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April 19, 2006

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Subject: Plan for Decommissioning Treating Process, Equipment, and Buildings at Koppers Inc.

Dear Mr. Ross:

Koppers Inc. (Koppers) has decided to discontinue wood treatment operations at its Superior, Wisconsin facility. This Plan for Decommissioning (Plan) is being submitted in order to proactively inform the Wisconsin Department of Natural Resources (WDNR) of our intentions and general approach, due to the regulated nature of the treating facility and decommissioning activities.

Koppers intends to cease treating operations in mid- to late-2006 and proceed with decommissioning activities. The objective of the schedule will be to accommodate the management of listed hazardous waste within a 90-day time frame. As discussed in Section 3.0, Koppers will sequence the termination of our permits, as appropriate, during and after the decommissioning activities.

Koppers will continue to conduct industrial activity at this facility; however, Koppers intends the future use to be related to untreated tie storage and trans-loading of ties from trucks to railcars as a support role for other Koppers facilities.

Please feel free to contact me if you have any questions or concerns.

Sincerely,


Patrick D. Stark

CC:

John Heller
Leslie Hyde
Steve Willis
Jane Patarcity
File

Koppers 2050
Koppers 1800
Koppers Superior
Beazer

**Plan for Decommissioning Treating Process, Equipment, and
Buildings at Koppers Inc. Superior, Wisconsin Facility**

April 17, 2006

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1.0 INTRODUCTION

Koppers Inc. (Koppers) has decided to discontinue wood treatment operations at its Superior, Wisconsin facility. This Plan for Decommissioning (Plan) is being submitted in order to proactively inform the Wisconsin Department of Natural Resources (WDNR) of our intentions and general approach, due to the regulated nature of the treating facility and decommissioning activities.

This Plan is organized into six main sections, as follows.

1. Introduction — This section provides an overview of the facility location, history and current operations, and approach to closure.
2. General Schedule — A tentative general schedule is listed to provide a context for the time frame for closure activities to initiate and the projected duration of activities.
3. Permits — A general discussion of the existing permits is provided and Koppers' approach to terminate these permitted activities is provided.
4. Wood Treating Facility Specific Approach — Due to the specific regulatory considerations for wood treating facilities, Koppers' approach to decommissioning the drip pad and dealing with the remaining treating solutions and listed wood treating wastes is discussed. This includes the general approach to deal with any residuals, tanks, and concrete.
5. Other — Other closure activities are addressed generally and include typical demolition work of ancillary buildings and processes that are unimpacted by the wood treating specific considerations.
6. Inventory and Diagram — To provide perspective for the closure approach, an inventory and illustration of main tanks, contents, and other structures is provided as information.

1.1 Facility Location

The facility is located approximately five miles southeast of the town of Superior, in Douglas County, at the junction of County Roads A and Z. The facility is approximately 112 acres in size. The treating and office facilities are located near the northern end of the facility, while some supporting facilities are located in the central portion of the facility, and the majority of the remaining property is used for the storage of treated and untreated wood. A facility diagram has been attached for reference that includes a listing of tanks and facilities describing the current usage. The information contained on this drawing is for informational purposes only.

1.2 Facility Processes and History

Pressure-treated railroad cross ties and bridge timbers are produced at the facility. Creosote with a number 6 fuel oil carrier has been the primary preservative used at the facility. However, pentachlorophenol with a petroleum oil carrier was also used as a preservative during the time period of 1955 to 1979. Wood is shipped to the plant pre-cut. It is seasoned at the plant by air drying, steaming, or Boultonizing (conditioning the wood with creosote). Prior to treatment, the wood is loaded onto tram cars, which are pushed into the treating cylinder using a lift truck or similar equipment. The cylinder door is

sealed with a pressure tight door. Treating solution (creosote and fuel oil) is then pumped into the cylinder and pressure applied. At the end of the process, the excess treating solution is pumped out of the cylinder and back to work tanks for reuse. A final vacuum is then applied to remove additional solution from the cylinder and wood, and this solution is also then pumped to the work tanks for reuse. The cylinder door is opened and the trams, loaded with treated wood, are pulled from the cylinder onto the drip pad.

