

**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

June 28, 2016

**SUBJECT:**    **Koppers Inc. – Clairton Tar Plant**  
                  300 North State Street  
                  Clairton, PA 15025  
                  Allegheny County

**Title V Operating Permit No. 0029**

**TO:**            Sandra L. Etzel  
                  Chief Engineer

**FROM:**        JoAnn Truchan  
                  Air Quality Engineer

<b>FACILITY DESCRIPTION:</b> .....	<b>2</b>
<b>PERMIT APPLICATION COMPONENTS:</b> .....	<b>2</b>
DETERMINATIONS .....	2
OLDER PERMITS .....	3
<b>EMISSION SOURCES:</b> .....	<b>4</b>
<b>STACKS:</b> .....	<b>6</b>
<b>METHOD OF DEMONSTRATING COMPLIANCE:</b> .....	<b>7</b>
<b>REGULATORY APPLICABILITY:</b> .....	<b>7</b>
<b>EMISSION CALCULATIONS</b> .....	<b>9</b>
THERMAL OXIDIZER RESIDENCE TIME .....	9
DTFO COMBUSTION .....	10
JZTO COMBUSTION.....	11
TAR REFINING PROCESS .....	13
ROD PITCH PROCESS .....	14
CENTRIFUGE OPERATION .....	17
CREOSOTE BLENDING PROCESS.....	20
LIQUID LOADING OPERATIONS (NON-PITCH).....	21
PITCH LOADING.....	23
PROCESS HEATERS .....	24
STORAGE TANKS .....	25
<b>SOURCES OF MINOR SIGNIFICANCE:</b> .....	<b>30</b>
COOLING TOWER.....	30
VEHICLES AND ROADWAYS.....	30
SOIL VAPOR RECOVERY SYSTEM .....	32
EQUIPMENT FUGITIVES.....	32
<b>EMISSIONS SUMMARY:</b> .....	<b>34</b>
<b>RECOMMENDATION:</b> .....	<b>34</b>
<b>APPENDIX A.1: TAR REFINING TANK MATERIAL COMPOSITION</b> .....	<b>35</b>
<b>APPENDIX A.2: 2-T-4 COLUMN EMISSIONS</b> .....	<b>36</b>
<b>APPENDIX A.2: 2-D-5 COLUMN EMISSIONS</b> .....	<b>37</b>
<b>APPENDIX B: CREOSOTE BLENDING EMISSIONS</b> .....	<b>38</b>
<b>APPENDIX C.1: LIQUID LOADING MATERIAL COMPOSITION</b> .....	<b>40</b>

<b>APPENDIX C.2: LIQUID LOADING EMISSIONS – BARGE .....</b>	<b>42</b>
<b>APPENDIX C.3: LIQUID LOADING EMISSIONS – TRUCK/RAILCAR .....</b>	<b>43</b>
<b>APPENDIX C.4: LIQUID LOADING EMISSIONS – PITCH.....</b>	<b>44</b>
<b>APPENDIX D.1: EQUIPMENT LEAK EMISSIONS – OPTION #1 .....</b>	<b>45</b>
<b>APPENDIX D.2: EQUIPMENT LEAK EMISSIONS – OPTION #2 .....</b>	<b>47</b>
<b>APPENDIX D.3: EQUIPMENT LEAK EMISSIONS – OPTION #3 .....</b>	<b>49</b>

## **FACILITY DESCRIPTION:**

Koppers Inc., Clairton Tar Plant is a tar refining facility that distills crude tar, petro tar, and decanted oil into various tar products, pitches, distillates, chemical oils, and creosotes. The recovery of the coal tar distillates is done by processing the tars through a series of flash and distillation columns, process heating units, centrifuges, and storage tanks. Liquid pitch can be extruded into solid pitch rods. Creosote is produced by blending products in Tanks #3, #4, and #36. Emissions from the creosote process are controlled by thermal oxidizer. Operations at the facility also include product loading, railcar depressurization, and a vapor/soil recovery unit.

The facility is a minor source of particulate matter (PM), particulate matter less than 10 µm in diameter (PM<sub>10</sub>), particulate matter less than 2.5 µm in diameter (PM<sub>2.5</sub>), oxides of nitrogen (NO<sub>x</sub>), oxides of sulfur (SO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOCs) as defined in Article XXI, §2101.20. The facility is a major source of hazardous air pollutants (HAPs) as defined in Article XXI, §2101.20.

## **PERMIT APPLICATION COMPONENTS:**

1. Title V Operating Permit application, dated September 1, 2010
2. Installation Permit #0029-I001, withdrawn/not issued (Fume Scrubber on Centrifuge and Pitch Loading)
3. Installation Permit #0029-I002, not issued via determination dated June 5, 2002 (Rod Pitch Process)
4. Installation Permit #0029-I003, issued August 21, 2003 (Creosote Blending)
5. Installation Permit #0029-I004, issued October 10, 2011 (Connections to RTO)
6. Installation Permit #0029-I005, issued January 17, 2012 (Tar Refining & Pitch Railcar Loading)
7. Installation Permit #91-I-0058-P, issued September 22, 2015 (Benzene Control)
8. RACT Plan Approval and Agreement #223, dated August 27, 1996
9. Stack test report, dated March 2, 2005 (Gas-blanketing gas destruction efficiency)
10. Stack test report, dated May 20, 2009 (Thermal oxidizer destruction efficiency)
11. Correspondence, dated September 19, 2010 (PTE calculations and insignificant sources)
12. Correspondence, dated September 17, 2010 (Process Heater Nomenclature)
13. Correspondence, dated November 15, 2010 (Miscellaneous information)
14. Correspondence, dated March 4, 2011 (information on pre-1995 permits)
15. Permits issued prior to 1996 (See Table 1 below)

## **Determinations**

1. November 1, 2001: Change of service in Tank #34
  - RFD on 10/12/01
  - Exempted from permitting; tank is included in the equipment list.
2. February 1, 2007: Change of service in Tanks #7 and #9
  - RFD on 01/15/07; follow-up on 02/01/07
  - Exempted from permitting; tanks are included in the equipment list.
3. June 16, 2006: New material in Creosote Blend
  - No response found in files
  - Included in section V.D of the TVOP
4. February 18, 2011: Use of V-111 as a Decanter
  - RFD on 12/17/10
  - Exempted from permitting; Included in section V.A of the TVOP
5. January 13, 2015: Storage of Pavement Sealer Base in Tanks #5-#9

- RFD on 01/23/15
- Exempted from permitting; PSB added to Emission Unit Table

**Older Permits**

Table 1 contains a list of permits issued prior to 1996, and if applicable, any reasons the permit was not referenced in the Title V Operating Permit.

**Table 1: Permits Issued Prior to 1996**

Permit Number	Issue Date	Description	Reason for Exclusion from TVOP
703695-010-25703	12/14/1973	Tar Refining Process	Incorporated into the TVOP under Sections V.A, V.F, and V.G.
73-O-1154-P	12/14/1973	Tar Refining Process	
73-I-4033-P	03/21/1974	Vent Condenser on Tanks 1, 1A, M, and C	Tanks C & M are no longer in service. Due to changes in material, the vent condensers are no longer in operation.
73-I-4027-P	10/31/1974	Tar Refining Tanks 3-8, S, & T	Tanks S & T are no longer in service. Tanks #3 & #4 are in the TVOP under Section V.D. Tanks #5-#8 incorporated into TVOP under Section V.H. Due to changes in material, the vent condensers are no longer in operation. Tank #7 is part of the gas-blanketing system in the TVOP under Section V.A.
73-I-4028-P	10/31/1974	Tar Refining Tanks 10, 11, V-113	Tanks #10 & #11 are no longer in service. There is no longer a carbon absorber on V-113 as it is part of the gas-blanketing system in the TVOP under Section V.A.
73-I-4030-P	10/31/1974	Tar Refining Tanks V-100 & V-101	Tanks are no longer in service.
73-I-4031-P	10/31/1974	Tar Refining Tanks 12 & 13	Tanks are incorporated into TVOP under Section V.H. Due to changes in material, the vent condensers are no longer in operation.
73-I-4034-P	10/31/1974	No. 1 Tar Acid Tank	Process and tank are no longer in operation.
85-I-0045-P	02/01/1985	Alpha Methylstyrene Hydrogenation Unit	Process is no longer in operation
78-I-0089-P	--/--/--	Rod Pitch Process	Incorporated into the TVOP under Section V.B. Cyclones have been replaced with a more efficient baghouse.
87-I-0024-P	10/06/1987	Rod Pitch Process	
7035695-013-99900	07/13/1988	Rod Pitch Process	
89-I-0045-P	11/20/1989	Tank V-113	Incorporated into the TVOP under Sections V.A & V.H. Carbon absorber has been replaced by the gas-blanketing system.
89-I-0046-P	11/20/1989	Drain Tank	Tank V-300. Due to changes in material, carbon absorber is no longer in operation.
89-I-0047-P	11/20/1989	Day Tank	Tank V-112. Tank is no longer in service.
89-I-0048-P	11/20/1989	Tank V-100	Tanks are no longer in service.
89-I-0049-P	11/20/1989	Tank V-101	
91-I-0058-P	08/13/1991	Gas Blanketing System	Some tanks are no longer part of Koppers. The rest have been incorporated into the TVOP under Section V.A.
7035775-001-71700	09/15/1993	Rod Pitch Process	Incorporated into the TVOP under Section V.B. Cyclones have been replaced with a more efficient baghouse.
7035775-001-25704	03/07/1994	Tar Refining, Storage, & Loading	Incorporated into the TVOP under Section V.A. <i>(Note: This permit was never issued)</i>
95-I-0057-P	10/20/1995	Soil Vapor Extraction	Incorporated into the TVOP under Section VI.C.

**EMISSION SOURCES:**

**Table 2: Emissions Sources**

<b>I.D.</b>	<b>Source Description</b>	<b>Control Device(s)</b>	<b>Maximum Capacity</b>	<b>Fuel/Raw Material</b>	<b>Stack I.D.<sup>1</sup></b>
<b>P001</b>	<b>Tar Refining Process (note 1)</b>				
	2 – Light Oil Decanters (V-110 and V-111)	direct-fired thermal oxidizer 4.5 MMBtu/hr; John Zink thermal oxidizer 12.34 MMBtu/hr (back-up)	65,700,000 gal/yr (total for P001)	light oil, water	S001, S003, or downriver
	R-6 Ejector (from 2-E-5 Ejector to 1-T-1 Column)			debenzolyzed tar, crude coal tar, petro tar, decanted oil	
	2-E-9 Ejector (from 2T4 Column to E13 Condenser, then V-113)			carbon black oil, petroleum distillate	
	2-E-16 Ejector (from 2D5 Column to E13 Condenser, then V-113)			carbon black oil, petroleum distillate (note 2)	
	2-E-5 Ejector (from 2T1 Column to R-6 Ejector)			debenzolyzed tar, petro tar, decanted oil	
<b>P002</b>	<b>Rod Pitch Process</b>				
	Dryer/Cooler	baghouse	12 ton/hr 60,480 tons/yr	liquid pitch	S002
	Solid Loading	none	12 ton/hr 60,480 tons/yr	solid pitch	--
<b>P003</b>	<b>Centrifuge Operation</b>				
	Tank V-20	none	31,536,000 gal/yr (total for P003)	debenzolyzed tar	--
	centrifuge	none		debenzolyzed tar	--
	dumpsters	none			--
	Tank V-18	none		debenzolyzed tar	--
<b>P004</b>	<b>Creosote Processing</b>				
	Tank #3	direct-fired thermal oxidizer 4.5 MMBtu/hr; John Zink thermal oxidizer 12.34 MMBtu/hr (back-up)	23,300,000 gal/yr (total for P004)	carbon black oil, naphthalene still residue, refined chemical oil, debenzolyzed tar, petroleum distillate	S007 (DFTO); S006 (JZTO)
	Tank #4				
	Tank #36				
<b>Other Processes</b>					
P005	Liquid Loading Operations - Barge	none	90,000 gal/hr	crude tar, petro tar, decanted oil, liquid pitch, refined chemical	--

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D. <sup>1</sup>
P005	Liquid Loading Operations – Truck & Railcar	DFTO; JZTO (see D001)	30,000 gal/hr	oil, carbon black oil, distillates, creosote, correction oils, petroleum pitch	S007; S006
P006	Cooling Tower	none	2,700 gal/min	cooling water	--
<b>Process Heaters</b>					
B001	Primary Heater 2F-1A (formerly 2-D-2)	none	16.0 MMBtu/hr	natural gas	S001
B002	TI Heater 2F-2A (formerly 2-D-5)	none	8.5 MMBtu/hr	natural gas	S001
B003	Spare Hot Oil Heater 1F-1C (formerly 1-T-2)	none	10.08 MMBtu/hr	natural gas	S001
B004	Hot Oil Heater 1F-2C (formerly 1-T-4)	none	4.5 MMBtu/hr	natural gas, gas blanketing gas	S001
B005	Prill Hot Oil Heater	none	4.5 MMBtu/hr	natural gas, gas blanketing gas	S003
B006	Secondary Heater 2F-1C (formerly 2-T-2)	none	6.2 MMBtu/hr	natural gas	S001
B007	2T3 Heater 2F-2B	none	6.0 MMBtu/hr	natural gas	S001
B008	2T4 Heater 2F-2C	none	6.0 MMBtu/hr	natural gas	S001
B009	2T1 Heater (2F-1B)	none	6.0 MMBtu/hr	natural gas	S001
B010	#1 Primary Flash Heater	none	18.9 MMBtu/hr	natural gas	S001
<b>Storage Tanks</b>					
D001	#7	direct-fired thermal oxidizer 4.5 MMBtu/hr; John Zink thermal oxidizer 12.34 MMBtu/hr (back-up)	1,000,000 gal.	crude tar	S007 (DFTO); S006 (JZTO)
D002	#5, #6, #8, #9 (note 3)		1,000, 000 gal. ea.	crude tar, petro tar, debenzolized tar, RCO, CBO, NSR, petro distillate, decanted oil, decanted oil distillate, creosotes, correction oil, pavement sealer base	
D003	M	none	100,000 gal.	debenzolized tar	--
D003	#12, #13	none	400,000 gal. ea.	debenzolized tar	--
D004	#34	DFTO; JZTO (see D001)	500,000 gal.	refined chemical oil, petro distillate (typical)	S007; S006
D005	#1, #1A, #2	none	1,000,000 gal. ea.	carbon black oil	--
D006	#35 (note 4)	none	600,000 gal.	distillate	--
D007	V-11, V-12, V-13	none	30,000 gal. ea.	pitch	--
D007	V-119 – V125, V-127	none	100,000 gal. ea.	pitch	--

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D. <sup>1</sup>
D008	#3, #4, #36 (note 5)	(see process P004)			
D009	#33	none	500,000 gal.	naphthalene still residue	--
D010	#32	none	60,000 gal.	correction oil	--
D011	V-113	natural gas blanketing	25,000 gal.	wastewater	--
D011	V-300	none	5,234 gal.	wastewater	--
D011	V-301	none	58,000 gal.	wastewater	--
D011	V-302	none	7,050 gal.	wastewater	--
D011	#11	none	500,000 gal.	wastewater	--
D012	V-110, V-111 (see process P001)	natural gas blanketing	80,000 gal. ea.	light oil	--
D013	#9	none	1,000,000 gal.	miscellaneous	--
D013	#31	none	60,000 gal.	miscellaneous	--
D013	V-16, V-17	none	5,000 gal. ea.	miscellaneous	--
D013	V-18, V-19	none	30,000 gal. ea.	miscellaneous	--
D013	V-112, V-112A	none	5,600 gal. ea.	miscellaneous	--
D013	V-126	none	100,000 gal.	miscellaneous	--
<b>Sources of Minor Significance</b>					
F001	Parking Lots & Roadways	none	n/a	n/a	--
G001	Railcar Depressurization	none	--	--	--
G002	Soil Vapor Extraction	none	--	--	--

1. Vapors from the tar refining process may be combined with coke-oven gas from the US Steel Clairton Works and sent downriver to the US Steel Irvin Works.
2. Vapors from the TI Column go directly to the 2-T-4 Column; vapors pulled from the 2-D-5 Column by the E-16 Ejector are condensed and make the carbon black oil that goes into the 2-T-4 Column.
3. Tanks #5-#9 are also considered crude tar storage (D001); Tanks #5 and #6 are used to store petro tar/decanted oil (D002) or debenzolized tar (D003).
4. Tank #35 is used to store distillate (D006) or correction oil (D010).
5. Tank #36 is used to process and/or store creosote.

**STACKS:**

**Table 3: Stacks**

Stack ID	Stack Height (ft)	Stack Diameter (ft)	Exhaust Rate (acfm)	Exhaust Temp. (°F)	Lining/Outer Material
S001	105	6.75	57,000	1,200	carbon steel / none
S002	53	1.0	30,000	125	carbon steel / none
S003	40	2.0	3,000	1,200	steel / 5" castable
S006	50	6.0	6,600	1,400	carbon steel / carbon steel

**METHOD OF DEMONSTRATING COMPLIANCE:**

Methods of demonstrating compliance with the emission standards set in this permit are summarized in Table 4 below.

