DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

| FACILITY: KOPPERS PERFORMANCE CHEMICALS INC. | | SRN / ID: B8596 |
|--|---|---------------------------|
| LOCATION: 52430 DUNCAN AVE M-26, HUBBELL | | DISTRICT: Upper Peninsula |
| CITY: HUBBELL | | COUNTY: HOUGHTON |
| CONTACT: Mark Karpinen , SHE Coordinator | | ACTIVITY DATE: 09/23/2016 |
| STAFF: Ed Lancaster | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Conducted an una | nnounced, scheduled ,compliance inspection. | |
| RESOLVED COMPLAINTS: | | |

Directions: Koppers Performance Chemicals is located at 52430 Duncan Avenue (M-26), in Hubbell, Houghton County, on the west shore of Torch Lake, about two miles south of the Village of Lake Linden and nine miles northeast of the City of Hancock.

Facility: Koppers processes scrap copper to manufacture cupric oxide and copper carbonate, for use in the wood treatment/preservation industry. The process equipment includes rotary distillers, tray dryer for the cupric oxide production, and an agitated flash dryer for the copper carbonate production. Portions of this process are controlled by the ammonia recovery system which is made up of the ammonia absorber, two ammonia scrubbers operating in parallel and the ammonia distillation towers.

Permits: On May 18, 2016, the AQD issued PTI No. 213-96J, to install a second ammonia scrubbing system and modify two conditions from PTI No. 213-96l.

Inspection: On September 23, 2016, I arrived at Koppers Performance Chemicals for an unannounced inspection. I initially met with the Safety, Health and Environmental (SHE) Coordinator, Mr. Mark Karpinen, we were later joined by Mr. Phil Sturos, Project Engineer.

We began the inspection reviewing the company's recently issued permit. Mr. Karpinen informed me the second ammonia scrubber tower and a few other items needed to be installed before the plant becomes fully operational. The vent lines for the new process are being run in parallel with the existing lines. Mr. Karpinen said he expected everything to be operational by late October.

EUNH3STG&HNDLG: This emission unit (EU) covers the anhydrous ammonia storage and handling area. The company keeps a copy of the MIOSHA Standard, Rule 7801 on site (SC No. III.1). An inspection and maintenance program and an emergency response plan are implemented and maintained (SC No. III.2 and 4) and properly trained personnel are responsible for proper compliance with all applicable procedures (SC No. III.3). Mr. Karpinen reported he will be meeting with the Local Fire Department in late-October for the annual review and approval of their Emergency Response Plan (SC No. VI.2).

The company has a Process Safety Management Plan (PSM) that complies with most of the Special Conditions (SC) in Sections II and III. Three weeks prior to the inspection, the company conducted a Process Hazard Analysis Test using a 5-gallon water trap (SC modification No. IV.6) in place of the 55-gallon water trap. Mr. Karpinen said the new trap worked well. On August 29th an external Preventative Maintenance Audit was conducted, that covered the Design/Equipment Parameters of SC Nos. IV. 1-6.

0.061 to 0.092% (SC Nos. V.1 and VI.5).

The facility was up to date on their monitoring and recordkeeping requirements of SC Nos. VI.1-9. All of the production records were available for immediate review, additional electronic data was submitted in a timely manner.

Based on my inspection and review of the company's records, Koppers Performance Chemicals appeared to be in compliance with their permit and Air Pollution Control Rules.

NAME A JONE OS DATE NO 7 30 SUPERVISOR