The prior owner of the facility, Koppers Company, Inc. (now known as Beazer East, Inc.)¹, has conducted and is conducting certain investigation and remediation activities regarding corrective action at portions of the facility in cooperation with WDNR. Beginning in 1982, two clay-lined wastewater impoundments were used at the facility for wastewater treatment. A Closure and Post-Closure Plan for these impoundments was submitted to the WDNR in August 1987. A Conditional Closure and Long-Term Care Plan Approval was issued by the WDNR in October 1987. All wastes were removed from these impoundments by August 1988 as K001 listed hazardous waste, but it was determined that some K001 constituents remained and, therefore, the impoundments were closed as a landfill. Closure activities were completed in August 1989 and documented in a Construction Documentation Surface Impoundment Closure Report that was submitted to the WDNR (November 1989). Because the State had not yet received authorization to implement the 1984 Hazardous and Solid Waste Amendments (HSWA), the U.S. EPA issued the HSWA portion of the permit for the facility in September 1988, that included the need to investigate the nature and extent of releases from solid waste management units (SWMUs). In September 1995, the WDNR issued a modification to the Closure and Long-Term Care Approval, which included provisions for state authorized site-wide corrective action for releases from SWMUs, under the State's then newly acquired HSWA authority. In December 1990, a Hazardous Waste Facility Operation License (License) was issued for the site by the WDNR. The License, which expires in 2020, governs long-term care of the closed RCRA surface impoundments. The License has been the WDNR's primary mechanism for managing corrective action activities at the site since the RCRA Part B Corrective Action permit expired in 1998. Koppers and Beazer East, Inc. have cooperated since Koppers acquired the Superior Plant in 1988, and will continue to do so throughout the decommissioning process.

1.3 Approach for Decommissioning

Koppers intends to cease treating operations in mid- to late-2006 and proceed with decommissioning activities. Koppers will, as a general approach, cease treating operations and demolish all buildings, process units, tanks, containment area walls, etc. associated with the wood treatment process at the

¹Until 1988, Koppers Company, Inc. owned and operated the Superior facility. At that time, Beazer PLC acquired all the stock of Koppers Company, Inc. After this acquisition, various assets of Koppers Company, Inc. – including this facility and the "Koppers" name – were sold to a group of Koppers Company managers, who together with other investors, formed Koppers Industries, Inc. After the purchase, Koppers Industries, Inc. continued to operate this facility and eventually changed its name to Koppers, Inc. Meanwhile, the former owner of this facility, Koppers Company, Inc., having sold its right to use the name "Koppers," eventually changed its name to Beazer East, Inc. (Beazer). Thus, Beazer (the former Koppers Company, Inc.) and Koppers (the former Koppers Industries, Inc.) are separate, unrelated entities, with Koppers presently owning and operating the facility. Under the December 1988 asset purchase agreement between Beazer and Koppers, and its amendments, Beazer retains certain responsibilities for environmental conditions and regulatory compliance that pre-date December 29, 1988 and Koppers retains certain responsibilities for environmental conditions and regulatory compliance that post-date December 29, 1988.

facility. The objective of the schedule will be to accommodate the management of listed hazardous waste within a 90-day time frame. As discussed in Section 3.0, Koppers will sequence the termination of our permits, as appropriate, during and after the decommissioning activities.

2.0 GENERAL SCHEDULE

The general schedule for the facility closure and decommissioning activities is tentatively set to begin in mid-2006 and conclude prior to the onset of inclement weather, a currently estimated three-month duration. Note that this is a tentative schedule and Koppers intends to keep the WDNR informed as the schedule may change.

3.0 PERMITS

Currently, the facility operates in accordance with four permits issued by the WDNR. The following provides an overview of these permits and our approach to terminate these permits. There are no general process or RCRA unit closure notification requirements that were identified as a part of Koppers' review of the Wisconsin and federal environmental regulations.

3.1 Air Quality Permit (No. 81 6009810-SOI)

Koppers air quality permit expires on April 25, 2007. A permit renewal application is due between November 25, 2005 and April 25, 2006 (12 to 18 months prior to expiration), which Koppers intends to submit in a timely fashion. The permit does not directly discuss facility shutdown, although it does address planned shutdown of air pollution equipment (Permit Part II, Section 0.2.) and deviation from conditions of the permit (Part II, Section 0.1.). Koppers intends to notify the Air Management Supervisor of the Northern Region of WDNR (the permit issuing region) of our intention to close our treatment operation. The permit indicates notification "in advance" but does not define a time frame. Koppers intends to notify in advance of ceasing treating operations, and upon establishing a more definitive schedule. Koppers will continue to operate in accordance with the requirements for each of the processes/sources listed in the permit, until each process/source ceases to operate during closure activities. Upon decommissioning all permitted processes/sources, Koppers intends to notify the Northern Region to terminate our air quality permit.