**Table 4: Method(s) of Demonstrating Compliance**

TVOP Section	Process	Method(s) of Demonstrating Compliance
V.A	Thermal Oxidizers	<ul style="list-style-type: none"> <li>• Testing of the thermal oxidizer at least once every 5 years</li> <li>• Monitoring of thermal oxidizer temperature</li> </ul>
V.B	Tar Refining Process	<ul style="list-style-type: none"> <li>• Monthly monitoring of all equipment in benzene service for equipment leaks</li> <li>• Recordkeeping of production and operation</li> <li>• Testing of VOC DRE on gas-blanketing combustion at least annually (when combusting gas-blanketing gas)</li> </ul>
V.C	Rod Pitch Process	<ul style="list-style-type: none"> <li>• Monitoring of baghouse pressure drop</li> <li>• Recordkeeping of throughput and ours of operation</li> </ul>
V.D	Centrifuge Operation	<ul style="list-style-type: none"> <li>• Recordkeeping of production and operation</li> <li>• Analyses of materials</li> </ul>
V.E	Creosote Blending Process	<ul style="list-style-type: none"> <li>• Recordkeeping of production</li> </ul>
V.F	Liquid Loading Operations	<ul style="list-style-type: none"> <li>• Recordkeeping of production and loaded material properties</li> <li>• Analyses of materials</li> </ul>
V.G	Process Heaters (natural gas only)	<ul style="list-style-type: none"> <li>• Recordkeeping of fuel use</li> </ul>
V.H	Process Heaters (gas blanketing gas)	<ul style="list-style-type: none"> <li>• Testing of VOC DRE on gas-blanketing combustion at least annually (when combusting gas-blanketing gas)</li> <li>• Recordkeeping of fuel use</li> </ul>
V.I	Storage Tanks	<ul style="list-style-type: none"> <li>• Recordkeeping of material, material vapor pressure, and throughput</li> </ul>
VI.A	Cooling Tower	<ul style="list-style-type: none"> <li>• Monitoring of total dissolved solids content</li> <li>• Monitoring of water recirculation rate</li> </ul>
VI.B	Vehicles and Roadways	<ul style="list-style-type: none"> <li>• Recordkeeping of dust suppression activities</li> <li>• Recordkeeping of fuel use</li> </ul>
VII.A	Tar Refining Process – Alternative Operating Scenario	<ul style="list-style-type: none"> <li>• Monthly monitoring of all equipment in benzene service for equipment leaks</li> <li>• Recordkeeping of natural gas blanketing use</li> </ul>

See operating permit No. 0029 for the specific conditions for determining compliance with the applicable requirements. Compliance with the short-term (lb/hr) limits must be maintained at all times, including startup and shutdown. Any emissions due to startup, shutdown, or malfunction are included in facility’s total annual emissions.

**REGULATORY APPLICABILITY:**

1. **Article XXI Requirements for Issuance:**

See Permit Application No. 0029, Appendix F. The requirements of Article XXI, Parts B and C for the issuance of operating permits have been met for this facility. Article XXI, Part D, Part E & Part H will have the necessary sections addressed individually.

2. **Testing Requirements:**

Testing is required on the thermal oxidizer at least once every five (5) years. Testing is also required annually on the 1F-2C Hot Oil Heater and Prill Hot Oil Heater while combusting gas blanketing gas to demonstrate compliance with RACT Order #223. The Department reserves the right to require additional testing if necessary in the future to assure compliance with the terms and conditions of this Title V Operating Permit.

3. **New Source Performance Standards (NSPS):**

No storage tanks meet the applicability requirements of 40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids (1973-1978)* or 40 CFR Part 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids (1978-1984)*. The two tanks constructed in 1978 (V-112 and V-112A) both have capacities below the applicability threshold.

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (post-1984)* does not apply. The facility is considered a coke oven by-product recovery plant, and is exempt from this subpart under §60.110b(d)(1).

4. **NESHAP and MACT Standards:**

The facility is subject to 40 CFR Part 61, Subpart L – *National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants*.

The facility is subject to 40 CFR Part 61, Subpart V – *National Emission Standards for Equipment Leaks (Fugitive Emission Sources)*, as referenced by Subpart L.

The Creosote Blending Process is subject to 40 CFR Part 63, Subpart MMM – *National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production*. Some sections of Subpart L are more stringent than those in Subpart MMM, so those conditions have been streamlined, with the Subpart MMM conditions being subsumed by the Subpart L conditions.

- Section 61.139 of Subpart L requires that a minimum temperature be met at all times and that the temperature be continuously monitored. Section 63.1366 of Subpart MMM is for establishing averaging periods for temperature monitoring.
- Section 61.139(f) requires continuous monitoring while §63.1366(b) requires monitoring in 15-minute intervals.

The facility is not subject to 40 CFR Part 61, Subparts F, G, and H (the Hazardous Organic NESHAP). The facility is considered a coke oven by-product recovery plant, and is exempt from these subparts under §63.100(j)(5).

The facility is not subject to 40 CFR Part 61, Subpart J – *National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene*. The facility is considered a coke oven by-product recovery plant, and is exempt from this subpart under §63.110(b).

The facility is not subject to 40 CFR Part 61, Subpart Y – *National Emission Standard for Benzene Emissions from Benzene Storage Vessels*. The facility is considered a coke oven by-product recovery plant, and is exempt from this subpart under §63.270(c).

The facility is not subject to 40 CFR Part 61, Subpart BB – *National Emission Standard for Benzene Emissions from Benzene Transfer Operations*. The facility is considered a coke oven by-product recovery plant, and is exempt from this subpart under §63.300(a).

The facility is not subject to 40 CFR Part 63, Subpart EEEE – *National Emission Standards for Hazardous Air Pollutants for Organic Liquid Distribution*. Only light oil is considered an organic liquid under this subpart. All light oil is pumped directly to another facility; no light oil is stored on-site or transferred into transport vehicles.

The facility is not subject to 40 CFR Part 63, Subpart FFFF – *National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes*. The SIC code for the facility is not among those listed for applicability to this subpart.



The process heaters are subject to 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*. Only the work practice standards under §63.7500(a)(1) and Table 3 apply.

5. **Greenhouse Gas Reporting (40 CFR Part 98):**

Greenhouse gases (GHGs) from this facility come from the creosote process thermal oxidizer and the ten process heaters. Only three (3) of the six GHG categories apply: CO<sub>2</sub>, N<sub>2</sub>O (nitrous oxide), and CH<sub>4</sub> (methane). Based on the calculation methodology in 40 CFR Part 98, §98.33(a)(1), potential emissions of CO<sub>2</sub>e are 42,742 tpy. This is less than the 100,000 tpy major source threshold, therefore the facility is not considered a major source of GHG emissions. Calculations of potential emissions are included in the Creosote Blending Process and Process Heaters sections below.

The requirements contained in the GHG reporting rule are not considered applicable requirements under the Title V regulations. Furthermore, after reviewing the actual natural gas use over the past ten (10) years (as reported in the Emissions Inventory), the highest actual CO<sub>2</sub>e emissions was less than 15,000 metric tons in any given year, under the 25,000 metric ton applicability threshold for the reporting rule. Should the facility exceed 25,000 metric tons of CO<sub>2</sub>e in any 12-month period, the facility would have to submit reports in accordance with 40 CFR Part 98.

**EMISSION CALCULATIONS**

**Thermal Oxidizer Residence Time**

The maximum capacity for the blower on the Direct-Fired Thermal Oxidizer is 2,100 acfm.

Combustion chamber volume = 170 ft<sup>3</sup>

Residence time = 170 ft<sup>3</sup> ÷ 2,100 ft<sup>3</sup>/min × 60 sec/min = 4.9 seconds

The maximum capacity for the blower on the John Zink Thermal Oxidizer is 3,000 acfm.

Combustion chamber volume = (5.5 ft)<sup>2</sup> × π/4 × 50 ft = 1,188 ft<sup>3</sup>

Residence time = 1,188 ft<sup>3</sup> ÷ 3,000 ft<sup>3</sup>/min × 60 sec/min = 23.8 seconds

To demonstrate that each of the thermal oxidizers is capable of handling the additional capacity from the other thermal oxidizer, the current percent capacity was determined, followed by the percent capacity with the additional sources.

**Table 5: Thermal Oxidizer Capacity**

DFTO Design Flow Rate Capacity <sup>(1)</sup>		JZTO Design Flow Rate Capacity <sup>(1)</sup>	
	1,800 scfm		2,084 scfm
Sources Currently Permitted for Control		Sources Currently Permitted for Control	
Tank 7	109 scfm	Tanks 3 & 4 <sup>(4)</sup>	235 scfm
Tank V-113 <sup>(2)</sup>	13 scfm	Tank 34 <sup>(5)</sup>	134 scfm
V-110 Decanter	38 scfm	Tank 36 <sup>(5)</sup>	134 scfm
V-111 Decanter	38 scfm	Distillate Loading <sup>(6)</sup>	107 scfm
Pitch Railcar Loading	26 scfm	Total:	610 scfm
Total:	224 scfm		
Total Flow with Sources Currently Permitted for Control:		Total Flow with Sources Currently Permitted for Control:	
	<b>224 scfm</b>		<b>610 scfm</b>
12.44% of DFTO design used with current sources		29.27% of JZTO design used with current sources	
87.56% of DFTO design available		70.73% of JZTO design available	

<u>New Sources Being Permitted for Control</u>		<u>New Sources Being Permitted for Control</u>	
Tank 5, 6, 8, or 9 <sup>(3)</sup>	14 scfm	Tank 7	109 scfm
Tank 5, 6, 8, or 9 <sup>(3)</sup>	14 scfm	Tank V-113 <sup>(2)</sup>	13 scfm
Tanks 3 & 4 <sup>(4)</sup>	235 scfm	V-110 Decanter	38 scfm
Tank 34 <sup>(5)</sup>	134 scfm	V-111 Decanter	38 scfm
Tank 36 <sup>(5)</sup>	134 scfm	Pitch Railcar Loading	26 scfm
Distillate Loading <sup>(6)</sup>	107 scfm	Tank 5, 6, 8, or 9 <sup>(3)</sup>	14 scfm
Total:	638 scfm	Tank 5, 6, 8, or 9 <sup>(3)</sup>	14 scfm
		Total:	252 scfm
<b>Total Flow with New Sources Being Permitted for Control:</b>	<b>862 scfm</b>	<b>Total Flow with New Sources Being Permitted for Control:</b>	<b>862 scfm</b>
47.89% of DFTO design used with additional sources		41.36% of JZTO design used with additional sources	
52.11% of DFTO design available		58.64% of JZTO design available	

1. Design Flow Rate Capacity and Flow Rates from sources to DFTO came from *Oxidizer and Tank Ventilation System Design Basis* by Industrial Energy Engineering for Koppers, January 2010 and previous permit applications.
2. Process vent streams from Tar Refining Columns 1-T-1, 2-T-4, and 2-D-5 are routed into Tank V-113.
3. Two of Tanks 5, 6, 8, or 9 can be filled at a time.
4. Flow rate during 2009 stack test.
5. Pump rate to Tanks 34 and 36 (per tank): 1,000 gpm = 134 scfm
6. Distillate Loading: 45 min. to load 18,000 gal. into a railcar = 400 gpm, so use: 500 gpm  
 20 min. to load 4,500 gal. into a truck = 225 gpm, so use: 300 gpm  
 Total: 800 gpm = 107 scfm

**DFTO Combustion**

Emissions of from thermal oxidizer combustion were based on the following assumptions:

- PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions are based on the limits found in Article XXI, §2104.02.a.1.A.
- All PM was assumed to be PM<sub>10</sub>; all PM<sub>10</sub> was assumed to be PM<sub>2.5</sub>.
- VOC emissions were based on the factor found in U.S. EPA AP-42 *Section 1.4: Natural Gas Combustion (7/98)*.
- CO emissions were based on the factor found in U.S. EPA AP-42 *Section 13.5: Industrial Flares (9/91)*.
- NO<sub>x</sub> emissions were based on a factor established by manufacturer data for waste gas.
- SO<sub>x</sub> (as SO<sub>2</sub>) emissions were based on H<sub>2</sub>S sampling from the compressor/chiller system during the December 2002 test.
- A 15% adjustment was added to all emissions calculated with AP-42 factors to account for operational variability.

Basis:

DFTO Rating: 4.5 MMBtu/hr (2.1 MMBtu/hr waste gas; 2.4 MMBtu/hr natural gas)  
 Natural gas rating: 1,050 Btu/scf  
 H<sub>2</sub>S concentration: 219 ppm  
 Chiller flow rate: 185 scfm  
 Molecular weights: H<sub>2</sub>S = 34 lb/lb·mol; SO<sub>2</sub> = 64 lb/lb·mol  
 NO<sub>x</sub> emission factor: 0.15 lb/MMBtu  
 Hours of operation: 8,760 hours/year

**Table 6a: DFTO Combustion – PM & VOC Emissions**

Pollutant	AP-42 Factors	Thermal Oxidizer Combustion	
		4.5 MMBtu/hr	
	lb/10 <sup>6</sup> scf	lb/hr	tpy
Particulate Matter	0.008 <sup>1</sup>	0.036	0.158
PM <sub>10</sub>	0.008 <sup>1</sup>	0.036	0.158
PM <sub>2.5</sub>	0.008 <sup>1</sup>	0.036	0.158
VOC	5.5	0.027	0.119
CO <sub>2e</sub>	--	550.0	2,656.7

1. Based on Article XXI, §2104.02.a.1.A (lb/MMBtu)

**Table 6b: DFTO Combustion – NO<sub>x</sub> & CO Emissions**

Pollutant	Emission Factors		Natural Gas		Waste Gas		Total	
	natural gas	waste gas	2.4 MMBtu/hr		2.1 MMBtu/hr			
	lb/10 <sup>6</sup> scf	lb/MMBtu	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
NO <sub>x</sub>	100	0.15	0.229	1.001	0.315	1.380	0.544	2.381
CO	84	0.37	0.192	0.841	0.894	3.914	1.086	4.755

DFTO Combustion SO<sub>x</sub> Emissions:

$$219 \text{ ppm} \div 10^6 \times 185 \text{ ft}^3/\text{min} \times 60 \text{ min/hr} \times 34 \text{ lb}_{\text{H}_2\text{S}}/\text{lb} \cdot \text{mol} \div 385 \text{ ft}^3/\text{lb} \cdot \text{mol} = 0.215 \text{ lb/hr of H}_2\text{S}$$

$$0.215 \text{ lb}_{\text{H}_2\text{S}}/\text{hr} \times 64 \text{ lb}_{\text{SO}_2}/\text{lb} \cdot \text{mol}_{\text{SO}_2} \div 34 \text{ lb}_{\text{H}_2\text{S}}/\text{lb} \cdot \text{mol}_{\text{H}_2\text{S}} \times \text{lb} \cdot \text{mol}_{\text{SO}_2}/\text{lb} \cdot \text{mol}_{\text{H}_2\text{S}} = \mathbf{0.404 \text{ lb/hr SO}_2}$$

$$= \mathbf{1.770 \text{ tpy SO}_2}$$

Potential GHG mass and CO<sub>2e</sub> Emissions

Calculations of greenhouse gases (GHG) and CO<sub>2</sub>-equivalent (CO<sub>2e</sub>) emissions are based on the methodology found in 40 CFR Part 98, Subpart C, §98.33(a)(1), and factors found in Table C-1 and Table C-2 of that subpart.

$$\text{Total rated heat input capacity of the thermal oxidizer} = 4.5 \text{ MMBtu/hr} \times 8,760 \text{ hr/yr} = 39,420 \text{ MMBtu/yr}$$

Emission Factors:

$$\text{CO}_2 = 53.02 \text{ kg/MMBtu}$$

$$\text{N}_2\text{O} = 1 \times 10^{-4} \text{ kg/MMBtu}$$

$$\text{CH}_4 = 1 \times 10^{-3} \text{ kg/MMBtu}$$

$$\text{CO}_2: 39,420 \text{ MMBtu/yr} \times 53.02 \text{ kg/MMBtu} \div 1,000 \text{ kg/metric ton} = 2,090 \text{ metric tons/year}$$

$$\text{NO}_2: 39,420 \text{ MMBtu/yr} \times 1 \times 10^{-4} \text{ kg/MMBtu} \div 1,000 \text{ kg/metric ton} = 0.004 \text{ metric tons/year}$$

$$\text{CH}_4: 39,420 \text{ MMBtu/yr} \times 1 \times 10^{-3} \text{ kg/MMBtu} \div 1,000 \text{ kg/metric ton} = 0.039 \text{ metric tons/year}$$

Global Warming Potential (GWP) Factors (from Part 98, Subpart A, Table A-1):

$$\text{CO}_2 = 1$$

$$\text{N}_2\text{O} = 298$$

$$\text{CH}_4 = 25$$

$$\text{CO}_{2e} = (2,090 \times 1) + (0.004 \times 298) + (0.039 \times 25) = 2,092 \text{ metric tons/year of CO}_{2e}$$

**JZTO Combustion**

Emissions of SO<sub>x</sub> and VOC from the John Zink Thermal Oxidizer combustion were based on factors found in U.S. EPA AP-42 Section 1.4: Natural Gas Combustion (7/98). NO<sub>x</sub> and CO emissions limits are based on the John Zink performance guarantee for the thermal oxidizer. Particulate matter emissions limits are those found in Article XXI, §2104.02.a.1.A. A 15% adjustment was added to all emissions calculated with AP-42 factors to account for operational variability. All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>.

The following assumptions were also used as a basis:

- Natural gas rating: 1,050 Btu/scf
- Hours of operation: 8,260 hours/year on natural gas

**Table 7: John Zink Thermal Oxidizer Emissions**

Pollutant	AP-42	Thermal Oxidizer Combustion	
	Factors	12.34 MMBtu/hr	
	lb/10 <sup>6</sup> scf	lb/hr	tpy
Particulate Matter <sup>1</sup>	0.008	0.099	0.432
PM <sub>10</sub>	0.008	0.099	0.432
PM <sub>2.5</sub>	0.008	0.099	0.432
Nitrogen Oxides (NO <sub>x</sub> ) <sup>2</sup>	0.15	1.851	8.107
Sulfur Oxides (SO <sub>x</sub> )	0.6	0.008	0.036
Carbon Monoxide (CO) <sup>2</sup>	0.20	2.468	10.810
VOC	5.5	0.074	0.326

1. Based on Article XXI, §2104.02.a.1.A (lb/MMBtu)
2. Based on John Zink performance guarantee (lb/MMBtu)

Potential GHG mass and CO<sub>2</sub>e Emissions

Calculations of greenhouse gases (GHG) and CO<sub>2</sub>-equivalent (CO<sub>2</sub>e) emissions are based on the methodology found in 40 CFR Part 98, Subpart C, §98.33(a)(1), and factors found in Table C-1 and Table C-2 of that subpart.

