

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

Allegheny Ludlum Corporation
100 River Road
Brackenridge, PA 15014
Allegheny County

) PLAN APPROVAL ORDER
) AND AGREEMENT NO.260
) UPON CONSENT

AND NOW, this 19th day of December, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that Allegheny Ludlum Corporation (hereafter referred to as "ALC"), 100 River Road, Brackenridge, Allegheny County, PA 15014, is the owner and operator of a steel production facility located at 100 River Road, Brackenridge, Allegheny County, PA 15014 (hereafter referred to as "the facility"), is a major stationary source of oxides of nitrogen and volatile organic compounds (hereafter referred to as "NO_x" and "VOCs") emissions as defined in Section 2101.20 of Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control (hereafter referred to as "Article XXI"); and

WHEREAS, the Department has determined that Section 2105.06.a. of Article XXI, entitled "Major Sources of NO_x & VOCs" is applicable to ALC's operations at this facility; and

WHEREAS, The Department has determined that ALC has been in full compliance at all relevant times with all relevant requirements of Section 2105.06 of Article XXI; and

WHEREAS, ALC timely submitted to the Department all documents information and submittals required by Section 2105.06.b of Article XXI (hereafter referred to as "the proposal"); and

WHEREAS, the Department, after a review of the proposal, has determined it to be complete; and

WHEREAS, the Department has further determined, after review of the proposal, that it constitutes Reasonably Available Control Technology (hereafter referred to as "RACT") for control of NO_x and VOC emissions from the facility; and

WHEREAS, the Department shall submit the contents of the proposal to the U.S. EPA as a revision to the Commonwealth of Pennsylvania's State Implementation Plan (hereafter referred to as "SIP"); and

WHEREAS, the Department and ALC desire to make enforceable the details of the proposal by entry of a RACT Plan Approval Order and Agreement Upon Consent, (hereafter referred to as "Agreed Order"; and

WHEREAS, the Department has determined that this Agreed Order will aid in the administration of Article XXI, notwithstanding the absence of any violation of any provision of Article XXI.

NOW, THEREFORE, this day first written above, the Department, pursuant to Section 2109.03 of Article XXI, and upon agreement of the parties as hereinafter set forth, hereby enters into and issues this Agreed Order:

I. ORDER

- 1.1. ALC shall perform an annual adjustment or "tuneup" on the combustion process of the following equipment once every twelve (12) months, (hereafter referred to as "annual tune-up").
1. Scrap preheaters No. 1 and No. 2
 2. No. 2 A&P line; preheat furnace
 3. No. 1 A&P line; preheat furnace and annealing furnace
 4. Boilers No. 1 and No. 2
 5. Loftus soaking pits No. 9 through No. 23
 6. Hot-band normalizing furnace

Such annual tune-up shall include:

- a. Inspection, adjustment, cleaning, or necessary replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer;

- b. Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO_x, and to the extent practicable minimize emissions of carbon monoxide (hereafter referred as "CO"; and
- c. Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

- 1.2. ALC shall maintain the following records of the annual tune-up for the subject equipment:
 - a. the date of the annual tune-up;
 - b. the name of the service company and/or individuals performing the annual tune-up;
 - c. the operating rate or load after the annual tune-up;
 - d. the CO and NO_x emission rate after the annual tune-up; and
 - e. the excess oxygen rate after the annual tune-up.

- 1.3. ALC shall maintain and operate the following

equipment in accordance with good engineering and air pollution control practices.

1. Basic oxygen furnace (BOF) No. 71 vessel and No. 72 vessel
2. Electric arc furnaces No. 31 through No. 34
3. Argon Oxygen Decarburization (AOD) vessel
4. Koppers BOF Ladle preheater No. 1
5. BOF vessel preheaters No. 1 and No. 2
6. Cadre BOF ladle preheaters No. 1 through No. 3
7. BOF mold preheaters No. 1 through No. 25
8. Olsen radiant tube annealing furnace No. 1
9. Slab warming furnaces No. 1 and No. 2
10. Bell annealing furnaces No. 1 through No. 5
11. No. 2 A&P line; kolene heater
12. No. 3 B&P line; coil heater
13. Tandem mill radiant preheater
14. Electric arc furnace vertical ladle preheaters No. 1 and No. 2, horizontal ladle preheater and scrap preheaters No. 1 and No. 2
15. Argon-oxygen decarburization mold preheaters 1 through No. 23 and vessel preheater No. 1
16. Tundish preheaters No. 1 and No. 2
17. Bloom horizontal ladle preheaters No. 1 and 2
18. American horizontal ladle preheaters No. 1

through No. 3

19. Department No. 2; plate torch cutters No. 1 and 2
20. Amsler-Morton soaking pits No. 35 through No. 42
21. Loftus soaking pits No. 43 through No. 46
22. No. 1 A&P line; HNO₃/HF tubs No. 1 and No. 2 and H₂SO₄ tub No. 1
23. No. 2 A&P line; HNO₃/HF tubs No. 1 and No. 2
24. No. 3 B&P line; H₂SO₄ tubs No. 1 and No. 3