3.2 Process Wastewater Conditional Approval for Modifications to Wastewater Pretreatment System (State Approval No. 95-0013 and Exemption No. 99-DMR-716)

This approval and modification permitted the use of equipment for wastewater evaporation. There are no notice requirements listed regarding facility shutdown. We intend to continue to operate the wastewater treatment system in support of our decommissioning activities and in accordance with this approval and modification. Koppers is also exploring the option of pre-treating its wastewater and then discharging its water into the city of Superior's POTW system via POTW pretreatment permit issued by the city of Superior. If Koppers elects to discharge treated waste water to the city of Superior, the use of the waste water evaporation system will be discontinued and we will provide a courtesy notification to the appropriate WDNR Northern Region wastewater management supervisor.

3.3 Boiler Water Discharge General Permit (WI-0044938-5)

This General Permit expires March 31, 2005. It is our understanding that the terms and conditions of the General Permit continue to apply until the General Permit is reissued or revoked or until an individual permit is issued by the WDNR; no re-application by Koppers is required.

We will continue to operate in accordance with this permit throughout the decommissioning activities as long as the boiler is in use. Upon shutdown of the boiler, Koppers will complete the applicable sections of the Request for Coverage and attach other relevant information indicating the current status of the facility and submit to the Northern Region of WDNR. It is our understanding that, at that time, the facility will be removed from the WDNR's list of currently permitted facilities.

3.4 Stormwater Discharge General Permit (WI-S067849-2)

The Tier I General Permit expires on March 31, 2006. It is our understanding that the renewal process is automatic and is conducted by the WDNR, and that no re-application by Koppers is required. We will continue to operate in accordance with this permit throughout the decommissioning activities. Koppers has noted that the permit language in the general conditions indicates that "The DNR will not continue to apply the general permit in the case of facility closure and abandonment, provided that the site is left clean of pollutant residuals that could contaminate storm water" (Part VI, General Permit Conditions, Section H). Upon completion of decommissioning, Koppers will submit a Notice of Termination. Koppers understands that this Notice must be approved by the Department in order for General Permit obligations of Koppers to cease.

4.0 WOOD TREATING FACILITY SPECIFIC APPROACH

Due to the specific regulatory nature of wood treating facilities, this section addresses Koppers' approach to facility decommissioning related to the drip pad, wood treating chemicals, and wood treating chemical residuals.

Materials of regulatory interest include the following:

- Hazardous Waste K001 — Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote or pentachlorophenol. This bottom sediment sludge is a listed hazardous waste both federally (40 CFR Part 261) and in Wisconsin (Chapter NR 605).
- Hazardous Waste F034 — Wastewaters (except those that have not come into contact with process contaminants), process residuals, preservative drippage and spent formulations from wood preserving processes generated at plants that use creosote formulations. This listing does not include K001 bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote or pentachlorophenol. Creosote-related wood treating wastes are listed hazardous wastes both federally (40 CFR Part 261) and in Wisconsin (Chapter NR 605). It is expected that F034 materials and residuals will be the predominant waste code utilized during decommissioning.

It should be noted that, historically, the facility utilized pentachlorophenol as a treating solution, prior to Koppers' acquisition of the facility. As a part of Koppers' closure approach, the need for designating waste as F032 or equipment cleaning to eliminate the F032 waste code in accordance with Chapter NR 605.05(6) is not required because any materials encountered as a waste or equipment that managed pentachlorophenol in the past will be otherwise regulated as a hazardous waste F034 as described in the F032 listing at NR 605.09 or recycled as exempt scrap metal in accordance with Chapter NR 605.05(2).

4.1 Product

Koppers intends to remove and transport its remaining treating solution as a commercial chemical product to another wood treating facility during the decommissioning activities. The tanks containing the treating solution will continue to be active as treating solution storage tanks, prior to arranging for the removal and transport of this remaining treating solution. Upon final discontinuation of using the tanks for product storage, residuals that may remain in these tanks following removal of usable product, if present, will only then become subject to the 90-day accumulation rule, as allowed at Chapter NR 605.05(5) (and 40 CFR Part 261.4(c)).