Total rated heat input capacity of the thermal oxidizer = 12.34 MMBtu/hr × 8,760 hr/yr = 108,098 MMBtu/yr

Emission Factors: CO<sub>2</sub> = 53.02 kg/MMBtu  
 N<sub>2</sub>O = 1×10<sup>-4</sup> kg/MMBtu  
 CH<sub>4</sub> = 1×10<sup>-3</sup> kg/MMBtu

CO<sub>2</sub>: 108,098 MMBtu/yr × 53.02 kg/MMBtu ÷ 1,000 kg/metric ton = 5,731.377 metric tons/year

NO<sub>2</sub>: 108,098 MMBtu/yr × 1×10<sup>-4</sup> kg/MMBtu ÷ 1,000 kg/metric ton = 0.011 metric tons/year

CH<sub>4</sub>: 108,098 MMBtu/yr × 1×10<sup>-3</sup> kg/MMBtu ÷ 1,000 kg/metric ton = 0.108 metric tons/year

Global Warming Potential (GWP) Factors (from Part 98, Subpart A, Table A-1):

CO<sub>2</sub> = 1  
 N<sub>2</sub>O = 298  
 CH<sub>4</sub> = 25

CO<sub>2</sub>e = (5,731.377 × 1) + (0.011 × 298) + (0.108 × 25) = 5,737 metric tons/year of CO<sub>2</sub>e

Creosote Blending Emissions

There are three options for the blending of creosote: P2 creosote, P1/P13 creosote, and a creosote petroleum solution. The maximum emissions represent the maximum for each component from the three options. Emissions were calculated using the following equation:

$$E = V/RT \times \sum(P_i)(MW_i)$$

Where:

- E = Mass of Emissions
- V = Volume of Gas Displaced
- R = Ideal Gas Constant = 10.731 cf psi/lb·mol °R
- P<sub>i</sub> = Partial Pressure
- MW<sub>i</sub> = Molecular Weight

Thermal oxidizer destruction efficiency: 98%

### Tar Refining Process

Emissions from the tar refining process are primarily from the 1-T-1, 2-T-4, and 2-D-5 columns, which vent directly to the natural gas-blanketed contaminated water tank V-113. The other tar refining columns (1-T-2, 2-T-1, 2-T-2, and TI columns) vent to either the 1-T-1, 2-T-4, or 2-D-5 columns.

Emissions from the 1-T-1, 2-T-4, and 2-D-5 columns were based on the method found in the U.S. EPA document Control of Volatile Organic Compound Emissions from Batch Processes – Alternative Control Techniques Information Document (Reference #A.94.102, 1994). The following equation was used:

$$S_e = MW_i \times (L_a/29) \times [P_{\text{system}} \div (P_{\text{system}} - P_i) - 1]$$

Where

- $S_e$  = VOC emissions (lb/hr)
- $MW_i$  = molecular weight of VOC (lb/lb·mol)
- $L_a$  = total air leakage rate in the system (lb/hr)
- $P_{\text{system}}$  = pressure of receiving vessel or ejector outlet conditions (mmHg)
- $P_i$  = vapor pressure of VOC at receiver temperature (mmHg)
- 29 = molecular weight of air (lb/lb·mol)

### 1-T-1 Column

The 1-T-1 Debenzolization column accepts emissions from the 2-T-1 and 1-T-2 columns. Emissions from the 1-T-1 column are then sent, through tank V-113, to the direct-fired thermal oxidizer (DFTO). Only one type of material is processed through this column, light oil from crude tar (petro tar and decanted oil are not used). The following were used as a basis:

- Air Leak Rate,  $L_a$  = 230 lb/hr
- System Pressure,  $P_{\text{system}}$  = 900 mmHg
- Operating Hours = 8,760 hours/year
- Compressor/Chiller Efficiency = 98%

For the light oil VOC:

- $MW_i$  = 80.05 lb/lb·mol
- $P_i$  = 0.5299 psia = 27.394 mmHg
- Calculated  $S_e$  = 0.399 lb/hr

**Table 8: 1-T-1 Column Emissions**

Pollutant	1-T-1 Column		
	Case 1 – 100% Crude Tar (light oil)		
	% in Vapor	lb/hr	tpy
<b>Total VOC</b>		0.399	1.746
Benzene	86.265	0.344	1.506
Ethylbenzene	0.174	0.001	0.003
Naphthalene	0.064	0.000	0.001
Phenol	0.002	0.000	0.000
Styrene	0.545	0.002	0.010
Toluene	10.666	0.043	0.186
m-Xylene	0.632	0.003	0.011
o-Xylene	0.199	0.001	0.003
p-Xylene	0.669	0.003	0.012
<b>Total HAP</b>		0.396	1.732
Total POM		0.000	0.001

### 2-T-4 and 2-D-5 Columns

The 2-T-4 and 2-D-5 columns accept emissions from the TI column and 2-T-2 column. Emissions are then sent,

through tank V-113, to the DFTO. Three (3) types of material are processed: crude tar (carbon black oil (CBO) for 2-T-4 and coal tar pitch for 2-D-5), petro tar (petroleum distillate for 2-T-4 and petro pitch for 2-D-5), and decanted oil (decanted oil distillate for 2-T-4 and decanted oil pitch for 2-D-5). The following were used as a basis:

**Table 9: 2-T-4 & 2-D-5 Column Input Data**

	2-T-4 Column			2-D-5 Column		
Air Leak Rate, $L_a$	75	lb/hr		75	lb/hr	
System Pressure, $P_{system}$	835	mmHg		835	mmHg	
Operating Hours	8,760	hrs/yr		8,760	hrs/yr	
Compressor/Chiller Efficiency	98	%		98	%	
	$MW_i$	$P_i$	$S_e$	$MW_i$	$P_i$	$S_e$
	lb/lb·mol	mmHg	lb/hr	lb/lb·mol	mmHg	lb/hr
Case 1 – 100% Crude Tar	141.02	0.858	0.0075	146.79	12.786	0.1181
Case 2 – 100% Petro Tar	130.60	6.090	0.0496	131.97	80.979	0.7331
Case 3 – 100% Decanted Oil	178.20	1.623	0.0180	179.25	26.440	0.3032

The constituent %<sub>wt</sub> in the vapor and estimated emissions for each case can be found in Appendix A. The worst-case emissions were from Case #2:

**Table 10: 2-T-4 & 2-D-5 Column Emissions**

Pollutant	Combined Maximum Emissions 2-T-4 & 2-D-5 Columns	
	lb/hr	tpy
<b>Total VOC</b>	0.783	3.428
<b>Total HAP</b>	0.484	2.122
Total POM	0.431	1.888

**Rod Pitch Process**

Emissions from the rod pitch process are produced from two separate operations: The Rod Pitch Dryer and the Solid Pitch Loading.

Per a determination letter dated June 5, 2002, emissions of particulate matter from the Rod Pitch Plant are limited to 9.28 tons/year.

**Rod Pitch Dryer**

Emissions factors from the Rod Pitch Dryer are based on a stack test of the baghouse conducted in July 1997. The following was used as a basis:

- Production: 12 tons/hr  
60,480 tons/yr
- Baghouse capture eff.: 97.5%
- Baghouse control eff.: 99.0%
- July 1997 Stack Test Results
  - PM 0.540 lb/hr
  - PM<sub>10</sub> 0.102 lb/hr
  - Throughput 8.000 tons/hr

All PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>

$$\begin{aligned} \text{Uncontrolled PM emission factor} &= 0.540 \text{ lb}_{\text{PM}}/\text{hr} \div 8.0 \text{ ton}_{\text{pitch}}/\text{hr} \div (97.5/100) \div [1 - (99.0/100)] \\ &= 6.923 \text{ lb}_{\text{PM}}/\text{ton}_{\text{pitch}} \end{aligned}$$

$$\begin{aligned} \text{Uncontrolled PM}_{10} \text{ emission factor} &= 0.540 \text{ lb}_{\text{PM}_{10}}/\text{hr} \div 8.0 \text{ ton}_{\text{pitch}}/\text{hr} \div (97.5/100) \div [1 - (99.0/100)] \\ &= 1.308 \text{ lb}_{\text{PM}_{10}}/\text{ton}_{\text{pitch}} \end{aligned}$$

**Table 11: Rod Pitch Dryer Particulate Emissions**

Pollutant	Uncontrolled Emission Factor	Hourly Emissions			
		Uncontrolled PTE	Stack PTE	Fugitive PTE	Total PTE
	lb <sub>PM</sub> /ton <sub>pitch</sub>	lb/hr	lb/hr	lb/hr	lb/hr
PM	6.923	83.077	0.810	2.077	<b>2.887</b>
PM <sub>10</sub>	1.308	15.692	0.153	0.392	<b>0.545</b>
PM <sub>2.5</sub>	1.308	15.692	0.153	0.392	<b>0.545</b>

Pollutant	Uncontrolled Emission Factor	Annual Emissions			
		Uncontrolled PTE	Stack PTE	Fugitive PTE	Total PTE
	lb <sub>PM</sub> /ton <sub>pitch</sub>	tpy	tpy	tpy	tpy
PM	6.923	209.354	2.041	5.234	<b>7.275</b>
PM <sub>10</sub>	1.308	39.545	0.386	0.989	<b>1.374</b>
PM <sub>2.5</sub>	1.308	39.545	0.386	0.989	<b>1.374</b>

HAP emissions from the Rod Pitch Dryer are based on the relative percentages of HAP (as a percent of total PM) from the three kinds of pitch produced: Coal Tar/Type A, Petro, or Decanted Oil Pitch.

**Table 12: Rod Pitch Dryer HAP Emissions**

Pollutant	Case 1 – Crude Tar Coal Tar/Type A Pitch			Case 2 – Petro Tar Petro Pitch			Case 3 – Decanted Oil Decanted Oil Pitch			Maximum Potential	
	% <sub>w</sub> in pitch	Potential		% <sub>w</sub> in pitch	Potential		% <sub>w</sub> in pitch	Potential		lb/hr	tpy
		lb/hr	tpy		lb/hr	tpy		lb/hr	tpy		
PM		2.887	7.275		2.887	7.275		2.887	7.275	2.887	<b>7.275</b>
PM <sub>10</sub>		0.545	1.374		0.545	1.374		0.545	1.374	0.545	<b>1.374</b>
PM <sub>2.5</sub>		0.545	1.374		0.545	1.374		0.545	1.374	0.545	<b>1.374</b>
Dibenzofuran	0.13	0.004	0.009	0.00	0.000	0.000	0.00	0.000	0.000	0.004	<b>0.009</b>
Naphthalene	0.01	0.000	0.001	0.01	0.000	0.001	0.01	0.000	0.001	0.000	0.001
Acenaphthene	0.06	0.002	0.004	0.35	0.010	0.025	0.35	0.010	0.025	0.010	0.025
Anthracene	0.72	0.021	0.052	0.23	0.007	0.017	0.23	0.007	0.017	0.021	0.052
Benzo(a)-anthracene	1.02	0.029	0.074	0.17	0.005	0.012	0.17	0.005	0.012	0.029	0.074
Benzo(b)-fluoranthene	1.90	0.055	0.138	0.02	0.001	0.001	0.02	0.001	0.001	0.055	0.138
Benzo(k)-fluoranthene	0.65	0.019	0.047	0.01	0.000	0.001	0.01	0.000	0.001	0.019	0.047
Benzo(g,h,i)-perylene	1.15	0.033	0.084	0.00	0.000	0.000	0.00	0.000	0.000	0.033	0.084

Pollutant	Case 1 – Crude Tar Coal Tar/Type A Pitch			Case 2 – Petro Tar Petro Pitch			Case 3 – Decanted Oil Decanted Oil Pitch			Maximum Potential	
	%w in pitch	Potential		%w in pitch	Potential		%w in pitch	Potential			
		lb/hr	tpy		lb/hr	tpy		lb/hr	tpy	lb/hr	tpy
Benzo(a)pyrene	1.53	0.044	0.111	0.09	0.003	0.007	0.09	0.003	0.007	0.044	0.111
Chrysene	1.15	0.033	0.084	0.26	0.008	0.019	0.26	0.008	0.019	0.033	0.084
Dibenzo(a,h)- anthracene	1.23	0.036	0.089	0.00	0.000	0.000	0.00	0.000	0.000	0.036	0.089
Fluoranthene	1.44	0.042	0.105	0.28	0.008	0.020	0.28	0.008	0.020	0.042	0.105
Fluorene	0.04	0.001	0.003	0.20	0.006	0.015	0.20	0.006	0.015	0.006	0.015
Indeno(1,2,3-cd)- pyrene	0.19	0.005	0.014	0.00	0.000	0.000	0.00	0.000	0.000	0.005	0.014
Phenanthrene	0.21	0.006	0.015	0.50	0.014	0.036	0.50	0.014	0.036	0.014	0.036
Pyrene	1.17	0.034	0.085	0.50	0.014	0.036	0.50	0.014	0.036	0.034	0.085
Total HAP		0.364	0.917		0.076	0.191		0.076	0.191	0.364	0.917
Total POM		0.364	0.917		0.076	0.191		0.076	0.191	0.364	0.917

**Solid Pitch Loading**

Emissions of particulate from the Solid Pitch Loading operation are based on factors found in U.S. EPA AP-42 Section 13.2.4: *Aggregate Handling and Storage Piles (11/06)* and the following equation:

$$E = k \times 0.0032 \times (U/5)^{1.3} \div (M/2)^{1.4}$$

Where:

- E = emission factor (lb/ton)
- k = particle size multiplier = 0.74 for PM  
 = 0.35 for PM<sub>10</sub>  
 = 0.11 for PM<sub>2.5</sub>
- U = mean wind speed = 9 mph
- M = moisture content = 2%

HAP emissions from Solid Pitch Loading are based on the relative percentages of HAP (as a percent of total PM) from the three kinds of pitch produced: Coal Tar/Type A, Petro, or Decanted Oil Pitch. A 15% adjustment factor was added to the calculated particulate values to account for operational variability from the AP-42 factors. The following assumptions were also used as a basis:

- Pitch Loading = 225 tons/hr (based on 3 bins of 75 tons each unloaded to truck or rail an hour)
- = 60,480 tons/yr

The calculated particulate emission factors are:

- PM = 0.00508 lb<sub>PM</sub>/ton<sub>pitch</sub>
- PM<sub>10</sub> = 0.00240 lb<sub>PM10</sub>/ton<sub>pitch</sub>
- PM<sub>2.5</sub> = 0.00076 lb<sub>PM2.5</sub>/ton<sub>pitch</sub>

**Table 13: Solid Rod Pitch Loading Emissions**

Pollutant	Case 1 – Crude Tar Coal Tar/Type A Pitch			Case 2 – Petro Tar Petro Pitch			Case 3 – Decanted Oil Decanted Oil Pitch			Maximum Potential	
	%w in pitch	Potential		%w in pitch	Potential		%w in pitch	Potential			
		lb/hr	tpy		lb/hr	tpy		lb/hr	tpy	lb/hr	tpy
PM		1.316	0.177		1.316	0.177		1.316	0.177	1.316	0.177
PM <sub>10</sub>		0.622	0.084		0.622	0.084		0.622	0.084	0.622	0.084
PM <sub>2.5</sub>		0.196	0.026		0.196	0.026		0.196	0.026	0.196	0.026
Dibenzofuran	0.13	0.002	0.000	0.00	0.000	0.000	0.00	0.000	0.000	0.002	0.000



Pollutant	Case 1 – Crude Tar Coal Tar/Type A Pitch			Case 2 – Petro Tar Petro Pitch			Case 3 – Decanted Oil Decanted Oil Pitch			Maximum Potential	
	%w in pitch	Potential		%w in pitch	Potential		%w in pitch	Potential			
		lb/hr	tpy		lb/hr	tpy		lb/hr	tpy	lb/hr	tpy
Naphthalene	0.01	0.000	0.000	0.01	0.000	0.000	0.01	0.000	0.000	0.000	0.000
Acenaphthene	0.06	0.001	0.000	0.35	0.005	0.001	0.35	0.005	0.001	0.005	0.001
Anthracene	0.72	0.009	0.001	0.23	0.003	0.000	0.23	0.003	0.000	0.009	0.001
Benzo(a)- anthracene	1.02	0.013	0.002	0.17	0.002	0.000	0.17	0.002	0.000	0.013	0.002
Benzo(b)- fluoranthene	1.90	0.025	0.003	0.02	0.000	0.000	0.02	0.000	0.000	0.025	0.003
Benzo(k)- fluoranthene	0.65	0.009	0.001	0.01	0.000	0.000	0.01	0.000	0.000	0.009	0.001
Benzo(g,h,i)- perylene	1.15	0.015	0.002	0.00	0.000	0.000	0.00	0.000	0.000	0.015	0.002
Benzo(a)pyrene	1.53	0.020	0.003	0.09	0.001	0.000	0.09	0.001	0.000	0.020	0.003
Chrysene	1.15	0.015	0.002	0.26	0.003	0.000	0.26	0.003	0.000	0.015	0.002
Dibenzo(a,h)- anthracene	1.23	0.016	0.002	0.00	0.000	0.000	0.00	0.000	0.000	0.016	0.002
Fluoranthene	1.44	0.019	0.003	0.28	0.004	0.000	0.28	0.004	0.000	0.019	0.003
Fluorene	0.04	0.001	0.000	0.20	0.003	0.000	0.20	0.003	0.000	0.003	0.000
Indeno(1,2,3-cd)- pyrene	0.19	0.002	0.000	0.00	0.000	0.000	0.00	0.000	0.000	0.002	0.000
Phenanthrene	0.21	0.003	0.000	0.50	0.007	0.001	0.50	0.007	0.001	0.007	0.001
Pyrene	1.17	0.015	0.002	0.50	0.007	0.001	0.50	0.007	0.001	0.015	0.002
Total HAP		0.166	0.022		0.034	0.005		0.034	0.005	0.166	0.022
Total POM		0.166	0.022		0.034	0.005		0.034	0.005	0.166	0.022

### Centrifuge Operation

Emissions from the Centrifuge process are from two phases: dumpster loading and dumpster storage. Calculations of emissions are based on the following:

- Centrifuge capacity = 60 gal/min = 3,600 gal/hr = 31,536,000 gal/yr
- Percent solids in the tar = 7%  
 = 252 gal/hr = 2,207,520 gal/yr
- Coal tar temperature = 180 °F (640 °R)
- Dumpster capacity: Length = 4 ft = 121.9 cm  
 Width = 3 ft = 91.4 cm  
 Depth = 4 ft = 121.9 cm  
 Capacity = 48 ft<sup>3</sup> = 359 gallons
- Turnovers (assuming all solids are centrifuged to the dumpster) = 2,207,520 gal/yr ÷ 359 gal  
 = 6,148 turnovers/year
- Composition of materials in dumpster: 50%<sub>v</sub> solid crude tar  
 25%<sub>v</sub> liquid crude tar  
 25%<sub>v</sub> air

