

**INTEGRATED CONTINGENCY PLAN
KOPPERS INC. GRENADA WOOD TREATING FACILITY
TIE PLANT, MISSISSIPPI**

Prepared for:
**KOPPERS INC.
436 SEVENTH AVENUE
PITTSBURGH, PENNSYLVANIA 15219**

MARCH 2008



KU Resources, Inc.

ENVIRONMENTAL MANAGEMENT - SITE DEVELOPMENT ENGINEERING

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TABLE OF CONTENTS

INTRODUCTION..... 1

EMERGENCY RESPONSE ACTION PLAN 4

 Section 1 – Facility Response Team/Qualified Individual Information 4

 Section 2 – Emergency Notification Phone List..... 4

 Section 3 – Environmental Incident Report Form 5

 Section 4 – Response Equipment List and Location – See Emergency Equipment Locations
 Figure 3 5

 Section 5 – Evacuation Plan 5

 Section 6 – Immediate Actions..... 5

 Section 7 – Facility Diagram..... 6

1.0 ANNEX 1: FACILITY LOCATION, DESCRIPTION, AND LAYOUT 9

 1.1 Location 9

 1.2 Facility Configuration 9

 1.3 Surface Water Drainage 9

 1.3.1 *Treated Process Wastewater Effluent – Discharge to POTW* 9

 1.4 Oil and Hazardous Material Inventory 9

 1.4.1 *Significant Materials Tanks and Container Storage Table*..... 9

 1.4.2 *Exposed Materials* 10

 1.5 Layout and Potential Pollutant Sources..... 11

 1.5.1 *Treating Cylinders Area* 11

 1.5.2 *Tank Farm Area*..... 11

 1.5.3 *Tank Car and Truck Unloading Area* 12

 1.5.4 *Fuel and Lubricating Oil Areas* 12

 1.5.5 *Oil/Water Separator Area* 12

 1.5.6 *Biological Wastewater Treatment Area* 13

 1.5.7 *Drip Pad* 13

 1.5.8 *Hazardous Waste Storage Areas* 13

 1.5.9 *Boiler Fuel Area* 13

 1.5.10 *Closed RCRA Surface Impoundments* 14

 1.5.11 *Radioactive Material* 14

 1.6 Record of Past Spills 14

 1.7 Non-Storm water Discharges and Illicit Connections..... 14

 1.8 Underground Pipes 14

2.0 ANNEX 2: NOTIFICATION REQUIREMENTS..... 15

 2.1 Emergency Coordinators 15

 2.2 Emergency Agencies/Contacts 15

3.0 ANNEX 3: EMERGENCY RESPONSE MANAGEMENT SYSTEM..... 19

 3.1 Description 19

 3.2 Emergency Contacts/Coordinators/Requirements 19

 3.3 Emergency Coordination 19

 3.4 Immediate Response 19

 3.5 Response Procedures 19

3.5.1	Emergency Notifications	21
3.6	Available Equipment	22
3.7	Emergency Response Contract Services	22
3.8	Fire and Disaster Response Plans	23
3.8.1	<i>Fire or Explosion</i>	23
3.8.2	<i>Earthquake, Tornado, or Other Disasters</i>	25
3.8.3	<i>Strike or Civil Strife</i>	25
3.8.4	<i>Adjacent Industry Emergency</i>	27
3.9	Evacuation	27
3.10	Fire Suppression System	28
3.11	Medical Emergency	28
4.0	ANNEX 4: DOCUMENTATION	29
4.1	Emergency Incident Documentation	29
4.1.1	<i>Post-Incident Information to be Gathered</i>	29
4.2	Administrative Records	29
4.3	Preventative and Inspection Records	30
5.0	ANNEX 5: TRAINING	31
6.0	ANNEX 6: PLAN REVIEW AND MODIFICATION PROCESS	33
6.1	Plan Distribution, Review, and Modification	33
6.2	Log of Changes to the Plan	34
7.0	ANNEX 7: PREVENTION	35
7.1	Spill Prevention Control and Countermeasures	35
7.1.1	<i>General Compliance</i>	35
7.1.2	<i>Fault Analysis</i>	35
7.1.3	<i>Containment and Diversionary Structures</i>	36
7.1.4	<i>Adequacy of Plan</i>	36
7.1.5	<i>Inspections, Tests, Records</i>	37
7.1.6	<i>Security</i>	38
7.1.7	<i>Tank Car and Tank Truck Unloading</i>	39
7.1.8	<i>Brittle Fracture Evaluation</i>	39
7.1.9	<i>Bulk Storage Containers</i>	39
7.1.10	<i>Transfer Operations, Pumping, Facility Operations</i>	39
7.2	Storm Water Pollution Prevention	39
7.2.1	<i>Pollution Prevention Team</i>	40
7.2.2	<i>Risk Identification and Summary of Potential Pollutant Sources</i>	40
7.2.3	<i>Measures and Controls</i>	42
7.2.4	<i>Visual Site Inspections</i>	45
7.2.5	<i>Best Management Practices for EPCRA Section 313 Chemicals</i>	46
7.2.6	<i>Monitoring and Reporting Requirements</i>	46
7.2.7	<i>Management Practices Plan for Area Source NESHAP</i>	48
7.2.7.1	<i>Application of Preservative</i>	48
7.2.7.2	<i>Management of Treated Wood</i>	49
7.2.7.3	<i>Releases</i>	49
7.2.7.4	<i>Corrective Action</i>	49
7.2.7.5	<i>Notification of Applicability and Compliance Status</i>	49
7.2.7.6	<i>Maintenance Requirements</i>	49

8.0	ANNEX 8: REGULATORY COMPLIANCE AND CERTIFICATION	50
	REQUIRED CERTIFICATIONS, APPROVALS, AND REVIEW	55

TABLE

Table 1	Significant Stored Materials
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FIGURES

Figure 1	Facility Location Map
Figure 2	Facility Layout
Figure 3	Surface Water Drainage Patterns/Areas
Figure 4	Detailed Facility Areas Layout
Figure 5	Exposed Materials
Figure 6	Emergency Equipment Locations

APPENDICES

Appendix A	Environmental Incident Report
Appendix B	Inspection Forms

INTRODUCTION

PLAN ORGANIZATION

This Integrated Contingency Plan (Plan) provides information and plans for preventing and responding to potential spills, accidents, fires, and other emergency incidents that require pre-planned preventative and response measures. This Plan contains practices implemented at the facility to minimize the potential occurrence of such incidents, and control measures that will be implemented in the event such an incident actually occurs. This Plan serves as a functional tool for training, responding to emergency situations, and implementing pollution prevention activities.

This Plan is organized into three main sections and contains information generally consistent with the National Response Team's Integrated Contingency Plan Guidance. The first section, *Introduction*, contains information regarding the general facility that is common to the requirements of 40 CFR Part 112 (SPCC Plan), 40 CFR Part 265, Subparts C and D (RCRA Contingency Plan and Emergency Procedures), 40 CFR Part 370.25 (EPCRA Inventory Reporting), the Oil Pollution Act of 1990 including substantial harm certification, requirements of the State Storm Water Wood Treater General Permit (provisions for a Storm Water Pollution Prevention Plan), and provisions required under the Mississippi Water Pollution Control Permit To Operate A Waste Disposal System (specifically spill prevention and best management plans).

The second section, the *Emergency Response Action Plan*, contains key information that is integrated into a concise format for response actions required under the above regulatory programs. This section, which is printed on colored paper, can be easily identified as a tool for use in emergency situations.

The third and final section includes eight supplemental *Annexes*, which provide additional information unique to the various regulatory programs described previously. The Annexes include:

Annex 1	Facility Location, Description, and Layout
Annex 2	Notification Requirements
Annex 3	Emergency Response Management System
Annex 4	Incident Documentation
Annex 5	Training
Annex 6	Plan Review and Modification Process
Annex 7	Prevention
Annex 8	Regulatory Compliance and Certification

In addition, supplemental information that is referenced in various sections of the Plan is provided in appendices.

PLAN REGULATORY COMPONENTS

This Plan addresses shared contingency planning and emergency response actions required for the facility under the following regulatory programs:

- Resources Conservation and Recovery Act (RCRA);
- SPCC Plan and Stormwater Pollution Prevention Plan (SWPPP) of the Clean Water Act;
- The inventory reporting requirements of the Emergency Planning and Community Right-to-Know Act (SARA Title III);
- Oil Pollution Act of 1990;
- National Pollutant Discharge Elimination System (NPDES) (direct and indirect discharge permits);
- National Emission Standards for Hazardous Air Pollutants (NESHAPS), Wood Preserving Area Sources; and
- Occupational Safety and Health Administration (OSHA), Emergency Action Plan and Fire Prevention Plan.

FACILITY OPERATIONS

The Koppers Inc. Grenada facility (facility) produces pressure treated wood products. Creosote coal tar solution and pentachlorophenol in oil are used as the preservatives.

FACILITY INFORMATION

The facility is located in the unincorporated town of Tie Plant, Mississippi, in Grenada County approximately one-half mile east of U.S. Highway 51 South on Koppers Drive. The approximate USGS location is West 89° 47' 19" longitude and North 33° 44' 04" latitude. A facility Location Map is provided as Figure 1, and the facility layout is provided as Figure 2.

Business Name:	Koppers Incorporated
Business Phone:	(662) 226-4584
Business Fax:	(662) 226-4588
Owner:	Koppers Inc. 436 Seventh Avenue Pittsburgh, PA 15219
Operator:	Same as owner
SIC Code:	2491
U.S. EPA ID Number:	MSD 007 027 543
Facility Address:	1 Koppers Drive Tie Plant, Mississippi 38960
Type of Business:	Wood Preservative Treatment

FACILITY CONTACTS

The Facility Manager is the primary facility contact responsible for maintenance of this Plan and assuring its implementation, as required. The Facility Manager (Facility Contacts listed in Annex 2, Section 2.1 and Section 1 of the Emergency Response Action Plan) can be contacted during normal daytime work hours at the business phone number provided previously. In the event of an emergency, the Facility Manager will also serve as the Primary Emergency Coordinator for implementation of this Plan beyond the initial response stages, and is to be contacted immediately or at the earliest possible time. If the Facility Manager is not available, a sequence of other facility representatives listed in Annex 2 are to be called in the order listed, until a representative on the list is contacted. The Primary Emergency Coordinator and alternates have complete authority to commit all necessary resources of the company in the event of an emergency.

RELATIONSHIP TO RCRA UNIT

A former series of surface impoundments were present in the east central portion of the facility, which were formerly used as a part of the wastewater treatment facilities (see Figure 2). These former surface impoundments were closed under RCRA as a landfill. Consequently, as a disposal facility, this RCRA landfill is also subject to Contingency Planning requirements of RCRA. The responsibility for the closed RCRA surface impoundments lies with Beazer East Inc. (Beazer), as required by the Hazardous Waste Management Post-Closure Permit. It should be noted that the closed RCRA surface impoundments are a relatively small, fenced, vegetated area where no activities are being conducted. Consequently, the likelihood of a circumstance requiring emergency response is limited.

EMERGENCY CONTACTS CAN BE FOUND IN THE EMERGENCY RESPONSE ACTION PLAN AND SECTION 2.1 OF ANNEX 2 OF THIS PLAN.

EMERGENCY RESPONSE ACTION PLAN
Koppers Inc. Wood Treating Facility, Grenada, Mississippi

This Emergency Response Action Plan is provided as a quick reference for trained personnel in the event of an actual emergency, to provide easy access to a summary of critical information.

Section 1 – Facility Response Team/Qualified Individual Information

EMERGENCY COORDINATORS

Name/Address	Title	Home/Cell Phones	Facility Phone
Vance Haskin 232 Robin Road Grenada, MS 38901	Plant Manager	H: 501-786-1155 C: 662-614-6881	(662) 226-4584
Marcus Smith 2249 Perry Road Grenada, MS 38901	Assistant Plant Manager	H: 662-226-5441 C: 662-417-3271	
Kevin Coker 906 Sleepy Hollow Cove Oxford, MS 38655	SH&E Supervisor	H: 662-513-4148 C: 662-417-4308	
John Cummings Route 1 Box 127B Grenada, MS 38901	Maintenance Supervisor	H: 662-237-9545 C: 662-417-6184	

Section 2 – Emergency Notification Phone List

EMERGENCY NOTIFICATION/RESPONSE PHONE LIST

Emergency Assistance Agency/Person	Phone
Police, Fire, Medical	911
Ambulance	911
Fire	911
Grenada Lake Medical Center*	Emergency 911, Hospital 662-227-7000
Local Emergency Planning Committee (LEPC)	(662) 226-1076
National Response Center	(800) 424-8802
Mississippi DEQ	(800) 222-6362
OSHA (Jackson, MS)	(662) 965-4606
U.S. EPA Region IV	(800) 241-1754 / 404-562-9900
City of Grenada POTW	(662) 227-3418
Shaw Environmental & Infrastructure	(800) 537-9540
Koppers Management	Joyce Fankulewski: W (412) 2272114; C (412)327-1487 Leslie Hyde: W (412) 227-2237; C (412) 398-1305 Michael Juba: W (412) 227-2882; C (412) 897-8407 Steve Lish: W (412) 227-2428; C (412) 335-1359

*Directions to Grenada Lake Medical Center (960 DR FS Aventura Drive, Grenada):

- Turn RIGHT onto US-51, proceed 2.4 miles
- Turn LEFT onto West Monroe Street, proceed 0.4 miles
- Turn LEFT onto DR FS Hill Drive, proceed 0.1 miles
- DR FS Hill Drive becomes DR JK Aventura Drive, proceed 0.1 miles to Hospital.

Section 3 – Environmental Incident Report Form

The attachment to this Emergency Response Action Plan, Form K-Form-SHE-008, Environmental Incident Report shall be used.

Section 4 – Response Equipment List and Location – See Emergency Equipment Locations Figure 3

Response Equipment

Equipment	Location
Lift Trucks (5)	Adjacent to Old Shop
Hydraulic loaders (4)	Adjacent to Old Shop
Dump Truck (1)	Adjacent to Tie Unloader
Grader (1)	Adjacent to Old Shop
Pickup Truck (2)	Shop/Office
Portable pumps (2)	Spill Kit-Drum House & Treating Building
Sand (3 piles)	North of Outfall 008, North of Outfall 003, and by Outfall 004
Sawdust Absorbent	Boiler House Wood Dust Pile
Portable Steam Cleaner (1)	Maintenance Department
Spill Response Equipment (1)	Spill Response Equipment-Drum House

Section 5 – Evacuation Plan

- Need for evacuation signaled over the radio to all supervisors and/or sounding of a siren.
- Supervisors notify their employees.
- Contractors follow safety path to Main Office.
- Employees follow safest path to meet and check in at the:

Service Building

- Supervisors account for all of their employees.
- Supervisors notify main office when "All Clear."
- Main Office to verify status of visitors and contractors based on attendance register.
- Alternate location designated and announced at the time of the incident if Service Building not a safe check.
- Decision to evacuate any surrounding local community areas shall be made by the local emergency response agency, and Koppers personnel shall assist by providing information to the agency and by providing any manpower or equipment the agency may request.

Section 6 – Immediate Actions

- Simple action to control the situation by shutting a valve to stop the flow from a ruptured pipe, and such action can be done safely, then the control action should be completed first.

- Provide first aid if injury has occurred.
- If there is no simple, safe control action or after taking such action, then immediately notify the Emergency Coordinator and any other personnel who may be endangered by the situation by phone or radio.

Upon discovery or notification that an emergency exists, the Emergency Coordinator shall:

- Determine the extent of the emergency,
- Implement facility evacuation, if needed, to prevent injury,
- Call for outside assistance as needed,
- Initiate immediate control actions,
- Implement cleanup or other responses,
- Notify local, state, and federal agencies as required,
- Notify Koppers Pittsburgh office,
- Initiate notifications per the Environmental Management Information System (EMIS) guidelines,
- Assure completion of cleanup,
- Provide for storage of cleanup material, including hazardous waste,
- Evaluate possible hazards to human health or environment, and
- Make a final written incident report.

Section 7 – Facility Diagram

See the attached Facility Diagram. Note that the attached Facility Diagram is a separate copy of Figure 2 of the Integrated Contingency Plan, for use as part of this Emergency Response Action Plan.

ENVIRONMENTAL INCIDENT REPORT FORM

APPENDIX D INCIDENT INVESTIGATION FORM

Facility:

SECTION 1: GENERAL INFORMATION

Note: Immediately make notifications to NRC, State, Local and Koppers (as applicable)

Type of Incident (check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Reportable release | <input type="checkbox"/> Injury / Illness |
| <input type="checkbox"/> Non-reportable release | <input type="checkbox"/> Near Miss |
| <input type="checkbox"/> Transportation related release | <input type="checkbox"/> Complaints of any kind (e.g. dust, odor, noise, etc) |
| <input type="checkbox"/> Permit limit exceedance (air/water) or permit / regulatory violation (explain below) | <input type="checkbox"/> Enforcement Notification (e.g. Notice of Violation/Letter of Noncompliance/ Agency Action, etc.) |
| <input type="checkbox"/> Failure of Pollution Control Equipment | <input type="checkbox"/> Other (Explain below) |

Location of Incident:

Date and time of Incident:

Description of Incident (include specifics of incident and incident sequence):

SH&E
Incident Investigation & Reporting

Written by: L.S. Hyde
Approved by: S.R. Lacy

SECTION 2: INVESTIGATION

Root Cause Analysis Summary (refer to Appendix E):

SECTION 3: CORRECTIVE / PREVENTIVE ACTION

Corrective / preventive action (describe what has been done or will be done to prevent recurrence):

SECTION 4: AGENCY CONTACT FOLLOWING THIS INCIDENT

Agency contact (Include date, time, name, title, agency and summary of inspection/visit/enforcement action):

SECTION 5: FOR ENVIRONMENTAL INCIDENTS ONLY

Materials Involved:

Material/Constituent	Quantity Released	RQ	Exceeded RQ?	Media Affected (soil, water, air)

Notification Log:

Agency	Phone No.	Date	Time	Name of Contact	Notes

Immediate Containment and Cleanup actions:

Disposition of recovered material:

Material	Quantity	Disposal or Storage Location

Assessment of Actual or potential hazards to human health or the environment:

Photographs: Attach photographs (if available) which show the incident area before, and after response action. Mark date and time of each photo.

Photos:

SPCC: Sign here to indicate that you have reviewed your plant's SPCC Plan and updated it with any required information.

Name:

Date:

SH&E
Incident Investigation & Reporting

Written by: L.S. Hyde
 Approved by: S.R. Lacy

SECTION 6: FOR INJURIES; ILLNESSES AND NEAR MISSES ONLY

Personal Data:

Name of Injured Employee	Social Security Number	Sex	Age	Substance Abuse Test Administered
				() Y () N

Department	Employee's Usual Occupation	Occupation at Time of Accident	Supervisor

Employment Category	Length of Employment	Time in Occupation at Time of Accident
<input type="checkbox"/> Regular, Full Time <input type="checkbox"/> Non-employee <input type="checkbox"/> Regular, Part Time <input type="checkbox"/> Seasonal <input type="checkbox"/> Temporary	<input type="checkbox"/> < 1 month <input type="checkbox"/> 6 months to 5 yrs <input type="checkbox"/> 1-5 months <input type="checkbox"/> more than 5 yrs	<input type="checkbox"/> < 1 month <input type="checkbox"/> 6 months to 5 yrs <input type="checkbox"/> 1-5 months <input type="checkbox"/> more than 5 yrs

Phase of Employee's Workday at Time of Accident

<input type="checkbox"/> During Rest Period	<input type="checkbox"/> Entering or Leaving Facility	<input type="checkbox"/> During Meal Period	<input type="checkbox"/> Performing Work Duties	<input type="checkbox"/> Working Overtime
<input type="checkbox"/> Other, explain: _____				

Incident Details:

Nature of Injury and Body Part
Names of Others Injured in Same Incident
Witnesses

Policy



Koppers Inc.
Scope: US, KA, KE
Document No.: K-SHE-008
Revision No.: 3
Effective Date: 1/15/07
Page 14 of 22

SH&E Incident Investigation & Reporting

Written by: L.S. Hyde
Approved by: S.R. Lacy

Incident Details:

Time of Injury	Severity of Injury		
<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> Report Only	<input type="checkbox"/> OSHA Recordable (Injury)	<input type="checkbox"/> Days Away
Time within shift:	<input type="checkbox"/> First Aid	<input type="checkbox"/> OSHA Recordable (Illness)	<input type="checkbox"/> Fatality
Type of Shift:	<input type="checkbox"/> Medical Treatment Only	<input type="checkbox"/> Restricted	<input type="checkbox"/> Other, specify

Task and Activity at Time of Accident	Supervision at Time of Accident	
General type of task:	<input type="checkbox"/> Directly Supervised	<input type="checkbox"/> Supervision not feasible
Specific activity:	<input type="checkbox"/> Indirectly Supervised	<input type="checkbox"/> Other, specify
Employee was working	<input type="checkbox"/> Not Supervised	
<input type="checkbox"/> Alone	<input type="checkbox"/> With crew or fellow worker	

SECTION 7: SIGNATURES

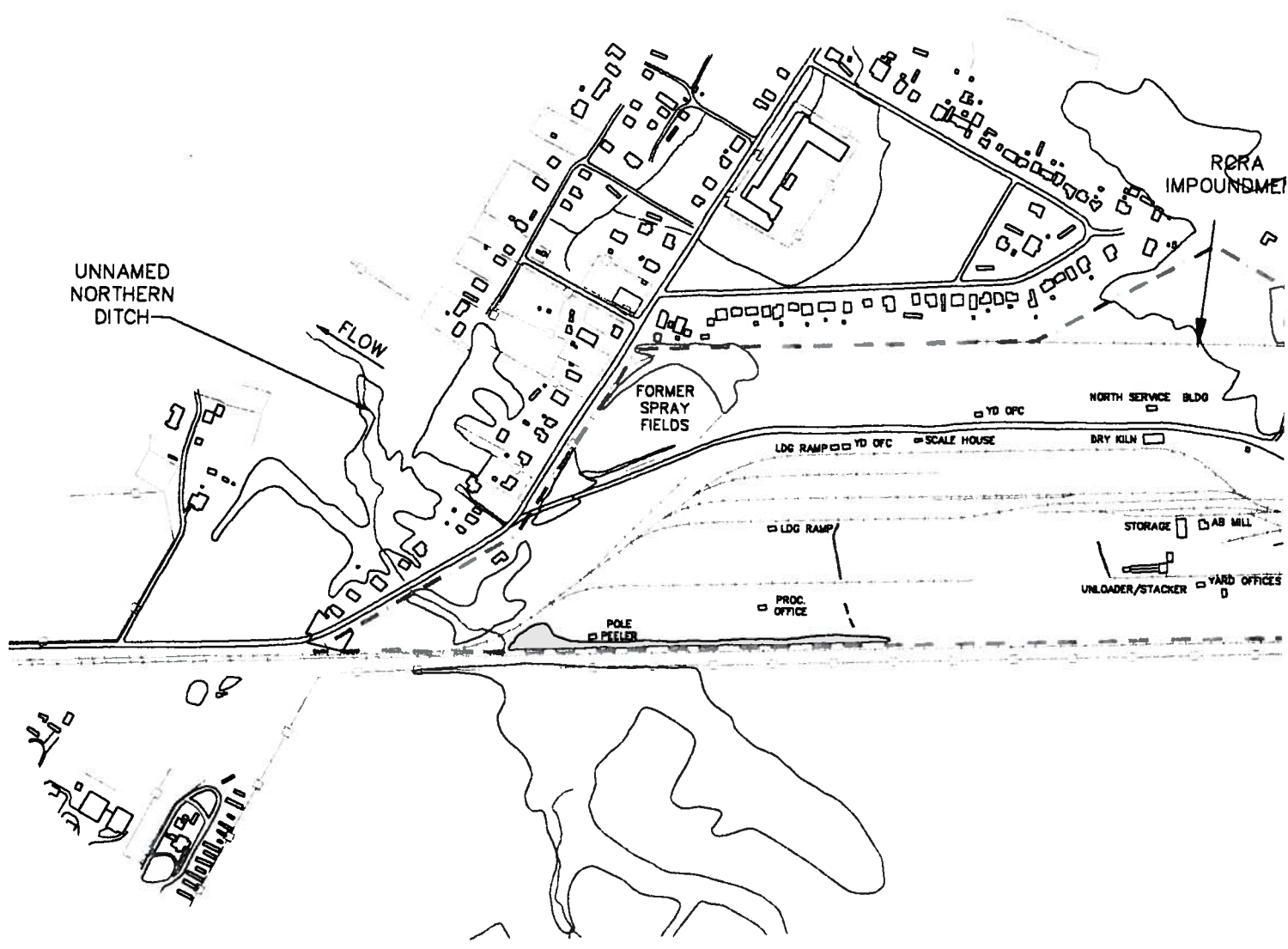
Preparer	Reviewer
Report Prepared By:	Report Approved By:
Title:	Title:
Department:	Date:
Date Investigation Complete:	
Corrective Actions Implemented? () Y () N	
Date Corrective Action Complete:	

