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
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.	)	

APPEARANCE

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

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
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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	)	
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

Exhibit 1

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

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
Applicant's Designation:
I.D. No.: 095804AAI
Date Received: March 15, 2021
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):

1a. The boilers are subject to the New Source Performance Standard (NSPS) 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)

b. Pursuant to 40 CFR 60.11(d), at all times, the Permittee shall, to the 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.

c. The Permittee shall comply with the applicable recordkeeping and reporting requirements of 40 CFR Part 60.7 and 60.48c.

2. The boilers are subject to 35 Ill. Adm. Code Part 216 Subpart B (Fuel 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

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

Pollutant	Emission Factor (lbs/mmscf)	Emissions (Tons/Mo)	(Tons/Yr)
Nitrogen Oxides (NO_x)	32	0.43	4.31
Carbon Monoxide (CO)	84	1.13	11.32
Particulate Matter (PM)	7.6	0.10	1.02
Volatile Organic Materials (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,

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.

7. 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

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. The 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. If relevant, the analysis should be performed in accordance with USEPA guidance 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::

i. 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, SO_2, 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.

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

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

WDM:JAS:tan

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

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

July 1, 1985

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

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

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

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

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

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

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

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

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

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

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

5. The issuance of this permit:

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

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

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

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

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

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

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

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

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

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

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

Exhibit 2

James R. Evans
Plant Manager

KOPPERS

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

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

FOR AGENCY USE ONLY

ID Number: _____ Permit #: _____

☐ Complete ☐ Incomplete Date Complete: _____

Check Number: _____ Account Name: _____

This form is to be used to supply fee information that must accompany all construction permit applications. This application must include payment in full to be deemed complete. Make check or money order payable to the Illinois Environmental Protection Agency, Division of Air Pollution Control - Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

Source Information

1. Source Name: Koppers Inc.
2. Project Name: Boiler Re-Installation
3. Source ID #: (if applicable) 095804AAI
4. Contact Name: James R. Evans
5. Contact Phone #: 309-343-5157

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal $0.00 + Section 2, 3 or 4 Subtotal $1,000.00 = $1,000.00 Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- **Major Source** is a source that is required to obtain a CAAPP permit.
- **Synthetic Minor Source** is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g.,FESOP).
- **Non-Major Source** is a source that is not a major or synthetic minor source.

☑ Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.

☐ Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.

☐ New major or synthetic minor source. Proceed to Section 4.

☐ New non-major source. Proceed to Section 3.

☐ AGENCY ERROR. If this is a timely request to correct an issued permit that involves only an agency error and if the request is received within the deadline for a permit appeal to the Pollution Control Board. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

$0.00 Section 1 Subtotal

This agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 ET SEQ. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Section 2: Special Case Filing Fee

8. **Filing Fee**. If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

Addition or replacement of control devices on permitted units.

Pilot projects/trial burns by a permitted unit

Land remediation projects

Revisions related to methodology or timing for emission testing

Minor administrative-type change to a permit

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 emission units. ($500 fee)	9. $0.00
10.	☑	This application consists of more than one new emission unit or more than two modified units. ($1,000 fee)	10. $1,000.00
11.	☐	This application consists of a new source or emission unit subject to Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator 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)	11. $0.00
12.	☐	A public hearing is held (see instructions). ($10,000 fee)	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

Application contains modified emission units only	14. For the first modified emission unit, enter $2,000.	
	15. Number of additional modified emission units = x $1,000.	
	16. Line 14 plus line 15, or $5,000, whichever is less.	16. $0.00
Application contains new and/or modified emission units	17. For the first new emission unit, enter $4,000.	
	18. Number of additional new and/or modified emission units = x $1,000.	
	19. Line 17 plus line 18, or $10,000, whichever is less.	19. $0.00
Application contains netting exercise	20. Number of individual pollutants that rely on a netting exercise or contemporaneous emissions decrease to avoid application of PSD or nonattainment area NSR = x $3,000.	20. $0.00
Additional Supplemental Fees	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.	
	22. If the source is a new major source subject to PSD, enter $12,000.	
	23. If the project is a major modification subject to PSD, enter $6,000.	
	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 $5,000 per unit for which a determination is requested or otherwise required. x $5,000.	26. $0.00
	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		28. $0.00

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: _____
Signature

James R. Evans
Typed or Printed Name of Signatory

Plant Manager
Title of Signatory

Mar 8, 2021
Date

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

Application for a Construction and/or Operating Permit for a Lifetime Source* **(Form APC629)**	**For Illinois EPA use only**	
	Date Received:	BOA ID Number:
		Application. Number:
		ACES ID Number:
		Construction Fee Check Amount Rec'd:

*NOTE: This form is intended to be used by all Lifetime Sources (see 35 IAC 201.169(a)) to identify and supply information as required by 35 IAC 201.152, 201.157, 201.159, 201.160, and 201.169 necessary to obtain a Construction Permit, a Joint Construction and Operating Permit, and/or an Operating Permit. Please attach other information, data, and/or completed forms regarding this project as necessary and appropriate.

I. Proposed Project Addressed By Application

1. Working Name of Proposed Project:
   Boiler Re-Installation
2. Is the Project occurring at a source that already has a permit from the Bureau of Air (BOA)?
   ☐ No ☒ Yes If Yes, provide BOA ID Number: 095804AAI
3. Does this application request a revision to an existing permit issued by the Bureau of Air (BOA)?
   ☐ No ☒ Yes If Yes, provide Application Number: 83070034
4. Do you request a new or modified Construction Permit? ☐ New ☐ Modified ☒ N/A
5. Do you request a new or modified Joint Construction and Operating Permit?
   ☐ New ☒ Modified ☐ N/A
6. Do you request a new or modified Operating Permit? ☐ New ☒ Modified ☐ N/A
7. If the application is for a construction permit, is the emission unit/air pollution control equipment covered by this application already constructed? ☐ Yes ☒ No ☐ N/A
   If "yes", the date construction was completed must be provided: Date:_____
8. If this application incorporates by reference a previously granted permit(s), has form APC-210, "Data and Information-Incorporation by Reference" been submitted? ☐ Yes ☐ No ☒ N/A

II. Source Information

1. Source name:* Koppers Inc.
2. Source street address:* 1291 State Route 41

3. City:* Galesburg	4. County:* Knox	5. Zip code:* 61401

* Is information different than previous information? ☐ Yes ☒ No
If yes, then explain what is different and why/when changed.

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

II. Source Information (continued)

ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN EXISTING ID NUMBER OR IF INFORMATION HAS CHANGED.

6. Is the source located within city limits? ☐ Yes ☒ No
   If No, provide Township name: Galesburg

7. Description of source and product(s) produced:
   Wood Treatment

8. Primary Classification Code of source: SIC: 2491 ____ or NAICS: 321114 ____

9. Latitude (DD:MM:SS.SSSS): 90°23'27.7"W

10. Longitude (DD:MM:SS.SSSS): 40°53'52.3"N

III. Applicant Information

1. Who is the applicant? ☐ Owner ☒ Operator	2. All correspondence to: (check only one) ☒ Owner ☐ Operator ☐ Source
3. Applicant's FEIN: 25-1588399	4. Attention name and/or title for written correspondence: James R. Evans

IV. Owner Information*

1. Name: Koppers Inc.
2. Address: 436 7th Avenue

3. City: Pittsburgh	4. State: PA	5. Zip code: 15219

* If this information different than previous information, then include a Request for Ownership Change.

V. Operator Information (If Different from Owner)*

1. Name: Koppers Inc.
2. Address: 1291 State Route 41

3. City: Galesburg	4. State: IL	5. Zip code: 61401

* If this information different than previous information, then include a Request for Operator Change.

VI. Technical Contacts for Application

1. Preferred technical contact: (check only one) ☒ Applicant's contact ☐ Consultant
2. Applicant's technical contact person for application: Kevin Rapsack

3. Contact person's telephone number: 412-227-2883	4. Contact person's email address: RapsackKG@koppers.com

5. Applicant's consultant for application: ☒ N/A

6. Consultant's telephone number: ☒ N/A	7. Consultant's email address: ☒ N/A

VII. Other Addresses/Contacts for the Permit Applicant

ONLY COMPLETE FOLLOWING FOR A SOURCE WITHOUT AN EXISTING ID NUMBER OR IF INFORMATION HAS CHANGED.

