²

VIMITES/yr

33,480,000 32823.52941

BTU/hr

Cleaver Brooks

^{2.} The hours of operations for this boiler is half of total years hours because this boiler will be

Tonne CO2e/yr

Estimated Actual for 29.3 mmbtu boiler

29,300,000

BTU/hr

Cleaver Brooks

28725.4902 0.02872549

ft3 NG/hr

AMES NG/hr

85.48705882

4/7 Operation

/IMFt3/yr

2,976

Actual Hours of

stimated

Opeartion (2)

				4,680.80 Tonne CO2e/yr
COZe		3467.543	10319408	4,680.80
CH4	23	0.07	196.6	0.10
-N20	2.2	0.06		0.09
CO3	120000	3,447.1	10,258,447.1	5,129.22
- dd	0.0005	0.00	0.0	0.00
. 10€	T	0.32	940.4	0.47
. voc	5.5	0.16	470.2	0.24
М		0.22	649.7	0.32
O)	84	2.41	3 7,180.9	3,59
Sox	9:0	0.02	51	0.03
Nox	32	0.92	2,735.6	1.37
Pollutant	, EE (3)	lb/mmbtu	lb/yr.	TANK T

2. Based on actual hours of operation in 2020.

Estimated Actual for 33.48 mmbtu boiler

Pollutant	Nox	Sox	. U)=	ANG.	WOL	TOC	3 9 .		で 日本		
_ (EF (B)	32	9.0	28	7.6	5.5	3 4	0.0005	120000	220	2.2	ezon roze
lb/mmbtu	1.05	0.02	2.76	0.25	0.18	0.36	0.00	3,938.8	0.07	0.08	3962.23
-lb/yr	3,125.9	58.6	8,205.4	742.4	537.3	537.3 1,074.5	0.0	11	214.9	224.7	11791596
ТРУ	1.56	0.03	4.10	0.37	0.27	0.54	0.00	5,860.97	0.11	0.11	5,348.58

Based on actual hours of operation in 2020.

0.032823529

VIME3 NG/hr

ft3 NG/hr

33,480,000 32823.52941

BTU/hr

97.68282353

24/7 Operation

MMft3/yr

2,976

Estimated: 🖟 ... Actual: Hours of

Opeartion (2)

^{2:} Describing and a noted and the second of the second of

for Small Boilers (<100MMBTU/hr) with low NOX burners and flue gas recirculation.

^{3.} Emission Factors (lb/SCFx10^6: USEPA AP-42, %th Edition, Chapter 1.4 Natural Gas Combustion for Small Boilers (<100MMBTU/hr) with low NOX burners and flue gas recirculation.

12 Month Rolling Totals Emission Summary

Facility:

Year: Month: Post Control Emissions (tons/year)

Galesburg 2021 January

Category	Emission Unit	Include in Rolling Total?	VOC	Naphthalene	Quinoline
Boiler	West	Yes	0.0000	0.0000	0.0000
Boiler	East	Yes	0.0000	0.0000	0.0000
Boiler	New	Yes	0.1602	0.0000	0.0000
Small Combustion	#1	Yes	0.0000	0.0000	0.0000
Small Combustion	#2	Yes	0.0000	0.0000	0.0000
Fuel Storage Tanks	22	Yes	0.0160	0.0000	0.0000
Fuel Storage Tanks	23	Yes	0.5074	0.0000	0.0000
Creosote Tanks	Storage Tank	Yes	0.0719	0.0143	0.0025
Creosote Tanks	Work Tank	Yes	0.3897	0.0774	0.0137
Equipment Losses	Pump Seals	Yes	0.0537	0.0140	0.0019
Equipment Losses	Valves	Yes	6900.0	0.0018	0.0002
Equipment Losses	Safety-relief Valves	Yes	0.0012	0.0003	0.0000
Equipment Losses	Open-ended Lines	Yes	0.0000	0.0000	0.0000
Equipment Losses	Flanges	Yes	0.0015	0.0004	0.0001
Equipment Losses	Sampling Connections	Yes	0.0002	0.0001	0.0000
Particulates	Double End Cutting of Ties	Yes	0.0000	0.0000	0.0000
Retort Door	Retort Door	Yes	0.7975	0.1702	0.0284
Dehydrator	Dehydrator	Yes	0.0000	0.0000	0.0000
Treatment-Conditioning	Boulton Conditioning	Yes	0.4181	0.0846	0.0147
Treatment-Conditioning	Empty Cell Lowry	Yes	0.2119	0.0429	0.0075
Treatment-Conditioning	Empty Cell Reuping	Yes	0.1692	0.0342	09000
Preservative Unloading	Non - Air Sparging	Yes	0.0380	0.0080	0.0013
Wastewater Treatment	Wastewater Treatment	Yes	0.0070	0.0018	0.0002
Sumps	Sumps	Yes	0.0250	0.0063	0.000
Wood Product Storage	Tie and Pole QA/QC	Yes	0.4847	0.1229	0.0170
Wood Product Storage	Tie Storage	Yes	2.6100	0.6617	0.0917
		Total	5.970	1.241	0.186