ENTER INVESTIGATION DATA IN EMIS

Notes:

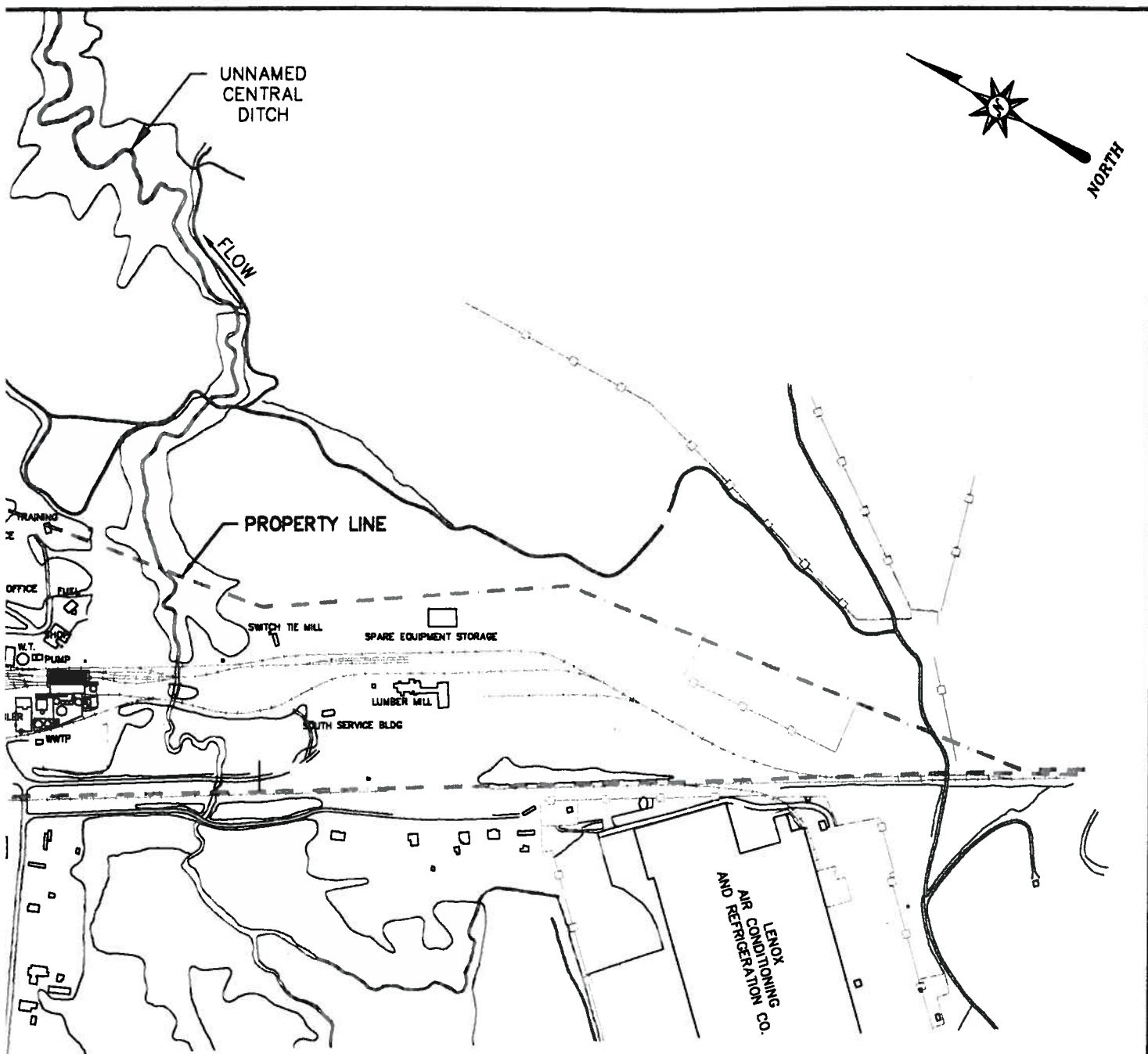
1. The use of this form is optional. Incident investigation details will be entered into EMIS. This form is for the investigator's use only.
2. Environmental incidents – complete sections 1, 2, 3, 4, 5 & 7
3. Safety incidents – complete sections 1, 2, 3, 4, 6 & 7


FACILITY DIAGRAM



LEGEND

- ROADWAYS
- - - - - APPROXIMATE PROPERTY
- RAIL
- DRAINAGE DITCHES
- STREAM/WATERWAYS
- — □ — □ — FENCE



REVISION	DATE	DESCRIPTION
FIGURE 2 FACILITY LAYOUT		
GRENADA FACILITY KOPPERS INC.		
PREPARED FOR KOPPERS INC. PITTSBURGH, PENNSYLVANIA		
APPROVED	XXX MM/DD/YYYY	 KU RESOURCES, INC. 22 SOUTH LINDEN STREET DUQUESNE, PA 15110 (412) 468-8331 FAX: (412) 468-8388 www.kuresources.com
CHECKED	XXX MM/DD/YYYY	
DRAWN	RLB 02/07/2007	
PROJECT NO.	KL06054GRIC.P	
DRAWING NUMBER		
06054B002		

1.0 ANNEX 1: FACILITY LOCATION, DESCRIPTION, and LAYOUT

1.1 Location

The facility is located in the unincorporated town of Tie Plant, Mississippi, in Grenada County approximately one-half mile east of U.S. Highway 51 South on Koppers Drive. The approximate USGS location is West 89° 47' 13" longitude and North 33° 44' 15" latitude. A Facility Location Map is provided as Figure 1.

1.2 Facility Configuration

Figure 2 provides a Facility Layout showing the property boundaries and facility configuration, including the main operating areas at the facility.

1.3 Surface Water Drainage

Surface water drainage patterns and areas for the facility are shown on Figure 3. The facility drains to nine outfalls which eventually drain toward the Batapan Bogue Creek, and then to the Yalabusha River. Eight of the nine outfalls discharge into one of three drainage ditches prior to draining to the Batapan Bogue Creek. These three tributaries are referred to as the "Central Ditch", the "Northern Ditch", and the eastern drainage pipe through the residential area. The Central Ditch, which collects water from Outfalls 002, 003, 004, 008, and 009, runs through the central portion of the plant property, approximately 100 feet to the south of the tank farm. The Northern Ditch, which collects water from Outfall 007, runs tangent to the northern tip of the plant property, approximately 150 yards north of the peeling operation. The eastern drainage pipe through the residential area collects water from Outfall 006 at the northern portion of the facility. Outfall 005 drains through a vegetated area to the east of the facility. Outfall 001, collecting runoff from the southern portion of the site, drains to an unnamed tributary which eventually leads to the Batapan Bogue Creek.

1.3.1 Treated Process Wastewater Effluent – Discharge to POTW

Process wastewater, including wastewater from drip pads, secondary containment structures, and wood treating processes, is treated in the on-site wastewater treatment system and discharged under permit to the Grenada POTW. The process wastewater treatment system is located within secondary containment, including the initial stages when the oil/water ratio is highest.

1.4 Oil and Hazardous Material Inventory

The wood preservatives used at the facility are creosote and pentachlorophenol. The oil and hazardous and non-hazardous materials that are stored at the facility in tanks and containers are listed by tank or container on Table 1. The locations of the tanks and containers are shown on Figure 4.

1.4.1 Significant Materials Tanks and Container Storage Table

The Material Safety Data Sheets (MSDS) that are required to be maintained at the facility are available for inspection in the Main Office. The facility uses various ancillary chemicals in its operation, including lubricants, hydraulic oil, boiler chemicals, quality control chemicals, cleaning agents, etc. Accidental

release of these ancillary materials does not constitute an environmental threat or endanger public health and safety, since any spills or leaks would be small and/or would be collected and contained proximal to the storage or use area(s).

The focus of industrial activity and material storage consists of the creosote and pentachlorophenol treating solution and process used to pressure treat railroad ties and timbers. These materials, due to their chemical composition, quantity, or storage practices, could constitute a material threat of a release and potential for environmental threat or endanger public health and safety. In addition, bulk storage (>55 gallons) of chemicals or oils may also pose a threat. These areas and materials are listed on Table 1.

1.4.2 Exposed Materials

Significant materials stored at the facility which are exposed to rainfall include untreated and treated wood, untreated wood waste fuel for the boiler, and general yard waste materials (wood debris, culls, metal banding, and municipal trash). Typical inventory volumes of these materials kept at the facility at any given time include the following:

• Untreated ties	260,000 pieces (pcs)
• Creosote-treated ties	105,500 pcs
• Barky poles	2,000 pcs
• Untreated poles	5,000 pcs
• Pentachlorophenol-treated poles	7,675 pcs
• Creosote-treated poles and pilings	1,350 pcs
• Untreated switch ties	500 pcs
• Creosote-treated switch ties	3,800 pcs
• Untreated lumber	500 pcs
• Creosote-treated lumber	3,850 pcs
• General yard waste	5 bins
• Boiler fuel, peeler shavings, untreated wood	80 tons

The typical location of these exposed materials is shown on Figure 5.

Pollutants that may potentially be detected in storm water and their potential sources are described as follows.

- Wood preservative constituents. Wood treating operations have been conducted on the property since the early 1900s. Residual preservative materials may be present due to historical waste disposal practices employed at the facility and former wood preserving practices. The facility is currently undergoing remediation under RCRA corrective action. Other potential sources of pollutants in storm water include storm water runoff from treated wood in storage on the yard.

- Fuel, lubricating, and hydraulic oils. These materials are used in mobile equipment, including trucks and equipment to convey materials, and fixed manufacturing equipment. Drips, leaks, or spills on the yard areas could cause oil or constituents of oil to enter storm water runoff.
- Organic material, generally from raw wood material brought to the facility. These materials may enter runoff from the stacks of untreated wood and the boiler fuel storage area.

Practices to control the potential for storm water impacts are discussed in Annex 7.

1.5 Layout and Potential Pollutant Sources

The wood treating process consists of five treating cylinders. The treating cylinders have associated work tanks/storage tanks, vacuum pumps, combined wastewater treatment system, vent collection and condensate tanks, unloading station, and oil/water separation. This equipment is within concrete containment with the exception of a line from the cooling tower to the condenser, which contains non-contact cooling water. The full facility layout is presented on Figure 2 and the detailed facility areas layout is presented on Figure 4. Refer to Table 1 for a presentation of containment, overfill and overflow methods, storm water exposure, and controls for the tanks and containers in each area. The main potential pollutant source areas are discussed in the following subsections.

1.5.1 Treating Cylinders Area

The treating cylinders area consists of five treating cylinders located in one common concrete containment area. Treating cylinders #1 and #5 are used for pentachlorophenol in oil wood treating. Treating cylinders #2, #3, and #4 are used for creosote wood treating. The largest treating cylinder capacity is 36,000 gallons. The concrete containment capacity of this cylinder basement area is of sufficient capacity to contain the volume of the largest treating cylinder. The treating cylinders are under a roof and any incidental rainwater which is collected in the containment is pumped to the wastewater treatment system.

The secondary containment in this area is constructed of concrete, that can contain any expected spill from the treating cylinders, and freeboard from precipitation in this area and allow it to be recovered back to the process. A shield has been placed on the outward side of the cylinders, where a door leak could otherwise cause preservative to spray outside of the containment. In addition, treating operators monitor the cylinder door area via a video camera and monitor screen in the treating control room.

1.5.2 Tank Farm Area

The tank farm area consists of process tanks, storage tanks, work tanks, and wastewater tanks located in one common concrete containment area. The largest tank capacity is ~303,300 gallons. The concrete containment capacity of the tank farm area is of sufficient capacity to contain the volume of the largest tank plus sufficient freeboard for precipitation. Any rainwater which is collected in the containment is pumped to the wastewater treatment system.

The secondary containment in this area is constructed of concrete, that can contain any expected spill in this area, plus freeboard and allow the spilled material to be recovered back to the process. Various electronic and manual gauges, process controls, and visual observations allow the operator to continuously monitor tank levels. The containment area was designed with a collection sump and pump to remove spilled material/storm water and transfer the spilled material into the wastewater treatment process/tanks. Several tanks are elevated to allow for inspection of leaks.

1.5.3 Tank Car and Truck Unloading Area

Trucks and tank cars are unloaded at two separate unloading stations, which are concrete lined for spill containment. All transfer pipelines are above ground and within containment limits. Any rainwater which is collected in the containments is pumped to the wastewater treatment system. All material transfers are attended at all times, and monitored by the pumper and a gauger and/or monitored through the use of operational controls.

The appropriate signage and a derail are employed per DOT regulations when tank cars are connected to the transfer piping. The average tank car capacity is approximately 18,000 gallons and the approximate containment capacity at the tank car unloading station is approximately 12,528 gallons. The tank car secondary containment has capacity to collect drips and small spills up to the listed capacity. In addition, a large spill would be managed via a quick drain system installed to direct overflow to the tank farm pentachlorophenol mixing area, which has capacity well exceeding a full tank car.

1.5.4 Fuel and Lubricating Oil Areas

Gasoline and diesel fuel are delivered by tank truck and transferred into storage tanks that are within containment that is sufficient to contain a spill from the largest tank. The manual drain valve for the secondary containment in this area is kept closed at all times.

Lubricating oil is delivered and stored in a building in 55-gallon drums stored in the oil house. A concrete curb is located at the entrance to the oil house. If a spill or leak occurred in the oil house, the curb provides sufficient containment to prevent a release. All drums are stored upright or on drum racks and remain sealed or with valves closed. In addition, Tanks 38 and 39 are used to store hydraulic oil. These tanks are located within full secondary containment inside a building. Dispensing areas are kept clean, any oil drippage is contained, and any minor spills are cleaned up.

1.5.5 Oil/Water Separator Area

The oil/water separators consist of one reinforced concrete tank and a second aboveground steel tank. The pH adjustment and coagulant and flocculent addition and mixing occur in an adjacent aboveground steel tank. These tanks are equipped with high-level switches which sound alarms in the control room and shut off inflowing wastewater. Facility operators are instructed in proper response to high-level alarms.

The acid and caustic solutions are stored in drums in the chemical building and are used in a wastewater treatment step immediately following the oil/water separators. These chemicals are delivered in 55-gallon

drums. The drums are within the containment of the building. Any spill of acids or caustics that occur would be collected and neutralized.

1.5.6 Biological Wastewater Treatment Area

The activated sludge aeration tank, clarifier, and final effluent tank are located in a concrete secondary containment area. Wastewater from the oil/water separator is transferred to the extended aeration treatment system via an above ground pipe. As a pollution prevention measure, this pipe line is protected by being installed in the trough of an I-beam which spans over the road separating the two areas and extends into the containment of each area. A second larger pipe is also welded over the top of the pipe to offer additional protection.

1.5.7 Drip Pad

A concrete surface sealed/coated drip pad is used to provide containment for the treating solution and recover any drippage that may occur from freshly treated wood, plus collect any storm water that falls onto the pad. Water and drippage collected from the drip pad and associated collection sumps is eventually pumped to the wastewater tanks. The wastewater is piped in series from the surge tanks to the chemical mix/treatment tank, oil/waste separator, and the biological wastewater treatment system.

1.5.8 Hazardous Waste Storage Areas

A hazardous waste storage building is used for the storage of hazardous waste in containers for less than 90 days. Since the wastes are stored for less than 90 days, the facility is not considered a storage or disposal facility and is excluded from the permitting requirements and certain RCRA regulations. The hazardous waste stored in the building is from the facility operations and maintenance activities. All of the stored wastes are compatible with each other and their containers and are not reactive, explosive or corrosive. The building has a concrete floor and berm and is fully contained within a steel building. Spills or leaks may occur when the waste containers are being moved into or out of the building. Waste containers are only to be moved with the lids securely attached and only DOT-approved containers in good condition are used.

The facility also stores a small amount of hazardous waste at strategically located satellite accumulation areas at and near the point of its original generation within the facility, in accordance with the applicable regulations. Three satellite hazardous waste accumulation areas are utilized at the facility: one is located outside the north treating room door, one is located outside the south treating room door near Tank 23, and another is located on the maintenance work pad. The hazardous waste storage areas are concrete pads with curbing to prevent a release in the event a drum leaked or spilled.

1.5.9 Boiler Fuel Area

The facility boiler is permitted to burn untreated wood fuel. Wood fuel is stored on site near the boiler. The facility utilizes only untreated wood for boiler fuel that is delivered or generated at the facility. The pile of wood fuel is partially covered. Only the portion of the pile which is being accessed by equipment is exposed. The nearest storm water grate is modified to prevent wood fuel from entering the storm water ditches.

1.5.10 Closed RCRA Surface Impoundments

The former owners of the facility maintained and operated surface impoundments for wastewater treatment that were located in the east-central portion of the facility. The impoundments were closed as a RCRA hazardous waste landfill and are now under post-closure care. All hazardous wastes were removed from the impoundments during closure. However, since clean closure was not accomplished, post-closure care monitoring is required. The impoundment has been capped and is located within a security fence. Weekly inspections and monitoring are conducted by the prior facility owner in accordance with a Post-Closure Care Plan.

1.5.11 Radioactive Material

One source of radioactive material is present on site located in the Treating Department (quality lab). This source (OSAMA X-ray) is licensed to Spectro Analytical. In the event of fire, explosion, acts of God, or any other situation that would cause damage to or displacement of the OSOMA, proper notification shall be made to Spectro Analytical (1-830-798-8786). Further, the appropriate notifications shall be made to the Mississippi Department of Environmental Quality (MDEQ).

1.6 Record of Past Spills

Within the last three years, there have not been any spills or leaks that resulted in any remaining site contamination. Copies of all spill reports for spills occurring during or after 1989 (the formation date of KI) are maintained at the plant. These reports address why spills occurred, as well as the required corrective actions necessary to prevent similar events.

1.7 Non-Storm water Discharges and Illicit Connections

All process water is collected and pretreated on site before being discharged to the POTW. Process water includes wood water from boultonizing, preserving process condensate, vacuum seal water, rain and wash water collected within process contaminants, boiler and cooling tower blow down, and vehicle and equipment wash water. All storm water collected on the process concrete secondary containment areas, including the subpart W drip pad are pretreated on site and discharged to the POTW. There is no contribution from these areas to the facility's storm water runoff. Process piping has been traced to assure that there are no illicit discharges to storm water ditches. Surface drainages have been inspected by members of the Pollution Prevention Team for flow during dry weather. No dry weather flows were occurring. As a part of the regularly scheduled inspections discussed in Section 7.1.5, this certification of non-storm water discharges is re-assessed and certified by signature on the inspection forms.

1.8 Underground Pipes

As a part of the wastewater treatment system, underground single-walled pipes run from the drip pad sumps to the wastewater treatment system. An underground pipe runs from the work pad by the shop to the treating cylinder basement area. Water collected on this pad is pumped to the cylinder basement area where it is eventually treated at the on-site wastewater treatment system. All pipe systems are regularly inspected. Underground lines are depicted on Figure 4.

2.0 ANNEX 2: NOTIFICATION REQUIREMENTS

2.1 Emergency Coordinators

The following list provides Emergency Coordinators that should be contacted in the event of an emergency. The Facility Manager is the Primary Emergency Coordinator. An attempt to contact the Facility Manager should be made first. If the Facility Manager cannot be contacted, others on the list should be called in the order listed, until contact is made with someone on the list. The Emergency Coordinator has complete authority to commit all necessary resources of the company in the event of an emergency. The listed personnel can be reached during working hours at the facility telephone number.

During off shifts, holidays, and weekends, the shift foreman or treating operator is the acting Emergency Coordinator until someone from the list is notified. As the Emergency Coordinator, the shift foreman or treating operator will take actions necessary in responding to an emergency including notification of one of the persons on the list below, calling for emergency response services, and mobilizing facility personnel and equipment to respond to the incident. The person contacted by the shift foreman or treating operator will assume responsibility as the Emergency Coordinator upon arrival at the facility.

Name/Address	Title	Home/Cell Phones	Facility Phone
Vance Haskin 232 Robin Road Grenada, MS 38901	Plant Manager	H: 501-786-1155 C: 662-614-6881	(662) 226-4584
Marcus Smith 2249 Perry Road Grenada, MS 38901	Assistant Plant Manager	H: 662-226-5441 C: 662-417-3271	
Kevin Coker 906 Sleepy Hollow Cove Oxford, MS 38655	SH&E Supervisor	H: 662-513-4148 C: 662-417-4308	
John Cummings Route 1 Box 127B Grenada, MS 38901	Maintenance Supervisor	H: 662-237-9545 C: 662-417-6184	

2.2 Emergency Agencies/Contacts

The appropriate Emergency Assistance Agency(ies) should be contacted if there is any danger to the community, facility personnel are injured, or there is a potential for release of hazardous materials. This information should be recorded on the Environmental Incident Report (see Appendix A) as required by Koppers' Corporate Incident Communication and Reporting Policy (Policy No. K-SHE-014).

1. Contact 911: If help is needed from emergency personnel, 911 should be dialed for emergency services. Once contacted, the caller should be prepared to describe the incident, assistance required such as fire emergency services, ambulance, emergency medical services, evacuation assistance, and/or civil control.
2. Hospital – Grenada Lake Medical Center - 911 - (662) 227-7000: In the case of injured personnel being transported to their facility.

3. Local Emergency Planning Committee (LEPC) (662) 226-1076: If a release or threatened release of hazardous material occurs, the LEPC should be contacted. This contact should be made when it is determined that a release or threatened release poses a significant hazard to human health and safety, property, or the environment AND that it is of a quantity that exceeds the Reportable Quantity (RQ) for the material.