1. Address for billing Site Fees for the source: ☐ Source ☐ Other (provide below):		
Address:		
City:	State:	Zip Code:
2. Contact person for Site Fees:	3. Contact person's telephone number:	
4. Address for Annual Emission Report for the source: ☐ Source ☐ Other (provide below):		
Address:		
City:	State:	Zip Code:
5. Contact person for Annual Emission Report:	6. Contact person's telephone number:	

VIII. Summary/Review Of Contents of the Application

NOTE: ANSWERING "NO" TO THESE ITEMS MAY RESULT IN THE APPLICATION BEING DEEMED INCOMPLETE (SEE 35 IAC 201.158)

1. Does the application include a detailed narrative description of the proposed project, and if for an existing source, does the application describe how the new/modified emission units/equipment in the project relate to the existing emission units/equipment at the existing source?	☒ Yes ☐ No
2. Does the application contain a list and detailed description of all the emission units and air pollution control equipment that are part of the project, and if the application includes a request for a revised operating permit, a list and description of all the emission units/equipment that the revised operating permit will need to address?	☒ Yes ☐ No
3. Does the application include a process flow diagram(s) for the project showing new/modified emission units/equipment, and if for an existing source, how it relates to existing emission units/equipment at the existing source?	☒ Yes ☐ No
4. If the project is at a source that has not previously received a permit from the BOA, does the application include a source description, plot plan and site map?	☐ Yes ☐ No ☒ N/A
5. Does the application identify and address all applicable or potentially applicable performance and emissions standards, including: a. State emission standards (35 IAC Chapter I, Subtitle B); b. Federal New Source Performance Standards (40 CFR Part 60); c. Federal standards for Hazardous Air Pollutants (HAPs) (40 CFR Parts 61 and 63)?	☐ Yes ☐ No ☒ N/A ☐ Yes ☐ No ☒ N/A ☐ Yes ☐ No ☒ N/A
6. Does the application include a listing and summary of the requested permitted annual emissions (tons/year) of the proposed project for the new and/or modified emission units for the pollutants to be emitted (CO, NOx, PM/PM10, SO2, VOM, and/or individual and combined HAPs), and if for an existing permitted source, how the new emissions correlate to the total proposed emissions for the entire source?	☐ 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 (continued)

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 ☒ 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)? 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 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 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.	☒ Yes ☐ No
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? 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.	☐ Yes ☐ No ☒ N/A* * No information in the application is claimed to be a TRADE SECRET

VIII. Summary/Review Of Contents of the Application (continued)

12a.	If the source is located in a county other than Cook County, have two separate complete copies of this application been submitted?	☒ Yes	☐ No ☐ N/A
b.	If the source is located in Cook County, have three separate complete copies of this application been submitted?	☐ Yes	☐ No ☒ N/A
13.	Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, for the emission units and control equipment for which a permit for construction or modification is being sought?	☒ Yes	☐ No ☐ N/A
14.	Does the application include a check in the proper amount for payment of the Construction permit application fee as identified in the Form 197-FEE?	☒ Yes	☐ No ☐ N/A

IX. Signature Block

Pursuant to 35 IAC 201.159, all applications and supplements thereto shall be signed by the owner and operator of the source, or their authorized agent, and shall be accompanied by evidence of authority to sign the application. Applications without a signed certification will be deemed incomplete.

Authorized Agent Listing

The Owner, Operator, or Source certifies that the listing below shall be considered as evidence for our authorized agents for this project; which shall have the authority to sign the application and supplements.

Consulting Company Name:		☒ N/A
Legal Firm Name:		☒ N/A
Testing Company Name:		☒ N/A
Other:		☒ N/A

Owner, Operator, or Source Signature

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. In addition, the technical contact person identified above is authorized to submit (by hard copy and/or by electronic copy) any supplemental information related to this application that may be requested by the Illinois EPA.

BY: 

AUTHORIZED SIGNATURE

Plant Manager

TITLE OF SIGNATORY

James R. Evans

TYPED OR PRINTED NAME OF SIGNATORY

3/8/21

DATE

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

* DATA AND INFORMATION FUEL COMBUSTION EMISSION SOURCE	

* THIS INFORMATION FORM IS TO BE COMPLETED FOR A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED FOR THE PRIMARY PURPOSE OF PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN EMISSION SOURCE THAT DOES NOT FIT THIS DESCRIPTION, INCLUDING AND EMISSION SOURCE USING DIRECT HEATING, IS EITHER A PROCESS EMISSION SOURCE OR AN INCINERATOR.

1. NAME OF PLANT OWNER: Koppers Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
3. 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: *See Attached Paperwork for Flow Diagram		
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 % JUN-AUG 50 % SEPT-NOV 50 %		

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. 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.
3. 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 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.

P9 9

GAS FIRING		
*11. ORIGIN OF GAS: ☐ DISTILLATE FUEL OIL GASIFICATION ☐ OTHER LIQUID FUEL GASIFICATION ☐ SOLID FUEL GASIFICATION ☐ BYPRODUCT SPECIFY SOURCE ☐ PIPELINE		
12. ARE YOU ON AN INTERRUPTABLE GAS SUPPLY: ☐ YES ☒ NO IF "YES", SPECIFY ALTERNATE FUEL:		
13. ANNUAL CONSUMPTION: 85487058.82 SCF	*14. HEAT CONTENT: BTU/SCF	*15. SULFUR CONTENT: % BY WT.
16. AVERAGE FIRING RATE: 29,300,000 BTU/HR	17. MAXIMUM FIRING RATE: 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: GALLONS	20. HEAT CONTENT: ☐ BTU/LB ☐ BTU/GAL	
21. SULFUR CONTENT: % BY WT	22. ASH CONTENT: % BY WT	
23. DIRECTION OF FIRING: ☐ HORIZONTAL ☐ TANGENTIAL ☐ OTHER: SPECIFY		
24. AVERAGE FIRING RATE: BTU/HR	25. MAXIMUM FIRING RATE: BTU/HR	

SOLID FUEL FIRING		
26. TYPE OF SOLID FUEL ☐ SUB-BITUMINOUS COAL ☐ BITUMINOUS COAL ☐ ANTHRACITE COAL ☐ OTHER: SPECIFY		
27. ANNUAL CONSUMPTION: TONS	28. HEAT CONTENT AS FIRED: BTU/LB	
29. MOISTURE CONTENT AS FIRED: % BY WT.	30. ASH CONTENT AS FIRED: % BY WT.	31. SULFUR CONTENT AS FIRED: % BY WT.
32. TYPE OF FIRING: ☐ CYCLONE ☐ PULVERIZED { ☐ WET BOTTOM OR ☐ DRY BOTTOM, ☐ HORIZONTALLY OPPOSED OR ☐ OTHER: SPECIFY _____		
☐ SPREADER STOKER: % REINJECTION _____ ☐ OTHER: SPECIFY _____		
33. AVERAGE FIRING RATE: BTU/HR	34. MAXIMUM FIRING RATE: 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.		

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*EMISSION INFORMATION

35. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): Two (2) NG Boilers - See Calculation Attachmt

AVERAGE OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	36a. GR/SCF	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
CARBON MONOXIDE	37a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
NITROGEN OXIDES	38a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
ORGANIC MATERIAL	39a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
SULFUR DIOXIDE	40a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.

MAXIMUM OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	41a. GR/SCF	b. ☐ 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/10^6 BTU ☐ LB/HR	c.
ORGANIC MATERIAL	44a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
SULFUR DIOXIDE	45a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.

* 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.

**EXHAUST POINT INFORMATION

46. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: See Flow Diagram Attachment

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 THIS SECTION SHOULD NOT BE COMPLETED.

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

* DATA AND INFORMATION FUEL COMBUSTION EMISSION SOURCE	

* THIS INFORMATION FORM IS TO BE COMPLETED FOR A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED FOR THE PRIMARY PURPOSE OF PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN EMISSION SOURCE THAT DOES NOT FIT THIS DESCRIPTION, INCLUDING AND EMISSION SOURCE USING DIRECT HEATING, IS EITHER A PROCESS EMISSION SOURCE OR AN INCINERATOR.

1. NAME OF PLANT OWNER: Koppers Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
3. 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: *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 OF EMISSION SOURCE: 24 HRS/DAY 7 DAYS/WK 26 WKS/YR	

11. PERCENT OF ANNUAL HEAT INPUT:
DEC-FEB 50 % MAR-MAY 50 % JUN-AUG 50 % SEPT-NOV 50 %

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. 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.
3. 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

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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.

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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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GAS FIRING		
*11. ORIGIN OF GAS: ☐ DISTILLATE FUEL OIL GASIFICATION ☐ OTHER LIQUID FUEL GASIFICATION ☐ SOLID FUEL GASIFICATION ☐ BYPRODUCT SPECIFY SOURCE ☐ PIPELINE		
12. ARE YOU ON AN INTERRUPTABLE GAS SUPPLY: ☐ YES ☒ NO IF "YES", SPECIFY ALTERNATE FUEL:		
13. ANNUAL CONSUMPTION: 97682823.53 SCF	*14. HEAT CONTENT: BTU/SCF	*15. SULFUR CONTENT: % BY WT.
16. AVERAGE FIRING RATE: 33,480,000 BTU/HR	17. MAXIMUM FIRING RATE: 33,480,000 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: GALLONS	20. HEAT CONTENT: ☐ BTU/LB ☐ BTU/GAL	
21. SULFUR CONTENT: % BY WT	22. ASH CONTENT: % BY WT	
23. DIRECTION OF FIRING: ☐ HORIZONTAL ☐ TANGENTIAL ☐ OTHER: SPECIFY		
24. AVERAGE FIRING RATE: BTU/HR	25. MAXIMUM FIRING RATE: BTU/HR	

SOLID FUEL FIRING		
26. TYPE OF SOLID FUEL ☐ SUB-BITUMINOUS COAL ☐ BITUMINOUS COAL ☐ ANTHRACITE COAL ☐ OTHER: SPECIFY		
27. ANNUAL CONSUMPTION: TONS	28. HEAT CONTENT AS FIRED: BTU/LB	
29. MOISTURE CONTENT AS FIRED: % BY WT.	30. ASH CONTENT AS FIRED: % BY WT.	31. SULFUR CONTENT AS FIRED: % BY WT.
32. TYPE OF FIRING: ☐ CYCLONE ☐ PULVERIZED { ☐ WET BOTTOM OR ☐ DRY BOTTOM, ☐ HORIZONTALLY OPPOSED OR ☐ OTHER: SPECIFY _____		
☐ SPREADER STOKER: % REINJECTION _____ ☐ OTHER: SPECIFY		
33. AVERAGE FIRING RATE: BTU/HR	34. MAXIMUM FIRING RATE: 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.		