### Dumpster Loading

Calculated emissions from dumpster loading were based on emission factors derived from AP-42 *Section 5.2: Transportation and Marketing of Petroleum Liquids (6/08)*. A 15% adjustment was added to the calculated VOC emissions to account for operational variability from the AP-42 factors (HAP emissions estimates are based on a percentage of the total VOC). The following equation was used:

$$L_L = 12.46 \times \text{SPM} \div T$$

Where:

- $L_L$  = loading loss, lb/10<sup>3</sup> gallons of liquid loaded
- $S$  = saturation factor = 1.45 (from Table 5.2-1)
- $P$  = true vapor pressure of liquid loaded, psia = 0.2221 psia
- $M$  = molecular weight of vapors, lb/lb·mol = 91.78 lb/lb·mol
- $T$  = temperature of bulk liquid loaded, °R = 640 °R

$$L_L = 0.5753 \text{ lb}_{\text{voc}}/10^3 \text{ gal}$$

$$\begin{aligned} \text{VOC emissions} &= 0.5753 \text{ lb}_{\text{voc}}/10^3 \text{ gal} \times (252 \div 1,000) 10^3 \text{ gal/hr} \times (1 + 0.15) = \mathbf{0.167 \text{ lb/hr VOC}} \\ &= 0.5753 \text{ lb}_{\text{voc}}/10^3 \text{ gal} \times (2,207,520 \div 1,000) 10^3 \text{ gal/hr} \times (1 + 0.15) = \mathbf{0.635 \text{ tpy VOC}} \end{aligned}$$

**Table 14: Centrifuge Loading Emissions**

Pollutant	Dumpster Loading		
	Potential Emissions		
	% <sub>w</sub> in Vapor	lb/hr	tpy
<b>Total VOC</b>	100.000	0.167	0.635
Benzene	50.449	0.084	0.320
Biphenyl	0.149	0.000	0.001
m-Cresol	0.257	0.000	0.002
o-Cresol	0.211	0.000	0.001
p-Cresol	0.104	0.000	0.001
Dibenzofuran	0.087	0.000	0.001
Naphthalene	16.902	0.028	0.107
Phenol	0.512	0.001	0.003
Quinoline	0.380	0.001	0.002
Styrene	1.870	0.003	0.012
Toluene	12.694	0.021	0.081
m-Xylene	2.362	0.004	0.015
o-Xylene	1.961	0.003	0.012
p-Xylene	2.444	0.004	0.016
Acenaphthene	0.546	0.001	0.003
Total POM		0.031	0.117
<b>Total HAP</b>		0.152	0.579

Dumpster Storage

Calculated emissions from dumpster storage were based on the procedures contained in “Air Emission Models for Waste and Wastewater”, EPA 453/R-94-080A, November 1994, *Chapter 9.3.4, Emission Model for Open Dumpster Storage*. The following additional assumptions were also used:

1. Average temperature assumed to be 77 °F (298 K) and average windspeed assumed to be 10 mph.
2. Diffusivity in air,  $D_a$ , was found in EPA’s Water 8 program.
3. Initial volatile organic amount was calculated as follows:
  - Density of crude tar = 10.08 lb/gal = 1.209 g/cm<sup>3</sup>
  - Amount of liquid crude tar in dumpster = 359 gallons × (25% ÷ 100) = 89.766 gallons
  - = 89.766 gal × 10.08 lb/gal = 904.841 lbs
4. Effective diffusion coefficient,  $D_e$ , was calculated using the following equation:
 
$$D_e = D_a \times (e_a^{3.33} \div e_r^2)$$

Where:

$e_a$  = air porosity of fixed waste = 0.25

$e_T$  = total porosity of fixed waste = 0.05

5. Partition coefficient,  $K_{eq}$ , was calculated using the following equation:

$$K_{eq} = P \times MW \times e_a \div (R \times T \times L)$$

Where:

P = vapor pressure of constituent, atm

L = waste loading = 1.209 g/cm<sup>3</sup> × 25% = 0.302 g/cm<sup>3</sup>

MW = molecular weight of liquid crude tar = 218 g/g·mol

$e_a$  = air porosity of fixed waste = 0.25

R = ideal gas constant = 82.05cm<sup>3</sup>·atm/g·mol·K

T = ambient temperature = 298 K

6. Volatilization constant,  $k_v$ , was calculated using the following equation:

$$k_v = K_{eq} \times D_e \div L^2$$

Where:

$K_{eq}$  = partition coefficient from #11 above

$D_e$  = effective diffusion coefficient from #10 above

L = length of dumpster = 121.9 cm

7.  $k_{vt}$  was calculated, assuming t equal to half a year, or 15,768,000 seconds.

8.  $k_{dt}$  was calculated using the following equation:

$$k_{dt} = k_v t \times \pi^2 \div 4$$

9. Fraction lost to the air,  $F_a$ , was calculated using the following equation:

$$F_a = 0.72 \times (k_{dt})^{1/2}$$

10. Maximum dumpster turnovers per year = 6,148.

**Table 15: Centrifuge Constants & Calculated Factors**

Pollutant	MW	P@77°F	D <sub>a</sub>	Tar	Init. VO	D <sub>e</sub>	K <sub>eq</sub>	k <sub>v</sub>	k <sub>vt</sub>	k <sub>dt</sub>	F <sub>a</sub>
	g/g·mol	atm	cm <sup>2</sup> /s	% <sub>w</sub>	lbs	cm <sup>2</sup> /s					
Benzene	78.10	0.12347	0.088	0.30	2.71	0.00348	0.00091	2.13E-10	0.00337	0.00831	0.066
Biphenyl	154.20	0.00003	0.040	0.70	6.33	0.00158	0.00000	2.36E-14	0.00000	0.00000	0.001
m-Cresol	108.10	0.00021	0.074	0.20	1.81	0.00293	0.00000	3.05E-13	0.00000	0.00001	0.002
o-Cresol	108.10	0.00038	0.074	0.10	0.90	0.00293	0.00000	5.52E-13	0.00001	0.00002	0.003
p-Cresol	108.10	0.00014	0.074	0.10	0.90	0.00293	0.00000	2.04E-13	0.00000	0.00001	0.002
Dibenzofuran	168.20	0.00000	0.000	2.20	19.91	0.00000	0.00000	0.00E+00	0.00000	0.00000	0.000
Naphthalene	128.20	0.00034	0.059	11.70	105.87	0.00233	0.00000	3.94E-13	0.00001	0.00002	0.003
Phenol	94.10	0.00044	0.082	0.20	1.81	0.00324	0.00000	7.09E-13	0.00001	0.00003	0.004
Quinoline	129.20	0.00012	0.000	0.60	5.43	0.00000	0.00000	0.00E+00	0.00000	0.00000	0.000
Styrene	104.20	0.00783	0.071	0.10	0.90	0.00281	0.00006	1.09E-11	0.00017	0.00042	0.015
Toluene	92.40	0.03818	0.087	0.20	1.81	0.00344	0.00028	6.53E-11	0.00103	0.00254	0.036
m-Xylene	106.20	0.01067	0.070	0.10	0.90	0.00277	0.00008	1.47E-11	0.00023	0.00057	0.017
o-Xylene	106.20	0.00848	0.087	0.10	0.90	0.00344	0.00006	1.45E-11	0.00023	0.00056	0.017
p-Xylene	106.20	0.01125	0.077	0.10	0.90	0.00305	0.00008	1.70E-11	0.00027	0.00066	0.019
Acenaphthene	154.20	0.00003	0.071	3.00	27.15	0.00281	0.00000	4.18E-14	0.00000	0.00000	0.001

Sample Calculation for Benzene

Emissions = Initial VO × F<sub>a</sub> × No. of Turnovers

$$= 2.71 \text{ lb/turnover} \times 0.066 \times 6,148 \text{ turnovers/yr} \div 2,000 \text{ lb/ton} = \mathbf{0.548 \text{ tpy of benzene}}$$

$$= 0.125 \text{ lb/hr of benzene}$$

**Table 16: Centrifuge Dumpster Storage Emissions**

Pollutant	Potential Emissions	
	lb/hr	tpy
<b>Total VOC</b>	0.455	<b>1.995</b>
<b>Benzene</b>	0.125	<b>0.548</b>
<b>Biphenyl</b>	0.003	<b>0.013</b>
<b>m-Cresol</b>	0.003	<b>0.014</b>
<b>o-Cresol</b>	0.002	<b>0.009</b>
<b>p-Cresol</b>	0.001	<b>0.006</b>
<b>Dibenzofuran</b>	0.000	<b>0.000</b>
<b>Naphthalene</b>	0.209	<b>0.918</b>
<b>Phenol</b>	0.005	<b>0.021</b>
<b>Quinoline</b>	0.000	<b>0.000</b>
<b>Styrene</b>	0.009	<b>0.041</b>
<b>Toluene</b>	0.046	<b>0.202</b>
<b>m-Xylene</b>	0.011	<b>0.048</b>
<b>o-Xylene</b>	0.011	<b>0.048</b>
<b>p-Xylene</b>	0.012	<b>0.052</b>
<b>Acenaphthene</b>	0.018	<b>0.077</b>
<b>Total POM</b>	0.455	<b>1.995</b>
<b>Total HAP</b>	0.230	<b>1.008</b>

**Creosote Blending Process**

There are three options for the blending of creosote: P2 creosote, P1/P13 creosote, and a creosote petroleum solution. The maximum emissions represent the maximum for each component from the three options. Emissions were calculated using the following equation:

$$E = V/RT \times \Sigma(P_i)(MW_i)$$

Where:

E = Mass of Emissions

P<sub>i</sub> = Partial Pressure

V = Volume of Gas Displaced

MW<sub>i</sub> = Molecular Weight

R = Ideal Gas Constant = 10.731 cf psi/lb·mol °R

Thermal oxidizer destruction efficiency: 98%

See Appendix B for the individual emissions estimates for each creosote option. The following table represents the maximum emissions limits:

**Table 17: Creosote Blending Emissions**

Constituent	Controlled Emissions		Constituent	Controlled Emissions	
	lb/hr	tpy		lb/hr	tpy
<b>Total VOC</b>	1.203	0.350	<b>Xylenes</b>	0.016	0.005
<b>Benzene</b>	0.008	0.003	<b>Acenaphthene</b>	0.010	0.003
<b>Biphenyl</b>	0.003	0.001	<b>Acenaphthylene</b>	0.001	0.000
<b>m-Cresol</b>	0.001	0.000	<b>Anthracene</b>	0.000	0.000
<b>o-Cresol</b>	0.005	0.001	<b>Fluroanthene</b>	0.001	0.000
<b>p-Cresol</b>	0.001	0.000	<b>Fluorene</b>	0.004	0.001
<b>Dibenzofuran</b>	0.002	0.001	<b>Phenanthrene</b>	0.001	0.000
<b>Naphthalene</b>	0.087	0.034	<b>Pyrene</b>	0.000	0.000
<b>Phenol</b>	0.003	0.001	<b>Total HAP</b>	0.116	0.045
<b>Quinoline</b>	0.006	0.002	<b>Total POM</b>	0.105	0.041

**Liquid Loading Operations (Non-Pitch)**

Liquid product is loaded to either barge, truck, or rail car. Barge loading emissions are not controlled. Pumping rates are:

Barge: 1,500 gal/min 90,000 gal/hr  
 Truck/Railcar: 500 gal/min 30,000 gal/hr

Calculated emissions from liquid loading operations were based on emission factors derived from AP-42 *Section 5.2: Transportation and Marketing of Petroleum Liquids (6/08)*. A 15% adjustment was added to the calculated VOC emissions to account for operational variability from the AP-42 factors (HAP emissions estimates are based on a percentage of the total VOC). The following equation was used:

$$L_L = 12.46 \times SPM \div T$$

Where:

- $L_L$  = loading loss, lb/10<sup>3</sup> gallons of liquid loaded
- $S$  = saturation factor = 0.50 (barge loading)  
= 1.45 (truck/railcar loading)
- $P$  = true vapor pressure of liquid loaded, psia
- $M$  = molecular weight of vapors, lb/lb·mol
- $T$  = temperature of bulk liquid loaded, °R

DFTO destruction efficiency: 98%

Three cases were calculated, 100% Crude Tar, 100% Petro Tar, and 100% Distillate Oil. The constituent %<sub>wt</sub> in the vapor, vapor pressure, and estimated loading loss factor for each case can be found in Appendix C. The throughputs and temperatures for each case are below:

**Table 18: Liquid Loading Throughputs & Temperatures**

Product		Quantity (gal/yr)	Temperature	
			(°F)	(°R)
Feed	Crude Tar	10,000,000	160	620
	Petro Tar	10,000,000	160	620
	Decanted Oil	10,000,000	160	620
	(maximum of the above)			
Feed	Debenzolyzed Tar	10,000,000	200	660
Overhead	Refined Chemical Oil	16,425,000	190	650
Distillate	Carbon Black Oil	22,995,000	165	625

Product		Quantity (gal/yr)	Temperature	
			(°F)	(°R)
	Petro Distillate	26,280,000	165	625
	Decanted Oil Distillate	26,280,000	165	625
	(maximum of the above)			
Creosotes	P2 Creosote	23,300,000	200	660
	P1/P13 Creosote	23,300,000	200	660
	CPS-P2/NCGO	23,300,000	200	660
	CPS-P2/Petro Distillate	23,300,000	200	660
	(maximum of the above)			
Purchased Correction Oil		7,000,000	200	660
Truck/Railcar Pump Rate		500 gal/min = 30,000 gal/hr		

Sample Calculation of VOC – Case #1, Crude Tar Loading

Basis:

Molecular Weight (M) = 90.42 lb/lb·mol  
 Vapor Pressure (P) = 0.1477 psia

$$L_{L\text{barge}} = 12.46 \times 90.42 \text{ lb/lb}\cdot\text{mol} \times 0.1477 \text{ psia} \times 0.50 \div 620 \text{ }^\circ\text{R} = 0.134 \text{ lb}/10^3 \text{ gal}$$

$$L_{L\text{truck/rail}} = 12.46 \times 90.42 \text{ lb/lb}\cdot\text{mol} \times 0.1477 \text{ psia} \times 1.45 \div 620 \text{ }^\circ\text{R} = 0.389 \text{ lb}/10^3 \text{ gal}$$

Barge Emissions:  $0.134 \text{ lb}/10^3 \text{ gal} \times 90,000 \text{ gal/hr} \div 1,000 \times (1 + 0.15) = 13.889 \text{ lb/hr}$   
 $0.134 \text{ lb}/10^3 \text{ gal} \times 10,000,000 \text{ gal/yr} \div 1,000 \div 2,000 \text{ lb/ton} \times (1 + 0.15) = 0.772 \text{ tpy}$

Truck/Railcar:  $0.389 \text{ lb}/10^3 \text{ gal} \times 30,000 \text{ gal/hr} \div 1,000 \times (1 + 0.15) \times (1 - 0.98) = 0.269 \text{ lb/hr}$   
 $0.389 \text{ lb}/10^3 \text{ gal} \times 10,000,000 \text{ gal/yr} \div 1,000 \div 2,000 \text{ lb/ton} \times (1 + 0.15) \times (1 - 0.98) = 0.045 \text{ tpy}$

Maximum short-term emissions are from barge loading (13.869 lb/hr); maximum long-term emissions are from truck/railcar loading (2.237 tpy).

Sample Calculation of Benzene – Case #1, Crude Tar Barge Loading

Basis:

Vapor %w = 53.6%

Short-term:  $13.889 \text{ lb/hr} \times (53.6 \div 100) = 7.444 \text{ lb/hr}$  of benzene

Long-term:  $0.772 \text{ tpy} \times (53.6 \div 100) = 0.414 \text{ tpy}$  of benzene

Estimated potential-to-emit differs slightly from installation permit IP #0029-I004. This is due to using more updated values for constituent %<sub>w</sub>t in the vapor and estimated vapor pressures, as well as a more accurate method of calculating short-term emissions that is more consistent with other loading calculations. Values for the weight percent and vapor pressures of each constituent can be found in Appendix C.1. Estimated emissions for each constituent for each case can be found in Appendix C.2 (for barge loading) and Appendix C.3 (for non-pitch tank and railcar loading).

**Table 19: Liquid Loading (Non-Pitch) Emissions**

POLLUTANT	Barge Loading		Truck & Railcar Loading	
	Hourly Emissions (lb/hr)	Total Yearly Emissions (tons/yr)*	Hourly Emissions (lb/hr)	Total Yearly Emissions (tons/yr)*
<b>Volatile Organic Compounds (VOCs)</b>	72.000	6.138	1.303	0.301
<b>Hazardous Air Pollutants (HAPs)</b>	54.403	4.813	0.967	0.226
<b>Benzene</b>	9.037	0.556	0.174	0.032
<b>Naphthalene</b>	28.383	2.484	0.532	0.137
<b>Total POM</b>	33.724	3.458	0.571	0.148

**Pitch Loading**

Calculated emissions from liquid pitch loading operations were based on emission factors derived from AP-42 Section 5.2: *Transportation and Marketing of Petroleum Liquids (6/08)*. A 15% adjustment was added to the calculated VOC emissions to account for operational variability from the AP-42 factors (HAP emissions estimates are based on a percentage of the total VOC). The following equation was used:

$$L_L = 12.46 \times SPM \div T$$

Where:

- $L_L$  = loading loss, lb/10<sup>3</sup> gallons of liquid loaded
- $S$  = saturation factor = 1.45
- $P$  = true vapor pressure of liquid loaded, psia
- $M$  = molecular weight of vapors, lb/lb·mol
- $T$  = temperature of bulk liquid loaded, °R

DFTO destruction efficiency: 98%

Four types of pitch were evaluated, Coal Tar Pitch, Type A Pitch, Liquid Petroleum Pitch, and Decanted Oil Pitch. The constituent %<sub>wf</sub> in the vapor and estimated emissions for each case can be found in Appendix C. The following properties were used as a basis:

**Table 20: Pitch Loading Input Data**

Pitch Type	Molecular Weight	Vapor Pressure	Saturation Factor	Loading Loss (L <sub>L</sub> )	Pump Rate	Annual Throughput	Temp.
	lb/lb·mol	psia		lb/10 <sup>3</sup> gal			
<b>Coal Tar</b>	180.09	0.0281	1.45	0.103	30,000	42,705,000	425
<b>Type A</b>	172.32	0.0302		0.106			
<b>Liquid Petroleum</b>	158.81	0.0532		0.172			
<b>Decanted Oil</b>	158.81	0.0532		0.172			

Maximum controlled emissions from Pitch Loading are:

**Table 21: Pitch Loading Emissions**

Pollutant	lb/hr	tpy
<b>Total VOC</b>	0.119	0.085
<b>Total HAP</b>	0.119	0.085
<b>Total POM</b>	0.119	0.085

**Process Heaters**

All emissions from the process heaters, except for particulate matter were based on factors found in U.S. EPA AP-42 Section 1.4: *Natural Gas Combustion (7/98)*. Particulate matter emissions limits are those specified in Article XXI, §2104.02.d. The 2F-2A TI Heater had no specific limit in Article XXI, so the limit in §2104.02.a.1.A was used. Except where limited by Article XXI, all PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>.