For hazardous materials, RQs are specified by the U.S. EPA. The facility will utilize the MSDSs as a source of determining the RQ for other materials that may be released. The main RQs of interest at the facility are the following:

Material	Reportable Quantity ¹ (gallons)
Coal Tar Creosote/Creosote Solution	0.125
Creosote wastes (F034)	0.1
Pentachlorophenol solution	4 or 10 ²
Pentachlorophenol wastes (F032)	0.1

Notes:

- RQs as listed in Koppers' Environmental Incident Communications & Reporting Policy K-SHE-014.
- Use the lower RQ for concentrated unmixed pentachlorophenol (40%) in diesel and the higher RQ for any mixed pentachlorophenol in oil solution (10% pentachlorophenol or less).

4. National Response Center (NRC) 1-800-424-8802: The NRC should be contacted if ANY of the following criteria are met:
- a. Occurrence of a spill or release which creates a threat to human health, or that is or threatens to migrate beyond the property boundaries.
 - b. Occurrence of a release entering a waterway or resulting in a sheen on/in runoff water entering a waterway.
 - c. Occurrence of a release of hazardous or extremely hazardous material that exceeds the RQ.
 - d. Occurrence or potential occurrence of a release of oils (lubricating and preservative), gasoline, transmission fluids, and/or creosote to navigable waters in amounts that violate an applicable water quality standard or cause a sheen upon or discoloration of the surface water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the water surface.
5. Mississippi Department of Environmental Quality (MDEQ): (800) 222-6362.

The MDEQ should be contacted immediately and not later than *WITHIN 24 HOURS* if any of the following criteria are met and within 15 days submit a written report to the MDEQ:

- a. If the facility Integrated Contingency Plan is implemented, or
- b. If hazardous waste or a hazardous waste unit is involved.

If a spill is large enough to require cleanup action but is not reportable, it is generally a good practice to make a courtesy report to the local agency contact. It shows that we are on top of the problem and provides valuable documentation of our response in the case of a report by a third party.

6. Occupational Safety and Health Administration (OSHA) (662) 965-4606

OSHA should be contacted *WITHIN EIGHT (8) HOURS* if ANY of the following criteria are met:

- a. Injuries result in three (3) or more people being hospitalized for any reason.
- b. Accident resulting in one or more fatality(ies).

7. U.S. Environmental Protection Agency (800) 241-1754

Whenever the facility has discharged more than 1,000 U.S. gallons of oil in a single discharge, or discharged more than 42 U.S. gallons of oil in each of two discharges as described in 40 CFR §112.1(b), occurring within a 12-month period, submit the following information to the Regional Administrator within 60 days from the time the facility becomes subject to 40 CFR 112.4(a):

- a. Name of the facility;
- b. Your name;
- c. Location of the facility;
- d. Maximum oil storage or oil handling capacity of the facility, and normal daily throughput;
- e. Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
- f. An adequate description of the facility, including maps, flow diagrams, and topographical maps, if necessary;
- g. The cause of such discharge as described in §112.1(b) of 40 CFR, including a failure analysis of the system or subsystem in which the failure occurred;
- h. Additional preventative measures you have taken or contemplated to minimize the possibility of recurrence; and
- i. Such other information as the Regional Administrator may reasonably require pertinent to this Plan or the discharge.

8. Koppers Management:

In all cases, Koppers management in Pittsburgh should be contacted in the event of a spill/release. Koppers' Incident Reporting and Communication Policy (K-SHE-014) should be followed in communicating information to management and other agencies. This includes the

preparation of the Environmental Incident Report contained in Appendix A of this Plan. As part of the Policy, at least one of the following contacts is to be notified:

<u>Name, Position</u>	<u>Work Phone</u>	<u>Cell Phone</u>
Joyce Fankulewski, Environmental Mgr.	(412) 227-2114	(412) 327-1487
Leslie Hyde, VP EH&S	(412) 227-2237	(412) 398-1305
Michael Juba, Industrial Hygiene	(412) 227-2882	(412) 897-8407
Steve Lish, Operations Mgr.	(412) 227-2428	(412) 335-1359

SUMMARY OF EMERGENCY NOTIFICATION/RESPONSE PHONE LIST

Emergency Assistance Agency/Person	Phone
Police, Fire, Medical	911
Ambulance	911
Fire	911
Grenada Lake Medical Center*	Emergency 911, Hospital 662-227-7000
Local Emergency Planning Committee (LEPC)	(662) 226-1076
National Response Center	(800) 424-8802
Mississippi DEQ	(800) 222-6362
OSHA (Jackson, MS)	(662) 965-4606
U.S. EPA Region IV	(800) 241-1754 / 404-562-9900
City of Grenada POTW	(662) 227-3418
Shaw Environmental & Infrastructure	(800) 537-9540
Koppers Management	Joyce Fankulewski: W (412) 227-2114; C (412)327-1487 Leslie Hyde: W (412) 227-2237; C (412) 398-1305 Michael Juba: W (412) 227-2882; C (412) 897-8407 Steve Lish: W (412) 227-2428; C (412) 335-1359

3.0 ANNEX 3: EMERGENCY RESPONSE MANAGEMENT SYSTEM

3.1 Description

This Annex describes the actions that are to be taken by Koppers personnel in response to any injury, accident, fire, explosion, other emergency, or an unplanned release of hazardous waste, hazardous material, or oil to the air, soil, or surface water.

3.2 Emergency Contacts/Coordinators/Requirements

The Emergency Coordinators can be found in the Emergency Response Action Plan and Section 2.1 of Annex 2. A full discussion of the emergency contacts, coordinators, and requirements is provided in Annex 2.

3.3 Emergency Coordination

As soon as an emergency situation is discovered by an employee, that person shall promptly estimate the extent of the problem, implement actions to control the situation in a safe manner, and then notify an Emergency Coordinator immediately. Other personnel will respond under the direction of the Emergency Coordinator, as required based on the type of emergency, individual skills, training, and facility responsibilities.

The Emergency Coordinator has the authority to commit Koppers employees, contract labor, and equipment for response actions. The Emergency Coordinator is responsible for the appropriate implementation of this Plan in an emergency.

Effective communication is essential in any situation requiring emergency response. All facility supervisors possess portable two-way radios while on site, which are used for communication and coordination between the facility offices and yard areas. Cellular telephones may also be used for communicating during emergencies. Evaluation of the emergency situation by the Emergency Coordinator may lead to contact with other local emergency agencies.

3.4 Immediate Response

As soon as an employee discovers an emergency situation, he shall quickly determine the extent of the problem. If a simple action can be taken to control the situation by taking action such as shutting a valve to stop the flow from a ruptured pipe, and such action can be done safely, then the control action should be completed first, and facility management should be notified afterward. If there is no simple safe control action that can possibly be implemented, the person shall immediately notify the facility management and any other personnel who may be endangered by the incident by phone or radio.

3.5 Response Procedures

Upon discovery or notification that an emergency exists, the Emergency Coordinator, assisted by the management team, shall:

- Determine the extent of the emergency,
- Initiate immediate control actions,
- Implement cleanup or other responses,
- Notify local, state, and federal agencies as required,
- Implement facility evacuation, if needed, to prevent injury,
- Call for outside assistance, as needed,
- Notify Koppers Pittsburgh office,
- Assure completion of cleanup,
- Provide for temporary storage of cleanup material, including hazardous waste,
- Evaluate possible hazards to human health or environment,
- Provide for the appropriate disposal of cleanup material including hazardous waste, and
- Make a final written incident report.

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator, or his designee, shall:

- Immediately call by radio or phone to notify all facility personnel;
- Immediately notify appropriate federal, state, and/or local agencies with designated response roles if their help is needed; and
- Make other notifications identified in the Emergency Response Core Plan.

Whenever there is a release, fire, explosion, or other emergency situation the Emergency Coordinator shall immediately identify the character, exact source, amount, and area extent of any released materials. This may be done by observation or review of facility records or manifests, MSDSs, and, if necessary, by chemical analysis. The Environmental Incident Report (Appendix A) should be used to document the information needed for notifications.

Concurrently, the Emergency Coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water runoff from water or chemical agents used to control fire and heat-induced explosions).

If the Emergency Coordinator determines that the facility has had a release, fire, or explosion which could threaten human health or the environment outside of the facility, and the assessment reveals that evacuation of local areas may be advisable, appropriate local authorities shall be notified immediately. The Emergency Coordinator shall be available to help appropriate officials decide whether local areas should be evacuated.

During an emergency, the Emergency Coordinator shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous wastes or materials at the facility. These measures could include turning water sprays onto tanks, stopping and

isolating processes, shutting off power to areas, collecting and containing released materials, or moving and isolating other containers.

If some or all operations are stopped in response to an emergency, the Emergency Coordinator shall monitor tanks, pipes, valves, and other process equipment for leaks, pressure build-up, or ruptures, wherever appropriate.

Immediately after an emergency, the Emergency Coordinator shall provide for treating, storing, or disposing recovered materials or wastes, contaminated soil, surface water, or any other material that results from a release, fire, or explosion.

Before resuming operations, the Emergency Coordinator shall:

- Ensure that cleanup is complete to the point that operations will not interfere or create further potential for hazardous waste release;
- Ensure that all emergency equipment is cleaned and fit for use or re-use; and
- If hazardous wastes or a hazardous waste unit has been involved, then advise the MDEQ and U.S. EPA Region IV that Steps a. and b. above are complete.

If hazardous wastes or a hazardous waste unit has been involved, the Emergency Coordinator shall submit a written report within 15 days of the incident to the MDEQ. Information compiled on an Environmental Incident Report Form (Appendix D of K-SHE-008, Incident Investigation and Reporting) (the form is included in Appendix A of this ICP) shall serve as a basis for the letter. The letter will be forwarded to the CSG Environmental Manager for review and editing, if needed, prior to being sent to the MDEQ. A copy of the completed report shall be maintained in the Operating Record.

3.5.1 Emergency Notifications

Annex 2 provides a list of all emergency notification requirements. The Emergency Coordinator shall ensure that the necessary notifications were made by utilizing the Environmental Incident Report form contained in Appendix A of this ICP. The form is organized to provide all the information needed for the initial verbal notification of the National Response Center or other agencies. As soon as a spill or other incident is discovered, the Emergency Coordinator who will do the reporting should begin filling in the information.

Request the position and name of the person who accepts the phone notifications. Also, if an incident number is assigned, as by the National Response Center, that number should be recorded. As more is learned about the incident, the report should be updated. A copy of the completed form must be kept in the facility's Operating Record.

In all cases, as soon as the emergency situation allows, Koppers management in Pittsburgh shall be called. The Emergency Coordinator or his designee shall follow the procedures contained in Koppers'

Crisis Communication, Management & Preparation Policy (K-SHE-019). At least one of the primary contacts in Pittsburgh shall be notified by telephone, as soon as possible. See Annex 2, Section 2.2.

3.6 Available Equipment

The following equipment is available at the facility for use in an emergency or incident. See Figure 6 for a full depiction of all emergency equipment (medical, communication, etc.) and locations.

Equipment	Location
Lift Trucks (5)	Adjacent to Old Shop
Hydraulic loaders (4)	Adjacent to Old Shop
Dump Truck (1)	Adjacent to Tie Unloader
Grader (1)	Adjacent to Old Shop
Pickup Truck (2)	Shop/Office
Portable pumps (2)	Spill Kit-Drum House & Treating Building
Sand (3 piles)	North of Outfall 008, North of Outfall 003, and by Outfall 004
Sawdust Absorbent	Boiler House Wood Dust Pile
Portable Steam Cleaner (1)	Maintenance Department
Spill Response Equipment (1)	Spill Response Equipment-Drum House

The above equipment can be used to control and clean spilled oil, hazardous material, or hazardous waste. Trucks and tractors can be used to construct soil containment dams, transport absorbent material to clean up liquids, and remove contaminated soil. Pumps can be used to transfer liquid into containers. After response action is complete, equipment should be decontaminated on the drip pad or some other contained area before being released from the facility.

All mobile equipment, including the mobile equipment listed above, is inspected on a daily basis. Preventive maintenance of equipment is scheduled and performed on a regular basis. Additional equipment or material needs may be supplied by local equipment or supply companies, as the need is identified.

3.7 Emergency Response Contract Services

Koppers has entered into a Corporate Agreement with Shaw Environmental & Infrastructure (Shaw) to provide various environmental services in the event of an emergency. Shaw can be contacted at their nationwide 24-hour line at (800) 537-9540.

Additionally, the following local contractors are available.

Willis Engineering – Robert Willis
 133 South Mound Street
 Grenada, MS 38901
 Phone: (662) 226-1081

Staten Construction
135 Apple Valley Road
Grenada, MS 38901
Phone: (662) 226-6097

Edwards Electrical Service – Ronald Edwards
Rte. 1, Box 106
Carrollton, MS 38917
Phone: (662) 229-0606 or (662) 237-9271

3.8 Fire and Disaster Response Plans

This section of the Plan provides additional information on specific response actions and should be taken in the event of a major disaster, emergency, or other disruption. Such an event could include:

- Fire or explosion
- Earthquake, tornado, or other disasters
- Strike or civil strife
- Adjacent industry emergency

3.8.1 Fire or Explosion

Fire disasters can occur anywhere in the facility, so all employees should be knowledgeable as to the proper method for handling type A, B, and C fires, and where the largest potential risk areas are located. Communications with and between facility employees is vital to a safe and effective response. Therefore, the following sections describe responses that put all employees at locations where facility radios or phones will be available. Additionally, this will facilitate accounting for all personnel without having to search for anyone. Employees that respond to the gate will keep all unauthorized traffic out of the facility and move other traffic in and out, as needed.

Training is provided for the use of fire extinguishers. Small fires, wherever possible, are to be extinguished by fire extinguisher. Be sure to inform maintenance supervisor after an extinguisher has been discharged so that the extinguisher can be recharged and the area can be inspected to make sure that the fire is out.

In case of a large or uncontrollable fire:

- A. The person observing the incident shall take the following steps immediately:
1. Notify the Plant Manager, Assistant Plant Manager, Maintenance Supervisor, Treating Supervisor, or Framing Mill Supervisor.
 2. The local fire department is to be notified at **911**.
 3. Other notifications as stated under Emergency Notifications.

B. The person reporting the incident needs to provide the following information:

1. Exact location of problem area.
2. Any out-of-the-ordinary potential hazards (i.e., pressurized tanks, gas, etc.).
3. Resources needed to handle situation.

In the event of fire, all efforts will be directed to controlling the fire and to the protection of personnel and equipment. The Volunteer Fire Department will be called immediately. Small, localized fires may be extinguished by the use of fire extinguishers by the properly trained employees in the immediate work area. Employees are instructed to first alert someone in the immediate area and then use the extinguisher. If the fire is spreading or there is a chance of an explosion, all efforts to use extinguishers shall cease and evacuation shall immediately occur.

The Emergency Coordinator will confirm as soon as possible the immediate personnel hazards from materials and waste inventory that may be involved in the fire incident. The Emergency Coordinator will ensure that hazard information is communicated to appropriate emergency response personnel.

A list of the major fire hazards present at the facility includes the following:

- Sawdust and wood chips from the tie trimming process
- Sawdust used for boiler fuel
- Creosote and pentachlorophenol preservative solutions
- Diesel fuel
- Gasoline
- Various oils and lubricants

All of these fire hazard materials are stored and/or only handled by trained facility personnel. These fire hazard materials are not stored in close proximity to heat producing equipment.

Unauthorized smoking is controlled by a no smoking policy around flammable or combustible materials. Electrical spark ignition sources are controlled by proper wiring and compliance with OSHA electrical equipment standards.

Good housekeeping procedures are described in Section 7.2.3 that serve to control the accumulation of flammable or combustible materials. No flammable or combustible materials are stored in or around electrical equipment.

The wood-fired boiler is the main and major heat producing piece of equipment at the facility. The boiler is inspected by a trained and certified boiler inspector on a regular basis. Additionally, facility personnel working in the boiler area conduct an undocumented visual inspection daily, when in use.

The Plant Manager is responsible for maintaining equipment to prevent or control sources of ignition or fires. The Plant Manager is also responsible for the control of fuel source hazards.

Designated Response Stations

In the case of a disaster or other major incident, employees shall secure their work areas and processes and then report to the following designated response stations to wait for further instruction:

1. Person reporting the incident to agencies must make sure arrangements are made to meet outside agencies responding and direct them to the problem area. Plant manager may designate a person to stay at the main entrance to direct emergency equipment to the problem area and prevent unauthorized persons from entering the facility.
2. Wood Storage Yards – Employees proceed to the North Service Building.
3. Shop – Radios available with lead man and supervisor.
4. Boiler Room – Proceed with controlled shutdown if necessary and safe. Radio available with treating supervisor.
5. Pole Peeler area – Employees proceed to the North Service Building.
6. Fire Pump – Maintenance Supervisor or his designate.
7. Treating plant – Stay at treating area for controlled shutdown processes, if safe. Otherwise respond to the North Service Building. Phone and radio available.
8. Office – Remain in office to coordinate outside calls, inquires, and media contacts.

3.8.2 Earthquake, Tornado, or Other Disasters

In the event of an earthquake, tornado, or other natural act or threatened disaster, the Facility Manager or Assistant Manager will notify all facility supervisors by radio of the emergency situation and will announce directions.

3.8.3 Strike or Civil Strife

Emergencies resulting from, or shutdowns as a result of, civil strife or strike situations require the control of people entering the facility, both authorized and unauthorized. All employees will be identified so that only authorized people will be allowed entry in an emergency. Local law enforcement agencies can be helpful in achieving this goal, but facility security is management's immediate concern. When a total shutdown is planned, and security measures are to be implemented, the following should be observed.

Treating Plant

Secure all treating systems, close cylinder doors, shut all valves, open all steam drain lines, shut down air compressor or arrange for maintenance

- Inspections of all processes shall be made on a regular basis, at least one every 2 hours at first, then every 4 hours

Secure electrical panels

Boiler

Secure gate and door locks

Follow typical shutdown procedure

Assure that all steam line drains are open

Hazardous Waste Storage Building

Properly store all hazardous waste drums

- Lock doors

Major operations (including mill, stacker, and shop)

Secure electrical panels

Turn off air compressors, shut valves

Store and secure portable tools, cords, hoses, etc.

Clean up area for safety and fire protection

Rolling Stock

Park in the area on front of the office

Gates

Keep locked at all times

Put on new locks to prevent unauthorized entry

Access Roads

Blockade with ties or lumber

Security Panels

- At least 2 persons will provide security patrols on shifts, 24 hours per day
- Facility vehicles will be provided
- Communication will be maintained at all times between the patrols and the main office by radio

3.8.4 Adjacent Industry Emergency

In the event that there is an emergency incident at neighboring facilities that may cause or has the potential to cause threat to facility personnel, the Plant Manager will be contacted by the facility or by the LEPC. The Plant Manager will then follow the guidelines set forth in this Plan to ensure the safety of Koppers' personnel.

3.9 Evacuation

- Need for evacuation signaled over the radio to all supervisors.
- Supervisors notify their employees.
- Contractors follow safety path to Main Office.
- Employees follow safest path to meet and check in at the:

Service Building

- Supervisors account for all of their employees.
- Supervisors notify main office when "All Clear."
- Main Office to verify status of visitors and contractors based on attendance register.
- Alternate location designated and announced at the time of the incident if Service Building not a safe check.
- Decision to evacuate any surrounding local community areas shall be made by the local emergency response agency and Koppers personnel shall assist by providing information to the agency and by providing any manpower or equipment the agency may request.

In case of an emergency where the facility must be evacuated, the facility treating operator and/or management personnel may be required to remain and complete shut-down of the treating process and wood-fired boiler before evacuation. While this situation is unlikely, if it would occur the treating operator and/or management personnel will ensure the treating cylinder doors are closed, and shut down all power to the treating cylinders and associated systems. The fuel feed to the boiler will be shut off and the boiler will be allowed to go out on its own. After these operations are completed, the treating operator and/or management personnel will meet at the designated meeting location. If imminent danger would occur and this shutdown procedure could not be carried out in this fashion, this procedure will be simplified to turning off all switches/electrical systems and leaving the area. For all other equipment/areas all materials will be placed so as to not create an unsafe condition, and switches/electrical systems will be turned off before leaving.

3.10 Fire Suppression System

The fire suppression system at the facility consists of the following components:

Sprinklers – activated by fusible links in the nozzles, are located in the ceiling areas of the treating building. Water supply must be left on at all times.

Fire Monitors/Hydrants – located at strategic points around the facility. Employees must be familiar with ones within their work areas.

Fire Extinguishers – located throughout the facility and on mobile equipment.

Electric fire pump – located in the firehouse, which pumps from the water tower. The pump is manually operated. This will provide fire protection water to the fire main pipe system. The switch to activate the pump is located in the pump house.

3.11 Medical Emergency

Emergency and first aid supplies are maintained at the following work locations:

- Main office
- Treating Room
- Shop (maintenance office)
- Pole Peeler (supply room)

First aid supplies are intended for use on minor cuts, abrasions, and burns requiring simple care such as band-aids, disinfectant, or ointment. Supplies are also available for immediate treatment of severe injuries while awaiting professional medical care, such as gauze pads, bandages, and splints. First aid applied at the facility, by plant supervisors, is in no way intended to replace any needed medical attention, but only to help prior to receiving professional treatment. If a serious injury occurs, the supervisor or designator will assure that an ambulance is called immediately.

4.0 ANNEX 4: DOCUMENTATION

The following documentation activities are described in various sections of this Plan and summarized herein according to the general administrative records, spill or emergency response records, and preventative/inspection-type records. These records are to be maintained to document compliance with various regulatory programs and general pollution prevention stewardship activities undertaken by Koppers.

4.1 Emergency Incident Documentation

The Koppers' Environmental Incident Report form in Appendix A is to be completed to document an emergency incident and response. As soon as a spill or other incident is discovered, the supervisor/manager who will do the reporting should begin filling in the information. This form will be useful to help facilitate the necessary notifications listed in Annex 2. Specifically for medical/injury incidents, the appropriate Koppers medical forms are to be completed.

4.1.1 Post-Incident Information to be Gathered

The following information should be recorded, reported, and maintained:

- The type of incident.
- The specific area(s) of the facility/location.
- A detailed description of the incident.
- The materials or products involved.
- Who has been notified of the incident.
- A complete list of all personnel on site at the time of the incident.
- Develop or gather records as to the process or other activities in the involved area at the time of the incident.
- A detailed list of all equipment/supplies used to stop/control the incident.
- The corrective actions taken.

4.2 Administrative Records

Administrative records should be maintained to demonstrate training, and that the Plan is updated and certified on a regular basis, and that revisions to the Plan are documented.

- Annex 5 contains training requirements for the Plan. A record of personnel training should be maintained.
- Annex 6 provides a log of revisions or amendments to the Plan that should be maintained as part of the recent version of the Plan.
- Annex 8 contains certifications required to fulfill various regulatory requirements.

4.3 Preventative and Inspection Records

The process for collecting information for these preventative and inspection records and the forms for these records are discussed in Annex 7, Section 7.1.5.

5.0 ANNEX 5: TRAINING

All facility employees shall receive training on the content of this Plan. Supervisors will each receive a copy and become thoroughly familiar with the Plan through training, discussion, and self study. Supervisors will train their employees in the overall Plan and in the specific needs of their work areas. This training will be incorporated into Koppers' standard training program (Policy K-SHE-005) found in the SHE Safety and Environmental Procedures Book. All training records and documents will be maintained on site.