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*EMISSION INFORMATION

35. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): Two (2) NG Boilers - See Calculation Attachmt

AVERAGE OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	36a. GR/SCF	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
CARBON MONOXIDE	37a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
NITROGEN OXIDES	38a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
ORGANIC MATERIAL	39a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
SULFUR DIOXIDE	40a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.

MAXIMUM OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	41a. GR/SCF	b. ☐ 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/10^6 BTU ☐ LB/HR	c.
ORGANIC MATERIAL	44a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.
SULFUR DIOXIDE	45a. PPM (VOL)	b. ☐ LB/10^6 BTU ☐ LB/HR	c.

* 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.

**EXHAUST POINT INFORMATION

46. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: See Flow Diagram Attachment

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 THIS SECTION SHOULD NOT BE COMPLETED.

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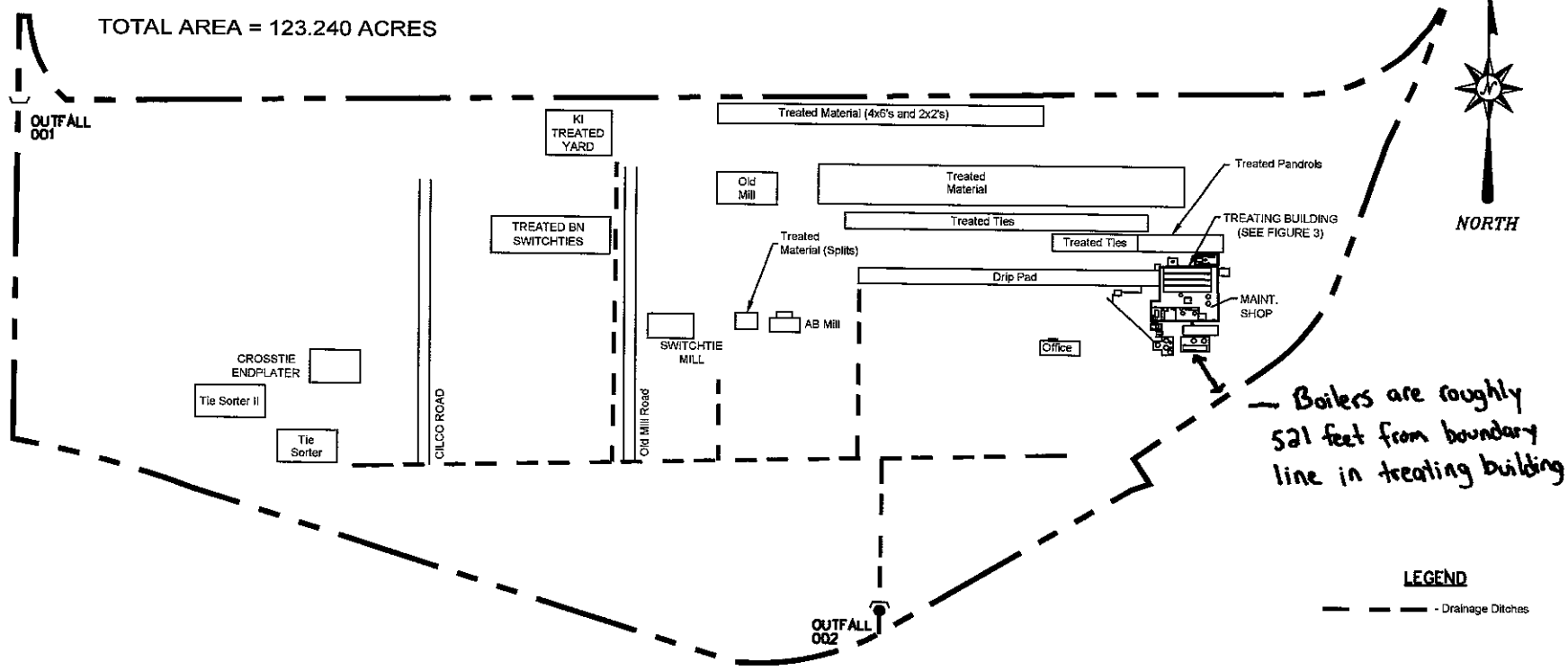


REFERENCE:
DRAWING CE2966, PROJECT NUMBER C1078 DATED 11-15-00 BY CROUSE AND COMPANY OF PITTSBURGH, PENNSYLVANIA

APPROVED	RTS 01/07/2016
CHECKED	RTS 01/07/2016
DRAWN	RAM 01/06/2016
CAD FILE NO.	08183A005
PROJECT NO.	KL08183GICP.P

KU Resources, Inc.
22 South Linden Street
Duquesne, PA 15110
412.469.9331
412.469.9336 fax
www.kuresources.com