Emissions of NO<sub>x</sub> for the 2F-1A Primary, 2F-2A TI, and 2F-1C Secondary Heaters are based on performance graphs from the manufacturer. Readings from the graph were taken from the “On Ratio” line. Based on the manufacturer information, a correction factor of 1.20 was added to the reading for a medium-velocity combustor. A 10% adjustment factor was added to account for operational variability. The NO<sub>x</sub> ratings used for the 2F-1A Primary, 2F-2A TI, and 2F-1C Secondary Heaters, at 3% oxygen, are 66 ppm, 56 ppm, and 86 ppm, respectively.

The following assumptions were also used as a basis:

- Natural gas rating: 1,050 Btu/scf
- Hours of operation: 8,760 hours/year
- NO<sub>x</sub> MW: 45.2 lb/lb·mol (based on 5% NO and 95% NO<sub>2</sub>)
- F<sub>d</sub>-Factor: 8,710 scf<sub>eg</sub>/MMBtu
- Exhaust Density: 385 scf/lb·mol
- Hours of operation: 8,760 hours/year

**Sample NO<sub>x</sub> Emissions (2F-1A Primary Heater):**

$$\begin{aligned}
 &(66 \text{ ppm} \div 10^6) \times 8,710 \text{ scf/MMBtu} \times 16.0 \text{ MMBtu/hr} \div 385 \text{ scf/lb}\cdot\text{mol} \times 45.2 \text{ lb/lb}\cdot\text{mol} \times [20.9/(20.9 - 3)] = \\
 &= \mathbf{1.261 \text{ lb/hr NO}_x \text{ from 2F-1A}} \\
 &= 1.261 \text{ lb/hr} \times 8,760 \text{ hr/yr} \div 2,000 \text{ lb/ton} = \mathbf{5.522 \text{ tpy NO}_x \text{ from 2F-1A}}
 \end{aligned}$$

**Table 22: Process Heater Emissions**

Pollutant	Factor (note 1)	2F-1A Primary		2F-2A TI		1F-1C Spare Hot Oil		1F-2C Hot Oil		Prill Hot Oil	
		16.0 MMBtu/hr		8.5 MMBtu/hr		10.08 MMBtu/hr		4.5 MMBtu/hr		4.5 MMBtu/hr	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
PM	0.008	0.128	0.561	0.068	0.298	0.050	0.219	0.010	0.044	0.020	0.088
PM <sub>10</sub>	0.008	0.070	0.307	0.068	0.298	0.050	0.219	0.010	0.044	0.020	0.088
PM <sub>2.5</sub>	0.008	0.070	0.307	0.068	0.298	0.050	0.219	0.010	0.044	0.020	0.088
NO <sub>x</sub>	100	1.261	5.522	0.568	2.489	0.960	4.205	0.429	1.877	0.429	1.877
SO <sub>x</sub>	0.6	0.009	0.040	0.005	0.021	0.006	0.025	0.003	0.011	0.003	0.011
CO	84	1.280	5.606	0.680	2.978	0.806	3.532	0.360	1.577	0.360	1.577
VOC	5.5	0.084	0.367	0.045	0.195	0.053	0.231	0.024	0.103	0.024	0.103

Pollutant	Factor (note 1)	2F-1C Secondary		2F-2B 2T3 Heater		2F-2C 2T4 Heater		2F-1B 2TI Heater		#1 Primary Flash	
		6.2 MMBtu/hr		6.0 MMBtu/hr		6.0 MMBtu/hr		6.0 MMBtu/hr		18.9 MMBtu/hr	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
PM	--	0.050	0.217	0.040	0.175	0.030	0.131	0.020	0.088	0.070	0.307
PM <sub>10</sub>	--	0.070	0.307	0.040	0.175	0.030	0.131	0.020	0.088	0.070	0.307
PM <sub>2.5</sub>	--	0.070	0.307	0.040	0.175	0.030	0.131	0.020	0.088	0.070	0.307
NO <sub>x</sub>	100	0.637	2.788	0.571	2.503	0.571	2.503	0.571	2.503	1.800	7.884
SO <sub>x</sub>	0.6	0.004	0.016	0.003	0.015	0.003	0.015	0.003	0.015	0.011	0.047
CO	84	0.496	2.172	0.480	2.102	0.480	2.102	0.480	2.102	1.512	60623
VOC	5.5	0.032	0.142	0.031	0.138	0.031	0.138	0.031	0.138	0.099	0.434

1. For PM, PM<sub>10</sub>, & PM<sub>2.5</sub>, emission are from Article XXI, §2104.02.d. For the 2F-2A TI Heater, PM emissions are based on factors from Article XXI, §2104.02.a.1.A, (lb/MMBtu); for all other pollutants, emission factors are from AP-42, Section 1.4, (lb/10<sup>6</sup> scf).



**Potential GHG mass and CO<sub>2</sub>e Emissions**

Calculations of greenhouse gases (GHG) and CO<sub>2</sub>-equivalent (CO<sub>2</sub>e) emissions are based on the methodology found in 40 CFR Part 98, Subpart C, §98.33(a)(1), and factors found in Table C-1 and Table C-2 of that subpart.

Total rated heat input capacity of the process heaters = 86.68 MMBtu/hr × 8,760 hr/yr = 759,317 MMBtu/yr

Emission Factors: CO<sub>2</sub> = 53.06 kg/MMBtu  
 N<sub>2</sub>O = 1×10<sup>-4</sup> kg/MMBtu  
 CH<sub>4</sub> = 1×10<sup>-3</sup> kg/MMBtu

CO<sub>2</sub>: 759,317 MMBtu/yr × 53.06 kg/MMBtu ÷ 1,000 kg/metric ton = 40,289 metric tons/year

NO<sub>2</sub>: 759,317 MMBtu/yr × 1×10<sup>-4</sup> kg/MMBtu ÷ 1,000 kg/metric ton = 0.076 metric tons/year

CH<sub>4</sub>: 759,317 MMBtu/yr × 1×10<sup>-3</sup> kg/MMBtu ÷ 1,000 kg/metric ton = 0.759 metric tons/year

Global Warming Potential (GWP) Factors (from Part 98, Subpart A, Table A-1):

CO<sub>2</sub> = 1  
 N<sub>2</sub>O = 298  
 CH<sub>4</sub> = 25

CO<sub>2</sub>e = (40,289 × 1) + (0.076 × 298) + (0.759 × 25) = 40,331 metric tons/year of CO<sub>2</sub>e

**Storage Tanks**

Emissions from the tanks were estimated using the USEPA Tanks 4.0.9d program for each storage tank. Each tank was then grouped by category. Total throughput emissions used in the Tanks program represent the maximum based on plant production capacity, and not necessarily storage capacity. Tanks classified as “miscellaneous” (D013) do not store any VOC-containing materials.

Emissions from Tanks #34 and #36 were calculated separately under IP #0029-I004, emissions from the Tar Refining Tanks were calculated separately under IP #0029-I005, and emissions from the Tanks #5-#9 were calculated separately under IP #0029-I007. Those calculations are included below.

**Table 23: Storage Tank Emissions**

Category	Potential Emissions – tons/yr							
	Total VOC	Total HAP	Benzene	Naphthalene	Xylenes	Acenaphthene	Total POM	D/F
Crude Tar	0.219	0.201	0.117	0.032	0.014	0.001	0.035	0.000
Petro Tar, Decanted Oil	2.159	1.598	0.114	0.960	0.421	0.066	1.050	0.005
Debenzolyzed Tar	2.418	1.894	0.144	1.159	0.531	0.003	1.202	0.002
Refined Chemical Oil	0.131	0.085	0.002	0.061	0.008	0.000	0.062	0.000
Carbon Black Oil	0.170	0.161	0.000	0.103	0.000	0.031	0.161	0.003
Distillate	1.038	0.667	0.000	0.526	0.000	0.021	0.613	0.004
Pitch	8.486	8.434	0.000	0.539	0.000	4.022	8.434	0.488
Naphthalene Still Residue	1.219	0.645	0.000	0.322	0.000	0.121	0.645	0.022
Correction Oil	0.949	0.358	0.000	0.059	0.162	0.015	0.132	0.003
Wastewater	0.005	0.005	0.005	0.000	0.000	0.000	0.000	0.000
Light Oil	0.060	0.060	0.052	0.000	0.001	0.000	0.000	0.000

Tanks in the Tar Refining Process consist of the crude tar tank (Tank #7), decanters (V-110 & V-111), and the contaminated water tank (V-113). All four vessels vent to the DFOT. Annual emissions from the tanks were estimated using the USEPA Tanks 4.0.9d program for each tank. Hourly emissions were calculated using the following equation for vessel displacement:

$$E = V/RT \times \Sigma(P_i)(MW_i)$$

Where:

E = Mass of Emissions  
 V = Volume of Gas Displaced  
 R = Ideal Gas Constant = 10.731 cf psi/lb·mol °R  
 P<sub>i</sub> = Partial Pressure  
 MW<sub>i</sub> = Molecular Weight

DFTO destruction efficiency: 98%

The following were used as a basis:

**Table 24: Tank Input Data**

Tank ID	Material	Throughput	Material Temp.	Pump Rate	
		gal/yr	°F	gal/min	gal/hr
#7	crude tar	65,700,000	200	1,500	90,000
V-110	light oil	1,314,000	120	4.1	246
V-111	light oil	1,314,000	120	4.1	246
V-113	wastewater	25,000,000	70	300	18,000

The constituent %<sub>wi</sub> in the vapor for each tank can be found in Appendix B. The controlled emissions from the tanks are as follows:

**Table 25: Tar Refining Process Tank Emissions**

Pollutant	Tank #7		V-110 & V-111 (combined)		V-113	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
<b>Total VOC</b>	1.036	0.497	0.044	0.192	0.000	0.000
<b>Total HAP</b>	0.938	0.450	0.044	0.189	0.000	0.000
<b>Benzene</b>	0.491	0.236	0.037	0.160	0.000	0.000
<b>Total POM</b>	0.215	0.103	0.000	0.000	0.000	0.000

Emissions from Tank #34 were estimated using the USEPA Tanks 4.0.9d program and AP-42 *Section 7.1: Organic Liquid Storage Tanks (9/97)*. Refined Chemical Oil (RCO) storage produced the worst-case emissions estimate, so RCO was used for all calculations.

Basis:

Tank Diameter = 48.0 ft  
 Tank Height = 40.0 ft  
 Ave. Liquid Height = 20.0 ft  
 Net Throughput = 16,425,000 gallons/year  
 Temperature (T<sub>LA</sub>) = 649.44 °R  
 Vapor Molecular Weight = 119.53 lb/ lb·mol (at T<sub>LA</sub>)  
 Vapor Pressure = 0.2501 psia (at T<sub>LA</sub>)

**Table 26: Tank #34 Emissions**

Pollutant	% Weight in Vapor	Controlled Emissions			
		Standing (lb/yr)	Working (lb/yr)	Total (lb/yr)	Total (tpy)
VOC	100.00	28.03	233.73	261.75	<b>0.131</b>
Benzene	1.68	0.47	3.93	4.40	<b>0.002</b>
Biphenyl	0.15	0.04	0.34	0.38	<b>0.000</b>
m-Cresol	0.22	0.06	0.50	0.57	<b>0.000</b>
o-Cresol	0.00	0.00	0.00	0.00	<b>0.000</b>
p-Cresol	0.18	0.05	0.41	0.46	<b>0.000</b>
Dibenzofuran	0.03	0.01	0.07	0.08	<b>0.000</b>
Ethylbenzene	1.41	0.40	3.31	3.70	<b>0.002</b>
Naphthalene	46.78	13.11	109.35	122.46	<b>0.061</b>
Phenol	0.27	0.08	0.63	0.71	<b>0.000</b>
Quinoline	0.37	0.10	0.88	0.98	<b>0.000</b>
Styrene	3.90	1.09	9.11	10.21	<b>0.005</b>
Toluene	3.22	0.90	7.52	8.43	<b>0.004</b>
m-Xylene	2.45	0.69	5.72	6.41	<b>0.003</b>
o-Xylene	1.02	0.29	2.38	2.67	<b>0.001</b>
p-Xylene	2.53	0.71	5.91	6.62	<b>0.003</b>
Acenaphthene	0.22	0.06	0.52	0.59	<b>0.000</b>
Acenaphthylene	0.11	0.03	0.26	0.29	<b>0.000</b>
Fluorene	0.05	0.01	0.11	0.12	<b>0.000</b>
Total HAP		18.11	150.97	169.08	<b>0.085</b>
Total POM		13.38	111.53	124.91	<b>0.062</b>

Emissions from the loading and storage of refined chemical oil (RCO) in Tank #36 are identical to those in Tank #34. RCO will only be stored in either Tank #34 or Tank #36 at any given time.

Tank #36 will also be used for creosote blending operations. Creosote will be mixed in Tank #36 with a side-mounted mixer rather than the heat exchanger/recirculation pump system currently used by Tanks #3 & #4. There are three options for the blending of creosote: P2 creosote, P1/P13 creosote, and a creosote petroleum solution. The maximum emissions come from the creosote petroleum solution (the sum emissions from P2 creosote, petroleum distillate, and purchased correction oil). See Appendix A for the individual emissions estimates from this creosote option.

Emissions were calculated using the following equation:

$$E = V/RT \times \Sigma(P_i)(MW_i)$$

Where:

E = Mass of Emissions

P<sub>i</sub> = Partial Pressure

V = Volume of Gas Displaced

MW<sub>i</sub> = Molecular Weight

R = Ideal Gas Constant = 10.731 cf psi/lb·mol °R

Thermal oxidizer destruction efficiency: 98%

**Table 27: Tank #36 Emissions**

Constituent	Controlled Emissions		Constituent	Controlled Emissions	
	lb/hr	tpy		lb/hr	tpy
<b>Total VOC</b>	1.203	0.350	<b>Xylenes</b>	0.016	0.005
<b>Benzene</b>	0.008	0.003	<b>Acenaphthene</b>	0.010	0.003
<b>Biphenyl</b>	0.003	0.001	<b>Acenaphthylene</b>	0.001	0.000
<b>m-Cresol</b>	0.001	0.000	<b>Anthracene</b>	0.000	0.000
<b>o-Cresol</b>	0.005	0.001	<b>Fluroanthene</b>	0.001	0.000
<b>p-Cresol</b>	0.001	0.000	<b>Fluorene</b>	0.004	0.001
<b>Dibenzofuran</b>	0.002	0.001	<b>Phenanthrene</b>	0.001	0.000
<b>Naphthalene</b>	0.087	0.034	<b>Pyrene</b>	0.000	0.000
<b>Phenol</b>	0.003	0.001	<b>Total HAP</b>	0.116	0.045
<b>Quinoline</b>	0.006	0.002	<b>Total POM</b>	0.105	0.041

Emissions from Tanks #5-#9 were based on the methodology found in U.S. EPA AP-42 Section 7.1: *Organic Liquid Storage Tanks (11/06)*. Three different cases were evaluated: Case #1 – 100% Crude Tar; Case #2 – 100% Petro Tar; Case #3 – 100% Decanted Oil. Each tank is capable of handling the entire throughput of each individual material. The following throughputs and temperatures were used:

**Table 28: Tanks #5-#9 Throughputs**

Material	Max. Throughput	Temperature	Case
Crude Tar	65,700,000 gal/yr	215 °F	1
Debenzolyzed Tar		215 °F	1
Petro Tar		215 °F	2
Decanted Oil		215 °F	3
Petroleum Distillate	26,280,000 gal/yr	215 °F	2
Decanted Oil Distillate		200 °F	3
Creosote <sup>1</sup>	23,300,000 gal/yr	215 °F	1,2,3
Carbon Black Oil	22,995,000 gal/yr	215 °F	1
Refined Chemical Oil	16,425,000 gal/yr	200 °F	1
Naphthalene Still Residue	7,000,000 gal/yr	215 °F	1,2,3
Purchased Correction Oil	7,000,000 gal/yr	215 °F	1,2,3
Wastewater	25,000,000 gal/yr	200 °F	1,2,3

1. Can be either P2 creosote, P2/needle coker gas oil creosote, or P2/petroleum distillate creosote.

For maximum emissions from each tank, the service (material; case) with the highest emissions for each individual constituent was used.

**Table 29: Tanks #5-#9 Individual Tank Limits**

Pollutant	Tank Emissions (tpy)
Volatile Organic Compounds (VOC)	0.669
Hazardous Air Pollutants (HAP) <sup>1</sup>	0.602
Benzene	0.302
Biphenyl	0.010
Naphthalene	0.373
Styrene	0.013
Toluene	0.080
Xylenes	0.055
Total POM	0.396

1. 'Total HAP' represents the emissions from the material (in Table 4) that gives off the maximum emissions and not the sum of the maximum emissions from each HAP constituent.

To determine the maximum total emissions from the five tanks, it was not feasible to just multiply the maximum individual emissions by five, as this would result in an artificially high number. Only one type of raw material other than crude tar (e.g. debenzolized tar, petro tar, decanted oil) can be processed at any given time. The same is true for distillates and creosotes. The maximum total emissions was determined by taking the five materials with the highest VOC emissions (which happen to be the same as those with the highest HAP emissions), and assume a worst-case situation where one tank is processing 100% of that material. The five materials with the highest emissions are:

**Table 30a: Tanks #5-#9 Total Tank Emissions – VOC & HAP**

Pollutant	VOC (tpy)	HAP (tpy)
Crude Tar	0.669	0.602
Debenzolized Tar	0.299	0.237
Refined Chemical Oil	0.188	0.122
Petro Distillate	0.085	0.054
Purchased Correction Oil	0.030	0.019
<b>Total</b>	<b>1.271</b>	<b>1.034</b>

**Table 30b: Tanks #5-#9 Total Tank Emissions – Selected Individual HAPs**

Pollutant	Crude Tar (tpy)	Debenz. Tar (tpy)	RCO (tpy)	Petro Dist. (tpy)	Purchased Corr. Oil (tpy)	Total (tpy)
Benzene	0.302	0.012	0.003	--	--	0.317
Biphenyl	0.002	0.001	0.001	0.001	0.001	0.006
Naphthalene	0.137	0.160	0.089	0.041	0.007	0.434
Styrene	0.013	--	0.007	--	--	0.020
Toluene	0.080	--	0.006	--	--	0.086
Xylenes	0.046	0.055	0.011	--	--	0.112
Total POM	0.008	0.008	0.016	0.006	0.006	0.044

Tanks #5- #9 are also permitted to store pavement sealer base (PSB), under an RFD exemption issued on January 23, 2015. The maximum per-tank emissions from PSB are 0.02 tpy of VOC and 0.02 tpy of HAP. It is not possible for all five tanks to process PSB at the same time.