All facility personnel involved in oil handling operations receive training specific to the materials handled, the operations with each material, and the safety issues concerning handling each material. Oil handling personnel receive periodic training due to changes in facility equipment and operations. Review of spill response procedures shall be done annually.

Training for all personnel will, at a minimum, include programs to ensure that facility personnel understand basic procedures for spill and pollution prevention and good housekeeping, and are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, as applicable to each employee's job function:

- Point of contact for all spill events is the facility Environmental Coordinator. Oil handling personnel are instructed to report immediately to their supervisor.
- Applicable pollution control laws, rules, and regulations.
- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- Communications and alarm systems.
- Response to fire or explosions.
- Response to groundwater or surface water contamination.
- Shutdown of operations.
- Methods for safe handling of hazardous or other material with the potential to cause environmental harm.
- Pollution prevention procedures for soil, groundwater, and surface water.
- Procedures for coordination with local emergency response organizations.
- Use and location of medical supplies.
- Use of emergency response equipment and supplies appropriate to work areas.
- Emergency Response procedures contained within this Plan.
- Oil handling personnel are instructed in the operation and maintenance of equipment to prevent discharges, to follow discharge procedure protocols and general facility operations, and to understand the contents of this Plan.
- Annual spill prevention meetings highlight any past spill events or failures and recently developed precautionary measures.
- Training includes oil spill prevention, containment, and retrieval methods.

Refresher training will be provided at least annually. New employees will not work in unsupervised positions until they have completed all training required for those positions. New employees are trained during orientation and through job procedure training. Supervisors will provide training to their employees, and management will assure that supervisors are properly trained.

Employees with specific additional job-related training needs will also be given that training, such as hazardous waste handling training as required by RCRA and State regulations, storm water pollution prevention, and waste water operations. This training may be coordinated and take place with Hazard Communication and RCRA training, safety meetings, and annual updates. Facility personnel are not trained for rescue, and first aid / CPR medical duties, outside responders are relied upon to perform these activities.

6.0 ANNEX 6: PLAN REVIEW AND MODIFICATION PROCESS

6.1 Plan Distribution, Review, and Modification

Copies of this Plan are available at the following facility locations:

- Main Office
- Treating Control Room
- Maintenance Shop

This Plan is written to facilitate the quick and efficient coordination of emergency response actions between Koppers and any emergency response companies or agencies that may be needed. Copies of this Plan, and updates, are provided to the following:

- U.S. EPA Region IV
- Grenada Fire Department
- Tie Plant Volunteer Fire Department
- Grenada Lake Medical Center
- City of Grenada Police
- Civil Defense
- LEPC

This Plan has been developed to provide a basis for planning for and responding to potential spills, accidents, fires, or other contingencies, and describe and implement practices to minimize and control pollutants in storm water discharges and ensure discharge permit compliance. Questions concerning this Plan may be directed to the following:

- Plant Manager
- SH&E Coordinator

This Plan must be kept up to date. Notify the Koppers Corporate Environmental Manager if any change is made or needed. Review and evaluation of the SPCC Plan is required every 5 years and the Plan must be amended, as necessary, within 6 months of such review to include more effective spill prevention and control technologies. This Plan must also be amended whenever there is a change in design, construction, operation, or maintenance which materially affects the facility's potential for discharge, and the amendment must be fully implemented as soon as possible and no later than within 6 months. A Professional Engineer must certify any technical amendment to the Plan. Evidence of the reviews and evaluations shall be recorded on the signature page in Annex 8.

The pollution prevention section of this Plan may require revisions in addition to those described above. If there is a change in the design, construction, operation, or maintenance, which may increase the discharge of pollutants to state waters, or the SWPPP proves to be ineffective in controlling storm water

7.0 ANNEX 7: PREVENTION

The following subsections provide a description of pollution prevention control and countermeasures activities, addressing the requirements for oil and hazardous substances, SPCC and RCRA Contingency Plans, and other pollution prevention requirements such as the SWPPP. These subsections also encompass, in total or part, the requirements for spill prevention planning and best management practices under other applicable regulatory or permit requirements. See Annex 8 for a full Plan regulatory and permit cross-reference.

7.1 Spill Prevention Control and Countermeasures

7.1.1 General Compliance

This facility is in conformance with the SPCC requirements. As described in the following subsections, the facility has evaluated its storage, transfer, management of oil and hazardous substances, provided for the containment of this material, and developed controls and countermeasures to prevent or respond to a release. There are no deviations from the SPCC requirements.

7.1.2 Fault Analysis

Although occasional reportable spills of hazardous materials have occurred and been reported, no oil spills, as defined by 40 CFR 110, have occurred at this facility. A record of all reported spill events is maintained in the facility operating record.

Fault analysis has determined that, while a remote possibility, transfer operations have the potential to allow spills outside of facility containments, with the release being gradual to instantaneous. Therefore, training, the use of qualified personnel, and established procedures have been developed for all product transfer operations.

Fault analysis has also determined that rail cars delivering the creosote treating solution to the facility could spill or leak prior to delivery, with anywhere from a minor leak to an entire tank car being released gradually or instantaneously. The bulk of the tank cars are staged in the central southern portion of the facility where there is no containment, a leak or failure at this location will travel first to the storm water drainage ditches/ponds and flow toward the unnamed tributaries of the Batapan Bogue Creek, which drains to the Yalabusha River. Storm water drainage from this area flows into a storm water ditches which flow to retention ponds. A gated weir is present at the outlets of the retention ponds to contain any tank car failure in the tank car staging area of the facility. In addition, the tank cars are visually inspected daily for the presence of leaks.

A drain valve is provided for the fuel tanks secondary containment structure. Water is only drained from this containment following visual inspection to assure that the water does not contain any oil and is only done by the Facility Environmental Supervisor or a person reporting to him. If the water contains oil, it is pumped out of the containment and transferred to the oil/water separator and then to the wastewater system.

All process tanks containing oil or hazardous materials have been provided with secondary containment. That containment can only be emptied by operation of pumps which use dedicated piping that is routed to wastewater tanks. It is unlikely that any event could cause significant quantities of material to be released to waters of the United States. If such an event did occur, the spilled material would follow the drainage ditches, which also include spill control capabilities. The quantities of materials listed for tank capacities in Table 1 represent the maximum quantities that could potentially be released. Locations can be found for processes and tanks on Figure 4. The rate of flow would depend on the incident.

7.1.3 Containment and Diversionary Structures

This facility meets the requirements for containment and/or diversionary structures or equipment to prevent discharged oil or hazardous substances from reaching navigable waters. This is accomplished by providing a system of curbs, dikes, and secondary containment for all major tanks and process equipment. Secondary containment is sufficiently impervious and of capacity to contain the largest tank in each tank area plus allow sufficient freeboard for precipitation. Also, in each detention pond, there are valved risers and/or closure gates at the discharge weirs of the retention ponds. Fuel and oil tanks and associated piping are located above ground and provided with secondary containment.

All storage tank containments are made of concrete with bottom slabs and concrete walls. Seams at concrete joints are epoxy sealed. Rainwater from containment areas is pumped to and treated with process wastewater. Process area containment structures do not have drain valves and, therefore, could not allow a spill or release. Curbing is used around the drip pad to prevent storm water and treating solution drippage runoff.

In the case of a spill or event in which hazardous materials or oil does reach or has the potential to reach any of the drainage ditches, immediate action must be taken to contain the spill. Valves or closure gates at the out falls will be closed. Temporary earth dams should be constructed using facility equipment along the ditches, creating a series of impoundments to contain the flow. Absorbent booms may be used to remove containments from the water held behind the dams, if needed. These dams can only hold back a limited amount of water, so emergency help should be contacted at the first sign that such a spill has occurred or may occur.

7.1.4 Adequacy of Plan

Koppers' management has determined that use of the containment and diversionary structures, and the use of readily available spill equipment to prevent discharged oil or hazardous substances from reaching navigable water, is practical and effective at this facility.

The discussion of this facility's compliance with the applicable SPCC guidelines is provided in this Plan. This addresses general and/or facility wide issues, as well as process or equipment specific issues. This plan is in conformance with all other applicable discharge prevention and containment requirements and any applicable more stringent State or local rules and regulations.

7.1.5 Inspections, Tests, Records

The operator on duty throughout each shift checks the operational areas in the Treating Department each shift. A video surveillance system is available for him to view from his operating station. The preservative pipes, valves, process equipment, tanks, and treating cylinders are routinely checked by the treating operator on duty. Any problems or unusual circumstances which cannot be immediately resolved are reported to management.

Formal inspections of the tanks, treating cylinders, and piping systems for signs of leaks, deterioration, or unsafe conditions are made weekly as part of the Plant Process Equipment Inspection. A copy of this inspection form (GNA-FORM-026) is included in Appendix B. Completed inspection forms are maintained in the plant's RCRA inspection records.

Additionally, whenever tanks are emptied and cleaned, a complete internal inspection will be made. Non-destructive shell thickness testing will be conducted at minimum every ten years for tanks used for oil storage. These additional inspections will be recorded in the plant environmental records file.

In order to assure that leaks in steam coils in contact with preservative or oil do not result in a release, waste water permit violation, or boiler damage, condensate return is monitored for clarity by a meter. Excess turbidity will activate an alarm and subsequently shut off the supply of condensate return to the boiler.

Additional security provisions are provided for the RCRA facilities. The Closed Surface Impoundment is enclosed within a fenced area. Gates are kept locked when not in use. Signs are posted at entrances to RCRA facilities stating, "Danger - Unauthorized Personnel Keep Out."

Any leaks or deficiencies identified by the above inspections will be corrected promptly. All blank forms are available in the Grenada Blank Forms Manual (GNA-DOC-009).

If a spill or release, reportable or non-reportable, occurs at the facility, a report is required to be sent to the Koppers Corporate Services Group. Details of this report are covered in Section 4.1.

The following table depicts the inspections completed at the facility. The forms utilized to complete these inspections are included in Appendix B.

Inspection	Scope of Inspection
RCRA Hazardous Waste Storage Area Inspection	Records weekly inspections for the aisle spacing, drum condition, security, facility condition, inventory, collection dates, and satellite storage areas conditions.
Storm Water Discharge and Outfall Inspection	Records monthly/quarterly inspections of outfalls, ditches, and detention basins.
Treated Wood Storage Yard Inspection record	Inspect storage yard areas for signs of drippage and tank car conditions.

Inspection	Scope of Inspection
Process Equipment Inspection	Records the weekly inspection of all equipment and containment used in the process area and wastewater operation, includes an inspection of stored acids and caustics.
Drip pad inspection record	Weekly drip pad inspections for cracks or damage to pad that could lead to a release and inspection of 90-day storage hazardous waste area.
Drip Pad Sump/Pump Maintenance	Inspection of the pumping system for the drip pad sumps.
Emergency Response Equipment	Emergency equipment inspection of phones, medical supplies, fire fighting equipment, spill clean up and control equipment is part of the Storm Water Discharge and Outfall Inspection and Fire Protection Equipment & System Inspection.
Security	Weekly Security Inspection of security structures, fences, gates, locks, lighting, etc.

Based on these inspections, prompt corrective actions are conducted if any deficiencies are noted.

7.1.6 Security

Security of the entire facility, hazardous and oil-related storage areas is provided as follows:

- The entire facility is fenced.
- Drain valves are in the closed position when in non-operating or standby status.
- Tank cars stored in the yard will have the bottom valve closed.
- Power controls for the oil pumps are located in the treating building; the building is locked when the facility is not occupied.
- Power controls to work tank pumps are located in power control building and chemical building; both are locked when the facility is not occupied.
- Cylinder doors will be closed and secured.
- Work tank header system valves are chained and locked to prevent opening.
- Unloading connections are capped or blank flanged when not in service for an extended time.
- Process area pipelines and tanks are illuminated with several strategically placed lights. Lighting consideration was given to discovering spills, leaking pumps, preventing discharges through acts of vandalism, and problems associated with the process at night.

In recent years, production operations at the facility have been ongoing an average of five to six days a week (24 hours each day). At least three employees are present during these times of operation. Process areas of the plant where oil or hazardous substances are stored are well lighted and portions are monitored by surveillance cameras. Roads leading into the plant are secured with gates, which are closed and locked when the plant is not occupied. The plant is bordered by other industrial or agricultural properties, railroad right-of-way, and some residential area.

Design features of the plant minimize the threat of release that could be caused by a trespasser. Process tank valves are connected to process pipes connected to other tanks, making release from an unauthorized opening unlikely. There are no drain valves on work tanks, so it would be difficult for

trespasser to cause a release. Some tanks have sample valves, which will remain locked when not in use. Entrance to the tank farm is blocked by a gate, thus preventing unintentional flow of traffic.

7.1.7 Tank Car and Tank Truck Unloading

Annex 1, Section 1.5.3 describes the layout and containment considerations for the unloading stations for tank cars and trucks. Tank cars are unloaded via an unloading rack and tank trucks are unloaded via direct piping from the truck to the respective tank. There is a quick drain system that extends from the secondary containment of the tank car unloading rack area to the tank farm containment, that will accommodate in excess of the volume of a single tank car. In addition, the facility has developed specific procedures for unloading bulk treating solution deliveries in order minimize the potential for a spill or leak, that also includes the use of a derail warning sign and wheel chocks and inspection of the lowermost drain and all outlets on tank cars for leakage prior to departure and adjustment to prevent discharge while in transit. Any rainwater which is collected in the containment is pumped to the WWTP for treatment.

7.1.8 Brittle Fracture Evaluation

All field-constructed aboveground containers undergoing repair, alteration, reconstruction, or change in service that might affect the risk of discharge or failure due to fracture or other catastrophe, must be evaluated under the new brittle fracture rule (API Standard 653). Also, such an evaluation must be performed if there has actually been such a discharge or failure due to brittle fracture or other catastrophe. Currently no change in service is scheduled for any of the existing field constructed tanks, unless noted on Table 1. Table 1 describes the planned integrity testing schedule applicable to the various tanks at the facility

7.1.9 Bulk Storage Containers

All of the aboveground storage tanks are of steel construction and are compatible with the oil they contain and the temperature and pressure conditions of storage. There are no buried or partially buried storage tanks at the facility. Whenever tanks are emptied and cleaned, a complete internal inspection shall be made. All tanks will be subject to full visual inspection of all sides.

7.1.10 Transfer Operations, Pumping, Facility Operations

All process transfer pipelines are all above ground. The primary potential spill sources in the treating process include leaks from the process tanks, valves, pumps, and pipe systems. These leaks can best be prevented by proper valve and pump maintenance and equipment inspection during treating solution transfers. Any leaks or drips must be cleaned up immediately. Out-of-service pipelines will be clearly identified and will be sealed with caps or blank-flanges until they are permanently removed.

7.2 Storm Water Pollution Prevention

This section of the Plan describes the pollution prevention to minimize the impact of storm water runoff to the surrounding environment. This section specifically addresses the requirements of the Storm Water Pollution Prevention Plan requirements of the facility's NPDES permit for requirements for wood preserving industrial operations.

Pollution prevention objectives and targets are as follows. The objectives of the SWPPP are: 1) to identify potential sources affecting pollution of storm water and 2) describe and implement practices to minimize and control pollutants in storm water discharges and ensure permit compliance. In the preamble to the Federal Register which finalized the U.S. EPA storm water general permits, the U.S. EPA described the permit program as "intended to facilitate a process whereby the operator of the industrial facility thoroughly evaluates potential pollution sources at the site and selects and implements appropriate measures designed to prevent or control the discharge of pollutants in storm water runoff." That process includes the following:

- Form a Pollution Prevention Team,
- Assess sources,
- Select and implement practices and controls, and
- Conduct periodic evaluations.

7.2.1 *Pollution Prevention Team*

The Pollution Prevention Team is responsible for developing this pollution prevention plan and assisting in its implementation, maintenance, and revision. The team consists of the following:

Name	Position	Responsibilities
Vance Haskin	Plant Manager	Overall facility compliance; signatory authority
Kevin Coker	SH&E Coordinator	Plan development and coordination, Routine inspections and enforcement
Joyce Fankulewski	Corporate Environmental Manager	Plan development and regulatory advise
Marcus Smith	Assistant Plant Manager	Provide perspective for development and coordination of Best Management Practices (BMPs) and other elements of the plan, risk evaluation, and control
John Cummings	Shop Supervisor	Provide perspective on potential sources associated with plant equipment and assets; Provide risk evaluation
Ron Rutledge	Treating Supervisor	Maintain equipment to ensure that pollution control equipment in order and repair, as needed

7.2.2 *Risk Identification and Summary of Potential Pollutant Sources*

The potential pollutant sources at the facility are included within three main general categories, as follows.

- Treating solutions (creosote and pentachlorophenol)
- Fuels, oils, and lubricants
- Ancillary, boiler and wastewater treatment chemicals

These materials, if released in large enough quantities, have the potential to cause possible environmental issues. Refer to Table 1 for a presentation of the capacities, containments, overflow/overflow prevention measures, and storm water controls for all of the stored significant materials at the facility.

Treating Solutions

Treating solutions are delivered by rail or by truck. For unloading, the delivery tank car or truck is placed over a concrete containment area, as described in Annex 1. All unloading operations are monitored at all times.

The rail tank car shall have at least one wheel chocked in both directions. The appropriate DOT signage and a derail are utilized at the rail car unloading area to prevent unauthorized rail traffic. The tank car is then opened from the top of car to verify contents and outage. The unloading line is then placed into the car and unloaded into the appropriate storage tanks. After unloading, the line is removed and the tank car is then secured for transport.

Tank trucks are unloaded at the tank truck unloading station. Unloading is conducted in accordance with applicable DOT and facility procedures.

All treating solution is managed in tanks within secondary containment, within the pressure treating cylinders within secondary containment, or on the 40 CFR 265, Subpart W drip pad and ancillary contained wastewater treatment system. Daily yard inspections are completed to inspect for any release of treating solution off of the drip pad in accordance with Contingency Plans.

Fuels, Oils, and Lubricants

Fuels are delivered by tank truck and transferred into aboveground storage tanks located within a concrete secondary containment with a roof. This fuel is dispensed by electrical fuel pumps. A spill kit is located on the western edge of the fuel storage containment area. Care is taken to prevent spillage during dispensing of fuel into vehicles and equipment.

Oils and hydraulic fluid are typically delivered in 55-gallon drums, although some are transferred from the delivery truck to tanks. A drum pump is then used for dispensing the fluid to equipment or the equipment is placed near to the tank for filling. Care is taken to prevent spillage during loading and dispensing of oils and hydraulic fluid to equipment and containers.

Ancillary, Boiler, and Wastewater Treatment Chemicals

Acids, caustics, and other ancillary boiler and wastewater treatment chemicals are delivered in 55-gallon drums, or other containers from the vendor. The containers are within concrete containment. Care is taken to prevent spillage during dispensing.

7.2.3 Measures and Controls

Housekeeping and Best Management Practices

The need and reasons for good housekeeping and best management practices (BMPs) will be communicated and emphasized to each employee and contractor working in the facility. Housekeeping practices will be part of each person's job, with emphasis on preventing contamination over cleaning contamination after it has occurred. Each supervisor is responsible for assuring that housekeeping is completed as part of each person's job.

The list below provides various structural and non-structural BMP specifically identified for wood treating facilities through various industry and regulatory sources. These BMPs will be implemented, as applicable, inspected and evaluated on a regular basis, and a record maintained of such activities. These BMPs point to methods and practices employed by the facility to minimize the contact of its products and equipment to storm water.

Area or Activity	Best Management Practice
Process Area/Active Wood Treating and Storage Area	<ul style="list-style-type: none"> • Assure drippage has ceased prior to removal of treated wood products from drip pad. • Manage treating preservatives to ensure acceptable levels thus ensuring clean surfaces on treated wood products. • Eliminate non-process traffic on drip pad; ensure that all equipment tires are washed before entering and departing from the drip pad. • Minimize the footprint of treated inventory, limiting the potential area of effect on storm water runoff. • Work to minimize the need to cut treated wood. However, when it is necessary, manage the saw dust associated with the cutting appropriately. • Maintain the condition of the untreated wood yard thus reducing the likelihood of mud and debris from accumulating on products prior to treatment and thus increasing the opportunity for storm water impact subsequent to the treating process. • Maintain the cleanliness of treating cylinders. Clean them on a routine schedule. • Inspect and ensure that all containments are adequate and intact. • Adjust preservative cycles as necessary working to ensure that the quantity of preservative placed in wood products is minimized yet compliant to AWWA retention and penetration requirements. • When feasible apply post-treatment processes such as steam flashing and expansion baths. • Work to minimize the quantity of treated wood stored on the site. • Ensure the appropriate implementation of yard drippage inspection programs.
Loading and Unloading Material Handling Areas	<ul style="list-style-type: none"> • Provide defined paths of storm water flow from loading and unloading areas enhancing vegetation in these areas to serve to filter and capture suspended solids. • Ensure that containments are adequate and allow no run-on or run-off of preservative. Evaluate and minimize the risks of spills in these areas. • Ensure that employees involved in this function of the plant's operations are adequately trained.
Chemical Storage Area	<ul style="list-style-type: none"> • Ensure that all secondary containment is adequate and intact. • Provide level gauges thus reducing the risk of spills.

Area or Activity	Best Management Practice
Chemical Storage Area	<ul style="list-style-type: none"> • Ensure that all secondary containment is adequate and intact. • Provide level gauges thus reducing the risk of spills. • Enclose chemical storage areas where possible.
Untreated Product Storage Area	<ul style="list-style-type: none"> • Divert storm water around storage area. • Position storage areas on stable, well-drained soils; conduct routine maintenance. • Keep the area free of debris. • Use silt fence and/or rip rap check dams in drainage ways. • Utilize and maintain catch basins near weirs at outfalls. • Maintain all ditch banks; sewing vegetation where applicable and beneficial. Utilize mixed vegetation ensuring its presence during each season of the year. • Do not drive loaders or other equipment through ditches or on banks. Stay on established roadways.
Peeler Site	<ul style="list-style-type: none"> • Conduct maintenance ensuring that hydraulic leaks are eliminated. • Ensure that stored bark does not fall into the north ditch. • Work to maintain the roadways and ditches around the peeling operation.
Maintenance	<ul style="list-style-type: none"> • Ensure that all oils and waste generated during maintenance and servicing activities in the plant are managed in a timely and appropriate fashion. • Park all mobile equipment on concrete or paved surfaces. • Recycle scrape metal as it is generated. Do not allow it to accumulate on the ground. • Ensure that all equipment washing activities are conducted on the wash pad.

Preventative Maintenance

Storm water management devices, such as detention basins and outlet structures, will be inspected at least monthly and after storms producing significant runoff. These will be inspected for signs of erosion, excess collected silt from runoff, and collection of debris that could interfere with discharge monitoring or flow.

On-site drainage systems will be inspected for signs of erosion or high silt loads or turbidity during runoff events. Such inspections will be made at least two times a year, generally in the fall and spring, depending on the storm events. Sources of turbidity or silt will be identified and potential remedial actions identified. Corrective actions that should be considered include: rerouting facility traffic, paving or gravel surfacing roads, ditch modifications, culvert additions or changes, changing yard activity or material storage locations, changing vegetation management, and yard grading.

Production equipment, including loaders, trucks, and the people operating the equipment will inspect fixed equipment, weekly. Inspections will include checks for oil and hydraulic leaks, accumulations of oil soaked dirt, pump, valve, and cylinder packing, and any other devices that could cause or contribute to leaks. Identified needs will be either repaired by the operator or will be identified to the maintenance department.