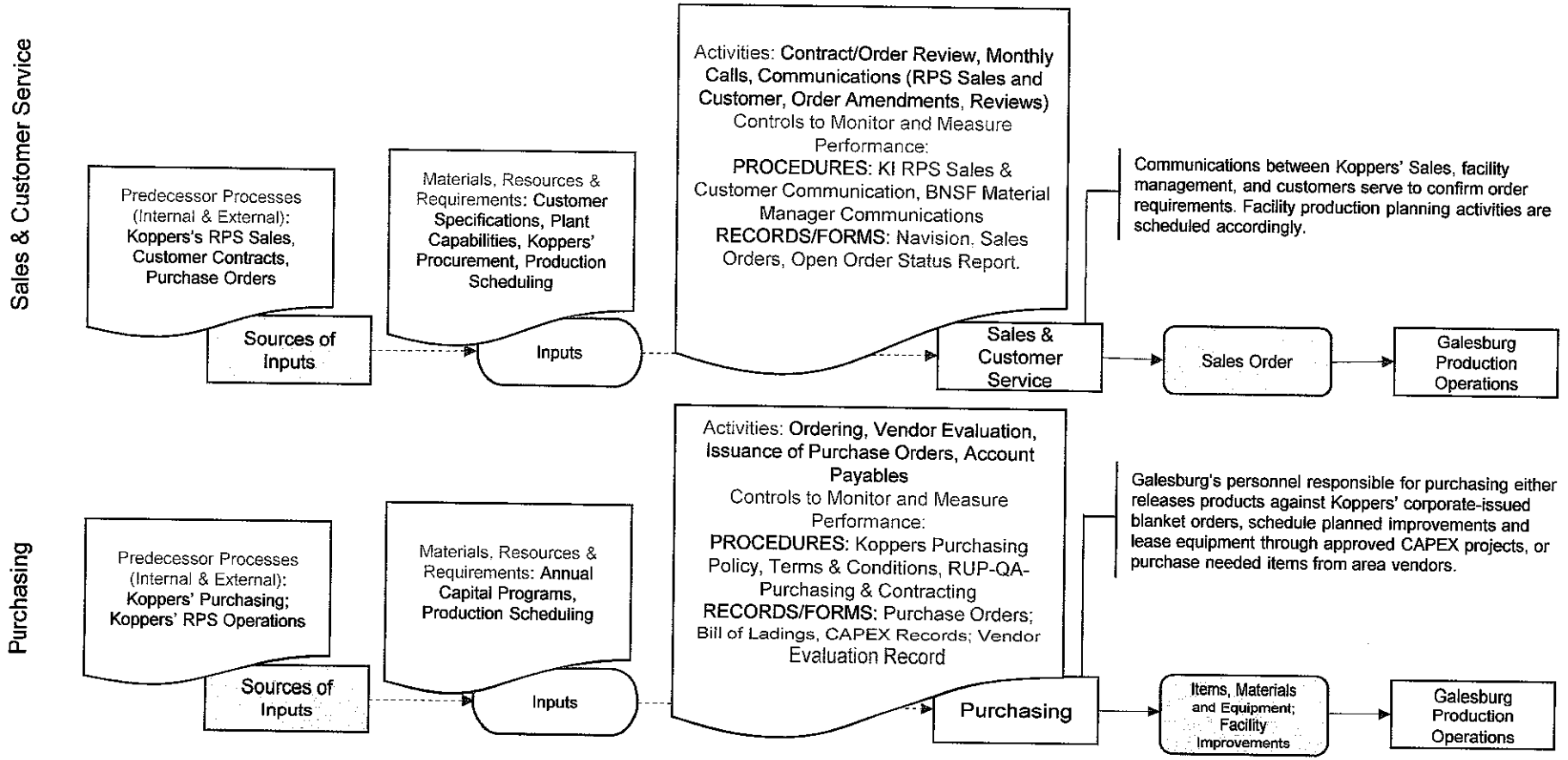
SCALE - FEET
0 500

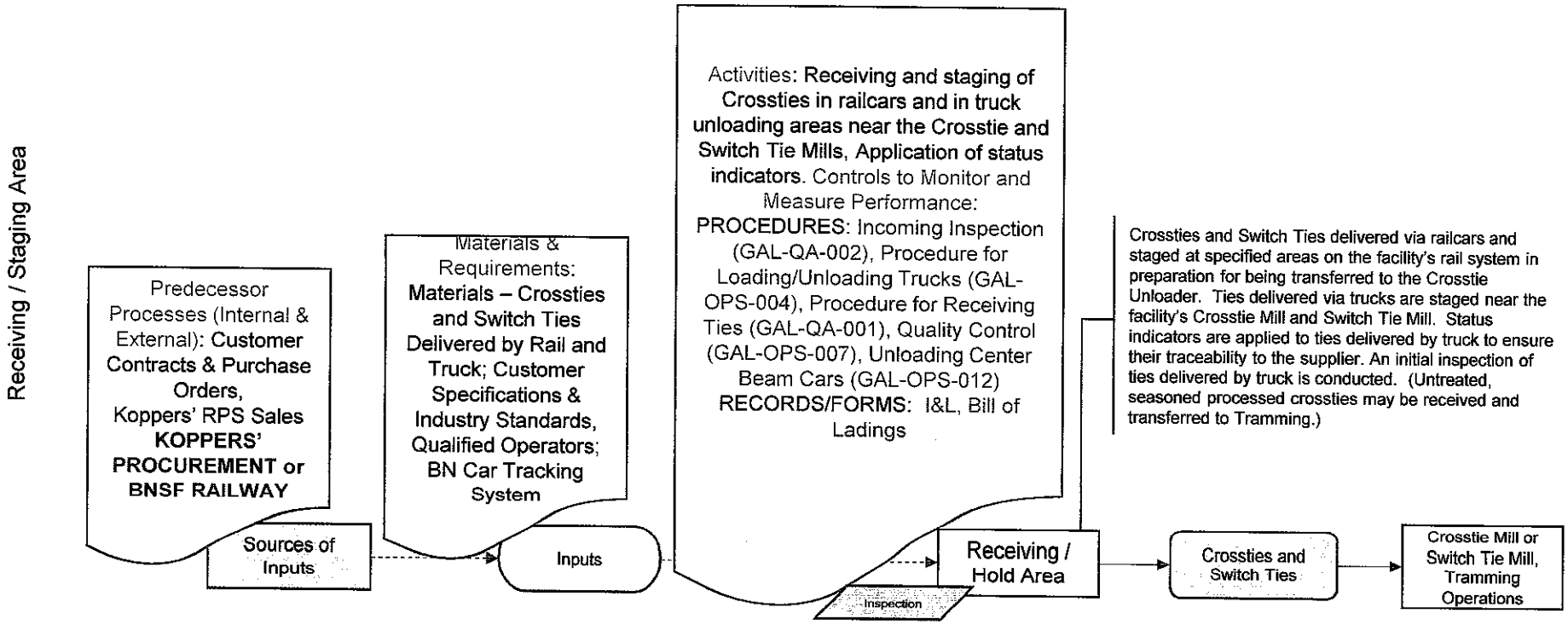
FIGURE 2
FACILITY DIAGRAM
GALESBURG FACILITY

CEDAR TOWNSHIP
KNOX COUNTY, ILLINOIS

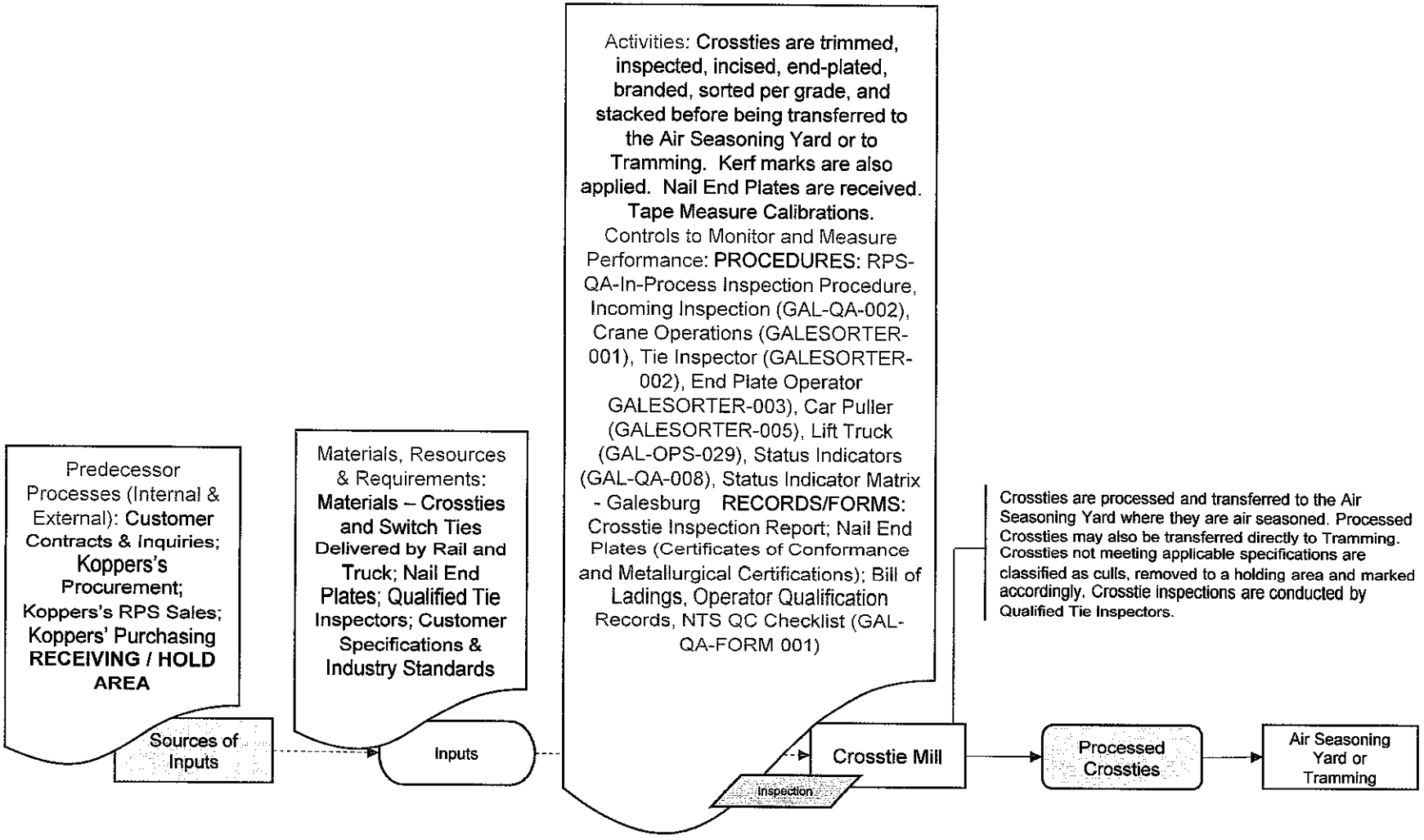
PREPARED FOR
KOPPERS INC
PITTSBURGH, PENNSYLVANIA

SUBJECT: **Cross & Switch Tie Process Diagram** **SCOPE:** **Galesburg Facility**