4.2 Drip Pad

Unique to wood treating facilities is the presence and use of a drip pad. The drip pad at the Superior facility was lined with concrete in the late 1970s/early 1980s. As part of the construction of an extension and expansion of the drip pad in the early 1990s, soils were excavated to a depth of two to three feet in the extension/expansion area. The drip pad at Superior became subject to federal regulation under 40 CFR 265, Subpart W, in the early 1990s and subsequently in the mid-1990s under Chapter NR 656 in

Wisconsin. This drip pad has been operated as a temporary accumulation unit by removing all wastes within a 90-day time frame, in addition to the other requirements listed for drip pads at Chapter NR 615.05(4)(b)(4), and as a consequence is specifically exempted from certain regulations, as listed at NR 656.04(2) and NR 656.08(1). The following decommissioning approach has been developed in a manner consistent with the federal closure requirements for non-permitted drip pads used by generators as temporary accumulation units only (40 CFR 265.1(c)(7) and 262.34(a)(1)(iii), and the U.S. EPA's Wood Preserving Resource Conservation And Recovery Act Compliance Guide, June 1996).

4.2.1 General Drip Pad Decommissioning Approach

The drip pad has been operated by Koppers at the facility under 40 CFR Part 265, Subpart W (Subpart W) and State Chapter NR 656 requirements, since those rules became effective. When the U.S. EPA promulgated the Subpart W requirements, it recognized, among other issues, two facts related to regulating drip pads as RCRA units that are relevant to Koppers' drip pad closure approach (refer to the Federal Register, Volume 55, No.235, dated Thursday, December 6, 1990, 40 CFR Part 260, et al, Wood Preserving; Identification and Listing of Hazardous Waste; Final Rule).

First, that concrete, as a common material of drip pad construction, is not impermeable, and, further, that it is prone to cracking and degradation throughout its thickness, not just on the surface, due to the effects of mobile equipment operated upon the drip pad and environmental conditions. The specific issue that Subpart W was designed to address is that some unregulated concrete drip pads had allowed releases into and through the concrete, and extending into the subsoils beneath drip pads. As a consequence, one of the Subpart W requirements was that in cases where liners/leak detection systems could or would not be installed beneath drip pads, a sealant/coating would be applied to the surface of the drip pad, that is required to meet stringent hydraulic conductivity requirements, and that this surface sealant/coating be continually maintained to achieve the hydraulic conductivity requirements. In essence, that the drip pad surface be maintained as impermeable, since the concrete itself is not.

Since becoming regulated pursuant to the implementation of Subpart W and the subsequent State requirements, Koppers has operated and maintained the drip pad in accordance with the applicable regulatory requirements. As a consequence of operating the drip pad in accordance with the regulatory requirements and as attested by the yearly Professional Engineer inspection and certification of the drip pad that has been conducted pursuant to Chapter NR 656.07(4)(g), Koppers has no reason to believe that the regulated drip pad surface sealant/coating was breached and/or that any release occurred from the regulated drip pad to the environment during the period that the drip pad was operated under the stringent regulatory requirements for drip pad since the inception of Subpart W.

The second relevant fact that the U.S. EPA recognized was that past releases of drippage and other wood treating residuals associated with routine practices in the wood treating industry had resulted in contamination being present associated with uncontained drip tracks and subsequent unregulated concrete drip pads. The U.S. EPA discussed (see the previously referenced Federal Register) that this contamination should be recognized and addressed in transitioning from a non-regulated drip pad to a regulated drip pad, with one of the mechanisms being corrective action for releases from SWMUs, under

RCRA 3004(u) requirements. The facility site-wide corrective action program initiated in 1988 addresses the requirements for corrective action for releases from SWMUs, and listed the drip pad as a SWMU.

As a consequence of these two points, it was recognized that drip pads were suspected to contain wood treating-related constituents and that subsoils beneath the drip pads may have been contaminated as a result of the historic, pre-Subpart W drip pad practices and nature of the unregulated drip pad. To address this concern, the drip pad was listed as a SWMU at the inception of the site-wide corrective action requirements in the mid-1980s (Area F, Drip Track). The corrective action process already required for the facility will address this potential contamination from this SWMU, consistent with the U.S. EPA's approach to formulating and implementing the Subpart W requirements.