**SOURCES OF MINOR SIGNIFICANCE:**

**Cooling Tower**

Emissions from the cooling tower were calculated using emission factors found in U.S. EPA AP-42 *Section 13.4: Wet Cooling Towers (1/95)*. A 15% adjustment was added to the calculated values to account for operational variability from the AP-42 factors. All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>.

The following assumptions were used as a basis:

- Recirculation Rate: 2,700 gal/min
- Total Dissolved Solids: 1,500 ppm
- Operating Hours: 8,760 hrs/yr
- Emission Factor: 1.7 lb/10<sup>3</sup>gal (from AP-42, Table 13.4-1 for induced draft)

$$1.7 \text{ lb}/10^3 \text{ gal} \div 1,000 \times 2,700 \text{ gal}/\text{min} \times 60 \text{ min}/\text{hr} \times (1,500 \text{ ppm} \div 10^6) \times (1 + 0.15) = 0.475 \text{ lb}/\text{hr PM} \\ = \mathbf{2.081 \text{ tpy PM}}$$

**Vehicles and Roadways**

**Vehicle & Equipment Engines**

Estimates of emissions from vehicles and equipment were based on factors found in U.S. EPA AP-42 *Section 3.3: Gasoline and Diesel Industrial Engines (10/96)*. A 15% adjustment was added to the calculated values to account for operational variability from the AP-42 factors. All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>. The following assumptions were used as a basis:

- Diesel Usage = 18,000 gal/yr, locomotive (assumes 1,500 gal/month)  
 3,600 gal/yr, other equipment (assumes 300 gal/month)  
 21,600 gal/yr total
- Heating Value of Diesel: 19,300 Btu/lb
- Density of Diesel: 7.05 lb/gal
  
- Gasoline Usage = 3,600 gal/yr (assumes 300 gal/month)
- Heating Value of Gasoline: 20,300 Btu/lb
- Density of Gasoline: 6.17 lb/gal

**Table 31: Vehicle & Equipment Engine Emissions**

Pollutant	Gasoline		Diesel		Potential Emissions		
	lb/MMBtu	lb/gal	lb/MMBtu	lb/gal	Gasoline tpy	Diesel tpy	Total tpy
<b>PM</b>	0.100	0.014	0.310	0.049	0.026	0.524	<b>0.550</b>
<b>PM<sub>10</sub></b>	0.100	0.014	0.310	0.049	0.026	0.524	<b>0.550</b>
<b>PM<sub>2.5</sub></b>	0.100	0.014	0.310	0.049	0.026	0.524	<b>0.550</b>
<b>NO<sub>x</sub></b>	1.630	0.235	4.410	0.690	0.423	7.453	<b>7.875</b>
<b>SO<sub>x</sub></b>	0.084	0.012	0.290	0.045	0.022	0.490	<b>0.512</b>
<b>CO</b>	0.990	0.143	0.950	0.149	0.257	1.605	<b>1.862</b>
<b>VOC</b>	2.100	0.302	0.350	0.055	0.544	0.591	<b>1.136</b>

Roadways

Estimates of emissions from paved and unpaved roads were based on factors found in U.S. EPA AP-42 *Section 13.2.1: Paved Roads (11/06)* and *Section 13.2.2: Unpaved Roads (11/06)*, respectively. A 15% adjustment was added to the calculated values to account for operational variability from the AP-42 factors. The following assumptions were used as a basis:

- Total VMT on Paved: 54,000 miles/yr (assumes 75% of total VMT)
- Total VMT on Unpaved: 18,000 miles/yr (assumes 25% of total VMT)
- Roadway control efficiency: 70% (based on dust control program)

For paved roadways, the following equation was used:

$$E = [k \times (sL/2)^{0.65} \times (W/3)^{1.5} - C] \times (1 - P/4N)$$

Where:

- E = emission factor (lb/VMT)
- k = particle size multiplier
- sL = road surface silt loading
- W = mean vehicle weight (tons)
- C = emission factor for 1980's vehicle fleet exhaust, brake wear, and tire wear
- P = number of days with at least 0.01" of precipitation during the averaging period
- N = number of days in averaging period = 365 days

For unpaved roadways, the following equation was used:

$$E = k \times (s/12)^a \times (W/3)^b \times [(365 - P) \div 365]$$

Where:

- E = emission factor (lb/VMT)
- s = surface material silt content (%)
- W = mean vehicle weight (tons)
- P = number of days with at least 0.01" of precipitation
- k, a, b = empirical constants

**Table 32a: Paved Roadway Emissions**

	Estimation Parameters					Emission Factor	Uncontrolled Emissions	Controlled Emissions
	k	sL	W	C	P			
						lb/VMT	tpy	tpy
<b>PM</b>	0.082	9.7	7.0	0.00047	150	0.731	22.711	<b>6.813</b>
<b>PM<sub>10</sub></b>	0.016	9.7	7.0	0.00047	150	0.142	4.421	<b>1.326</b>
<b>PM<sub>2.5</sub></b>	0.0024	9.7	7.0	0.00036	150	0.021	0.655	<b>0.197</b>

**Table 32b: Unpaved Roadway Emissions**

	Estimation Parameters						Emission Factor	Uncontrolled Emissions	Controlled Emissions
	k	a	b	s	W	P			
							lb/VMT	tpy	tpy
<b>PM</b>	4.9	0.7	0.45	6.0	7.0	150	2.601	26.925	<b>8.077</b>
<b>PM<sub>10</sub></b>	1.5	0.9	0.45	6.0	7.0	150	0.693	7.175	<b>2.153</b>
<b>PM<sub>2.5</sub></b>	0.15	0.9	0.45	6.0	7.0	150	0.069	0.718	<b>0.215</b>

**Soil Vapor Recovery System**

Basis:

- Uncontrolled VOC = 0.24 lb/hr (per IP #95-I-0057-P, issued 10/20/1995)
- Carbon Control = 99%

Controlled emissions = 0.24 lb/hr × (1 – 0.99) = 0.0024 lb/hr × 8,760 hrs/yr ÷ 2,000 lb/ton = **0.011 tpy of VOC**

**Equipment Fugitives**

Estimates of equipment fugitive emissions from were based on factors found in US EPA document *Protocol for Equipment Leak Emissions Estimates* (November 1995, EPA-453/R-95-017). The leak threshold value was assumed to be the highest value, 10,000 ppm.

Components Above Leak Threshold: 2%  
 Components Below Leak Threshold: 98% (“default zero”)  
 Screening Value (SV): 10,000 ppm  
 Hours of Operation: 8,760 hours/year

**Table 33: Equipment Leak Rates**

Equipment Type <sup>1</sup>	Service	SOCMI Leak Rate			Default Zero Value (Table 2-11)
		(Table 2-9)			
		Leak Rate = (a) × (SV) <sup>b</sup> × 2.205 lb/kg			
		a	b	lb/hr	lb/hr
Pump Seals (P)	LL or HL	1.90×10 <sup>-5</sup>	0.824	8.27×10 <sup>-2</sup>	1.65×10 <sup>-5</sup>
Agitator Seals (Ag)	LL or HL	1.90×10 <sup>-5</sup>	0.824	8.27×10 <sup>-2</sup>	1.65×10 <sup>-5</sup>
Compressor Seals (C)	Gas	1.90×10 <sup>-5</sup>	0.824	8.27×10 <sup>-2</sup>	1.65×10 <sup>-5</sup>
Valves (V)	LL or HL	6.41×10 <sup>-6</sup>	0.797	2.18×10 <sup>-2</sup>	1.08×10 <sup>-6</sup>
	Gas	1.87×10 <sup>-6</sup>	0.873	1.28×10 <sup>-2</sup>	1.45×10 <sup>-6</sup>
PRV	Gas	1.90×10 <sup>-5</sup>	0.824	8.27×10 <sup>-2</sup>	1.65×10 <sup>-5</sup>
Flanges (FL)	Gas, LL or HL	3.05×10 <sup>-6</sup>	0.885	2.33×10 <sup>-2</sup>	1.34×10 <sup>-6</sup>

1. Open-ended lines have all been capped, therefore in accordance with EPA-453/R-95-017, this has a control reduction of 100%.

Three cases were calculated, 100% Crude Tar, 100% Petro Tar, and 100% Distillate Oil. Maximum emissions for VOC and for a majority of HAPs was from Case 1 – 100% Crude Tar. See Appendix B for the individual VOC emissions estimates and compositions for each option.

Sample Calculation of VOC – Case #1, Crude Tar, Valves in Heavy Liquid Service

Basis:

No. of Valves = 108 valves

$$\text{Total Leak Rate} = [108 \text{ valves} \times 2\%/100 \times 2.18 \times 10^{-2} \text{ lb/hr/valve}] + [108 \text{ valves} \times 98\%/100 \times 1.08 \times 10^{-6} \text{ lb/hr/valve}]$$

$$= 0.047 \text{ lb/hr} = \mathbf{0.207 \text{ tpy of VOC}}$$



**Table 34: Maximum Equipment Fugitive Emissions**

<b>Pollutant</b>	<b>Case 1 100% Crude Tar</b>	<b>Case 2 100% Petro Tar</b>	<b>Case 3 100% Decanted Oil</b>	<b>Maximum (tpy)</b>
VOC	8.920	5.330	5.315	<b>8.920</b>
Benzene	0.313	0.000	0.000	<b>0.313</b>
Biphenyl	0.039	0.049	0.029	<b>0.049</b>
m-Cresol	0.005	0.008	0.000	<b>0.008</b>
o-Cresol	0.003	0.008	0.002	<b>0.008</b>
p-Cresol	0.004	0.007	0.000	<b>0.007</b>
Dibenzofuran	0.116	0.086	0.042	<b>0.116</b>
Ethylbenzene	0.005	0.000	0.000	<b>0.005</b>
Naphthalene	1.343	0.410	0.200	<b>1.343</b>
Phenol	0.011	0.005	0.006	<b>0.011</b>
Quinoline	0.039	0.034	0.019	<b>0.039</b>
Styrene	0.020	0.000	0.000	<b>0.020</b>
Toluene	0.074	0.000	0.000	<b>0.074</b>
m-Xylene	0.024	0.000	0.000	<b>0.024</b>
o-Xylene	0.021	0.007	0.007	<b>0.021</b>
p-Xylene	0.024	0.000	0.000	<b>0.024</b>
Acenaphthene	0.213	0.164	0.097	<b>0.213</b>
Acenaphthylene	0.050	0.060	0.014	<b>0.060</b>
Anthracene	0.165	0.071	0.036	<b>0.165</b>
Benzo(a)anthracene	0.094	0.041	0.014	<b>0.094</b>
Benzo(b)fluoranthene	0.056	0.005	0.004	<b>0.056</b>
Benzo(k)fluoranthene	0.030	0.002	0.001	<b>0.030</b>
Benzo(g,h,i)perylene	0.032	0.001	0.001	<b>0.032</b>
Benzo(a)pyrene	0.064	0.005	0.005	<b>0.064</b>
Chrysene	0.097	0.031	0.018	<b>0.097</b>
Dibenzo(a,h)anthracene	0.027	0.000	0.000	<b>0.027</b>
Fluoranthene	0.385	0.091	0.132	<b>0.385</b>
Fluorene	0.171	0.104	0.062	<b>0.171</b>
Indeno(1,2,3-cd)pyrene	0.022	0.001	0.001	<b>0.022</b>
Phenanthrene	0.593	0.265	0.150	<b>0.593</b>
Pyrene	0.274	0.124	0.124	<b>0.274</b>
TOTAL HAPS	4.313	1.578	0.963	<b>4.313</b>
TOTAL POM	3.809	1.544	0.948	<b>3.809</b>

**EMISSIONS SUMMARY:**

**Table 35: Emissions Summary for Koppers Inc. – Clairton Tar Plant**

<b>Pollutant</b>	<b>Total (tpy)*</b>
Particulate Matter	<b>29.086</b>
Particulate Matter <10 µm (PM <sub>10</sub> )	<b>17.509</b>
Particulate Matter <2.5 µm (PM <sub>2.5</sub> )	<b>14.442</b>
Nitrogen Oxides (NO <sub>x</sub> )	<b>44.186</b>
Sulfur Oxides (SO <sub>x</sub> )	<b>0.742</b>
Carbon Monoxide (CO)	<b>35.048</b>
Volatile Organic Compounds (VOC)	<b>44.648</b>
Hazardous Air Pollutants (HAP)	<b>30.952</b>
Benzene	<b>3.713</b>
Ethylbenzene	<b>0.051</b>
Naphthalene	<b>10.258</b>
Phenol	<b>0.137</b>
Quinoline	<b>0.300</b>
Styrene	<b>0.220</b>
Toluene	<b>0.781</b>
Xylenes	<b>2.003</b>
Acenaphthene	<b>5.637</b>
Dibenzofuran	<b>0.876</b>
Total POM	<b>24.613</b>

\* A year is defined as any consecutive 12-month period.

**RECOMMENDATION:**

All applicable Federal, State, and County regulations have been addressed in the permit application and the facility was found to be in compliance. The Title V Operating Permit for the Koppers Inc., Clairton Tar Plant facility should be approved with the emission limitations and terms & conditions in Permit No. 0029.

**Appendix A.1: Tar Refining Tank Material Composition**

Pollutant	Tank #7	V-110 & V-111	V-113
	% weight in vapor	% weight in vapor	% weight in vapor
Benzene	47.363	83.612	99.236
Biphenyl	0.186	0.000	0.000
m-Cresol	0.306	0.001	0.000
o-Cresol	0.248	0.001	0.000
p-Cresol	0.127	0.001	0.000
Cumene	0.000	0.000	0.000
Dibenzofuran	0.116	0.000	0.000
Ethylbenzene	0.000	0.235	0.000
Naphthalene	19.013	0.143	0.307
Phenol	0.605	0.004	0.458
Quinoline	0.440	0.000	0.000
Styrene	1.919	0.795	0.000
Toluene	12.299	11.949	0.000
m-Xylene	2.395	0.872	0.000
o-Xylene	2.001	0.283	0.000
p-Xylene	2.470	0.911	0.000
Acenaphthene	0.651	0.000	0.000
Acenaphthylene	0.000	0.000	0.000
Anthracene	0.023	0.000	0.000
Benzo(a)anthracene	0.000	0.000	0.000
Benzo(b)fluoranthene	0.000	0.000	0.000
Benzo(k)fluoranthene	0.000	0.000	0.000
Benzo(g,h,i)perylene	0.000	0.000	0.000
Benzo(a)pyrene	0.000	0.000	0.000
Chrysene	0.000	0.000	0.000
Dibenzo(a,h)anthracene	0.000	0.000	0.000
Fluoranthene	0.031	0.000	0.000
Fluorene	0.279	0.000	0.000
Indeno(1,2,3-cd)pyrene	0.000	0.000	0.000
Phenanthrene	0.050	0.000	0.000
Pyrene	0.001	0.000	0.000

**Appendix A.2: 2-T-4 Column Emissions**

Pollutant	2-T-4 Column								
	Case 1 – CBO			Case 2 – Petroleum Distillate			Case 3 – Decanted Oil Distillate		
	% in Vapor	lb/hr	tpy	% in Vapor	lb/hr	tpy	% in Vapor	lb/hr	tpy
<b>Total VOC</b>		<b>0.008</b>	<b>0.033</b>		<b>0.050</b>	<b>0.217</b>		<b>0.018</b>	<b>0.079</b>
Biphenyl	0.736	0.000	0.000	1.580	0.001	0.003	1.811	0.000	0.001
m-Cresol	0.000	0.000	0.000	1.843	0.001	0.004	0.000	0.000	0.000
o-Cresol	0.000	0.000	0.000	1.960	0.001	0.004	0.000	0.000	0.000
p-Cresol	0.000	0.000	0.000	1.576	0.001	0.003	0.000	0.000	0.000
Dibenzofuran	2.498	0.000	0.001	0.599	0.000	0.001	0.209	0.000	0.000
Naphthalene	54.083	0.004	0.018	47.890	0.024	0.104	3.776	0.001	0.003
Phenol	0.000	0.000	0.000	0.481	0.000	0.001	1.104	0.000	0.001
Quinoline	1.114	0.000	0.000	2.079	0.001	0.005	0.457	0.000	0.000
Acenaphthene	19.303	0.001	0.006	2.291	0.001	0.005	0.319	0.000	0.000
Acenaphthylene	0.000	0.000	0.000	2.238	0.001	0.005	0.879	0.000	0.001
Anthracene	0.841	0.000	0.000	0.042	0.000	0.000	0.020	0.000	0.000
Benzo(a)anthracene	0.006	0.000	0.000	0.001	0.000	0.000	0.000	0.000	0.000
Benzo(b)fluoranthene	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(k)fluoranthene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(g,h,i)perylene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(a)pyrene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Chrysene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Dibenzo(a,h)-anthracene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Fluoranthene	2.916	0.000	0.001	0.041	0.000	0.000	0.345	0.000	0.000
Fluorene	8.390	0.001	0.003	0.664	0.000	0.001	0.190	0.000	0.000
Indeno(1,2,3-cd)-pyrene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Phenanthrene	4.168	0.000	0.001	0.173	0.000	0.000	0.085	0.000	0.000
Pyrene	0.102	0.000	0.000	0.005	0.000	0.000	0.016	0.000	0.000
<b>Total HAP</b>		<b>0.007</b>	<b>0.031</b>		<b>0.031</b>	<b>0.138</b>		<b>0.002</b>	<b>0.007</b>
Total POM		0.007	0.031		0.029	0.125		0.001	0.006