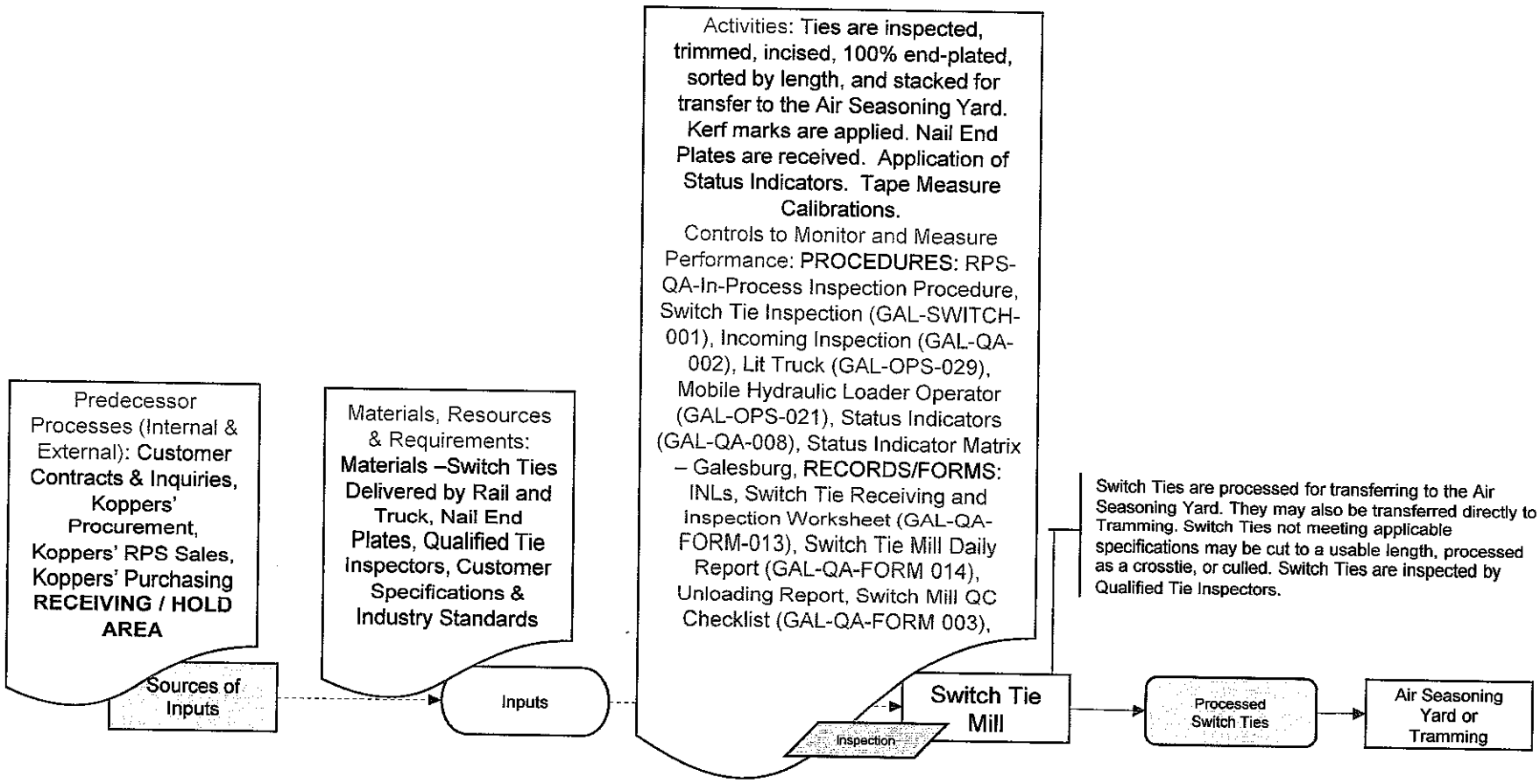




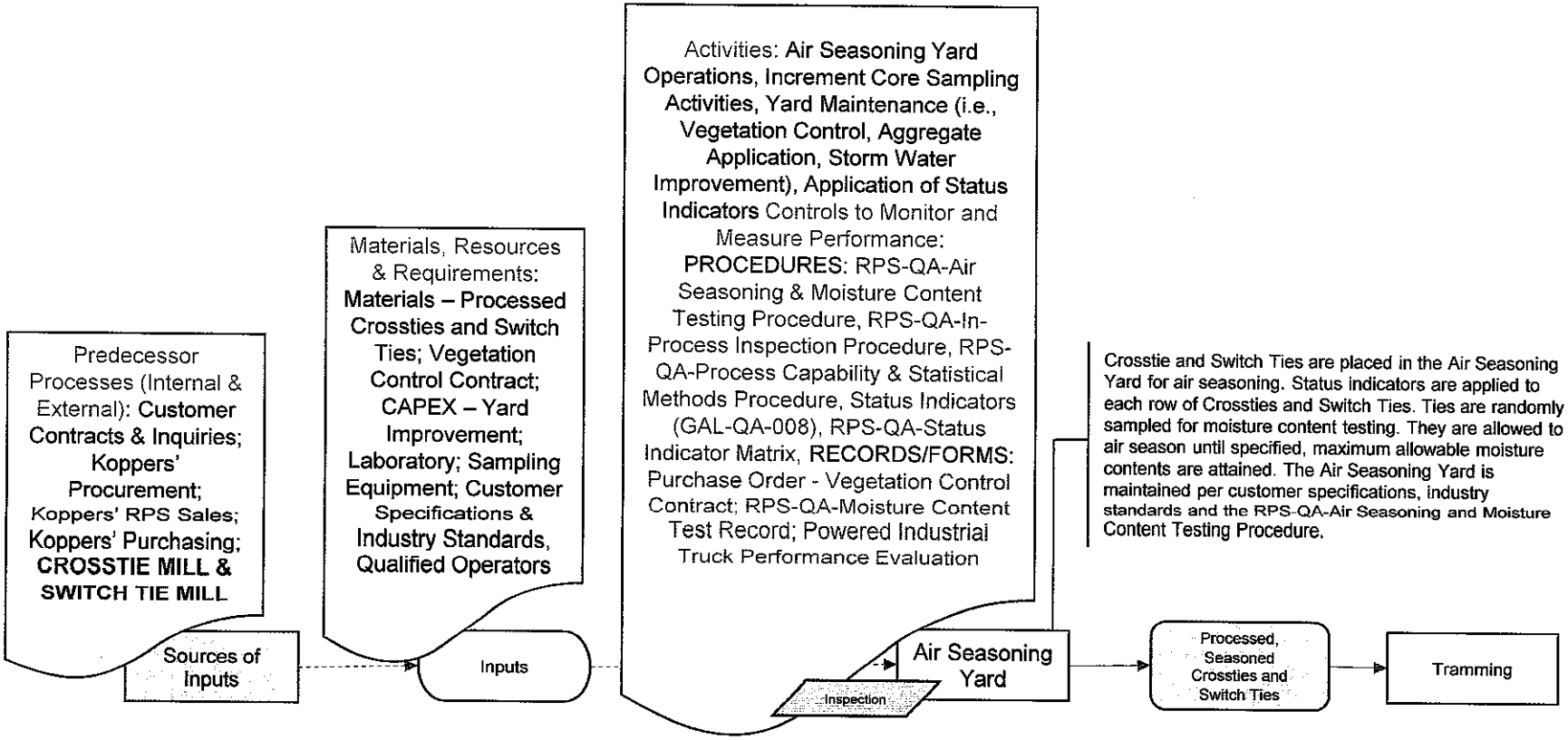
Crosstie Mill



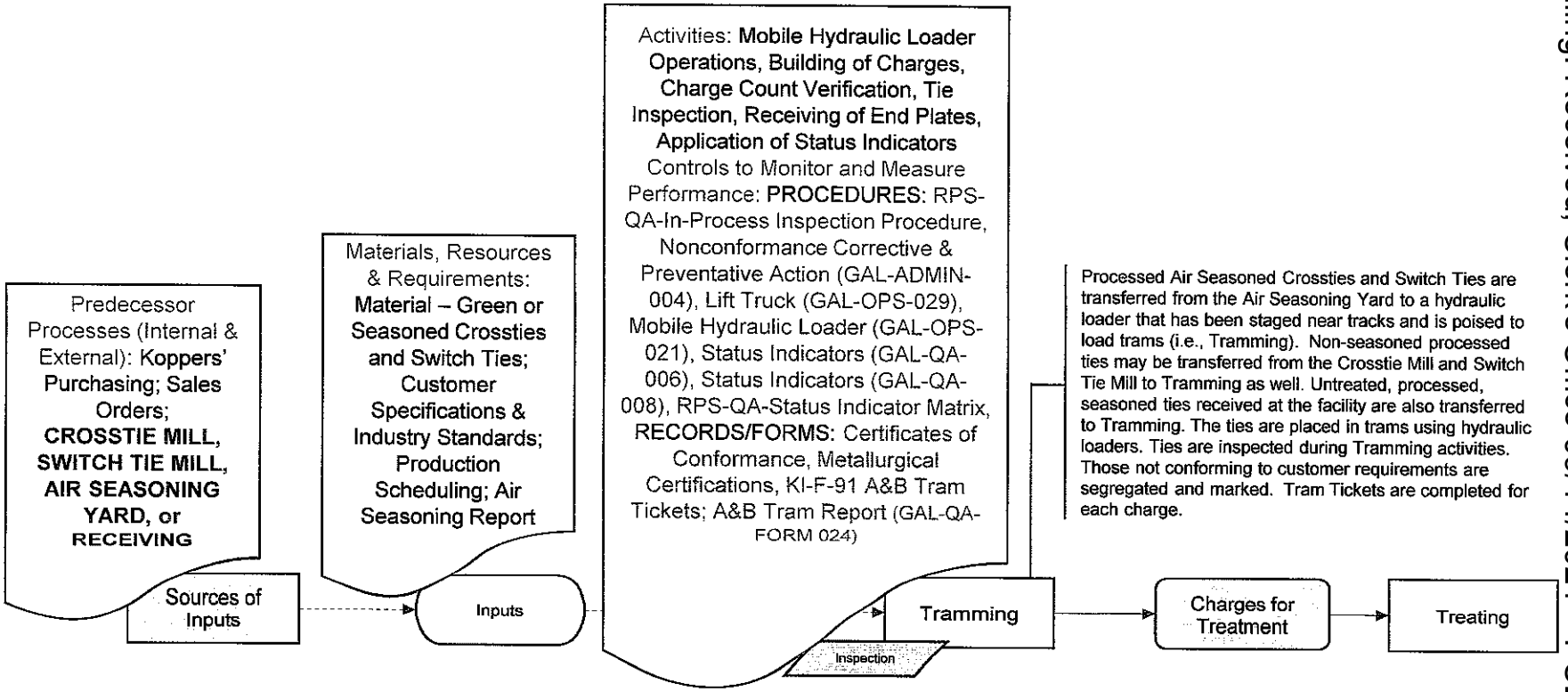