Following decommissioning, it is Koppers' intention that the concrete drip pad remain in place. As part of its decommissioning efforts, Koppers intends to follow the cleaning technology protocol that is listed for hazardous debris at Chapter NR 675.25, as follows:

- Solids present on the drip pad will be removed for off-site disposal as F034 hazardous waste.
- A physical extraction technology listed in Table 1 of 675.25 will be utilized to clean the concrete to a visually clean surface. Specifically, Koppers intends to power wash the drip pad using water under high pressure. Wash water will be routed to the existing wastewater system for management or disposed off site at the POTW.
- Residues from the physical extraction process will be managed as a F034 hazardous waste.
- Subsequent to the physical extraction process, the pad will be washed with water and the rinse will be tested for the presence of regulated hazardous constituents. The regulated hazardous constituents to be analyzed in the rinse water samples will be those listed in 40 CFR Part 268.40 (Treatment Standards For Hazardous Wastes) under the applicable F034 waste code (because the State Land Disposal Restriction Regulations at NR 675.20 do not include this applicable waste code under Treatment Standards For Hazardous Wastes). The analytical results will be compared to the Universal Treatment Standards for wastewaters listed in NR 675.28. The list of compounds and applicable wastewater concentrations that will be utilized include the following:

<u>Regulated Hazardous Constituent</u>	<u>Concentration (in milligrams/liter)</u>
Acenaphthene	0.059
Anthracene	0.059
Benzo(a)anthracene	0.059
Benzo(b)fluoranthene	0.11
Benzo(k)fluoranthene	0.11
Benzo(a)pyrene	0.061
Chrysene	0.059
Dibenzo(a,h)anthracene	0.055
Fluorene	0.059
Indeno(1,2,3-c,d)pyrene	0.0055
Naphthalene	0.059
Phenanthrene	0.059
Pyrene	0.067
Arsenic	1.4
Chromium (total)	2.77

- The physical extraction, testing, and evaluation of data may be repeated, as needed.
- When the rinse water test passes the above criteria, the drip pad will be sealed with an epoxy coating and the curbs will be breached to prevent storm water from accumulating.

4.3 Tanks, Residuals, and Concrete

4.3.1 Tanks

The tanks containing wood treating solutions or associated with the wastewater system will be cleaned by pressure washing. Residuals removed from the tanks will be managed as F034 or K001 hazardous waste, as applicable. The tanks will then be recycled as scrap metal.

Any scrap metal that is to be recycled is excluded from regulation pursuant to Chapter NR 605.05(2)(a) "Scrap metal that is legitimately recovered or reclaimed", after it is appropriately surface cleaned. Koppers will require its contractor to supply the information listed at Chapter NR 605.05(3), documenting that the metal is being sent to a recycler and recycled to document compliance with the terms of the State scrap metal exemption.

Koppers will be attentive to the fact that "wastes" cannot be managed in tanks/containers for more than 90 days, unless an extension is requested in writing and granted at the discretion of the WDNR. We do not anticipate the need for an extension, but would like to alert the WDNR that, if unforeseen conditions occur, Koppers may request an extension for a maximum of 30 days due to "unforeseen, temporary, and uncontrollable circumstances"(see Chapter NR 615.05(4)(b)).

4.3.2 Residuals

All listed wood treating related residuals to be discarded as wastes will be managed in accordance with the applicable hazardous waste management requirements. Such residuals may include materials removed from tanks, containment areas, the drip pad, or as a result of decontamination of metal or concrete. If needed, incidental soil impacted by a hazardous waste as a result of decommissioning activities will also be removed and managed in accordance with the applicable hazardous waste requirements. The management of hazardous waste residuals, or any other hazardous waste generated during decommissioning, will be in accordance with the accumulation of wastes for 90-days or less container requirements of NR 615.

4.3.3 Concrete

Concrete containment associated with the wood treating process, cylinder basement, sumps, tank farm area, and hazardous waste accumulation areas, all of which are not considered part of the drip pad system, will be cleaned as follows:

- Solids present will be removed for off-site disposal as F034 hazardous waste.
- Power washing will be utilized to clean the concrete to a visually clean surface. Wash water will be routed to the wastewater system for management.
- Residues from the cleaning process will be managed as a F034 hazardous waste.
- Containment walls that extend above grade will be removed and disposed off site in a properly-permitted facility.
- The cylinder basement will be crowned with clean fill and paved with asphalt in such a manner to prevent water from accumulating on the surface. All sumps will be filled to prevent water accumulation.