Maintenance needs identified by inspections will be accomplished on a schedule appropriate for each situation. Leaking mobile equipment will not be operated on the yard until the leaks are repaired.

Sampling and Lab Procedures

Storm water sampling procedures are addressed in the form GNA-FORM-071. All laboratory analysis is conducted by a contracted certified off-site facility. Koppers employees collect the sample, measure pH and flow rate as addressed in GNA-FORM-071.

Inspections

This section describes inspection procedures for storm water pollution prevention. In addition, there are also inspection requirements that also further support pollution prevention under various other programs that are listed in Section 7.1.5.

Storm water pollution prevention devices, such as detention basins and outlet structures will be inspected quarterly and/or after storms producing significant runoff. Inspections of each structural and non-structural control will be documented on a monthly basis, as dictated the plant's NPDES permit. The Storm Water Discharge and Outfall Inspection form will be used to document these inspections. Maintenance or repair needs will be identified on these forms. The form will also be used to document when and how identified needs are corrected.

Record Keeping and Internal Reporting Procedures

NPDES sample results are maintained at the facility's storm water monitoring results file. All completed storm water pollution prevention inspection forms will be maintained by the Plant Manager. He will also be responsible for tracking maintenance and repair work to assure that needed work is completed and documented.

Maintenance and repair needs identified by inspections and which the inspector cannot correct will, at a minimum, be reported to the Plant Manager and the SH&E coordinator, as appropriate. Where priorities need to be determined, the pollution prevention team may be involved. The Plant Manager is responsible for setting work schedules and priorities.

Sediment and Erosion Control

The facility is generally flat to slightly rolling. Soil does not tend to erode, except where vehicle traffic keeps the soil loose and prevents vegetation. Erosion is a problem where storm water runs or puddles in areas of traffic. This section describes prevention type procedures for sediment and erosion control.

Erosion prevention mainly involves the design and maintenance of facility roads, drainages, storm water control devices, and storage areas. Additional improvements will be made as necessary based on future inspections.

Management of Runoff

The facility drainage system has been designed to maximize its potential to mitigate or improve the quality of storm water runoff. Mitigation involves equipment and procedures to minimize the effect of erosion and other activities occurring on site. Mitigation generally includes use of grassy swales or drainage to help filter sediment from runoff water and detention basins to enhance gravity settling and to remove sediment from runoff water. The surface water drainage areas and existing detention ponds are depicted on Figure 3. Other specific storm water runoff activities and controls are as follows:

General yard maintenance — It will remain important that existing roads be used and maintained to minimize mud, that drainage ditches includes vegetation, and that yard area that are found to produce muddy runoff could be improved by installing better drainage, grading, and/or surfacing, as needed.

Vegetation — All disturbances will be seeded and mulched, as necessary, to establish a native mix of annual and perennial plants to control erosion and provide filtration. Vegetated areas will be maintained, including periodic mowing and reseeding, as necessary.

Outlet structures — Outlet structures meet several needs including: provide for flow monitoring, provide a location for sampling, retain water for most storm events, allow slow release of water over one to several days, pass large storm flows as overflow without damage to structure or dams, allow for flow shutoff in case of a spill within the plant, and be easy to maintain.

Wet detention vs. dry detention — Wet detention basins, in which at least a portion of the basin is a permanent pond; provide more potential for biological treatment and longer hydraulic holding time for the water than dry detention basins, which completely drain following storm events. However, wet basins also present problems. The ponds can present safety or liability problems, mosquito breeding, maintenance is more difficult, the long term ponding of potentially contaminated water can pose groundwater questions, and initial cost is greater. The dry detention basins require less excavation, thus less cost, and, since they are dry most of the time, present much less hazard. Additionally, a dry basin can later be made into a wet basin by digging part of it deeper. Thus, dry basins have been installed. If monitoring results indicate a need for water quality improvement that could be achieved by a wet pond, then modifications will be implemented as needed.

7.2.4 Visual Site Inspections

Comprehensive site compliance evaluations (Evaluations) are required by the General Permit and are intended as self-audits of the plant storm water pollution prevention program. The Evaluations will be conducted to:

- 1) Confirm the accuracy of descriptions of sources contained in the SWPPP,
- 2) Determine if all storm water pollution prevention measures are accurately identified in the plan, in place, and working properly, and
- 3) Assess compliance with the storm water NPDES permit.

Evaluations will be made at least annually. The Plant Manager is the individual responsible for the evaluations and will sign each evaluation. Other members of the team may be involved in the evaluation, as requested by the Plant Manager. Each Evaluation must be documented. Documentation should include the date of the Evaluation, names of persons involved, a listing of areas inspected, major observations, deficiencies noted, and the signature of the Plant Manager. Documentation will consist of the Mississippi Part VII evaluation form and will be kept in the plant operating records. The SWPPP will be revised within two weeks after the Evaluation inspection and those revisions must be implemented in a timely manner and not later than 12 weeks after the inspection. Annual Visual Site Inspection and Evaluations and Certifications are maintained.

7.2.5 Best Management Practices for EPCRA Section 313 Chemicals

There are special requirements for facilities which store, process, or otherwise handle Section 313 listed chemicals. This plant uses pentachlorophenol and creosote, which are such chemicals, and reports releases of these annually on the Form R reports. These materials are stored in tanks and used in the process area where full secondary containment is provided. Thus, all storm water which could come in contact with the chemicals is contained. All liquids, including storm water, from the containment areas is processed in the wastewater treatment system and discharged to the POTW. No water from process or tank secondary containment is discharged with storm water runoff.

7.2.6 Monitoring and Reporting Requirements

Monitoring of storm water runoff is required by the General Permit for specified parameters and results of monitoring are to be reported to the State in accordance with that permit. These requirements are summarized for informational purposes only in this section. The permit itself should be used as the primary document for NPDES monitoring and compliance.

Parameters and Sample Type

Operations contributing to each outfall are substantially the same, i.e., wood preservation, so each outfall must be monitored for the same constituents. The following parameters are to be measured in the units noted:

<u>Parameter</u>	<u>Units</u>	<u>Sample Types</u>
pH	s.u.	Grab
Total Suspended Solids (TSS)	mg/l	Grab + Composite
Oil and Grease	mg/l	Grab
Total Phenols	mg/l	Grab + Composite
Pentachlorophenol	mg/l	Grab + Composite
PAH	mg/l	Grab

In addition, the following will be determined and reported:

- The date and duration (in hours) of the storm(s) sampled;
- Rainfall measurements or estimates (in inches) of the storm which generated the sampled runoff;
- The duration between the storm sampled and the end of the previous measurable (greater than 0.1-inch rainfall) storm; and
- An estimate of the total discharge (gallons) for the storm sampled.

Frequency of Monitoring

Sampling will be conducted at least one time per year, except as exempted in the permit for concentrations below indicated values or for substantially identical discharges.

Outfall Information Summary

OUT-FALL NO.	LOCATION	INDUSTRIAL OPERATIONS IN RUNOFF AREA	AREA AND RUNOFF COEF.
1	South end of south yard	Treated and untreated wood storage, closed ash landfill	15.9 Acres C= 0.3
2	Northeast end of south yard	Treated and untreated wood storage, switch tie mill	12.1 Acres C= 0.3
3	Maintenance shop area	Vehicle and equipment maintenance, washing	2.8 Acres C= 0.5
4	Southwest 1/4 of north yard	Treated and untreated wood storage, hazardous waste storage, boiler, wood treating process, preservative tanks, cooling water pond	24.1 Acres C= 0.3
5	Southeast 1/4 of north yard	Treated and untreated wood storage, dry kiln, truck loading, closed surface impoundment	26.2 Acres C= 0.3
6	Northeast 1/4 of north yard	Treated and untreated wood storage	9.5 Acres C= 0.3
7	Northwest 1/4 of north yard	Treated and untreated wood storage, pole peeler, bark storage	13.2 Acres C= 0.3
8	Middle area of north end of south yard	Treated and untreated wood storage, tram loading/unloading area.	2.4 Acres C=0.3
9	Northwest end of south yard	Lumber mill area, truck loading and unloading, treated and untreated storage area	10.7 Acres C=0.3

Criteria for Sampling

A) For discharges from detention ponds with a retention period greater than 24 hours, (estimated by dividing the volume of the detention pond by the estimated volume of water discharged during the 24 hours previous to the time that the sample is collected) one grab sample will be taken.

B) For all other discharges, both a grab sample and a composite sample will be taken.

All such samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1-inch rainfall) storm event. The grab sample will be taken during the first 30 minutes of the discharge. The composite sample will be either flow-weighted or time-weighted in accordance with the General Permit.

The facility's Storm Water Sampling Form (GNA-FORM-071) shall be used in the instance of storm water sampling activities. This form also provides guidance on the appropriate methods and frequencies to be used in collecting storm water samples.

Substantially Identical Outfalls

On a regular basis, the facility undertakes a review of its activities and materials storage practices. Based on this review, if substantially identical outfalls are identified, then sampling will be conducted at a representative outfall only, as allowed under the NPDES permit. The logic and approach to this practice will be documented within the NPDES permit files.

Reporting

Annual Comprehensive Site Compliance Evaluation inspection reports and annual Discharge Monitoring Reports will be submitted to the following location and must be postmarked no later than January 28 for the previous report year:

Environmental Compliance Division
MS Dept. of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

7.2.7 Management Practices Plan for Area Source NESHAP

This section of the Plan is developed in compliance with 40 CFR Part 60, Subpart QQQQQQ, which establishes National Emission Standards for Hazardous Air Pollutants (NESHAP) for area source wood treating facilities. Any changes to the listed regulation will be reflected in any future changes to this section. Specific to the facility, applicability is due to the use of pentachlorophenol as the treating solution.

7.2.7.1 Application of Preservative

Pentachlorophenol will not be applied outside of an enclosed treating cylinder. The facility will take action to minimize the amount of preservative used. The facility will fully drain the pentachlorophenol treating cylinders to the extent practicable, prior to opening the cylinder doors.

The facility will maintain records of the type of treatment process and type and amount of preservative used at the facility. Existing production records may be used to satisfy this requirement; however, these records will be managed in accordance with the ISO 14001 Management System to ensure they are preserved for use in compliance demonstrations.

The facility will maintain records of the pressure readings inside cylinders during the treatment cycle. Existing production records may be used to satisfy this requirement, however, these records must be managed in accordance with the ISO 14001 Management System to ensure they are preserved for use in compliance demonstrations.

7.2.7.2 Management of Treated Wood

Treated wood will be maintained on a subpart W drip pad until drippage has ceased. Records maintained pursuant to subpart W may be used as evidence of compliance with this requirement.

7.2.7.3 Releases

The facility will promptly collect any spills of preservative in accordance with Section 7.1 of this plan. Spill reporting and investigation records may be used to document compliance with this requirement.

7.2.7.4 Corrective Action

Should the facility discover any condition that would result in higher than normal air emissions (i.e., a leaking gasket, malfunctioning air pollution control devices, etc), the facility will take corrective or preventive action prior to resuming operations.

The facility will report any deviation from any requirement of this section to the EPA within 30 days of the deviation.

7.2.7.5 Notification of Applicability and Compliance Status

In accordance with 40 CFR 63.11432(b) and (c), this facility submitted an initial notification of applicability and compliance status notification on August 17, 2007. These notifications are maintained in the facility files.

Any change in the information already provided in these notifications shall be provided to the Administrator in writing within 15 calendar days after the change (40 CFR 63.9(j)).

7.2.7.6 Maintenance Requirements

At all times, including periods of startup, shutdown, and malfunction, the facility will operate and maintain the treating equipment, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions (40 CFR 63.6(e)(1)(i)).

8.0 ANNEX 8: REGULATORY COMPLIANCE AND CERTIFICATION

This section provides cross-references to various regulatory programs that are included within this Integrated Contingency Plan.

SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN (SPCC) 40 CFR PART 112

SPCC PLAN REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Certifications - 40 CFR 112.3(d)	Annex 8
Ownership Information – 40 CFR 112.1(b)	Introduction
Plan Maintenance – 40 CFR 112.3(e)	Annex 6
Plan Review and Amendment – 40 CFR 112.5(a),(b), and (c)	Annex 6 and Annex 8
Cross-reference of Requirements – 40 CFR Part 112.7	Annex 8
General Compliance – 40 CFR Part 112.7(a)(1)	Section 7.1.1
Deviations – 40 CFR Part 112.7(a)(2)	Section 7.1.1
Facility Layout – 40 CFR Part 112.7(a)(3) and (a)(3)(i)	Annex 1 and Figures 2 through 6
Discharge Prevention – 40 CFR 112.7(a)(3)(ii)	Annex 7
Discharge and Drainage Controls – 40 CFR Part 112.7(a)(3)(iii)	Annex 7
Countermeasures – 40 CFR Part 112.7(a)(3)(iv)	Annex 3
Material Disposal – 40 CFR Part 112.7(a)(3)(v)	Section 3.5
Contacts – 40 CFR Part 112.7(a)(3)(vi)	Annex 2 and Section 3.7
Reporting Format – 40 CFR Part 112.7(a)(4)	Section 3.5.1 and Appendix A
Emergency Response Procedures – 40 CFR 112.7(a)(5)	Emergency Response Action Plan
Fault Analysis – 40 CFR 112.7(b)	Section 7.1.2
Containment and Diversionary Structures– 40 CFR 112.7(c)	Sections 1.4.1 and 7.1.3, Table 1, and Figure 4
Adequacy of Plan – 40 CFR Part 112.7(d)	Sections 7.1.1 and 7.1.4
Inspection, Tests, and Records – 40 CFR 112.7(e)	Sections 1.4.1, 4.2, 4.3, and 7.1.5
Employee Training and Discharge Prevention Procedures – 40 CFR 112.7(f)	Annex 5
Security – 40 CFR 112.7(g)	Section 7.1.6
Loading/Unloading Rack – 40 CFR 112.7(h)	Section 7.1.7

SPCC PLAN REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Brittle Fracture Evaluation Requirements – 40 CFR 112.7(i)	Section 7.1.8
Conformance with State/Other Requirements – 40 CFR 112.7(j)	Annex 8
Facility Drainage – 40 CFR 112.8(b)	Section 1.5 and Annex 7
Bulk Storage Containers – 40 CFR 112.8(c)(1)	Table 1 and Section 7.1.9
Bulk Storage Containers – 40 CFR 112.8(c)(2) and (3)	Section 7.1.3, Table 1, and Figure 4
Bulk Storage Containers – 40 CFR 112.8(c)(4) and (5)	N/A
Bulk Storage Containers – 40 CFR 112.8(c)(6)	Sections 7.1.5 and 7.1.8
Bulk Storage Containers – 40 CFR 112.8(c)(7)	Section 7.1.5
Bulk Storage Containers – 40 CFR 112.8(c)(8)	Table 1
Bulk Storage Containers – 40 CFR 112.8(c)(9)	Section 7.1.5
Bulk Storage Containers – 40 CFR 112.8(c)(10)	Section 7.1.5
Bulk Storage Containers – 40 CFR 112.8(c)(11)	N/A
Facility Transfer Operations, Pumping, and Facility Process – 40 CFR 112.8(d)	Sections 7.1.5 and 7.1.10
Substantial Harm Certification – 40 CFR 112.20	Annex 8

**RESOURCE CONSERVATION AND RECOVERY ACT
CONTINGENCY PLAN AND EMERGENCY PROCEDURES
40 CFR PART 265, SUBPARTS C AND D**

CONTINGENCY PLAN AND EMERGENCY PROCEDURES REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Maintenance and Operation of the Facility – 265.31	Annexes 1 and 7
Emergency Equipment – 40 CFR 265.32 and 265.52(e)	Sections 3.3, 3.6, 3.7, and 3.10
Testing and Maintenance of Equipment – 40 CFR 265.33	Section 7.1.5
Access to Communications or Alarm Systems – 40 CFR 265.34	Section 3.3
Arrangements With Local Authorities – 40 CFR 265.37 and 265.52(c)	Section 2.2
Evacuation Plan – 40 CFR 265.52(f)	Section 3.9
Plan Maintenance – 40 CFR 265.53	Annex 6
Plan Amendments – 40 CFR 265.54	Annex 6

CONTINGENCY PLAN AND EMERGENCY PROCEDURES REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Emergency Response Personnel Including Emergency Coordinator – 40 CFR 265.55 and 265.52(d)	Annex 2
Emergency Response Procedures – 40 CFR 265.56 and 265.52(a)	Annex 3

**STORMWATER POLLUTION PREVENTION PLAN (SWPPP)
NPDES STORMWATER WOOD TREATER GENERAL PERMIT NO. MSR220005
PART III, C**

SWPPP REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Signatory Requirement – C.1.	Annex 8
Amendment Requirements – C.6.	Annex 6
Description of Potential Pollutant Sources – C.7.a.	
Site Map – (1)	Section 1.3 and Figure 3
Topographic Map – (2)	Section 1.1 and Figure 1
Narrative Description of Significant Materials – (3)	Sections 1.4, 1.5, 7.1, 7.2, and 7.2.5
Monthly Updated List of Significant Spills and Leaks of Toxic or Hazardous Pollutants – (4)	Section 1.6 and 7.1.5
Prediction of Direction of Flow and Types of Pollutants – (5)	Sections 1.3, 7.2.2, and 7.2.5
Update Summary of Storm Water Sampling Data – (6)	Sections 7.2.3, 7.2.4, and 7.2.6
Storm water Management Controls – C.7.b.	
Pollution Prevention Manager/Committee – (1)	Section 7.2.1
Risk Identification and Assessment/Material Inventory – (2)	Annexes 1 and 7
Sediment and Erosion Prevention – (3)	Section 7.2.3
Preventive Maintenance – (4)	Section 7.2.3
Good Housekeeping – (5)	Section 7.2.3
Spill Prevention and Response Procedures – (6)	Annexes 3 and 7
Employee Training – (7)	Annex 5
Treating for Illicit Connections – Certification – (8)	Section 1.7
Visual Site Inspection – C.7.c.	Sections 7.1.5 and 7.2.4
Recordkeeping – C.7.d.	Sections 7.2.3, 4.2, and 4.3

**EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT (EPCRA)
 INVENTORY REPORTING**

INVENTORY REPORTING REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Typical Example of Inventory Above Threshold Levels – 40 CFR Part 370	Table 1

OIL POLLUTION ACT OF 1990 (OPA 90)

OIL POLLUTION ACT REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Substantial Harm Certification – 40 CFR Part 112.20	Annex 8

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
 40 CFR PART 63, SUBPART QQQQQQ**

NESHAP REQUIREMENTS	CROSS REFERENCE TO INTEGRATED PLAN
Management Practice Plan	Section 7.2.7

OSHA EMERGENCY ACTION PLAN (29 CFR 1910.38)

OSHA EMERGENCY ACTION PLAN REQUIREMENTS	CROSS-REFERENCE TO INTEGRATED PLAN
Procedures for reporting a fire or other emergency – 1910.38(c)(1)	Annex 2
Procedures for emergency evacuation, including type of evacuation and exit route assignments – 1910.38(c)(2)	Section 3.9
Procedures to be followed by employees who remain to operate critical plant operations before they evacuate - 1910.38(c)(3)	Section 3.9
Procedures to account for all employees after evacuation - 1910.38(c)(4)	Section 3.9
Procedures to be followed by employees performing rescue or medical duties - 1910.38(c)(5)	Section 5.0

OSHA EMERGENCY ACTION PLAN REQUIREMENTS	CROSS-REFERENCE TO INTEGRATED PLAN
The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties - 1910.38(c)(6)	Section 6.1

OSHA FIRE PREVENTION PLAN (29 CFR 1910.39)

OSHA FIRE PREVENTION PLAN REQUIREMENTS	CROSS-REFERENCE TO INTEGRATED PLAN
A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard – 1910.39(c)(1)	Section 3.8.1
Procedures to control accumulations of flammable and combustible waste materials - 1910.39(c)(2)	Section 3.8.1
Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials - 1910.39(c)(3)	Section 3.8.1
The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires - 1910.39(c)(4)	Section 3.8.1
The name of job title of employees responsible for the control of fuel source hazards - 1910.39(c)(5)	Section 3.8.1

REQUIRED CERTIFICATIONS, APPROVALS, AND REVIEW

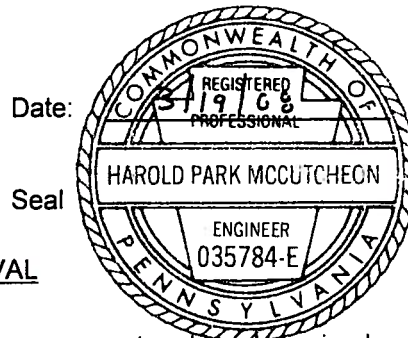
CERTIFICATION

I hereby certify that I have reviewed this Spill Prevention Control and Countermeasure Plan, and being familiar with the Federal Regulation 40 CFR, Part 112 for SPCC requirements, attest as follows:

- That I or my agent have visited and examined the facility;
- That the plan has been prepared in accordance with good engineering practices and considers applicable industry standards;
- That procedures for required inspections and testing have been established; and
- That the Plan is adequate for the facility.

[40 CFR Part 112.3(d)]

Signature: 




Registration Number: 035784-E

Seal

MANAGEMENT APPROVAL

This Integrated Contingency Plan is fully approved by Koppers management and has been implemented as herein described.



Vance Haskin
 Facility Manager

Dated: 03/25/08

ANNUAL REVIEW AND EVALUATION OF SPCC PLAN

I have completed an annual review and evaluation of this Plan on the date noted and [will] [will not] amend the Plan as a result [note: Koppers review policy is annual, regulatory requirement is once per five years - 40 CFR Part 112.5(b)].

