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May 17, 2002

Pennsylvania Department of Environmental Protection
Air Quality Control
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Attn: Mark Wayner

RE: Koppers Industries, Inc.-Monessen Coke Plant

Dear Mr. Wayner:

This letter is in response to a telephone conversations with Frank Condrick on May 10, 2002, Bill Charlton on May 13th and yourself on May 14, 2002, regarding PADEP's intention to issue the Title V permit for the Monessen Coke Plant within a "couple of weeks". Koppers Industries, Inc. (KII) was distressed to hear this because discussions on plan approvals, the RACT permit and Title V are ongoing and KII has been awaiting PADEP's decision/modification of these documents. This letter will address some of the outstanding issues:

1. Existing plan approvals:
 - a. Coke oven battery-#65-305-048- A meeting held May 18, 1999 and restated by KII in a letter dated October 22, 1999 condition 21 of the plan approval was to be amended to replace 45-grains/100 cu.ft. with 50 grains/ 100 cu. ft. and delete the words "reduced by 90% whichever is more stringent.
 - b. Two boilers-#65-302-071: Plan approval to include permit conditions to address applicability of Subpart Db and installation and operation of a Continuous Emission Monitor (CEM). KII submitted a written position on the non- applicability and implementation of New Source Performance Standards, subpart Db on July 23 and October 22, 1999. These letters also included a response to the PADEP letter of September 27, 1999 relating to Subparts Db and Dc. The discussions on derating the boilers and complying with Subpart Db were put on hold when a letter was received from EPA rescinding a January 14, 1999 decision by EPA that the sulfur dioxide monitoring program proposed by KII did not meet requirements of Subpart Db. EPA was to review the interpretation and respond as soon as the examination of the issues was complete. PADEP was proceeding along the line of KII commitment to install the CEM and would re-issue the plan approval to reflect CEM conditions. KII has not received a response from any agency and is awaiting the revised plan approval.
2. A Draft RACT Permit was issued to KII on November 5-1997. KII responded on December 3, 1997 requesting increased permit limits based on the variability of the emission rates and the need for operational flexibility. The RACT Operating Permit was issued March 20, 1998 and did not incorporate or address KII's comments. The final RACT permit was discussed at a meeting between KII and PADEP on June 2, 1998. At the meeting, KII offered to conduct extended

testing to demonstrate the variability of emission rates. On June 16, 1998 KII submitted a follow-up letter providing 1) proposed RACT permit language, 2) proposed potential to emit rates for the coke battery underfire stacks and pushing emission control and 3) Subpart L determination of annual coal feed capacity limits. KII also committed to conducting extended testing for both NOx and VOC.

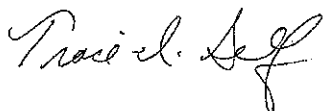
The "test protocol" was submitted to PADEP on June 26, 1998. The test program results were submitted to PADEP on November 2, 1998 with suggested statistically derived permit limits. Following revision, KII understood that the RACT was to be made part of the State Implementation Plan (SIP). At a meeting held May 18, 1999, KII requested a determination on the governing emission limits-RACT or Plan Approvals. PADEP was reminded of KII comments and analysis and was assured that the RACT would be revised. While awaiting RACT revision, KII was informed that the original RACT was SIP approved by EPA and KII would be informed of next steps needed to make the required RACT revisions. KII has not received a request for additional information and is awaiting the RACT amendment.

3. Compliance Order and Agreement (COA) dated June 12, 1998: By letter dated June 14, 1998, KII submitted a request to PADEP to delete condition 3(c) and rely on condition 3(b) to govern installation of the CEM's unit. To date KII has not received the revision to the COA.
4. Phase I submittal and approval- KII submitted a revised Phase 1 on May 18, 1998 to incorporate subpart Db requirements. PADEP did not respond to the submittal. The EPA disapproved the plan initially, but later rescinded and approved the Phase 1 Plan in a Jan 20, 1999 Letter to Mr. Charlton. In a July 14, 1999 meeting with KII, Mr. Charlton indicated that he was delaying the Phase 1 Approval and would provide KII with CEM requirements. Note also that during a conversation with Bill Charlton on June 15, 1999 he indicated PADEP was proposing that "KII install COG flow meters on the boilers, flare and combustion side of coke oven" and stated that this approach would provide PADEP with a comfort level to approve the Phase I and amend the COA and plan approval for the two boilers. KII and PADEP have been working for many years to resolve this issue and install the CEM unit. In an effort to expedite the permitting process and resolve compliance issues, KII installed flow meters to the boilers and installed sampling ports on the underfire lines for both batteries for the calendar year 2000 stack test. KII believed this would resolve all issues regarding the COA. KII has not received an amended COA or Plan Approval.
5. Registry of ERC's. - PADEP has issued the credits to KII with a condition that they be claimed by September 2002. KII has not applied the credits to the Monessen plant pending resolution of the boiler plan approval and RACT permit. Resolution is necessary to ensure the credits are applied appropriately.
6. By letter dated October 10, 1997, U.S. EPA stated "The words "including but not limited to" indicate that all coal-derived synthetic fuels are "coal" for purposes of Subpart Db regardless of whether they are specifically listed." Since COG is coal, the Monessen facility must be allowed to account for sulfur reduction from the beginning of the process, like all subpart Db facilities. As discussed at a meeting on May 18, 1999 meeting, at the time of promulgation of subpart Db, higher sulfur content coal was in use not only at the Monessen facility but also throughout the industry. The facility is capable of using a higher sulfur content coal, but to reduce emissions, KII chose not to do so. KII prepared and submitted a technical analysis of the sulfur reduction that would be achieved if the facility used the higher sulfur coal. KII stated in an October 22, 1999 letter and in a sincere effort to resolve the issues a willingness to accept a permit condition that limits the facility to use of lower sulfur coal blends.
7. Title V permit-The draft Title V permit was issued by PADEP on December 29, 2000 and received by KII on January 2, 2001, during time of ongoing discussions. KII expressed concern about issuance of the draft permit during a time when KII and PADEP were working to resolve RACT

and plan approval issues. PADEP by letter dated January 10, 2001 stated " the Department does not intend to issue the Title V Operating Permit until any outstanding issues are resolved to the maximum extent possible". KII submitted extensive comments on the draft permit on January 30, 2001. KII has not received a response to comments.

KII is committed to working with PADEP to resolve the permitting and compliance issues, but we must object to any issuance of the Title V permit until a resolution is reached on the outstanding issues. Issuance of the Title V permit without addressing KII's concerns is unreasonable and will force KII to file an appeal with the Environmental Hearing Board, causing an unnecessary expenditure of time and resources for both KII and PADEP. We appreciate your courtesy in this matter and would like to meet concerning these issues as soon as possible.

Sincerely,



Traci I. Self
Environmental Manager

CC: Frank Condrick-PADEP
William Charlton-PADEP