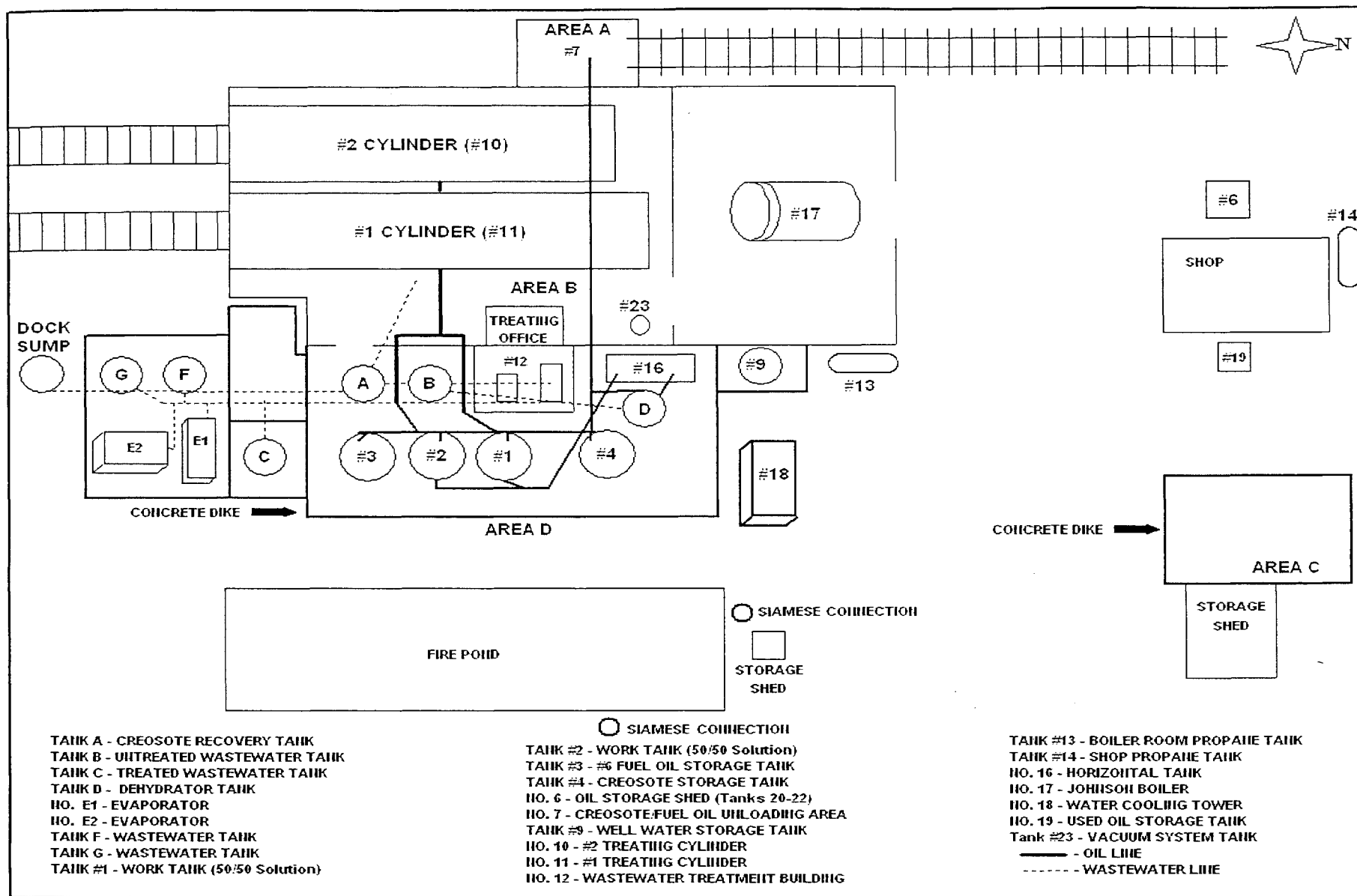
5.0 OTHER

For the remaining portion of the facility, standard demolition activities will be conducted. Other specific objectives for our decommissioning work currently include the following.