	Т	7	T	Т	1	Т		Τ	\top	Т	T	T	T	1	T	1	Ţ	Τ	1	Τ	1	Τ	T	Ţ	Т	Τ	Т
Phenol	0000	00000	0000	0,000	0000	0000	0,000	00000	00000	0000	0000	0000	0000	0000	0000	0.000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000	00000	0000	0000	0.000	0000
Xylene (Mixed	0 000	00000	0.000	0.0000	0.0000	0.000	0.0000	0.0008	0.0045	0.0023	0.0003	0.0000	0000	0.0001	0.0000	0,000	0.0122	0.0000	0.0052	0.0026	0.0021	0.0005	0.0002	60000	0.0172	0.0928	0.142
Formaldehyde	00000	0.0000	0.0022	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000	0.002
Ethylbenzene	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000
Cresol (Mixed Isomers)	0.0000	0.0000	0.0000	0.0000	0.000	0.0000	0.0000	0.0001	0.0008	0.0001	0.0000	0.0000	0.000	0.0000	0.0000	0.0000	0.0016	0.0000	0.000	0.0004	0.0004	0.0001	0.0000	0.0000	0.0009	0.0046	0.010
Benzene	0.0000	0.0000	0.0001	0.0000	0.000	0.0000	0.000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000.0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000
Dibenzofuran	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0007	0.0037	0.0001	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0058	0.0000	0.0037	0.0019	0.0015	0.0000	0.0000	0.0001	0.0014	0.0076	0.026
Biphenyl	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0012	9900:0	0.0004	0.0001	0.0000	0.0000	0.0000	0.0000	0.0000	0.0117	0.0000	0.0068	0.0035	0.0028	0.0006	0.0001	0.0002	0.0043	0.0231	0.061

0.0000 0.0000 0.0000 0.000.0 0.2213 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 1.2264 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 1.448 Σ filterable + condensables PM-2.5 0.0000 0.0000 0.0000 0.0000 0.0000 0.000.0 0.0000 0.000 0.2213 0.000.0 0.0000 0.0000 0.0000 0.000.0 0.0000 0.0123 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.234 0.0000 0.0000 PM-10 0.0000 0.0000 0.2213 0.0000 0.0000 0.0000 0.000.0 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.6132 0.835 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 2.9122 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0,000 0.000 2.912 0.0000 Š 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000.0 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000 0.0000 0.0000 0.0000 0.000.0 0.0000 0.0000 0.0000 0,000 0.0000 0.0000 Lead 0.000 00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000 2.4462 0.000 0.0000 0.0000 0.0000 0.0000 2.446 0.000.0 0,000 8 **Fotal Hap** 0.0024 0.0000 0.1159 0.8816 0.0000 0.0000 0.0000 0.0000 0.0024 0.0004 0.0024 0.0000 0.0197 0.1067 0.0187 0.0000 0.0005 0.0001 0.2299 0.0000 0.0587 0.0469 0.0105 0.0084 0.0000 0.1637 1.669 **Methanol** 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000.0 0.0000 0.0000 0.0000 0.000 0.0000 0.0000 0.000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000 0.0000 0.000 0.000 0.000 0.000 0.000 Pentachlorophenol 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000 0.0000 0.0000 0.0000 0.000 0.000 Toluene 0.0000 0.0001 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000.0 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000 0.00 Styrene 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000.0 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.000

Electronic Filing: Received, Clerk's Office 09/14/2021 **PCB 2022-005**

January 1

February 2

March 3

April 4

May 5

June 6

September 10

s02	0.0000	0.0000	0.0175	0.0000	0.000	00000	0.000	0.0000	0.0000	0.0000	0.0000	0.000	0.0000	0.000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000	0.0000	0.0000	0.0000	0.0000	0.017	
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Exhibit 3

Electronic Filing: Received, Clerk's Office 09/14/2021 **PCB 2022-005**

From: Selling, Jason < <u>Jason.Selling@illinois.gov</u>>
Sent: Tuesday, September 7, 2021 3:39 PM
To: Rapsack, Kevin G. < <u>RapsackKG@koppers.com</u>>

Cc: Patel, Kunj <Kunj.Patel@Illinois.gov>

Subject: RE: Construction Permit - Boiler Approval - LOP Denial

WARNING: External Sender

Kent,

I have spoken with my supervisors. The issue of Koppers's PTE is between Koppers and the USEPA. The Illinois EPA is not currently authorized to enter a discussion with Koppers regarding their permitting status. Have a good day.

Jason Selling

Environmental Protection Engineer

Illinois Environmental Protection Agency Bureau of Air

From: Rapsack, Kevin G. < Rapsack, Kevin G. Rapsack, Kevin G. Rapsack, Kevin G. Rapsack, Kevin G. RapsackKG@koppers.com>

Sent: Thursday, September 2, 2021 2:50 PM **To:** Selling, Jason <Jason.Selling@illinois.gov>

Subject: [External] Construction Permit - Boiler Approval - LOP Denial

Hello Jason,

I am reaching out to set up a technical call regarding the boiler construction approval and LOP denial that the Agency sent to Koppers for their Galesburg II facility. Please let me know when you and your team is available next week and I will set up a teams call. I appreciate your help with getting this meeting set up.

Thanks,

Kevin G. Rapsack
Environmental SH&E Manager
Koppers Inc. | 436 Seventh Avenue | Pittsburgh, PA 15219 | United States
T: +1 412 227 2883 | M: +1 412 721 7987 | F: +1 412 227 2423
RapsackKG@koppers.com



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