Signature	Title	Will or Will Not	Date

OIL POLLUTION ACT NO SUBSTANTIAL HARM CERTIFICATION

Facility Name: Koppers Inc., Grenada, Mississippi Facility

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

NO

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

NO

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

NO

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

NO

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

NO

Certification:

I certify under penalty of law that I have personally examined and am familiar with the information presented, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____

Vance R. Haskin

Printed Name: _____

Vance R. Haskin

Date: _____

03/25/08

TABLE

**Table 1
Significant Stored Materials**

Tank #	Description/ Contents	Capacity (gallons)	Containment	Overfill/ Overflow Method	Storm Water Exposure/ Controls	Planned Integrity Testing, as applicable
1	Pentachlorophenol treating cylinder, flow through process vessel	36,000	Full concrete secondary containment	Process controls	No exposure, covered by a roof. Any incidental storm water is collected in secondary containment and pumped to wastewater treatment.	--
2	Creosote treating cylinder, flow through process vessel	29,250	Full concrete secondary containment	Process controls	No exposure, covered by a roof. Any incidental storm water is collected in secondary containment and pumped to wastewater treatment.	--
3	Creosote treating cylinder, flow through process vessel	28,865	Full concrete secondary containment	Process controls	No exposure, covered by a roof. Any incidental storm water is collected in secondary containment and pumped to wastewater treatment.	--
4	Creosote treating cylinder, flow through process vessel	28,970	Full concrete secondary containment	Process controls	No exposure, covered by a roof. Any incidental storm water is collected in secondary containment and pumped to wastewater treatment.	--
5	Pentachlorophenol treating cylinder, flow through process vessel	28,760	Full concrete secondary containment	Process controls	No exposure, covered by a roof. Any incidental storm water is collected in secondary containment and pumped to wastewater treatment.	--
6	Pentachlorophenol work tank, storage	35,180	Full concrete secondary containment	Float-type manual gauge. Direct communication between pumping and gauging when filling from mix tanks 32/33.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Second Quarter 2008
7	Creosote work tank, storage	35,882	Full concrete secondary containment	Float-type manual gauge. Direct communication between pumping and gauging when filling from rail car.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Second Quarter 2008
8	Creosote work tank, storage	30,084	Full concrete secondary containment	Electronic gauge and high level alarm. Direct communication between pumping and gauging when filling from rail car.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Second Quarter 2008
9	Creosote work tank, storage	30,983	Full concrete secondary containment	Electronic gauge and high level alarm. Direct communication between pumping and gauging when filling from rail car.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	2013
10	Pentachlorophenol work tank, storage	35,882	Full concrete secondary containment	Float-type manual gauge. Direct communication between pumping and gauging when filling from mix tanks 32/33.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Second Quarter 2008

Tank #	Description/ Contents	Capacity (gallons)	Containment	Overfill/ Overflow Method	Storm Water Exposure/ Controls	Planned Integrity Testing, as applicable
11	Ferric Acid, storage	330	Full concrete secondary containment	Pre-filled tote from manufacturer.	No exposure, stored inside a building.	--
12	Process and storm wastewater, storage	112,248	Full concrete secondary containment	Pressure gauge at bottom of tank, manual gauge.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	API 653 external inspection completed 1/28/08
13	Process and storm wastewater, storage	112,248	Full concrete secondary containment	Direct communication between pumping and gauging when filling.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Fourth Quarter 2008
14	Diesel fuel, storage	112,248	Full concrete secondary containment	Pressure gauge at bottom of tank, manual gauge. Direct communication between pumping and gauging when filling.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	API 653 external inspection completed 1/28/08
15	Creosote, storage. Tank currently empty and planned to be removed from service.	101,560	Full concrete secondary containment	None	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	API 653 external inspection completed 1/28/08
16	Process and storm wastewater, storage	303,301	Full concrete secondary containment	Pressure gauge at bottom of tank, manual gauge.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Second Quarter 2008
17	Process and storm wastewater, storage	259,875	Full concrete secondary containment	Float-type manual gauge.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Second Quarter 2008
18	Coagulant, wastewater treatment system chemical	1,548	Full metal / concrete secondary containment	Visual	No exposure, inside a building.	--
19	Process wastewater, storage	4,552	Full concrete secondary containment	Float-type manual gauge.	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Fourth Quarter 2008
20	Creosote process wastewater, storage	8,269	Full concrete secondary containment	High level alarm.	No exposure, under a roof.	Fourth Quarter 2008
21	Removed	--	--	--	--	--
22	Process wastewater, vacuum vent tank	2,994	Full concrete secondary containment	Fume management condensate tank, visual inspection	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
23	Pentachlorophenol process wastewater, storage	8,269	Full concrete secondary containment	High level alarm	No exposure, under a roof.	Fourth Quarter 2008
24	Gasoline, storage	1,050	Full concrete secondary containment	Measured prior to and during filling. Visual observation and direct communication between the gauger and pumper.	No exposure, under a roof.	Fourth Quarter 2008
25	Diesel fuel, storage	10,539	Full concrete secondary containment	Measured prior to and during filling. Visual observation and direct communication between the gauger and pumper.	No exposure, under a roof.	Fourth Quarter 2008
26	Treated wastewater, storage	17,202	Full concrete secondary containment	High level alarm	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--

Tank #	Description/ Contents	Capacity (gallons)	Containment	Overfill/ Overflow Method	Storm Water Exposure/ Controls	Planned Integrity Testing, as applicable
27	Treated wastewater, flow-through clarifier	30,582	Full concrete secondary containment	Clarifier overflows to Tank 26	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
28	Treated wastewater, flow-through biological aeration tank	169,664	Full concrete secondary containment	Aeration tank overflows to Tank 27	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
29	Removed	--	--	--	--	--
30	Pentachlorophenol process wastewater, storage	10,415	Full concrete secondary containment	Operational and visual controls. Valved manifold system to observation box	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Fourth Quarter 2008
31	Pentachlorophenol process wastewater, storage	10,415	Full concrete secondary containment	Operational and visual controls. Valved manifold system to observation box	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Fourth Quarter 2008
32	Pentachlorophenol concentrate and diesel fuel, mixing tank	9,166	Full concrete secondary containment	Visual, open topped. Used for batch mixing of treating solution in series with Tank 33	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Fourth Quarter 2008
33	Pentachlorophenol concentrate and diesel fuel, mixing tank	5,060	Full concrete secondary containment	Visual, open topped. Used for batch mixing of treating solution in series with Tank 32	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Fourth Quarter 2008
34	Pentachlorophenol concentrate, storage	10,513	Full concrete secondary containment	Float type manual gauge, direct communication between pumping and gauging when filling	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	Fourth Quarter 2008
35	Filter press treatment mix, water and lime storage	1,003	Full concrete secondary containment	Visual, open topped, observed when filled	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
36	Hydraulic oil, reservoir for operating equipment	75	Concrete pad contained by topography	Observed when filled during maintenance	Exposed, on a concrete pad with visual inspection and cleanup as needed.	--
37	Hydraulic oil, reservoir for operating equipment	55	Concrete pad contained by topography	Observed when filled during maintenance	Exposed, on a concrete pad with visual inspection and cleanup as needed.	--
38	Hydraulic oil, storage	179	Full concrete secondary containment inside a building	Observed when filled during maintenance, manual measurements	No exposure, inside a building.	Small, elevated tank, visual
39	Hydraulic oil, storage	179	Full concrete secondary containment inside a building	Observed when filled during maintenance, manual measurements	No exposure, inside a building.	Small elevated tank, visual
40	Motor oil, storage	179	Full concrete secondary containment	Observed when filled during maintenance, manual measurements	No exposure, covered by a roof.	Small, elevated tank, visual
41	Used oil, storage	290	Full concrete secondary containment	Observed when filled during maintenance, manual measurements	No exposure, covered by a roof.	Small, elevated tank, visual
42 A	Hydraulic oil, reservoir for operating equipment	100	Contained by topography	Observed when filled during maintenance	No exposure, covered by a roof.	--
42 B	Hydraulic oil, reservoir for operating equipment	27	Contained by topography	Observed when filled during maintenance	No exposure, covered by a roof.	--

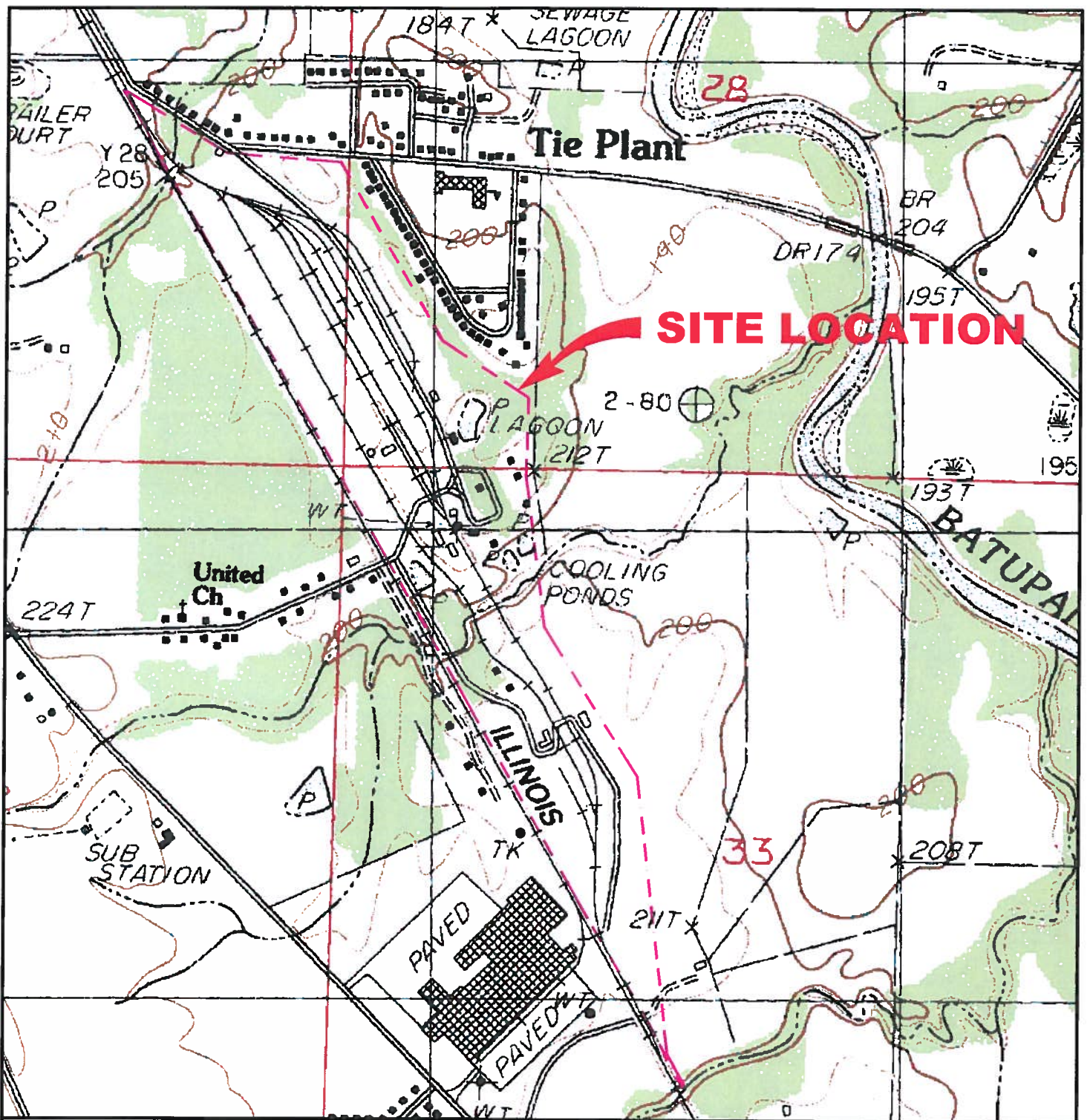
Tank #	Description/ Contents	Capacity (gallons)	Containment	Overfill/ Overflow Method	Storm Water Exposure/ Controls	Planned Integrity Testing, as applicable
42 C	Hydraulic oil, reservoir for operating equipment	29	Contained by topography	Observed when filled during maintenance	No exposure, covered by a roof.	--
43	Hydraulic oil, storage	73	Full concrete secondary containment, inside a building	Direct observation when filling	No exposure, inside a building.	Small, elevated tank, visual
44 A	Hydraulic oil, reservoir for operating equipment	70	Full concrete secondary containment	Observed when filled during maintenance	No exposure, covered by a roof.	--
44 B	Hydraulic oil, reservoir for operating equipment	6	Contained by topography	Observed when filled during maintenance	No exposure, covered by a roof.	--
45	Hydraulic oil, reservoir for operating equipment	42	Contained by topography	Controlled at time of equipment maintenance	Exposed, on a concrete pad with visual inspection and cleanup as needed.	--
46	Hydraulic oil, reservoir for operating equipment	71	Contained by topography	Controlled at time of equipment maintenance	Exposed, on a concrete pad with visual inspection and cleanup as needed.	--
47	Hydraulic oil, reservoir for operating equipment	71	Contained by topography	Controlled at time of equipment maintenance	Exposed, on a concrete pad with visual inspection and cleanup as needed.	--
48 A	Process wastewater, flow-through oil/water separator	35,040	Full concrete secondary containment	High level alarm and shutoff	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
48 B	Process wastewater, flow-through oil/water separator. Planned to be removed in Y2008.	34,703	Full concrete secondary containment	High level alarm and shutoff	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
49	Process wastewater, flow-through chemical mix tank	1,431	Full concrete secondary containment	Overflows to wastewater treatment tanks	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
50	Process wastewater, flow-through oil/water separator	48,227	Full concrete secondary containment	High level alarm and shutoff	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
51	Process wastewater, storage	615	Full concrete secondary containment	High level alarm	No exposure, inside a building.	--
52	Process wastewater, storage	615	Full concrete secondary containment	High level alarm	No exposure, inside a building.	--
53	Process wastewater, storage	588	Full concrete secondary containment	High level alarm	No exposure, inside a building.	--
54	Motor oil, storage	69	Full concrete secondary containment, inside a building	Controlled at the time of filling, site glass	No exposure, inside a building.	Small, elevated tank, visual
55	Transmission oil, storage	69	Full concrete secondary containment, inside a building	Controlled at the time of filling, site glass	No exposure, inside a building.	Small, elevated tank, visual
56	Motor oil, storage	69	Full concrete secondary containment, inside a building	Controlled at the time of filling, site glass	No exposure, inside a building.	Small, elevated tank, visual

Tank #	Description/ Contents	Capacity (gallons)	Containment	Overfill/ Overflow Method	Storm Water Exposure/ Controls	Planned Integrity Testing, as applicable
57	Motor oil, storage	69	Full concrete secondary containment, inside a building	Controlled at the time of filling, site glass	No exposure, inside a building.	Small, elevated tank, visual
58	Gear oil, storage	69	Full concrete secondary containment, inside a building	Controlled at the time of filling, site glass	No exposure, inside a building.	Small, elevated tank, visual
59	Boiler blowdown wastewater, storage	809	Full concrete secondary containment	Automatic float and pump switch	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
60	Boiler blowdown wastewater, storage	809	Full concrete secondary containment	Automatic float and pump switch	Exposed, storm water collected in secondary containment and pumped to wastewater treatment.	--
61	Air receiver	25,692	--	--	--	--
62	Air receiver	10,277	--	--	--	--
63	Condensate return wastewater, storage	1,650	Sumps	Overflow to sumps and pumped to wastewater treatment	No exposure, inside a building.	--
64	Boiler reverse osmosis equipment make-up water, clean water	1,000	On concrete, inside a building	Automatic float switch	No exposure, inside a building.	--
65	Boiler reverse osmosis equipment discharge water	300	On concrete, inside a building	Visual	No exposure, inside a building.	--
66	Boiler reverse osmosis equipment, chemical tank Hypersperse MDC 150	50	On concrete, inside a building	Visual	No exposure, inside a building.	--
67	Boiler reverse osmosis equipment, chemical tank Control IS104	50	On concrete, inside a building	Visual	No exposure, inside a building.	--
68	Boiler chemicals, Optisperse CL370	400	On concrete, inside a building	Visual	No exposure, inside a building.	--
69	Boiler chemicals, Steammate NA9658	550	On concrete, inside a building	Visual	No exposure, inside a building.	--
70	Boiler chemicals, Control OS5300	119	On concrete, inside a building	Visual	No exposure, inside a building.	--

Notes:

- **Bold tanks** indicate SPCC applicable tanks.
- All tanks are included in a regularly scheduled visual inspection.
- Overfill/overflow method is for SPCC applicable bulk oil storage containers.
- Planned integrity testing is for SPCC applicable bulk oil storage containers, not including storage reservoirs for operating equipment (i.e., hydraulic equipment), and <30,000-gallon tanks, if fully visible for inspection.
- Planned ongoing SPCC applicable bulk oil storage containers integrity testing will be assessed on an ongoing basis, but should not exceed once every 10 years.
- Secondary containment volumes and areas for SPCC applicable tanks are presented on Figure 4.
- All bulk storage containers were specifically selected or designed to be compatible with the materials stored and conditions of the storage.

FIGURES



LEGEND

--- APPROXIMATE PROPERTY LINE

SCALE - FEET



REFERENCE:
USGS 7.5-MIN TOPOGRAPHIC TIE PLANT QUADRANGLE,
MISSISSIPPI, TAKEN 1973, MAP EDITED 1983.

**FIGURE 1
FACILITY LOCATION MAP
GRENADA FACILITY
KOPPERS INC.
GRENADA COUNTY, MISSISSIPPI**

PREPARED FOR
KOPPERS INC.
PITTSBURGH, PA

APPROVED	RB 6/13/2007
CHECKED	RS 6/14/2007
DRAWN	RB 6/11/2007
PROJECT NO.	KI.06054GRICP
DRAWING NUMBER	

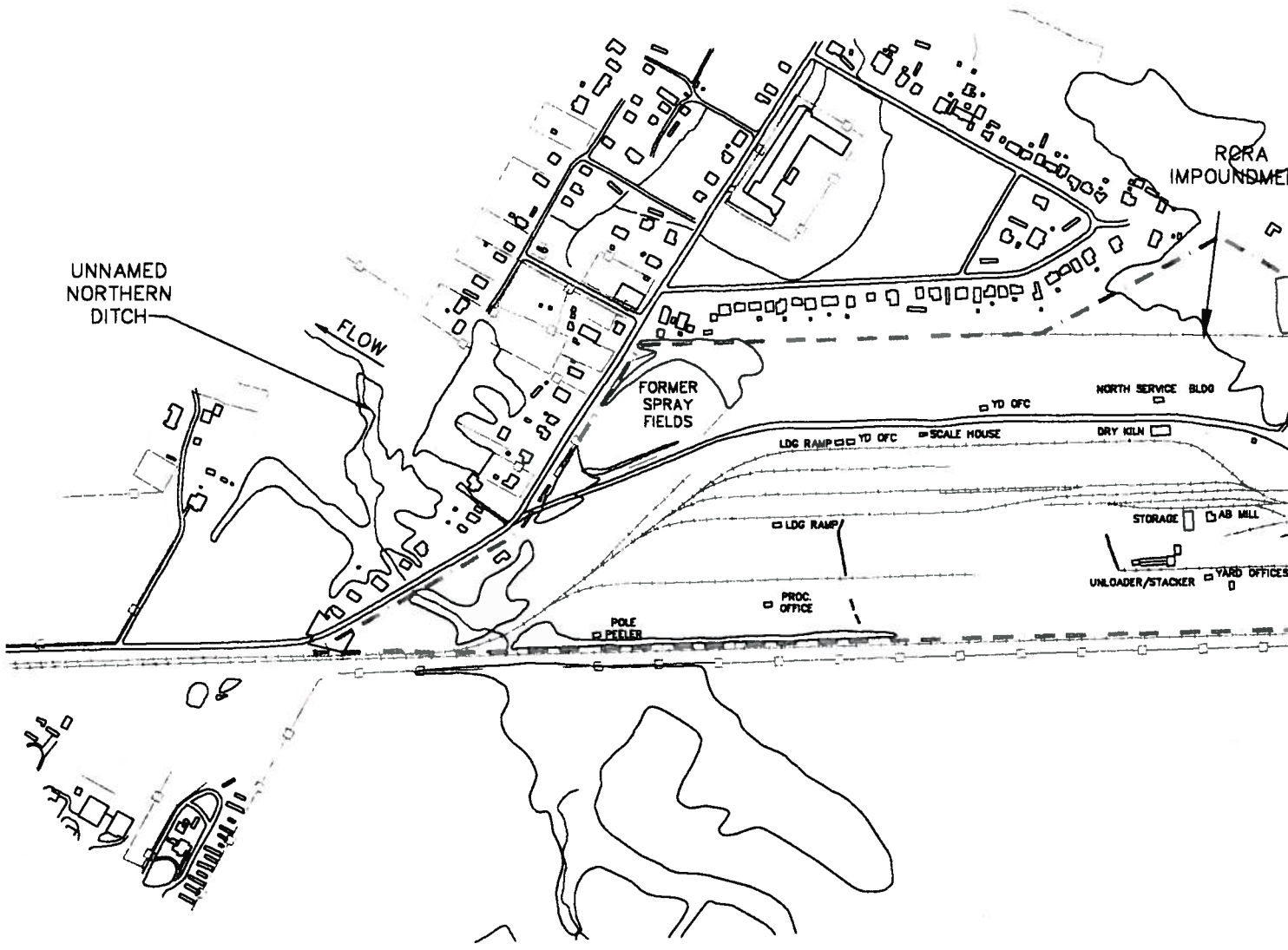


KU RESOURCES, INC.
22 SOUTH LINDEN STREET
DUQUESNE, PA 15110
(412) 488-8331
FAX: (412) 488-8338

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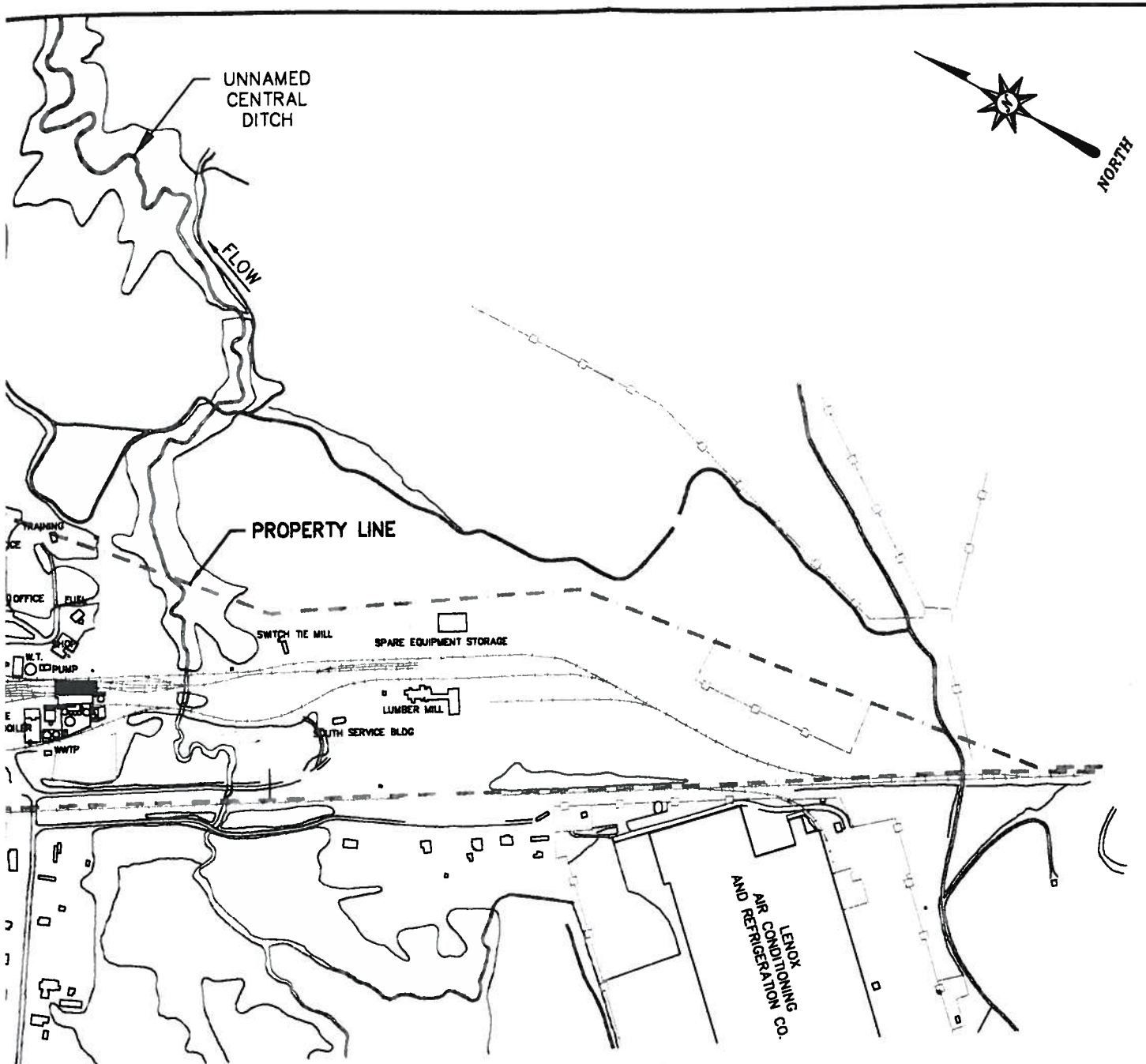
REVISION	DATE	DESCRIPTION