**Appendix A.2: 2-D-5 Column Emissions**

Pollutant	2-D-5 Column								
	Case 1 – Coal Tar Pitch			Case 2 – Petro Pitch			Case 3 – Decanted Oil Pitch		
	% in Vapor	lb/hr	tpy	% in Vapor	lb/hr	tpy	% in Vapor	lb/hr	tpy
<b>Total VOC</b>		<b>0.118</b>	<b>0.517</b>		<b>0.733</b>	<b>3.211</b>		<b>0.303</b>	<b>1.328</b>
	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Biphenyl	0.930	0.001	0.005	2.308	0.017	0.074	2.172	0.007	0.029
m-Cresol	0.000	0.000	0.000	2.142	0.016	0.069	0.000	0.000	0.000
o-Cresol	0.000	0.000	0.000	2.131	0.016	0.068	0.000	0.000	0.000
p-Cresol	0.000	0.000	0.000	2.078	0.015	0.067	0.000	0.000	0.000
Dibenzofuran	4.234	0.005	0.022	1.173	0.009	0.038	0.336	0.001	0.004
Naphthalene	41.474	0.049	0.214	42.453	0.311	1.363	2.748	0.008	0.036
Phenol	0.000	0.000	0.000	0.541	0.004	0.017	1.019	0.003	0.014
Quinoline	0.979	0.001	0.005	2.112	0.015	0.068	0.381	0.001	0.005
Acenaphthene	19.488	0.023	0.101	2.673	0.020	0.086	0.306	0.001	0.004
Acenaphthylene	0.000	0.000	0.000	2.611	0.019	0.084	0.842	0.003	0.011
Anthracene	1.823	0.002	0.009	0.104	0.001	0.003	0.041	0.000	0.001
Benzo(a)anthracene	0.032	0.000	0.000	0.003	0.000	0.000	0.000	0.000	0.000
Benzo(b)fluoranthene	0.003	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(k)fluoranthene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(g,h,i)perylene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(a)pyrene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Chrysene	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Dibenzo(a,h)-anthracene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Fluoranthene	4.533	0.005	0.023	0.073	0.001	0.002	0.508	0.002	0.007
Fluorene	9.802	0.012	0.051	0.897	0.007	0.029	0.211	0.001	0.003
Indeno(1,2,3-cd)-pyrene	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Phenanthrene	9.542	0.011	0.049	0.459	0.003	0.015	0.184	0.001	0.002
Pyrene	0.395	0.000	0.002	0.021	0.000	0.001	0.060	0.000	0.001
<b>Total HAP</b>		<b>0.110</b>	<b>0.482</b>		<b>0.453</b>	<b>1.984</b>		<b>0.027</b>	<b>0.117</b>
Total POM		0.110	0.482		0.402	1.762		0.024	0.103

**Appendix B: Creosote Blending Emissions**

	Option 1					Option 2				
	P2 Creosote					P1/P13 Creosote				
	Quantity:	23,300,000		gal/yr		Quantity:	23,300,000		gal/yr	
		3,114,765		cf/yr			3,114,765		cf/yr	
		4,010		cf/hr			4,010		cf/hr	
	Temperature:	685		°R		Temperature:	715		°R	
	MWi	Pi	(Pi)(MWi)	E	E	MWi	Pi	(Pi)(MWi)	E	E
Constituent	lb/mol	psia	psia-lb/mol	lbs/hr	tons/yr	lb/mol	psia	psia-lb/mol	lbs/hr	tons/yr
VOC	131.79	7.74E-02	10.2038	0.111	0.043	124.77	8.47E-02	10.5701	0.110	0.043
Benzene	78.10	0.0000	0.0000	0.000	0.000	78.10	0.0096	0.7505	0.008	0.003
Biphenyl	154.20	0.0010	0.1518	0.002	0.001	154.20	0.0011	0.1765	0.002	0.001
m-Cresol	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0009	0.0961	0.001	0.000
o-Cresol	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0000	0.0000	0.000	0.000
p-Cresol	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0008	0.0822	0.001	0.000
Dibenzofuran	168.20	0.0007	0.1150	0.001	0.000	168.20	0.0007	0.1244	0.001	0.001
Naphthalene	128.20	0.0436	5.5951	0.061	0.024	128.20	0.0620	7.9487	0.083	0.032
Phenol	94.10	0.0012	0.1133	0.001	0.000	94.10	0.0006	0.0565	0.001	0.000
Quinoline	129.20	0.0021	0.2757	0.003	0.001	129.20	0.0028	0.3608	0.004	0.001
o-Xylene	106.20	0.0000	0.0000	0.000	0.000	106.20	0.0000	0.0000	0.000	0.000
Acenaphthene	154.20	0.0048	0.7473	0.008	0.003	154.20	0.0053	0.8174	0.009	0.003
Acenaphthylene	152.20	0.0001	0.0164	0.000	0.000	152.20	0.0002	0.0232	0.000	0.000
Anthracene	178.20	0.0001	0.0144	0.000	0.000	178.20	0.0001	0.0174	0.000	0.000
Fluoranthene	202.30	0.0002	0.0413	0.000	0.000	202.30	0.0002	0.0416	0.000	0.000
Fluorene	166.20	0.0017	0.2792	0.003	0.001	166.20	0.0000	0.0000	0.000	0.000
Phenanthrene	178.20	0.0004	0.0703	0.001	0.000	178.20	0.0004	0.0730	0.001	0.000
Pyrene	202.30	0.0000	0.0021	0.000	0.000	202.30	0.0000	0.0015	0.000	0.000
Total HAP				0.081	0.031				0.110	0.043
Total POM				0.080	0.031				0.100	0.039

**Appendix B: Creosote Blending Emissions (cont'd.)**

Constituent	Option 3														
	P2 Creosote				Petroleum Distillate				Purchased Correction Oil						
	Quantity:		Quantity:		Quantity:		Quantity:		Quantity:		Quantity:				
	MW <i>i</i>	Pi	(Pi)(MW <i>i</i> )	psia	lb/mol	psia	lb/mol	(Pi)(MW <i>i</i> )	psia	lb/mol	(Pi)(MW <i>i</i> )	psia			
VOC	131.79	0.0774	10.2038	0.111	0.032	315.85	0.3170	100.0000	1.091	0.318	121.77	0.0696	8.4761	0.092	0.027
Benzene	78.10	0.0000	0.0000	0.000	0.000	78.10	0.0000	0.0000	0.000	0.000	78.10	0.0000	0.0000	0.000	0.000
Biphenyl	154.20	0.0010	0.1518	0.002	0.000	154.20	0.0006	0.0970	0.001	0.000	154.20	0.0006	0.0970	0.001	0.000
m-Cresol	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0000	0.0000	0.000	0.000
o-Cresol	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0039	0.4213	0.005	0.001	108.10	0.0039	0.4213	0.005	0.001
p-Cresol	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0000	0.0000	0.000	0.000	108.10	0.0000	0.0000	0.000	0.000
Dibenzofuran	168.20	0.0007	0.1150	0.001	0.000	168.20	0.0001	0.0232	0.000	0.000	168.20	0.0001	0.0232	0.000	0.000
Naphthalene	128.20	0.0436	5.5951	0.061	0.018	128.20	0.0041	0.5246	0.006	0.002	128.20	0.0041	0.5246	0.006	0.002
Phenol	94.10	0.0012	0.1133	0.001	0.000	94.10	0.0016	0.1553	0.002	0.000	94.10	0.0016	0.1553	0.002	0.000
Quinoline	129.20	0.0021	0.2757	0.003	0.001	129.20	0.0018	0.2326	0.003	0.001	129.20	0.0018	0.2326	0.003	0.001
o-Xylene	106.20	0.0000	0.0000	0.000	0.000	106.20	0.0136	1.4417	0.016	0.005	106.20	0.0136	1.4417	0.016	0.005
Acenaphthene	154.20	0.0048	0.7473	0.008	0.002	154.20	0.0008	0.1311	0.001	0.000	154.20	0.0008	0.1311	0.001	0.000
Acenaphthylene	152.20	0.0001	0.0164	0.000	0.000	152.20	0.0004	0.0562	0.001	0.000	152.20	0.0004	0.0562	0.001	0.000
Anthracene	178.20	0.0001	0.0144	0.000	0.000	178.20	0.0000	0.0045	0.000	0.000	178.20	0.0000	0.0045	0.000	0.000
Fluoranthene	202.30	0.0002	0.0413	0.000	0.000	202.30	0.0000	0.0077	0.000	0.000	202.30	0.0000	0.0077	0.000	0.000
Fluorene	166.20	0.0017	0.2792	0.003	0.001	166.20	0.0004	0.0625	0.001	0.000	166.20	0.0004	0.0625	0.001	0.000
Phenanthrene	178.20	0.0004	0.0703	0.001	0.000	178.20	0.0002	0.0369	0.000	0.000	178.20	0.0002	0.0369	0.000	0.000
Pyrene	202.30	0.0000	0.0021	0.000	0.000	202.30	0.0000	0.0012	0.000	0.000	202.30	0.0000	0.0012	0.000	0.000
Total HAP				0.081	0.024				0.035	0.010				0.035	0.010
Total POM				0.080	0.023				0.013	0.004				0.013	0.004

The maximum total for Option #3 is the emissions from P2 Creosote plus either the emissions from Petroleum Distillate or from the Purchased Correction Oil, whichever is greater.

**Appendix C.1: Liquid Loading Material Composition**

Material Type	Molecular Weight	Vapor Pressure	Loading Loss (L) – Barge	Loading Loss (L) – Railcar
	lb/lb·mol	psia	lb/10 <sup>3</sup> gal	lb/10 <sup>3</sup> gal
Crude Tar	90.42	0.1477	0.134	0.389
Debenzolyzed Tar	118.11	0.1098	0.13	0.355
Refined Chemical Oil	119.54	0.2535	0.29	0.842
Carbon Black Oil	138.48	0.0032	0.004	0.013
Coal Tar Pitch	180.09	0.0281	0.036	0.103
Type A Pitch	172.32	0.0302	0.037	0.106
P2 Creosote	131.21	0.0417	0.052	0.150
P1/P13 Creosote	123.24	0.0468	0.054	0.158
CPS-P2/NCGO	131.55	0.0365	0.045	0.131
CPS-P2/Petro Distillate	131.77	0.0442	0.055	0.159
Petro Correction Oil (NCGO)	121.02	0.0391	0.045	0.130
Petro Tar	142.11	0.0037	0.005	0.015
Petro Distillate	129.83	0.0240	0.031	0.090
Liquid Petroleum Pitch	158.81	0.0532	0.059	0.172
Decanted Oil	190.00	0.0043	0.008	0.024
Decanted Oil Distillate	177.42	0.0056	0.010	0.029
Decanted Oil Pitch	158.81	0.0532	0.059	0.172



**Appendix C.1: Liquid Loading Material Composition (cont'd.)**

Percent (%) Weight in Vapor

	Crude Tar	Debenzolyzed Tar	Refined Chemical Oil	Carbon Black Oil	Coal Tar Pitch	Type A Pitch	P2 Creosote	P1/P13 Creosote	CPS-P2/NCGO	CPS-P2/Petro Distillate	Petro Correction Oil (NCGO)	Petro Tar	Petro Distillate	Liquid Petroleum Pitch	Decanted Oil Distillate	Decanted Oil Pitch
Benzene	53.6	4.4	1.7	0.0	0.0	0.0	0.0	8.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Biphenyl	0.1	0.1	0.1	0.6	0.0	0.0	1.3	1.5	1.4	1.4	1.0	6.1	1.2	0.0	1.6	0.0
m-Cresol	0.2	0.0	0.2	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	1.6	0.0	0.0	0.0
o-Cresol	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.6	0.0	1.8	0.0	0.0	0.0
p-Cresol	0.1	0.0	0.2	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	1.3	0.0	0.0	0.0
Dibenzofuran	0.1	0.1	0.0	1.7	18.5	18.2	0.9	1.0	0.9	0.9	0.2	1.1	0.4	0.0	0.2	0.0
Ethylbenzene	0.0	0.0	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Naphthalene	14.8	52.2	46.8	60.7	0.0	11.2	55.7	75.0	53.8	56.4	6.0	26.5	50.7	7.4	4.6	7.4
Phenol	0.4	0.8	0.3	0.0	0.0	0.0	1.1	0.5	1.2	0.9	1.7	0.0	0.4	0.0	1.2	0.0
Quinoline	0.3	0.3	0.4	1.1	0.0	0.0	2.7	3.3	2.9	2.6	2.6	2.5	2.0	0.0	0.5	0.0
Styrene	1.8	0.0	3.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Toluene	13.0	0.0	3.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
m-Xylene	2.3	6.7	2.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
o-Xylene	1.9	5.6	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	18.6	0.0	0.0	0.0	0.0	0.0
p-Xylene	2.4	6.9	2.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Acenaphthene	0.4	0.1	0.2	18.3	14.6	11.9	7.0	7.2	6.8	5.8	1.4	13.9	2.0	55.3	0.3	55.3
Acenaphthylene	0.0	1.0	0.1	0.0	0.0	0.0	0.2	0.2	0.2	0.8	0.6	5.3	2.0	0.0	0.9	0.0
Anthracene	0.0	0.0	0.0	0.5	18.2	15.4	0.1	0.1	0.1	0.1	0.0	0.2	0.0	3.8	0.0	3.8
Benzo(a)anthracene	0.0	0.0	0.0	0.0	1.4	1.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1
Benzo(b)fluoranthene	0.0	0.0	0.0	0.0	1.2	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Benzo(k)fluoranthene	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Benzo(g,h,i)perylene	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Benzo(a)pyrene	0.0	0.0	0.0	0.0	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Chrysene	0.0	0.0	0.0	0.0	0.3	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Fluoranthene	0.0	0.1	0.0	2.1	27.1	24.4	0.3	0.3	0.3	0.3	0.1	0.2	0.0	3.4	0.3	3.4
Fluorene	0.2	0.4	0.0	7.2	5.7	5.6	2.5	0.0	2.5	2.0	0.6	5.2	0.5	18.7	0.2	18.7
Indeno(1,2,3-cd)pyrene	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Phenanthrene	0.0	0.1	0.0	2.4	6.4	4.8	0.5	0.5	0.6	0.4	0.3	0.7	0.1	9.9	0.1	9.9

**Appendix C.2: Liquid Loading Emissions – Barge**

	Case #1 – 100% Crude Tar		Case #1 – 100% Petro Tar		Case #3 – 100% Decanted Oil		Maximum	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
<b>Total VOC</b>	72.000	6.138	20.230	2.876	18.343	2.574	<b>72.000</b>	<b>6.138</b>
Benzene	9.037	0.556	0.493	0.064	0.493	0.064	<b>9.037</b>	<b>0.556</b>
Biphenyl	0.212	0.019	0.201	0.020	0.145	0.015	<b>0.212</b>	<b>0.020</b>
m-Cresol	0.142	0.014	0.101	0.014	0.048	0.006	<b>0.142</b>	<b>0.014</b>
o-Cresol	0.237	0.010	0.272	0.017	0.213	0.008	<b>0.272</b>	<b>0.017</b>
p-Cresol	0.104	0.011	0.082	0.011	0.040	0.005	<b>0.104</b>	<b>0.011</b>
Dibenzofuran	0.798	0.175	0.083	0.010	0.066	0.008	<b>0.798</b>	<b>0.175</b>
Ethylbenzene	0.424	0.039	0.000	0.000	0.000	0.000	<b>0.424</b>	<b>0.039</b>
Naphthalene	28.383	2.484	6.736	0.912	5.010	0.673	<b>28.383</b>	<b>2.484</b>
Phenol	0.390	0.027	0.149	0.012	0.147	0.012	<b>0.390</b>	<b>0.027</b>
Quinoline	0.512	0.045	0.384	0.039	0.310	0.029	<b>0.512</b>	<b>0.045</b>
Styrene	1.421	0.121	0.000	0.000	0.000	0.000	<b>1.421</b>	<b>0.121</b>
Toluene	2.776	0.189	0.000	0.000	0.000	0.000	<b>2.776</b>	<b>0.189</b>
m-Xylene	1.962	0.135	0.000	0.000	0.000	0.000	<b>1.962</b>	<b>0.135</b>
o-Xylene	2.185	0.118	0.858	0.033	0.858	0.033	<b>2.185</b>	<b>0.118</b>
p-Xylene	2.027	0.140	0.000	0.000	0.000	0.000	<b>2.027</b>	<b>0.140</b>
Acenaphthene	1.239	0.204	4.017	0.877	3.879	0.863	<b>4.017</b>	<b>0.877</b>
Acenaphthylene	0.245	0.018	0.166	0.018	0.082	0.008	<b>0.245</b>	<b>0.018</b>
Anthracene	0.688	0.161	0.244	0.057	0.242	0.056	<b>0.688</b>	<b>0.161</b>
Benzo(a)anthracene	0.051	0.012	0.009	0.002	0.009	0.002	<b>0.051</b>	<b>0.012</b>
Benzo(b)fluoranthene	0.046	0.011	0.001	0.000	0.001	0.000	<b>0.046</b>	<b>0.011</b>
Benzo(k)fluoranthene	0.002	0.000	0.000	0.000	0.000	0.000	<b>0.002</b>	<b>0.000</b>
Benzo(g,h,i)perylene	0.001	0.000	0.000	0.000	0.000	0.000	<b>0.001</b>	<b>0.000</b>
Benzo(a)pyrene	0.006	0.001	0.000	0.000	0.000	0.000	<b>0.006</b>	<b>0.001</b>
Chrysene	0.010	0.002	0.002	0.001	0.002	0.001	<b>0.010</b>	<b>0.002</b>
Dibenzo(a,h)anthracene	0.001	0.000	0.000	0.000	0.000	0.000	<b>0.001</b>	<b>0.000</b>
Fluoranthene	1.042	0.241	0.235	0.053	0.236	0.053	<b>1.042</b>	<b>0.241</b>
Fluorene	0.499	0.079	1.358	0.295	1.314	0.291	<b>1.358</b>	<b>0.295</b>
Phenanthrene	0.308	0.063	0.664	0.150	0.657	0.150	<b>0.664</b>	<b>0.150</b>
Pyrene	0.166	0.039	0.078	0.018	0.077	0.018	<b>0.166</b>	<b>0.039</b>
Total POM	33.724	3.458	14.010	2.429	11.864	2.146	<b>33.724</b>	<b>3.458</b>
<b>Total HAP</b>	<b>54.403</b>	<b>4.813</b>	<b>15.935</b>	<b>2.577</b>	<b>13.633</b>	<b>2.272</b>	<b>54.403</b>	<b>4.813</b>