Switch Tie Unloader



Air Seasoning Yard

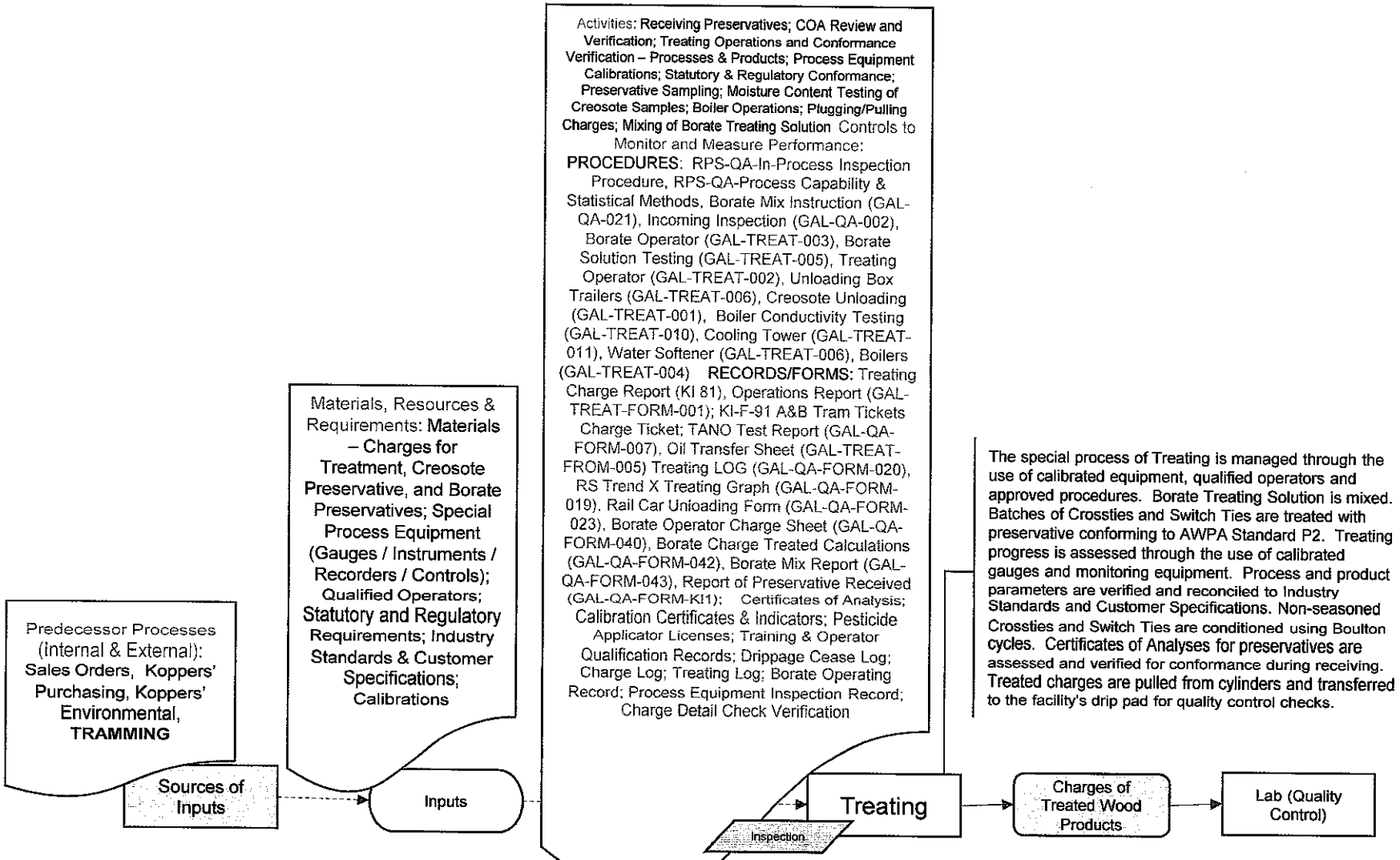


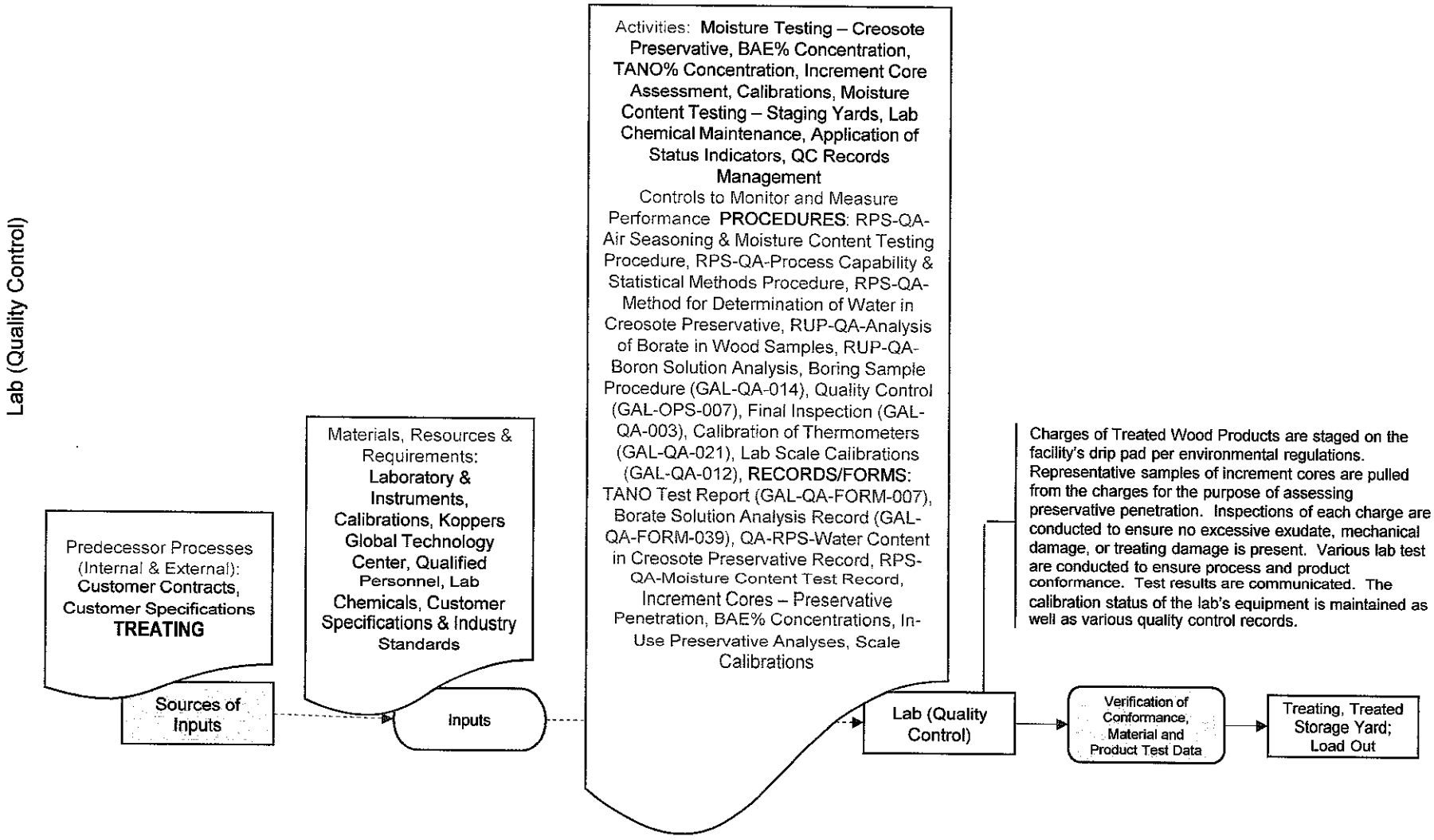
Tramming