06054A001



LEGEND

- ROADWAYS
- - - APPROXIMATE PROPERTY
- - - RAIL
- - - DRAINAGE DITCHES
- STREAM/WATERWAYS
- - - ○ - ○ FENCE



REVISION	DATE	DESCRIPTION
FIGURE 2 FACILITY LAYOUT GRENADA FACILITY KOPPERS INC. PREPARED FOR KOPPERS INC. PITTSBURGH, PENNSYLVANIA		
APPROVED	XXX MM/DD/YYYY	 KU RESOURCES, INC. 22 SOUTH LINDEN STREET DUQUESNE, PA 15110 (412) 468-8881 FAX: (412) 468-8888 www.kuresources.com
CHECKED	XXX MM/DD/YYYY	
DRAWN	RLB 02/07/2007	
PROJECT NO.	KI.06054GRIC.P	
DRAWING NUMBER		
06054B002		

UNNAMED
NORTHERN
DITCH

FLOW

UNDERGROUND
PIPE

OUTFALL
006

OUTFALL 005

OUTFALL
007

LEGEND

ROADWAYS

APPROXIMATE PROPERTY
RAIL

STREAM/WATERWAYS

DIVIDE BETWEEN OUTFALLS

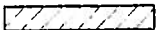
DRAINAGE DITCHES/
STORMWATER FLOW DIRECTION



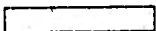
OUTFALL 001 DRAINAGE AREA



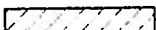
OUTFALL 002 DRAINAGE AREA



OUTFALL 003 DRAINAGE AREA



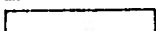
OUTFALL 004 DRAINAGE AREA



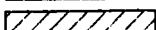
OUTFALL 005 DRAINAGE AREA



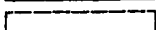
OUTFALL 006 DRAINAGE AREA



OUTFALL 007 DRAINAGE AREA

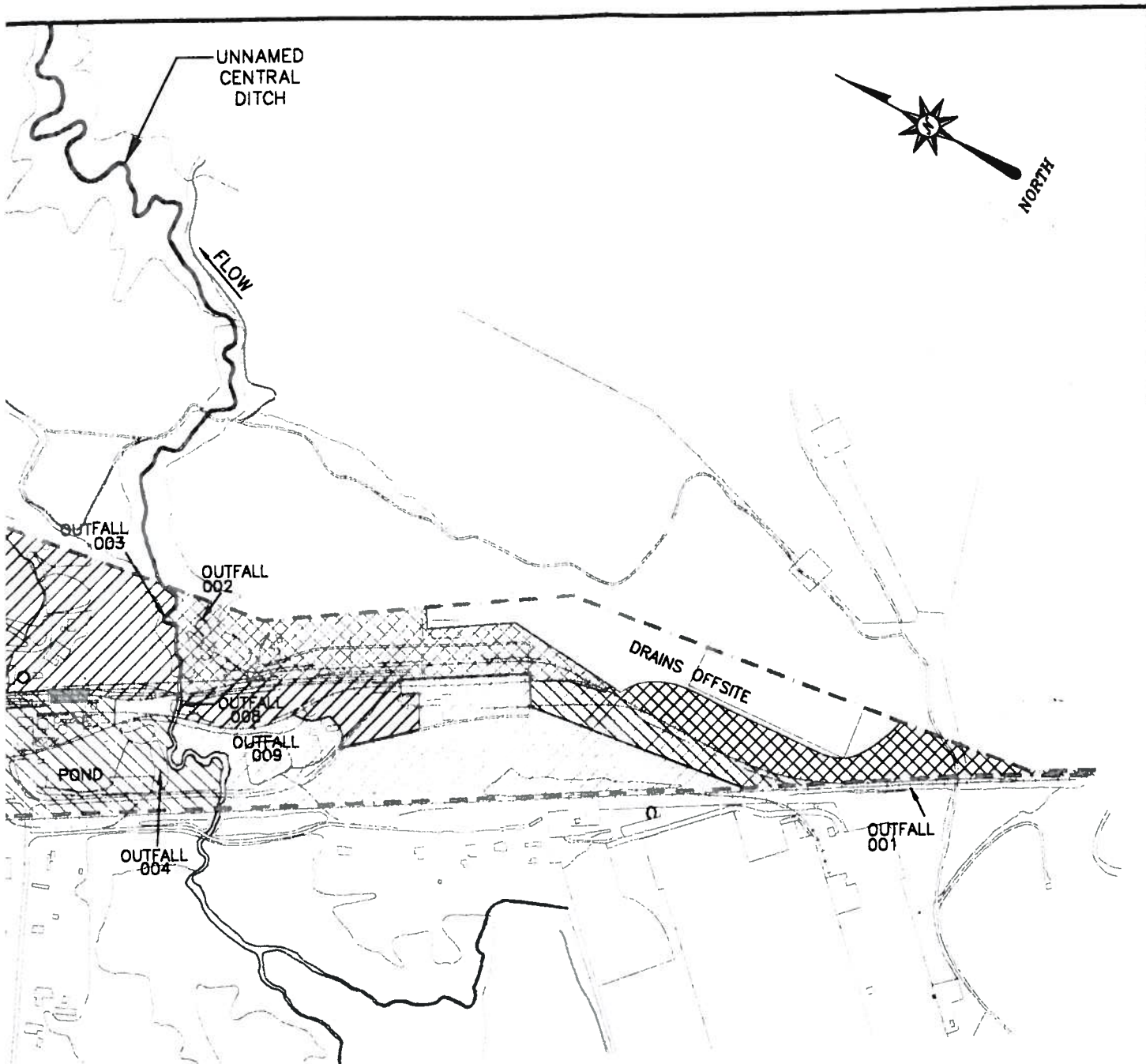



OUTFALL 008 DRAINAGE AREA



OUTFALL 009 DRAINAGE AREA

NOTE: ALL LOCATIONS ARE APPROXIMATE
AND SOME TRACK AND STRUCTURES ARE
NOT SHOWN.

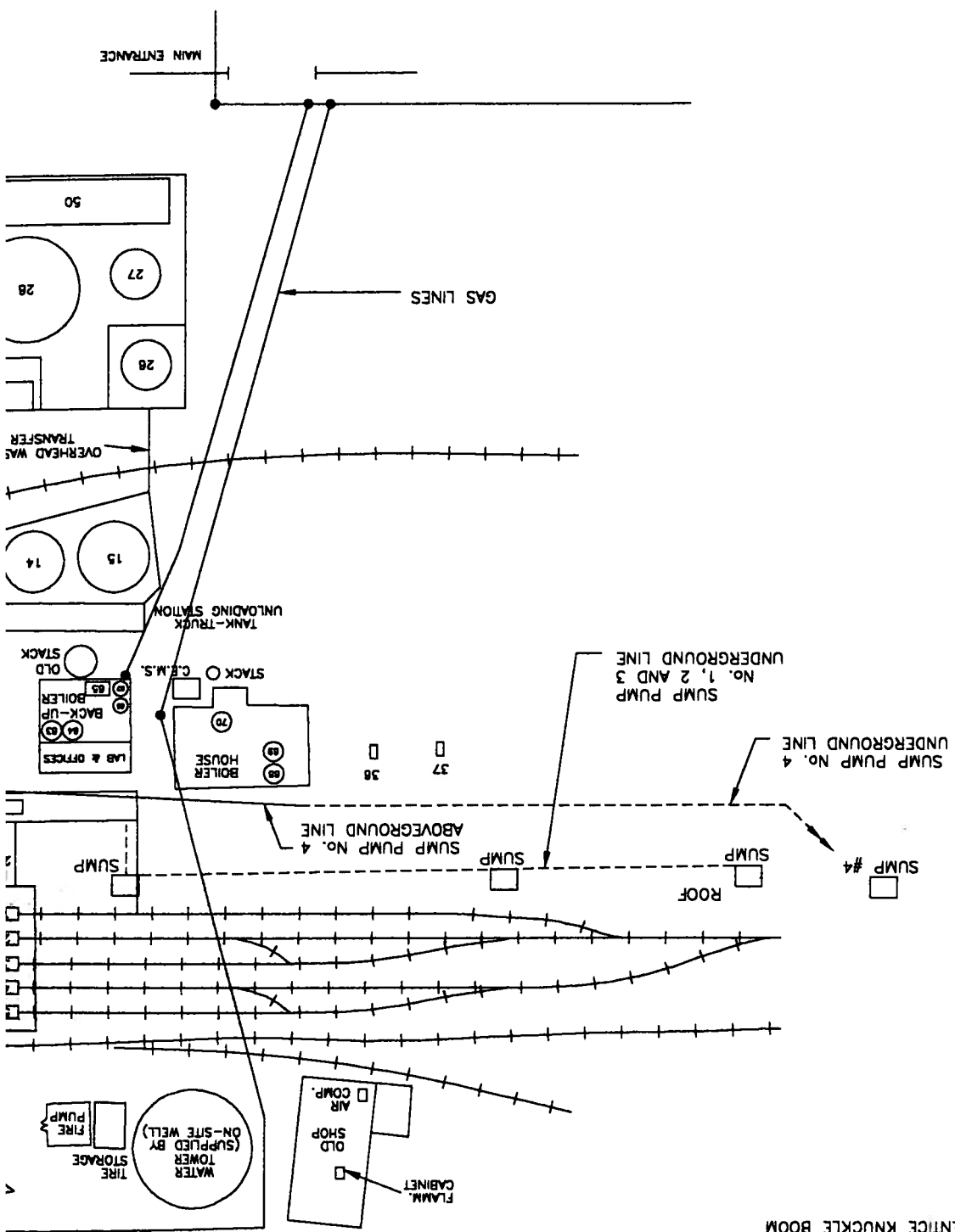


REVISION	DATE	DESCRIPTION
FIGURE 3 SURFACE WATER DRAINAGE PATTERNS AND AREAS GRENADA FACILITY KOPPERS INC. PREPARED FOR KOPPERS INC. PITTSBURGH, PENNSYLVANIA		
APPROVED	XXXX MM/DD/YYYY	 KU RESOURCES, INC. 22 SOUTH LINDEN STREET DUCQUESNE, PA 15110 (412) 469-8331 FAX: (412) 469-8336 www.kuresources.com
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DRAWN	RLB 02/20/2007	
PROJECT NO.	KI.06054GRIC.P	
DRAWING NUMBER		
06054B003		

SPPC-REGULATED BULK OIL STORAGE CONTAINER AREAS

AREA	LARGEST TANK	SECONDARY CONTAINMENT VOLUME
MAIN TANK FARM	TANK 14 = 112,428 GALLONS	300,000 GALLONS
PENTA MIX AREA	TANK 34 = 10,513 GALLONS	40,000 GALLONS
WASH PAD AREA	TANK 41 = 290 GALLONS	2,060 GALLONS
SHOP	TANK 40 = 179 GALLONS	>3,000 GALLONS
OIL HOUSE	TANKS 38/39 = 179 GALLONS (EACH)	800 GALLONS
FUEL AREA	TANK 25 = 10,539 GALLONS	11,670 GALLONS
LUMBER MILL	TANK 43 = 73 GALLONS	180 GALLONS

- 42A-42C - SWITCH TIE MILL
- 44A-44B - TIE STACKER
- 45 - TIE SORTER PRENTICE KNUCKLE BOOM
- 46 - A&B MILL IN-FEED PRENTICE KNUCKLE BOOM
- 47 - A&B MILL OUT-FEED PRENTICE KNUCKLE BOOM
- OIL STORAGE TANK NOT DEPICTED:
- 43 - LUMBER MILL



GAS LINES

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 KU RESOURCES, INC.
 22 SOUTH LINDEN STREET
 DUCESBURG, PA 16110
 (412) 489-8831
 FAX: (412) 489-8838

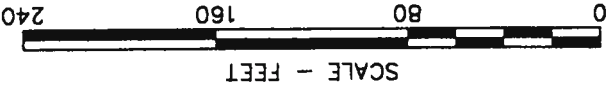


APPROVED XXX MM/DD/YYYY
 CHECKED XXX MM/DD/YYYY
 DRAWN RLB 02/28/2008
 PROJECT NO. K1060546R/C.P
 DRAWING NUMBER 06054B004

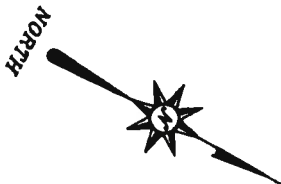
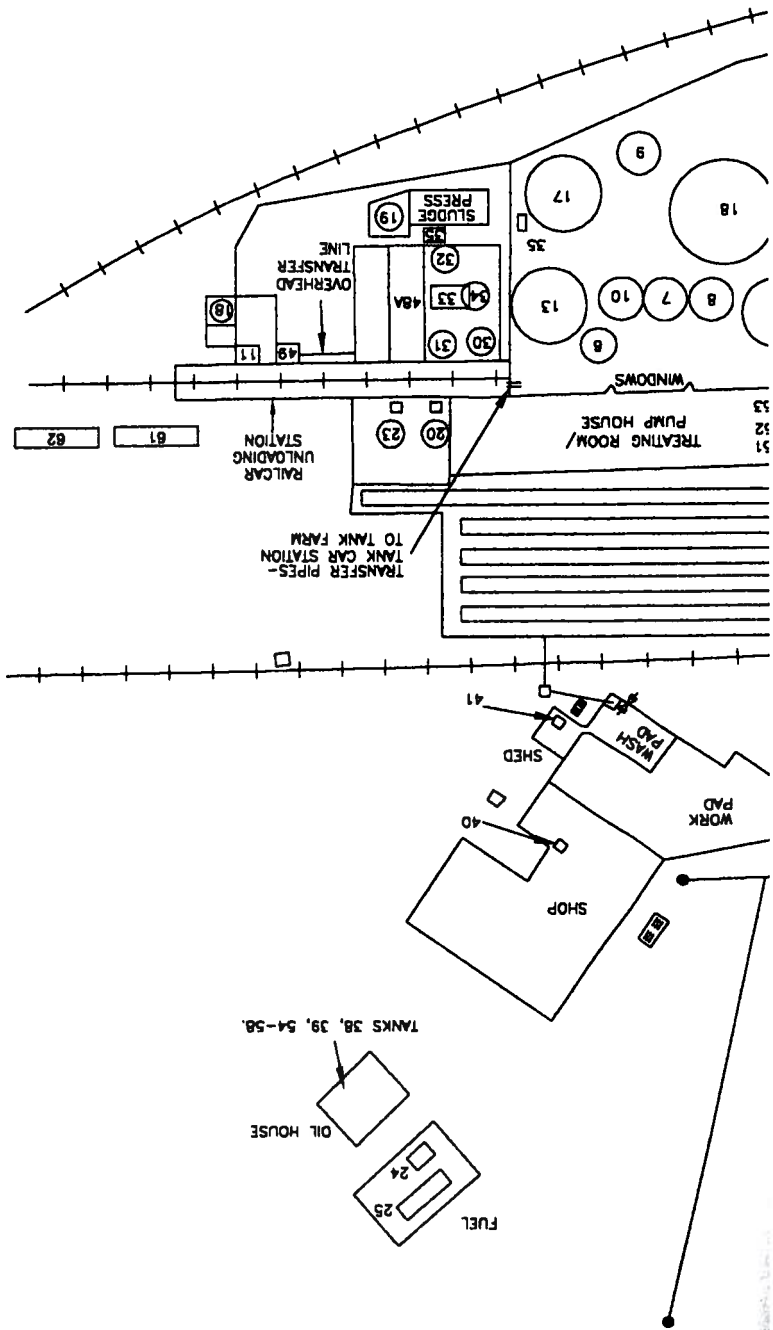
PREPARED FOR
 KOPPERS INC.
 PITTSBURGH, PENNSYLVANIA

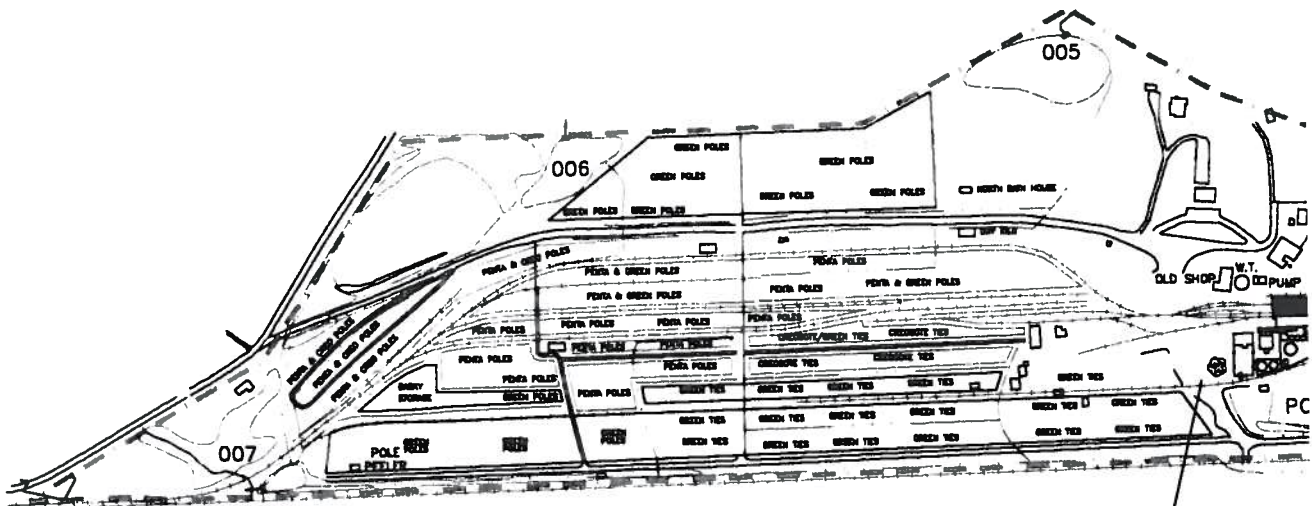
FIGURE 4
 DETAILED FACILITY
 AREAS LAYOUT
 GRENADA FACILITY
 KOPPERS INC.

REVISION	DATE	DESCRIPTION



LEGEND
 ● GAS METER
 ○ ROOF

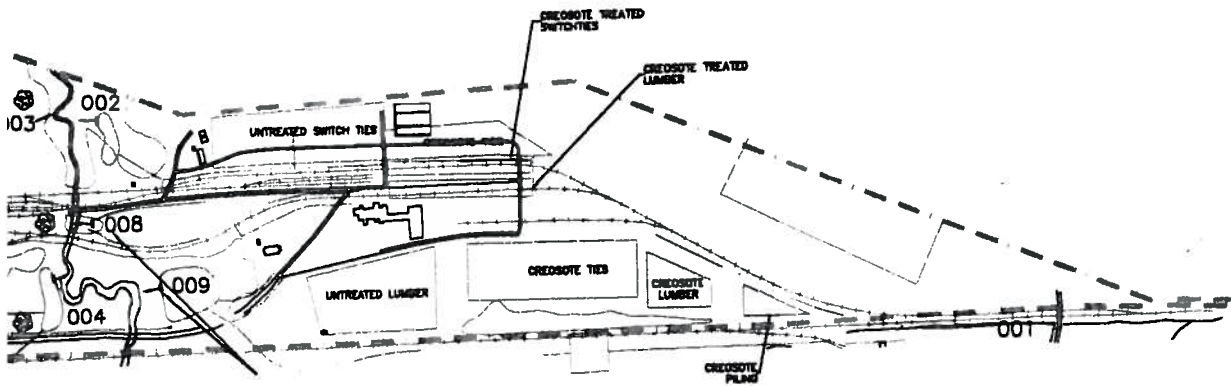
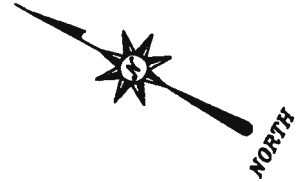




LEGEND


- | | | | |
|-----------|----------------------|-------|---|
| ————— | ROADWAYS | ————— | COMBINED TREATED PRODUCTS
(PENTA & CREOSOTE) |
| - - - - - | APPROXIMATE PROPERTY | ————— | PENTA TREATED PRODUCTS |
| - - - - - | RAIL | ————— | CREOSOTE TREATED PRODUCTS
STORAGE AREA |
| - - - - - | DRAINAGE DITCHES | ————— | GREEN/CLEAN PRODUCTS
STORAGE AREA |
| ————— | STREAM/WATERWAYS | ● | SAND/SAWDUST PILES |

