



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: NOV 01 2018

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Koppers, Inc, Galesburg, Illinois

FROM: Vicky Mei, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Koppers, Inc.

Facility Location: 1291 U.S. 41, Galesburg, Illinois 61401

Date of Inspection: October 25, 2018

EPA Inspector(s):

1. Vicky Mei, Environmental Engineer

Other Attendees

1. Jim Evans, Plant Manager, Koppers, Inc.
2. Drew Lozier, Assistant Plant Manager, Koppers, Inc.
3. John Luke, Treating Supervisor, Koppers, Inc.
4. Nick Ward, Safety and Health Coordinator, Koppers, Inc.

Contact Email Address: EvansJR@koppers.com

Purpose of Inspection: General Clean Air Act Inspection

Facility Type: Creosote Wood Treatment Facility

Arrival Time: 2:10PM

Departure Time: 3:55PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Evans, Mr. Lozier, Mr. Luke, and Mr. Ward unless otherwise noted.

Process Description:

Koppers, Inc. received ownership and started operations of the 100-year-old facility in 1988. The facility produces about 800,000 to 1 million crossties and 30,000 to 40,000 switch ties annually. The neighboring BNSF facility provides Kopper, Inc. with untreated ties, which are left out to dry for 6 to 12 months. Creosote is injected into the dried untreated ties under 165 psi for 12 hours in enclosed cylinders. While still in the cylinders, the ties are dried for approximately 3 hours under 21 to 22 inches of mercury. The excess creosote from the cylinders is recycled into the work tanks. The work tanks are controlled by a 17-year-old Venturi scrubber and the liquid effluent stream enters the biological air system for pretreatment. The treated ties are then taken out of the cylinders to dry for 1 to 2 hours on a drip pad that catches any remaining creosote drips. The treated ties are loaded onto railcars or moved to ground storage.

Staff Interview:

The enclosed cylinders are visually checked for steam leaks. The creosote storage and work tanks are checked for temperature and creosote levels. The scrubbers are checked for the presence of water flow. The last odor complaint about the facility was from 2 years ago.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Cylinder #1 parameter:

Pressure: 51 psi

Cylinder #3 parameters:

Pressure: 165 psi

Storage tank temperature: 209° F

Cylinder temperature: 208° F

Vacuum: -1.2 psi

The FLIR camera detected plumes of volatile organic material (VOM) emitted from both the scrubber stack and the release valve of work tank WT #2.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

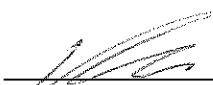
1. Lifetime operating permit 2008
2. Air Pollution Control System Performance Evaluation 2007
3. Wastewater Phenol Analytical Report 2018
4. Monthly Wastewater Analytical Report 2018
5. Quarterly diesel, gasoline, electricity, and natural gas consumption (Jan 2018 – Sept 2018)
6. Creosote solution safety data sheet
7. Charge report from 10/24/2018

CLOSING CONFERENCE

Requested documents:

- Premier Solutions, Inc. manual for the Venturi scrubber, if available
- Monthly usage of creosote (Jan 2014 – Sept 2018)
- Monthly treatment production (Jan 2014 – Sept 2018)
- 2017 Emissions report

SIGNATURES

Report Author:  Date: 10/30/2018

Section Chief:  Date: 11/1/18

Facility Name: Koppers, Inc

Facility Location: 1291 U.S. 41, Galesburg, Illinois

Date of Inspection: October 25, 2018

APPENDICES AND ATTACHMENTS

I. Appendix A: Digital Image Log

Facility Name: Koppers, Inc
Facility Location: 1291 U.S. 41, Galesburg, Illinois
Date of Inspection: October 25, 2018

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Vicky Mei	2. Date(s) of Inspection: October 25, 2018
3. Company/Facility Name: Koppers, Inc	4. Street Address, City, State: 1291 U.S. 41, Galesburg, Illinois
5. Number of Images: 2	6. Archival Record Location: CD-R, labelled "Koppers, Inc. Galesburg, IL Inspection Videos 10/25/2018"

Image Number	File Name	Date and Time (incl. time zone and DST)	Description of Image
1	MOV_2272.mp4	10/25/2018 16:24	Emissions from the scrubber stack.
2	MOV_2273.mp4	10/25/2018 16:27	Emissions from the work tank WT #2 release valve.