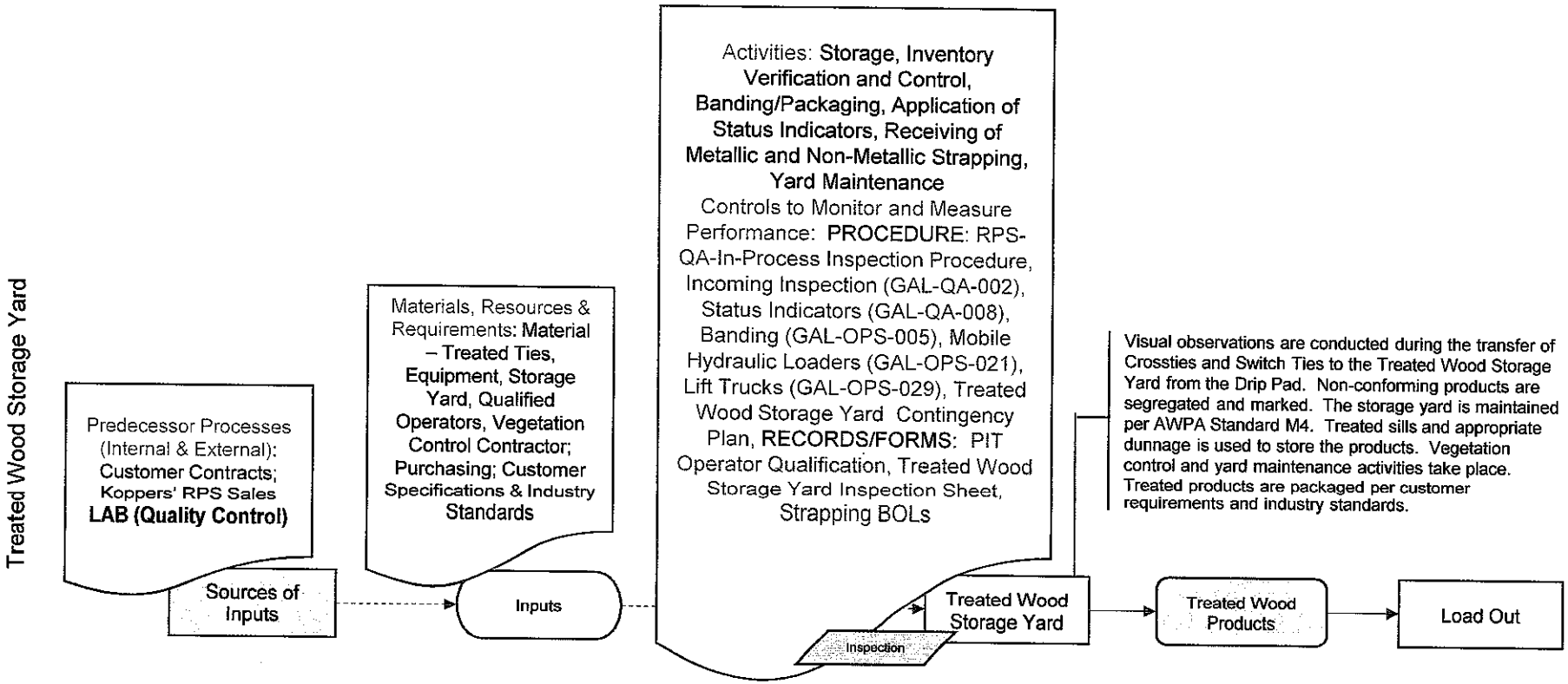


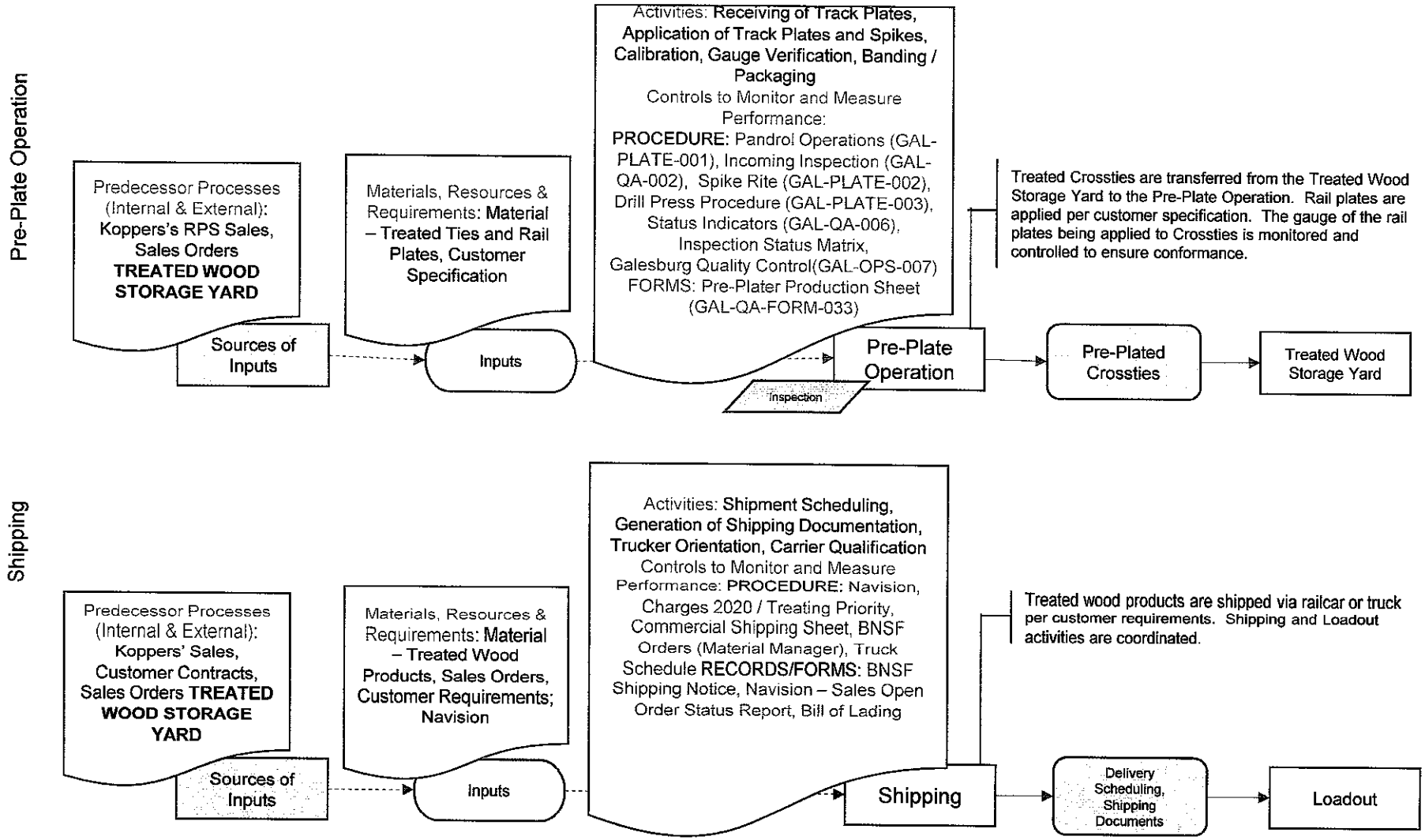
SUBJECT: **Cross & Switch Tie Process Diagram** **SCOPE:** **Galesburg Facility**