- Asbestos assessment and abatement, if needed. Notification prior to demolition activities will be made.
- Appropriate management of oil, fuel, scrap metal, construction and demolition debris, universal waste, computer electronics, etc.
- Structures except the maintenance shop and main office will be removed to grade. These structures will remain intact for future potential use by Koppers.
- The Fire Pond will be eliminated and the area leveled at the general property grade.
- The treating cylinder basement will be cleaned as presented in Section 4.3.3 of this Plan and filled in with concrete debris from uncontaminated building demolition and additional clean fill, as necessary. Once filled, the area will be paved.
- The concrete floor of the tank farm will remain in place and the walls will be collapsed and disposed off site in a properly-permitted facility.
- Soils will be disturbed only to the extent necessary to complete the listed facility decommissioning activities. Koppers intends to return non-contaminated disturbed soils into open excavations to the extent possible.
- Koppers' contractor will work in accordance with a Health and Safety Plan (including an Emergency Response Section) in accordance with local, state, and federal regulations for the scope of activities expected to be encountered, as well as reasonably expected contingent activities. The contractor will also provide stormwater controls to prevent runoff during and following decommissioning activities. The decommissioning work will be in a manner that does not impact soil, groundwater, surface water, or air quality.

6.0 INVENTORY OF TANKS AND FACILITY DIAGRAM

Attached for informational purposes is an inventory and illustration of main tanks, contents, and other structures.