NOTE: ALL
SOV
NOT

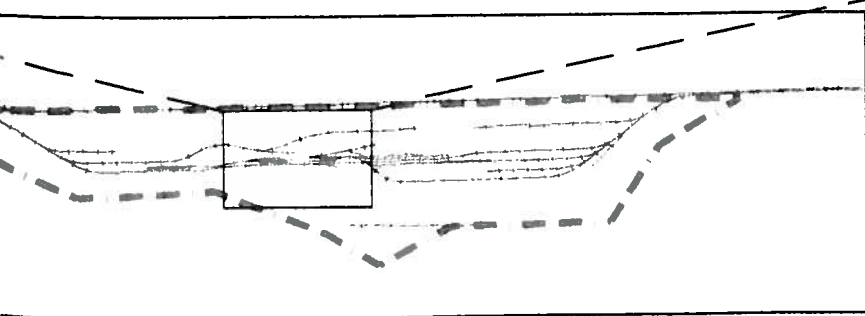
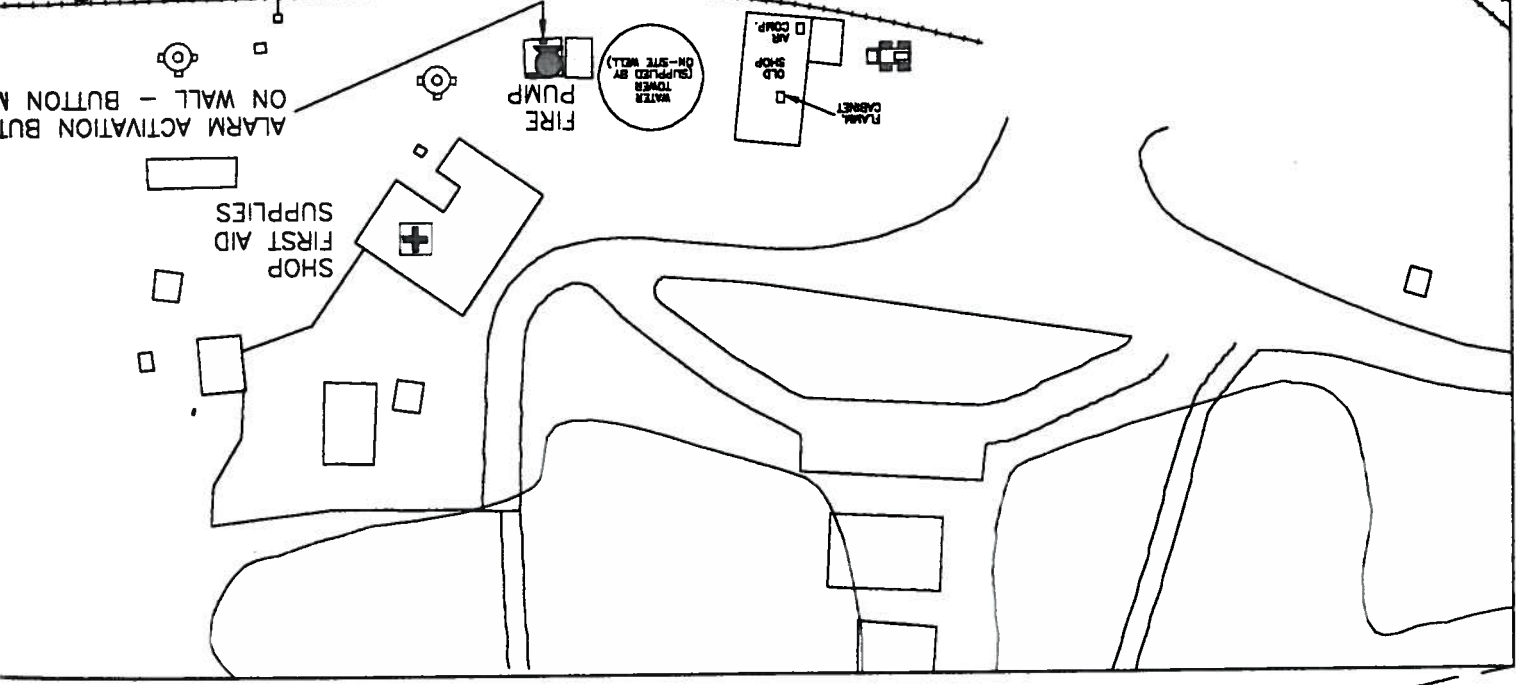
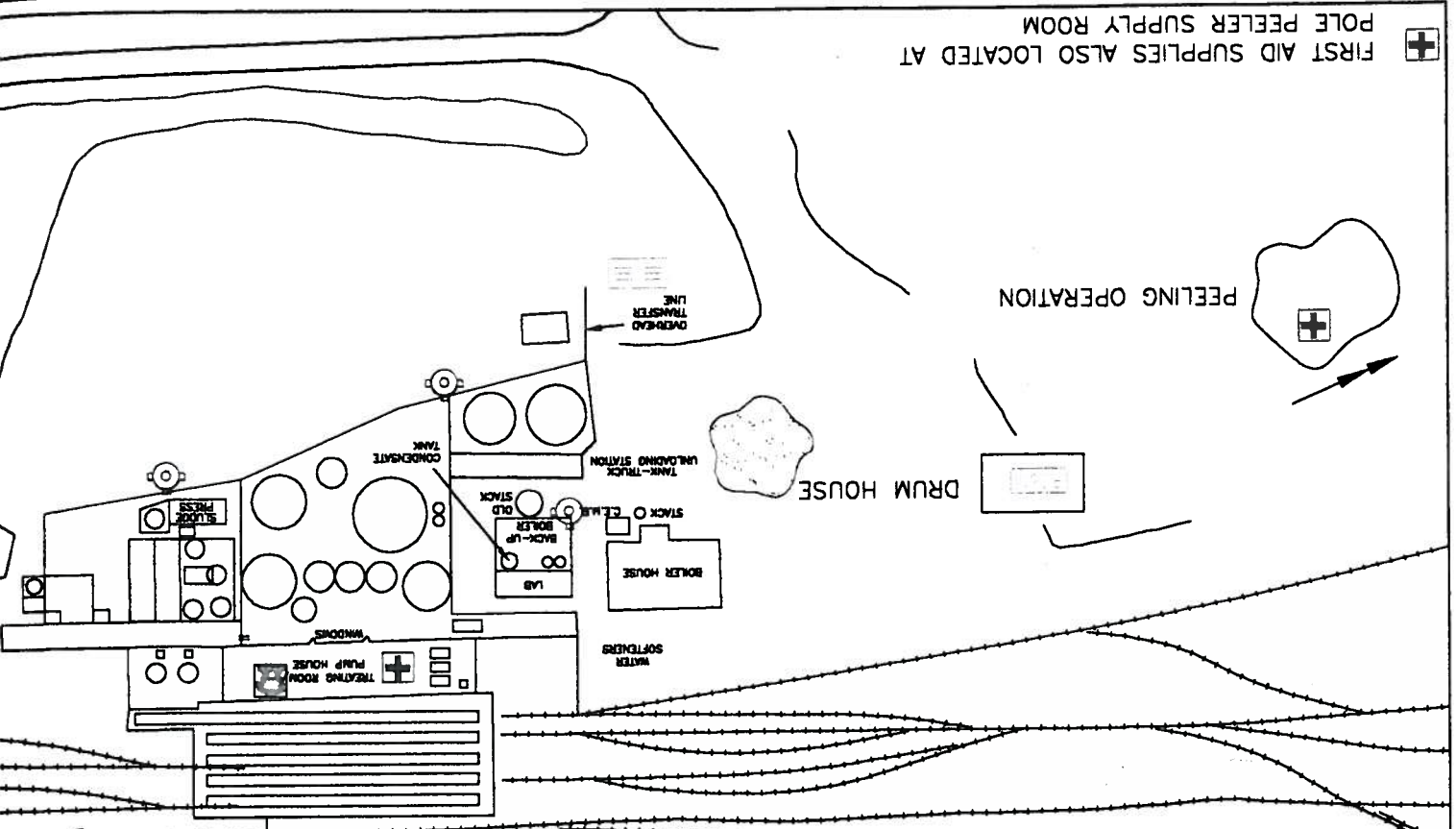


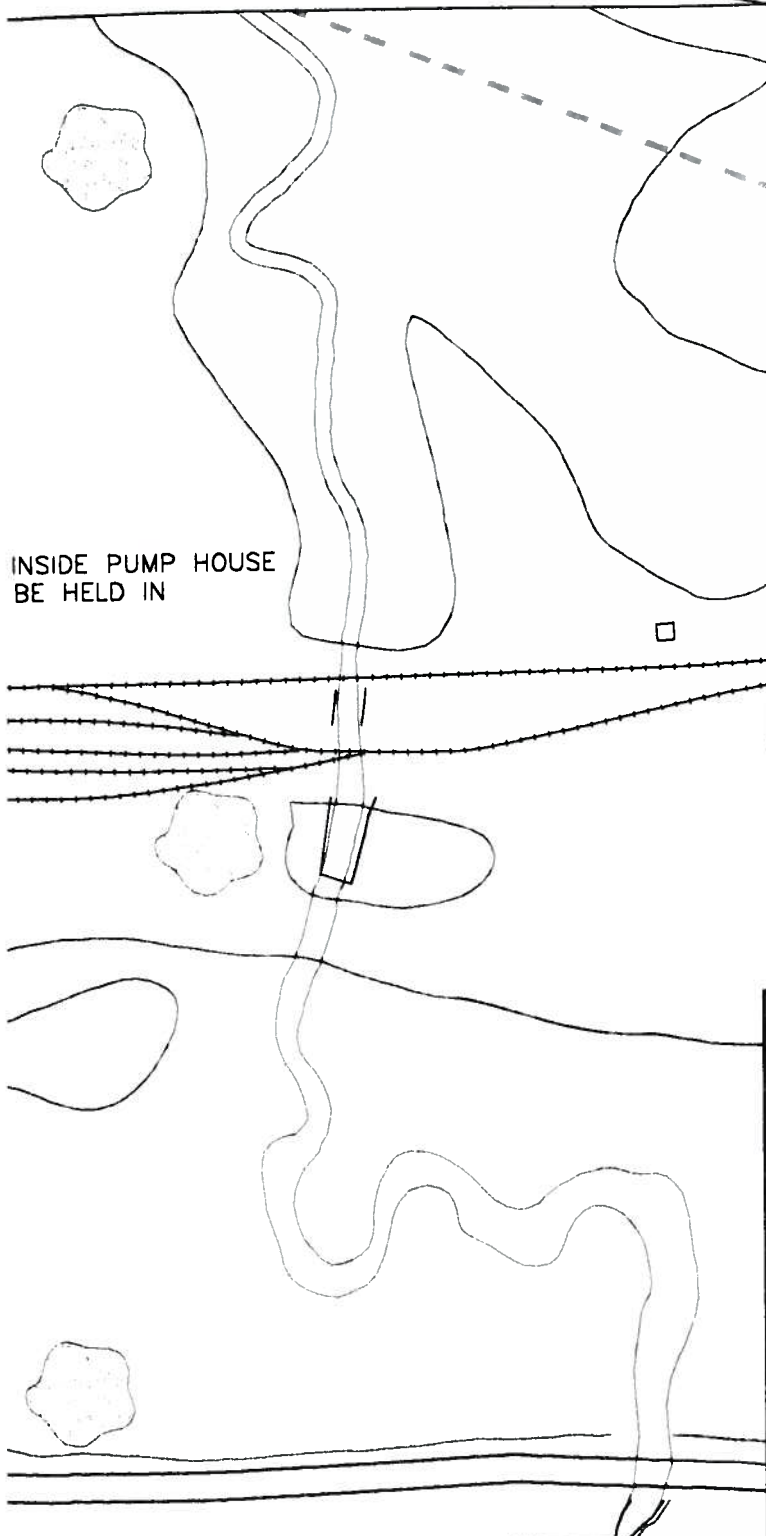
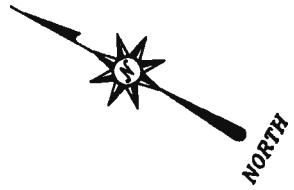
POINTS ARE APPROXIMATE,
 & STRUCTURES ARE












REVISION	DATE	DESCRIPTION
FIGURE 5 EXPOSED MATERIALS		
GRENADA FACILITY KOPPERS INC.		
PREPARED FOR KOPPERS INC. PITTSBURGH, PENNSYLVANIA		
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DRAWING NUMBER		
06054B005		

FIRST AID SUPPLIES ALSO LOCATED AT
POLE PEELER SUPPLY ROOM






LEGEND

-  - PUMP
-  - POLLUTION CONTROL AND MITIGATION EQUIPMENT (SPILL KIT)
-  - FIRST AID SUPPLIES
-  - TELEPHONE TO REPORT EMERGENCIES
-  - MONITORS / HYDRANTS
-  - LOADERS / FORKLIFTS
-  - SAND/SAWDUST PILES
-  - CATCH BASIN
-  - APPROXIMATE PROPERTY LINE

NOT TO SCALE

REVISION	DATE	DESCRIPTION
<p>FIGURE 6 EMERGENCY EQUIPMENT LOCATIONS</p> <p>GRENADA FACILITY KIPPERS INC.</p> <p>PREPARED FOR KOPPERS INC. PITTSBURGH, PENNSYLVANIA</p>		
APPROVED	XXX MM/DD/YYYY	 <p>KU RESOURCES, INC. 22 SOUTH LINDEN STREET DUQUESNE, PA 16110 (412) 488-8331 FAX: (412) 488-8936</p> <p>www.kuresources.com</p>
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PROJECT NO.	KI.06054GRIC.P	
DRAWING NUMBER		
<p>06054B006</p>		

APPENDICES

Appendix A
Environmental Incident Report

APPENDIX D INCIDENT INVESTIGATION FORM

Facility:

SECTION 1: GENERAL INFORMATION

Note: Immediately make notifications to NRC, State, Local and Koppers (as applicable)

Type of Incident (check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Reportable release | <input type="checkbox"/> Injury / Illness |
| <input type="checkbox"/> Non-reportable release | <input type="checkbox"/> Near Miss |
| <input type="checkbox"/> Transportation related release | <input type="checkbox"/> Complaints of any kind (e.g. dust, odor, noise, etc) |
| <input type="checkbox"/> Permit limit exceedance (air/water) or permit / regulatory violation (explain below) | <input type="checkbox"/> Enforcement Notification (e.g. Notice of Violation/Letter of Noncompliance/ Agency Action, etc.) |
| <input type="checkbox"/> Failure of Pollution Control Equipment | <input type="checkbox"/> Other (Explain below) |

Location of Incident:

Date and time of Incident:

Description of Incident (include specifics of incident and incident sequence):

SECTION 2: INVESTIGATION

Root Cause Analysis Summary (refer to Appendix E):

SECTION 3: CORRECTIVE / PREVENTIVE ACTION

Corrective / preventive action (describe what has been done or will be done to prevent recurrence):

SECTION 4: AGENCY CONTACT FOLLOWING THIS INCIDENT

Agency contact (Include date, time, name, title, agency and summary of inspection/visit/enforcement action):

SECTION 5: FOR ENVIRONMENTAL INCIDENTS ONLY

Materials Involved:

Material/Constituent	Quantity Released	RQ	Exceeded RQ?	Media Affected (soil, water, air)

Notification Log:

Agency	Phone No.	Date	Time	Name of Contact	Notes

Immediate Containment and Cleanup actions:

Disposition of recovered material:

Material	Quantity	Disposal or Storage Location

Assessment of Actual or potential hazards to human health or the environment:

Photographs: Attach photographs (if available) which show the incident area before, and after response action. Mark date and time of each photo.

Photos:

SPCC: Sign here to indicate that you have reviewed your plant's SPCC Plan and updated it with any required information.

Name:

Date:

SECTION 6: FOR INJURIES, ILLNESSES AND NEAR MISSES ONLY

Personal Data:

Name of Injured Employee	Social Security Number	Sex	Age	Substance Abuse Test Administered
				() Y () N

Department	Employee's Usual Occupation	Occupation at Time of Accident	Supervisor

Employment Category	Length of Employment	Time in Occupation at Time of Accident
<input type="checkbox"/> Regular, Full Time <input type="checkbox"/> Non-employee <input type="checkbox"/> Regular, Part Time <input type="checkbox"/> Seasonal <input type="checkbox"/> Temporary	<input type="checkbox"/> < 1 month <input type="checkbox"/> 6 months to 5 yrs <input type="checkbox"/> 1-5 months <input type="checkbox"/> more than 5 yrs	<input type="checkbox"/> < 1 month <input type="checkbox"/> 6 months to 5 yrs <input type="checkbox"/> 1-5 months <input type="checkbox"/> more than 5 yrs

Phase of Employee's Workday at Time of Accident

<input type="checkbox"/> During Rest Period	<input type="checkbox"/> Entering or Leaving Facility	<input type="checkbox"/> During Meal Period	<input type="checkbox"/> Performing Work Duties	<input type="checkbox"/> Working Overtime
<input type="checkbox"/> Other, explain: _____				

Incident Details:

Nature of Injury and Body Part
Names of Others Injured in Same Incident
Witnesses

Policy



Koppers Inc.
Scope: US, KA, KE
Document No.: K-SHE-008
Revision No.: 3
Effective Date: 1/15/07
Page 14 of 22

SH&E Incident Investigation & Reporting

Written by: L.S. Hyde
Approved by: S.R. Lacy

Incident Details:

Time of Injury	Severity of Injury		
() AM () PM	() Report Only	() OSHA Recordable (Injury)	() Days Away
Time within shift:	() First Aid	() OSHA Recordable (Illness)	() Fatality
Type of Shift:	() Medical Treatment Only	() Restricted	() Other, specify

Task and Activity at Time of Accident	Supervision at Time of Accident	
General type of task:	() Directly Supervised	() Supervision not feasible
Specific activity:	() Indirectly Supervised	() Other, specify
Employee was working	() Not Supervised	
() Alone	() With crew or fellow worker	

SECTION 7: SIGNATURES

Preparer	Reviewer
Report Prepared By:	Report Approved By:
Title:	Title:
Department:	Date:
Date Investigation Complete:	
Corrective Actions Implemented? () Y () N	
Date Corrective Action Complete:	

ENTER INVESTIGATION DATA IN EMIS

Notes:

1. The use of this form is optional. Incident investigation details will be entered into EMIS. This form is for the investigator's use only.
2. Environmental incidents – complete sections 1, 2, 3, 4, 5 & 7
3. Safety incidents – complete sections 1, 2, 3, 4, 6 & 7

Appendix B
Inspection Forms

SHE
Fire Protection Equipment & Systems Inspection
Report

Written by: H.C. Huschak
 Approved by: S.R. Lacy

FIRE PROTECTION EQUIPMENT & SYSTEMS INSPECTION REPORT

Plant	Location	Date
--------------	-----------------	-------------

Instructions: Complete this form while on your inspection. Most, if not all, systems should be checked on a weekly basis, unless supervised by a central station alarm system (Monthly checks are satisfactory). When the form is completed, sign it, and forward copies to the supervisor in charge of fire protection.

Sprinkler Control Valves

List any unsatisfactory conditions, locations, corrections, etc. on the reverse side.

No.	Area Controlled	Open	Shut	Sealed	Static Pressure	Residual Pressure Drain Valve Open	No.	Area Controlled	Open	Shut	Sealed	Static Pressure	Residual Pressure Drain Valve Open

If any valve is found shut or unsealed, give explanation on reverse side of sheet; replace missing seals and record pressure with drain valve wide open after resealing.

Sprinklers & Alarms

- Are all sprinklers connected and free of corrosion or paint?
- Are all sprinklers free from obstructions by high piling or partitions?
- Were sprinkler alarms tested?
- Operated Satisfactorily?

YES	NO
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Number of extra sprinklers: _____ 165°F: _____ 212°F: _____ 286°F: _____ 350°F

Dry Pipe Valves

- Are dry pipe valves located in heated rooms or areas?
- Are air valves open?
- Was the valve tested for water column?
- Were low points drained of condensate?

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Special Extinguishing Systems

In service Yes No Properly Maintained? Yes No

Fire Pumps - Use Koppers Diesel or Electric Fire Pump Checklists (K-FORM-SHE-009 & 010)

Tanks & Reservoirs - Use Koppers Diesel or Electric Fire Pump Checklists (K-FORM-SHE-009 & 010)

SHE
Fire Protection Equipment & Systems Inspection Report

Written by: H.C. Huschak
Approved by: S.R. Lacy

City Water
In commission Yes No Pressure _____ lbs.

	YES	NO
Surveillance		
Premises fenced?	<input type="checkbox"/>	<input type="checkbox"/>
Fencing in good repair?	<input type="checkbox"/>	<input type="checkbox"/>
Exterior lighting provided?	<input type="checkbox"/>	<input type="checkbox"/>
Lighting coverage adequate?	<input type="checkbox"/>	<input type="checkbox"/>

Type of alarm system? Central station Police Local Proprietary NONE

Housekeeping		
Is combustible waste removed on schedule?	<input type="checkbox"/>	<input type="checkbox"/>
Are there sufficient non-combustible trash receptacles?	<input type="checkbox"/>	<input type="checkbox"/>
Are oily rags kept in approved metal containers?	<input type="checkbox"/>	<input type="checkbox"/>
Are containers emptied daily?	<input type="checkbox"/>	<input type="checkbox"/>
Is outside waste storage kept at least 20 feet from buildings?	<input type="checkbox"/>	<input type="checkbox"/>
Are dry grass and weeds removed around buildings and outside storage?	<input type="checkbox"/>	<input type="checkbox"/>

Areas Requiring Attention: _____

Smoking Regulations		
Are "No Smoking" areas prominently posted with "No Smoking" signs?	<input type="checkbox"/>	<input type="checkbox"/>
Are properly sized receptacles provided in areas where smoking is permitted?	<input type="checkbox"/>	<input type="checkbox"/>
Fire Extinguishers		
Are units charged and tagged with date of recharging?	<input type="checkbox"/>	<input type="checkbox"/>
Are units properly hung and accessible?	<input type="checkbox"/>	<input type="checkbox"/>
Fire Doors & Exits		
Are doors in good condition and operated properly?	<input type="checkbox"/>	<input type="checkbox"/>
Are doors or exits free from obstructions or blockages?	<input type="checkbox"/>	<input type="checkbox"/>
Fire Hoses		
Are fire hoses and nozzles in good condition?	<input type="checkbox"/>	<input type="checkbox"/>
Adequate hose inventory maintained at all times for emergency use only?	<input type="checkbox"/>	<input type="checkbox"/>
Hydrants		
Are Hydrants in good condition?	<input type="checkbox"/>	<input type="checkbox"/>
Any obstructed?	<input type="checkbox"/>	<input type="checkbox"/>

VIOLATIONS NOTED: _____

GENERAL COMMENTS & RECOMMENDATIONS: List here all necessary repairs, replacements, unusual conditions and any suggestions for additional fire protection or prevention and improvement of any fire hazards. _____

Inspector: _____ **Date:** _____

One Copy to Office Files **One Copy to Maintenance Department**

PROCESS EQUIPMENT INSPECTION

DATE: _____

Part I. Inspection

Treating Cylinders				
Cylinder Basement				
Creosote & Penta Tanks				
Restricted-Use Signs				
NFPA Signs				
SPCC Tank Numbes				
Piping & Valves				
Treating / Pump Room				
Tank Car / Truck				
Unloading				
WWTP Oil / Water				
Seperation				
WWTP Bug Tank Area				
Shop Area				
Fuel & Oil Tanks				
Underground Lines from				
all sumps				
Acid / Caustic storage				
Tank Farm Containments				
(3 ea.)				
INSPECTED BY - SIGNATURE:				
TIME:				
DATE:				

Legend: O indicates "no items of concern identified"; X indicates "items of concern were found" Note: All "items of concern" and their respective corrective action must be detailed in Part II.

Part II. Observations & Corrective Action

Date	Description

Supervisor's Signature Verifying Completion & Corrective Actions: _____

Inspection Frequency: Weekly

GNA-FORM-026

Used with Document 006 (SPCC)

ISO 14001 4.5.1

Revision #3

Facility Security Inspection



KOPPERS INC.
GRENADA PLANT

MONTH / YEAR:

Part I. Inspection

Date	Time	Fencing	Entrance Gate	North Gate	Plant Perimeter	Lighting

Legend: O indicates "no items of concern identified". X indicates "items of concern were found". Note: All "items of concern" and their respective corrective actions must be detailed in "Part II. Notes".

Part II. Notes

Date	Time	Comments/Corrective Actions

Facility Security Officer: Kevin Coker
Inspection Frequency: Weekly



STORM WATER DISCHARGE & OUTFALL INSPECTION

KOPPERS INC. – GRENADA PLANT

Date: _____

Rain Gauge Reading (if applicable): _____

OUTFALL NUMBER	INSPECTION NOTES
001	
002	
003	
004	
005	
006	

007	
008	
009	
Emergency Response Equipment	

Per Part IVA of the plant's NPDES Permit No. MSR220005 storm water discharges "shall be free from...debris, oil, scum, and other floating materials other than trace amounts...eroded soils and other materials that will settle to form objectionable deposits in receiving waters...suspended solids, turbidity and color at levels inconsistent with the receiving waters...chemicals in concentrations that would cause violation of State Water Quality Criteria in the receiving waters..." These criteria shall be analyzed in the assessment of the plant's storm water and documented accordingly.

Emergency Response Equipment inspections shall include phones and emergency notification lists, medical supplies, fire fighting equipment, and spill clean up / control equipment.

Inspection Frequency: Monthly during and after significant storm events

Inspector: _____

CORRECTIVE ACTIONS / COMMENTS

Supervisor(s) Signature Verifying Completion and Corrective Action: _____