Treating

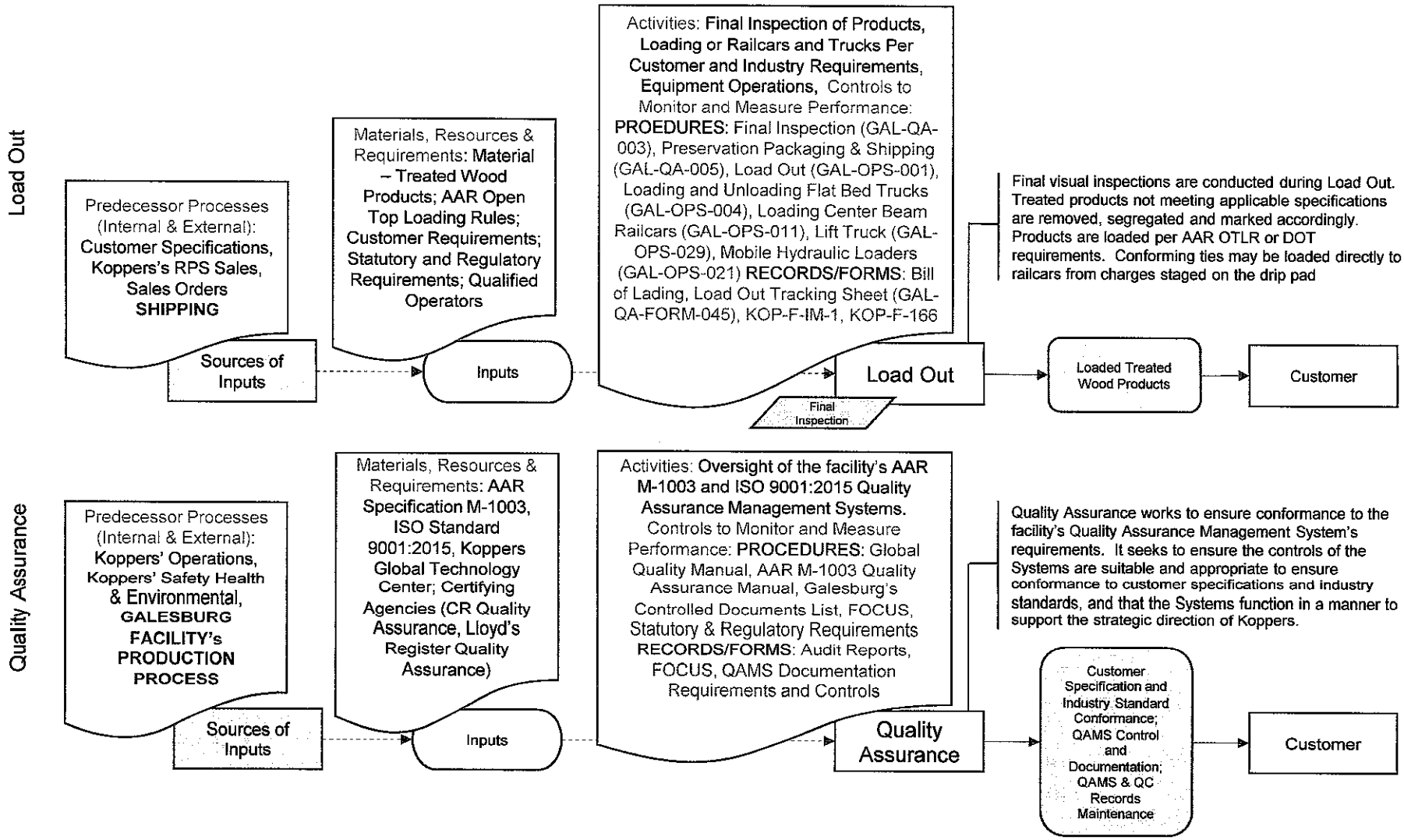




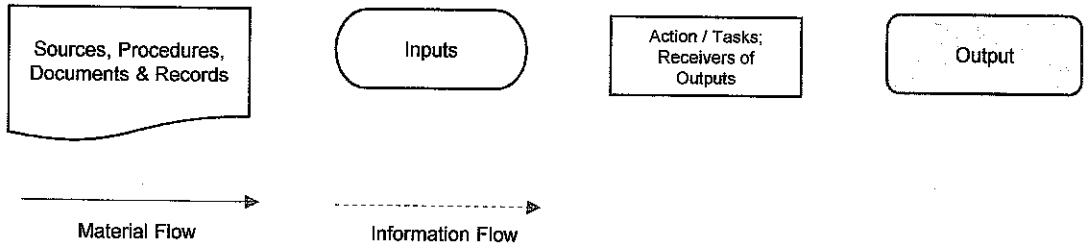




SUBJECT: **Cross & Switch Tie Process Diagram** **SCOPE:** **Galesburg Facility**



Legend



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

Cleaver Brooks

BTU/hr	29,300,000
ft3 NG/hr	28725.4902
MMft3 NG/hr	0.02872549
24/7 Operation MMft3/yr	125.8176471
Hours Operated (24/7)[2]	4,380

Potential To Emit (PTE) for 29.3 mmbtu boiler

Pollutant	Nox	Sox	CO	PM	VOC	TOC	Pb	CO2	N2O	CH4	CO2e
EF [1]	32	0.6	84	7.6	5.5	11	0.0005	120000	2.2	2.3	
lb/mmbtu	0.92	0.02	2.41	0.22	0.16	0.32	0.00	3,447.06	0.06	0.07	3467.542971
lb/yr	4,026.16	75.5	10,569	956.2	692.0	1,384.0	0.06	15,098,118	276.8	289.4	15187838.21
TPY	2.01	0.04	5.28	0.48	0.35	0.69	0.00	7,549.06	0.14	0.14	6,889.09 Tonne CO2e/yr

1. 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.
2. The hours of operations for this boiler is half of total years hours because this boiler will be operated half of the year.

Cleaver Brooks

BTU/hr	33,480,000
ft3 NG/hr	32823.52941
MMft3 NG/hr	0.032823529
24/7 Operation MMft3/yr	143.7670588
Hours Operated (24/7)[2]	4,380

Potential To Emit (PTE) for 33.48 mmbtu boiler

Pollutant	Nox	Sox	CO	PM	VOC	TOC	Pb	CO2	N2O	CH4	CO2e
EF [1]	32	0.6	84	7.6	5.5	11	0.0005	120000	2.2	2.3	
lb/mmbtu	1.05	0.02	2.76	0.25	0.18	0.36	0.00	3,938.82	0.07	0.08	3962.229988
lb/yr	4,600.55	86.26	12,076.43	1,092.63	790.72	1,581.44	0.07	17,252,047.06	316.29	330.66	17354567.35
TPY	2.30	0.04	6.04	0.55	0.40	0.79	0.00	8,626.02	0.16	0.17	7,871.90 Tonne CO2e/yr

1. 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.
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	CO	PM	VOC	TOC	Pb	CO2	N2O	CH4	CO2e
lb/yr	8,626.71	161.75	22,645.12	2,048.84	1,482.72	2,965.43	0.13	32,350,164.71	593.09	620.04	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	14,760.99

Cleaver Brooks

BTU/hr	29,300,000
ft3 NG/hr	28725.4902
MMft3 NG/hr	0.02872549
24/7 Operation MMft3/yr	85.48705882
Estimated Actual Hours of Opeartion [2]	2,976

Estimated Actual for 29.3 mmbtu boiler

Pollutant	Nox	Sox	CO	PM	VOC	TOC	Pb	CO2	N2O	CH4	CO2e
EF [3]	32	0.6	84	7.6	5.5	11	0.0005	120000	2.2	2.3	
lb/mmbtu	0.92	0.02	2.41	0.22	0.16	0.32	0.00	3,447.1	0.06	0.07	3467.543
lb/yr	2,735.6	51.3	7,180.9	649.7	470.2	940.4	0.0	10,258,447.1	188.1	196.6	10319408
TPY	1.37	0.03	3.59	0.32	0.24	0.47	0.00	5,129.22	0.09	0.10	4,680.80 Tonne CO2e/yr

2. Based on actual hours of operation in 2020.
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.

BTU/hr	33,480,000
ft3 NG/hr	32823.52941
MMft3 NG/hr	0.032823529
24/7 Operation MMft3/yr	97.68282353
Estimated Actual Hours of Opeartion [2]	2,976

Estimated Actual for 33.48 mmbtu boiler

Pollutant	Nox	Sox	CO	PM	VOC	TOC	Pb	CO2	N2O	CH4	CO2e
EF [3]	32	0.6	84	7.6	5.5	11	0.0005	120000	2.2	2.3	
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	1,074.5	0.0	11,721,938.8	214.9	224.7	11791596
TPY	1.56	0.03	4.10	0.37	0.27	0.54	0.00	5,860.97	0.11	0.11	5,348.58 Tonne CO2e/yr

2. Based on actual hours of operation in 2020.
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: Galesburg
Year: 2021
Month: January

Post Control Emissions (tons/year)

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	0.0069	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	0.0060
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	0.0009
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**

Biphenyl	Dibenzofuran	Benzene	Cresol (Mixed Isomers)	Ethylbenzene	Formaldehyde	Xylene (Mixed Isomers)	Phenol
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	0.0001	0.0000	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	0.0000	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
0.0012	0.0007	0.0000	0.0001	0.0000	0.0000	0.0008	0.0000
0.0066	0.0037	0.0000	0.0008	0.0000	0.0000	0.0045	0.0000
0.0004	0.0001	0.0000	0.0001	0.0000	0.0000	0.0023	0.0000
0.0001	0.0000	0.0000	0.0000	0.0000	0.0000	0.0003	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	0.0001	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
0.0117	0.0058	0.0000	0.0016	0.0000	0.0000	0.0122	0.0000
0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0068	0.0037	0.0000	0.0009	0.0000	0.0000	0.0052	0.0000
0.0035	0.0019	0.0000	0.0004	0.0000	0.0000	0.0026	0.0000
0.0028	0.0015	0.0000	0.0004	0.0000	0.0000	0.0021	0.0000
0.0006	0.0000	0.0000	0.0001	0.0000	0.0000	0.0005	0.0000
0.0001	0.0000	0.0000	0.0000	0.0000	0.0000	0.0002	0.0000
0.0002	0.0001	0.0000	0.0000	0.0000	0.0000	0.0009	0.0000
0.0043	0.0014	0.0000	0.0009	0.0000	0.0000	0.0172	0.0000
0.0231	0.0076	0.0000	0.0046	0.0000	0.0000	0.0928	0.0000
0.061	**0.026**	**0.000**	**0.010**	**0.000**	**0.002**	**0.142**	**0.000**

Styrene	Toluene	Pentachlorophenol	Methanol	Total Hap	CO	Lead	NOx	PM-10 filterable + condensables	PM-2.5 filterable + condensables	PM filterable + condensables
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	0.0001	0.0000	0.0000	0.0024	2.4462	0.0000	2.9122	0.2213	0.2213	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	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	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0197	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.1067	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0187	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0024	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0004	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	0.0005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0001	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	0.0123	1.2264
0.0000	0.0000	0.0000	0.0000	0.2299	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	0.1159	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0587	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0469	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0105	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0024	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.0084	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.1637	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000	0.8816	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
0.000	**0.000**	**0.000**	**0.000**	**1.669**	**2.446**	**0.000**	**2.912**	**0.835**	**0.234**	**1.448**

January	1
February	2
March	3
April	4
May	5
June	6
September	9
October	10

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Exhibit 3

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