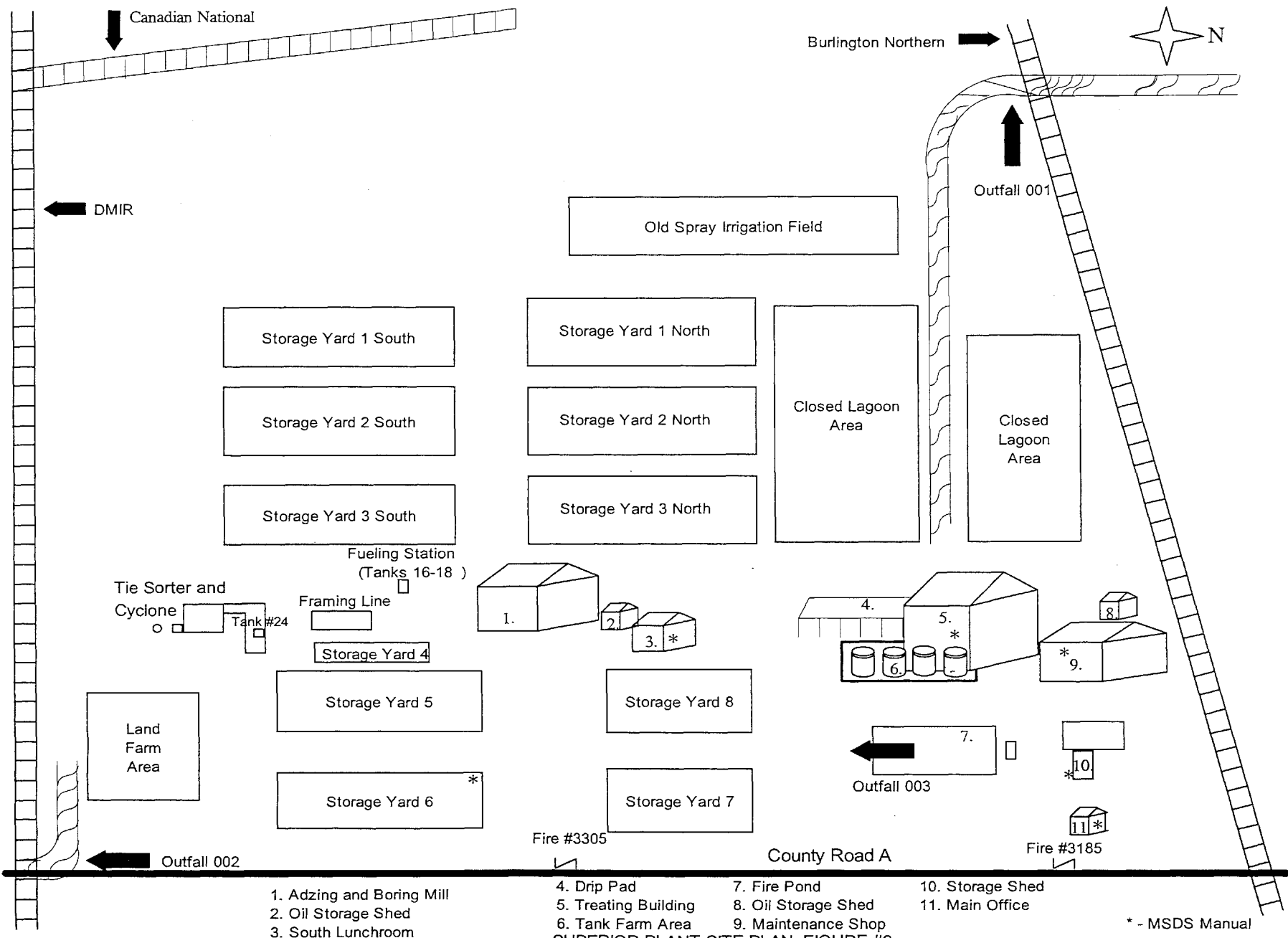
TREATING DEPARTMENT SITE PLAN FIGURE #3

TANK LISTINGS TABLE 3.1

Tank #	Tank Name	Contents	Dia.	Ht./Length	Capacity (gals)	Gals/Foot
A	Creosote Recovery	Wastewater/Creosote	13'6"	32'	35,100	1,070
B	Untreated Wastewater	Wastewater/Creosote	13'6"	32'	35,100	1,070
C	Treated Wastewater	Water	13'6"	32'	35,100	1,070
D	Dehydrator	Process water	10'	21'	12,000	N/A
F	Treated Wastewater	Wastewater	13'6"	40'	40,000	1,070
G	Treated Wastewater	Wastewater	13'6"	40'	40,000	1,070
E1	Small Evaporator	Wastewater		16'	14,000	N/A
E2	Big Evaporator	Wastewater		16'	21,000	N/A
1	Work Tank	50/50 Solution Creo/#6 Oil	13'6"	32'9"	35,100	1,070
2	Work Tank	50/50 Solution Creo/#6 Oil	13'6"	32'9"	35,100	1,070
3	#6 Oil Storage	#6 Fuel Oil	11'	21'	14,900	710
4	Creosote Storage	Grade 1 Creosote	18'6"	25'	52,000	2,010
9	Well Water Storage	Water	10'	21'	12,000	587
10	#2 Treating Cylinder	50/50 Solution	7'6"	115'	38,415	N/A
11	#1 Treating Cylinder	50/50 Solution	7'6"	125'	41,065	N/A
13	Boiler Room Propane	L.P. Gas	41"	193"	1,000	N/A
14	Shop Propane	L.P. Gas	37"	118"	500	N/A
15	Lunchroom Propane	L.P. Gas	37"	118"	500	N/A
16	Diesel Fuel	#2 Diesel Fuel			500	N/A
17	Diesel Fuel	#2 Diesel Fuel			500	N/A
18	Unleaded Gasoline	Unleaded Gasoline			265	N/A
19	Used Oil Storage	Used Oil			240	N/A
20	Motor Oil Tank	15W-40 Oil Storage	4	5'	265	N/A
21	Transmission Oil Tank	10W Engine Oil Storage	2.5'	5'	180	N/A
22	Hydraulic Oil Tank	Hydraulic Oil Storage	4	5'	265	N/A
23	Vacuum System Tank	Hydraulic Oil Reservoir	2.5'	5'	180	N/A
24	End-Plate Machine Tank	Hydraulic Oil Reservoir			145	N/A

Bold print represents tanks subject to SPCC Regulation

PROCEDURE: SUP-ENVIRO-001.2	SUPERIOR ENVIRONMENTAL PROGRAM	Page 14 of 34
ISSUE DATE: 9-27-02	WRITTEN BY: Steve Willis	REVISION NUMBER: 2
	APPROVED BY: TRR	REVISION DATE: 5-18-04



- 1. Adzing and Boring Mill
- 2. Oil Storage Shed
- 3. South Lunchroom

- 4. Drip Pad
- 5. Treating Building
- 6. Tank Farm Area

- 7. Fire Pond
- 8. Oil Storage Shed
- 9. Maintenance Shop

- 10. Storage Shed
- 11. Main Office

SUPERIOR PLANT SITE PLAN FIGURE #2