**Appendix C.3: Liquid Loading Emissions – Truck/Railcar**

	Case #1 – 100% Crude Tar		Case #1 – 100% Petro Tar		Case #3 – 100% Decanted Oil		Maximum	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
<b>Total VOC</b>	1.303	0.301	0.272	0.082	0.236	0.065	<b>1.303</b>	<b>0.301</b>
Benzene	0.174	0.032	0.010	0.004	0.010	0.004	<b>0.174</b>	<b>0.032</b>
Biphenyl	0.004	0.001	0.004	0.001	0.003	0.001	<b>0.004</b>	<b>0.001</b>
m-Cresol	0.003	0.001	0.002	0.001	0.001	0.000	<b>0.003</b>	<b>0.001</b>
o-Cresol	0.005	0.001	0.005	0.001	0.004	0.000	<b>0.005</b>	<b>0.001</b>
p-Cresol	0.002	0.001	0.002	0.001	0.001	0.000	<b>0.002</b>	<b>0.001</b>
Dibenzofuran	0.002	0.001	0.002	0.001	0.001	0.000	<b>0.002</b>	<b>0.001</b>
Ethylbenzene	0.008	0.002	0.000	0.000	0.000	0.000	<b>0.008</b>	<b>0.002</b>
Naphthalene	0.532	0.137	0.121	0.047	0.088	0.033	<b>0.532</b>	<b>0.137</b>
Phenol	0.007	0.002	0.003	0.001	0.003	0.001	<b>0.007</b>	<b>0.002</b>
Quinoline	0.010	0.003	0.007	0.002	0.006	0.002	<b>0.010</b>	<b>0.003</b>
Styrene	0.027	0.007	0.000	0.000	0.000	0.000	<b>0.027</b>	<b>0.007</b>
Toluene	0.054	0.011	0.000	0.000	0.000	0.000	<b>0.054</b>	<b>0.011</b>
m-Xylene	0.037	0.008	0.000	0.000	0.000	0.000	<b>0.037</b>	<b>0.008</b>
o-Xylene	0.041	0.007	0.017	0.002	0.017	0.002	<b>0.041</b>	<b>0.007</b>
p-Xylene	0.038	0.008	0.000	0.000	0.000	0.000	<b>0.038</b>	<b>0.008</b>
Acenaphthene	0.014	0.004	0.012	0.004	0.009	0.003	<b>0.014</b>	<b>0.004</b>
Acenaphthylene	0.005	0.001	0.003	0.001	0.002	0.000	<b>0.005</b>	<b>0.001</b>
Anthracene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Benzo(a)anthracene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Benzo(b)fluoranthene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Benzo(k)fluoranthene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Benzo(g,h,i)perylene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Benzo(a)pyrene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Chrysene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Dibenzo(a,h)anthracene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Fluoranthene	0.001	0.000	0.000	0.000	0.000	0.000	<b>0.001</b>	<b>0.000</b>
Fluorene	0.005	0.002	0.004	0.001	0.003	0.001	<b>0.005</b>	<b>0.002</b>
Phenanthrene	0.001	0.000	0.001	0.000	0.001	0.000	<b>0.001</b>	<b>0.000</b>
Pyrene	0.000	0.000	0.000	0.000	0.000	0.000	<b>0.000</b>	<b>0.000</b>
Total POM	0.571	0.148	0.152	0.056	0.110	0.040	<b>0.571</b>	<b>0.148</b>
<b>Total HAP</b>	<b>0.967</b>	<b>0.226</b>	<b>0.189</b>	<b>0.065</b>	<b>0.145</b>	<b>0.047</b>	<b>0.967</b>	<b>0.226</b>

**Appendix C.4: Liquid Loading Emissions – Pitch**

Pollutant	Coal Tar Pitch			Type A Pitch			Liquid Petroleum Pitch or Decanted Oil Pitch		
	%wt	lb/hr	tpy	%wt	lb/hr	tpy	%wt	lb/hr	tpy
Total VOC		0.071	0.051		0.073	0.052		0.119	0.085
Benzene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Biphenyl	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
m-Cresol	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
o-Cresol	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
p-Cresol	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Cumene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Dibenzofuran	18.5	0.013	0.009	18.2	0.013	0.010	0.0	0.000	0.000
Ethylbenzene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Naphthalene	0.0	0.000	0.000	11.2	0.008	0.006	7.4	0.009	0.006
Phenol	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Quinoline	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Styrene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Toluene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
m-Xylene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
o-Xylene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
p-Xylene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Acenaphthene	14.6	0.010	0.007	11.9	0.009	0.006	55.3	0.066	0.047
Acenaphthylene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Anthracene	18.2	0.013	0.009	15.4	0.011	0.008	3.8	0.005	0.003
Benzo(a)anthracene	1.4	0.001	0.001	1.2	0.001	0.001	0.1	0.000	0.000
Benzo(b)fluoranthene	1.2	0.001	0.001	1.1	0.001	0.001	0.0	0.000	0.000
Benzo(k)fluoranthene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Benzo(g,h,i)perylene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Benzo(a)pyrene	0.2	0.000	0.000	0.1	0.000	0.000	0.0	0.000	0.000
Chrysene	0.3	0.000	0.000	0.2	0.000	0.000	0.0	0.000	0.000
Dibenzo(a,h)anthracene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Fluoranthene	27.1	0.019	0.014	24.4	0.018	0.013	3.4	0.004	0.003
Fluorene	5.7	0.004	0.003	5.6	0.004	0.003	18.7	0.022	0.016
Indeno(1,2,3-cd)pyrene	0.0	0.000	0.000	0.0	0.000	0.000	0.0	0.000	0.000
Phenanthrene	6.4	0.005	0.003	4.8	0.004	0.003	9.9	0.012	0.008
Pyrene	4.5	0.003	0.002	4.2	0.003	0.002	1.2	0.001	0.001
Total HAP		0.070	0.050		0.072	0.051		0.119	0.085
Total POM		0.070	0.050		0.072	0.051		0.119	0.085



**Appendix D.1: Equipment Leak Emissions – Option #1 (cont'd.)**

Option #1 – 100% Crude Tar, Composition

	Liquid Composition (as a % of total VOC <sub>L</sub> )										Gas Composition (as a % of total VOC <sub>G</sub> )									
	Crude Tar	Light Oil	Deben Tar	RCO	CBO	Pitch	NSR	Creo-sote	Corr. Oil		Crude Tar	Light Oil	Deben Tar	RCO	CBO	Pitch	NSR	Creo-sote	Corr. Oil	
Benzene	0.30	36.29	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.00	47.36	83.61	5.91	1.67	0.00	0.00	0.00	0.00	0.00	
Biphenyl	0.70	0.00	0.20	1.20	0.10	0.00	2.70	1.00	0.40	0.00	0.19	0.00	0.11	0.15	0.60	0.00	2.57	1.50	0.78	
m-Cresol	0.20	0.10	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.31	0.00	0.00	0.22	0.00	0.00	0.00	0.00	0.00	
o-Cresol	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.20	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.05	
p-Cresol	0.10	0.10	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.00	0.00	0.18	0.00	0.00	0.00	0.00	0.00	
Cumene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Dibenzofuran	2.20	0.08	0.83	1.28	1.60	0.13	7.18	3.57	0.45	0.00	0.12	0.00	0.08	0.03	1.71	18.52	1.21	1.13	0.15	
Ethylbenzene	0.00	0.80	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.23	0.00	1.41	0.00	0.00	0.00	0.00	0.00	
Naphthalene	11.70	13.35	11.45	59.44	1.36	0.01	4.20	6.82	0.40	0.00	19.01	0.14	47.99	46.83	60.69	11.18	29.51	54.83	5.73	
Phenol	0.20	0.28	0.10	0.19	0.00	0.00	0.00	0.07	0.06	0.00	0.60	0.00	0.70	0.27	0.00	0.00	0.00	1.20	1.46	
Quinoline	0.60	0.06	0.16	1.07	0.06	0.00	1.91	0.72	0.38	0.00	0.44	0.00	0.29	0.38	1.15	0.00	5.76	2.98	2.33	
Styrene	0.10	4.20	0.00	0.40	0.00	0.00	0.00	0.00	0.00	0.00	1.92	0.79	0.00	3.89	0.00	0.00	0.00	0.00	0.00	
Toluene	0.20	15.30	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.00	12.30	11.95	0.00	3.21	0.00	0.00	0.00	0.00	0.00	
m-Xylene	0.10	3.50	0.10	0.20	0.00	0.00	0.00	0.00	0.00	0.00	2.39	0.87	7.66	2.44	0.00	0.00	0.00	0.00	0.00	
o-Xylene	0.10	1.40	0.10	0.10	0.00	0.00	0.00	0.00	0.10	0.00	2.00	0.28	6.31	1.02	0.00	0.00	0.00	0.00	20.98	
p-Xylene	0.10	3.50	0.10	0.20	0.00	0.00	0.00	0.00	0.00	0.00	2.47	0.91	7.95	2.52	0.00	0.00	0.00	0.00	0.00	
Acenaphthene	3.00	0.00	0.21	2.20	3.40	0.06	11.05	6.38	0.70	0.00	0.65	0.00	0.10	0.22	18.25	14.56	9.34	7.32	1.21	
Acenaphthylene	0.00	0.17	1.69	1.10	0.00	0.00	1.91	0.18	0.30	0.00	0.00	0.00	0.84	0.11	0.00	0.00	1.61	0.26	0.52	
Anthracene	3.70	0.00	1.25	0.05	4.35	0.72	2.84	3.60	0.70	0.00	0.02	0.00	0.01	0.00	0.49	18.22	0.05	0.14	0.03	
Benzo(a)anthracene	1.60	0.00	1.05	0.00	2.08	1.02	0.00	1.83	0.51	0.00	0.00	0.00	0.00	0.00	0.00	1.37	0.00	0.00	0.00	
Benzo(b)fluoranthene	0.50	0.00	0.60	0.00	0.40	1.90	0.00	0.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.25	0.00	0.00	0.00	
Benzo(k)fluoranthene	0.30	0.00	0.44	0.00	0.50	0.65	0.00	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.00	0.00	0.00	
Benzo(g,h,i)perylene	0.00	0.00	0.68	0.00	0.00	1.15	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00	
Benzo(a)pyrene	1.20	0.00	0.95	0.00	0.54	1.53	0.00	0.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.17	0.00	0.00	0.00	
Chrysene	1.40	0.00	1.02	0.00	2.20	1.15	0.00	1.97	1.30	0.00	0.00	0.00	0.00	0.00	0.00	0.27	0.00	0.00	0.00	
Dibenzo(a,h)anthracene	0.50	0.00	0.15	0.00	0.00	1.23	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	
Fluoranthene	3.90	0.00	3.29	0.01	12.47	1.44	2.42	8.57	1.00	0.00	0.03	0.00	0.05	0.00	2.11	27.07	0.06	0.41	0.05	
Fluorene	2.80	0.00	1.30	1.00	3.10	0.04	8.60	5.00	0.70	0.00	0.28	0.00	0.28	0.05	7.25	5.73	3.16	2.74	0.52	
Indeno(1,2,3-cd)pyrene	0.80	0.00	0.63	0.00	0.00	0.19	0.00	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Phenanthrene	7.40	0.00	4.79	0.27	19.35	0.21	12.10	15.82	5.20	0.00	0.05	0.00	0.05	0.00	2.37	6.41	0.23	0.72	0.20	
Pyrene	3.10	0.00	2.26	0.00	8.22	1.17	1.58	8.02	3.00	0.00	0.00	0.00	0.00	0.00	0.04	4.45	0.00	0.02	0.00	



**Appendix D.2: Equipment Leak Emissions – Option #2 (cont'd.)**

Option #2 – 100% Petro Tar, Composition

	Liquid Composition (as a % of total VOC <sub>L</sub> )						Gas Composition (as a % of total VOC <sub>G</sub> )					
	Petro Tar	Petro Distillate	Pitch	NSR	Creosote	Corr. Oil	Petro Tar	Petro Distillate	Pitch	NSR	Creosote	Corr. Oil
Benzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Biphenyl	1.10	1.40	0.00	2.70	1.00	0.40	6.09	1.22	0.00	2.57	1.50	0.78
m-Cresol	0.00	0.30	0.00	0.00	0.00	0.00	0.00	1.65	0.00	0.00	0.00	0.00
o-Cresol	0.00	0.20	0.00	0.00	0.00	0.20	0.00	1.83	0.00	0.00	0.00	4.05
p-Cresol	0.00	0.30	0.00	0.00	0.00	0.00	0.00	1.30	0.00	0.00	0.00	0.00
Cumene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dibenzofuran	1.10	2.50	0.00	7.18	3.57	0.45	1.06	0.39	0.00	1.21	1.13	0.15
Ethylbenzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Naphthalene	0.63	7.85	0.01	4.20	6.82	0.40	26.45	50.65	7.40	29.51	54.83	5.73
Phenol	0.00	0.04	0.00	0.00	0.07	0.06	0.00	0.44	0.00	0.00	1.20	1.46
Quinoline	0.14	0.73	0.00	1.91	0.72	0.38	2.50	2.02	0.00	5.76	2.98	2.33
Styrene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Toluene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
m-Xylene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
o-Xylene	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	20.98
p-Xylene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acenaphthene	2.80	2.63	0.35	11.05	6.38	0.70	13.92	2.04	55.30	9.34	7.32	1.21
Acenaphthylene	1.07	2.57	0.00	1.91	0.18	0.30	5.32	2.00	0.00	1.61	0.26	0.52
Anthracene	2.31	1.40	0.23	2.84	3.60	0.70	0.23	0.02	3.79	0.05	0.14	0.03
Benzo(a)anthracene	1.05	1.16	0.17	0.00	1.83	0.51	0.00	0.00	0.15	0.00	0.00	0.00
Benzo(b)fluoranthene	0.10	0.00	0.02	0.00	0.60	0.00	0.00	0.00	0.01	0.00	0.00	0.00
Benzo(k)fluoranthene	0.13	0.00	0.01	0.00	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Benzo(g,h,i)perylene	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Benzo(a)pyrene	0.00	0.00	0.09	0.00	0.58	0.00	0.00	0.00	0.01	0.00	0.00	0.00
Chrysene	0.60	0.57	0.26	0.00	1.97	1.30	0.00	0.00	0.04	0.00	0.00	0.00
Dibenzo(a,h)anthracene	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fluoranthene	1.43	1.14	0.28	2.42	8.57	1.00	0.22	0.03	3.43	0.06	0.41	0.05
Fluorene	2.40	1.60	0.20	8.60	5.00	0.70	5.15	0.54	18.65	3.16	2.74	0.52
Indeno(1,2,3-cd)pyrene	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Phenanthrene	6.79	5.25	0.50	12.10	15.82	5.20	0.73	0.09	9.94	0.23	0.72	0.20
Pyrene	3.21	2.41	0.50	1.58	8.02	3.00	0.01	0.00	1.24	0.00	0.02	0.00





**Appendix D.3: Equipment Leak Emissions – Option #3 (cont'd.)**

Option #3 – 100% Decanted Oil, Composition

	Liquid Composition (as a % of total VOC <sub>L</sub> )						Gas Composition (as a % of total VOC <sub>G</sub> )					
	Decanted Oil	Decant.Oil Distillate	Decant.Oil Pitch	NSR	Creosote	Corr. Oil	Decanted Oil	Decant.Oil Distillate	Decant.Oil Pitch	NSR	Creosote	Corr. Oil
Benzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Biphenyl	0.00	0.70	0.00	2.70	1.00	0.40	0.00	1.61	0.00	2.57	1.50	0.78
m-Cresol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
o-Cresol	0.00	0.00	0.00	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.00	4.05
p-Cresol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cumene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dibenzofuran	0.00	0.38	0.00	7.18	3.57	0.45	0.00	0.15	0.00	1.21	1.13	0.15
Ethylbenzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Naphthalene	0.00	0.27	0.01	4.20	6.82	0.40	0.00	4.59	7.40	29.51	54.83	5.73
Phenol	0.00	0.04	0.00	0.00	0.07	0.06	0.00	1.16	0.00	0.00	1.20	1.46
Quinoline	0.00	0.07	0.00	1.91	0.72	0.38	0.00	0.51	0.00	5.76	2.98	2.33
Styrene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Toluene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
m-Xylene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
o-Xylene	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	20.98
p-Xylene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acenaphthene	0.00	0.16	0.35	11.05	6.38	0.70	0.00	0.33	55.30	9.34	7.32	1.21
Acenaphthylene	0.00	0.44	0.00	1.91	0.18	0.30	0.00	0.90	0.00	1.61	0.26	0.52
Anthracene	0.00	0.29	0.23	2.84	3.60	0.70	0.00	0.01	3.79	0.05	0.14	0.03
Benzo(a)anthracene	0.00	0.00	0.17	0.00	1.83	0.51	0.00	0.00	0.15	0.00	0.00	0.00
Benzo(b)fluoranthene	0.00	0.00	0.02	0.00	0.60	0.00	0.00	0.00	0.01	0.00	0.00	0.00
Benzo(k)fluoranthene	0.00	0.00	0.01	0.00	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Benzo(g,h,i)perylene	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Benzo(a)pyrene	0.00	0.00	0.09	0.00	0.58	0.00	0.00	0.00	0.01	0.00	0.00	0.00
Chrysene	0.00	0.00	0.26	0.00	1.97	1.30	0.00	0.00	0.04	0.00	0.00	0.00
Dibenzo(a,h)anthracene	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fluoranthene	0.00	4.19	0.28	2.42	8.57	1.00	0.00	0.27	3.43	0.06	0.41	0.05
Fluorene	0.00	0.20	0.20	8.60	5.00	0.70	0.00	0.18	18.65	3.16	2.74	0.52
Indeno(1,2,3-cd)pyrene	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Phenanthrene	0.00	1.12	0.50	12.10	15.82	5.20	0.00	0.05	9.94	0.23	0.72	0.20
Pyrene	0.00	3.72	0.50	1.58	8.02	3.00	0.00	0.01	1.24	0.00	0.02	0.00