1.4. ALC shall maintain records of fuel type and usage for each combustion unit including certifications from fuel suppliers for all types of liquid fuel. For each shipment of distillate oils number 1 or 2, a certification that the fuel complies with ASTM D396-78 "Standard Specifications for Fuel Oils" is required. For residual oils, minimum record keeping includes a certification from the fuel supplier of the nitrogen content of the fuel, and identification of the sampling method and sampling protocol.

1.5. At no time shall ALC allow emissions of NO_x from the Salem Reheat Furnace, and the Rust Reheat

Furnace at this facility to exceed the following NO_x emission limitations:

NO_x Emissions:

<u>Unit:</u>	<u>Lbs/MMBTU</u>	<u>Tons/Year</u>
Salem Furnace	0.15	175
Rust Furnace	0.15	60

- 1.6. ALC shall determine compliance of each furnace with the emission limitations referenced in paragraphs 1.5 above by NO_x emissions testing. ALC shall conduct such testing no less than once every five years for the Salem and Rust Reheat Furnaces. The emission testing shall be conducted according to applicable U.S. EPA approved test methods and Section 2108.02 of Article XXI. ALC shall complete initial emission testing of the furnaces by September 30, 1997.
- 1.7. ALC shall conduct emissions monitoring of NO_x from the Salem and Rust Reheat Furnaces. The emission monitoring shall continuously measure and record fuel flow rate, combustion air flow rate, furnace pressure and furnace temperature.

~~1.8. The Department reserves the right to evaluate the NO_x Lbs per MMBTU and Tons per Year emission limitations, for the Salem and Rust Reheat Furnaces, upon analysis of actual stack test data from the subject furnaces, and amend if appropriate. The amended NO_x emission limitations shall be submitted as a source specific revision to the Commonwealth of Pennsylvania State Implementation Plan.~~

1.9. ALC shall maintain all appropriate records to demonstrate compliance with the requirements of both Section 2105.06 Article XXI and the Agreed Order. Such records shall provide sufficient data to clearly demonstrate that all requirements of both Section 2105.06 of Article XXI and the Agreed Order are being met. Data and information required to determine compliance shall be recorded and maintained by ALC and shall include the following:

A.) Production and operating records for the BOF No. 71 and No. 72 vessels, EAFs No. 31 through No. 34, the 56 inch tandem mill,

Lewis temper and United and Hot strip rolling mills.

- 1.10. ALC shall perform miscellaneous painting/coating activities utilizing paints/coatings with a maximum VOC content equal to or less than 7.0 pounds per gallon, less water and exempt solvents, after adjustment to a standard solvent density of 7.36 pounds per gallon and a solids basis. ALC shall maintain records of the quantity used, the density, water content and weight percent of VOCs per gallon of the paints/coatings used at the facility.

- 1.11. ALC shall retain all records required by both Section 2105.06 of Article XXI and the Agreed Order for the facility for at least two (2) years and shall make the same available to the Department upon request.

II. AGREEMENT

The foregoing Agreed Order shall be enforceable in accordance with and is subject to the following agreement of the parties, to wit:

- 2.1. The contents of the Order portion of this Agreed Order shall be submitted to the U.S. EPA as a revision to the Allegheny County's portion of the Commonwealth of Pennsylvania's State Implementation Plan.
- 2.2. Failure to comply with any portion of this Order or Agreement is a violation of Article XXI that may subject ALC to civil proceedings, including injunctive relief, by the Department.
- 2.3. This Agreed Order does not, in any way, preclude, limit or otherwise affect any other remedies available to the Department for violations of this Agreed Order or of Article XXI, including, but not limited to, actions to require the installation of additional pollution control equipment and the implementation of additional corrective operating practices, nor does it, in any way, limit ALC's rights to appeal any acts or omissions of the

Department, except as set forth in paragraph 2.4 hereinbelow.

2.4. ALC hereby enters into this Agreed Order and hereby knowingly waives its rights to appeal said this Agreed Order, and the undersigned represents that he is authorized to consent to the Agreed Order and to enter into this Agreement on behalf of ALC. ALC hereby expressly reserves its rights to appeal pursuant to Article XXI, Rules and Regulations of the Department, Hearings and Appeals, any revisions made by the Department to this Agreed Order without ALC's express consent.

~~2.5. ALC and the Department understand that the purpose of this Agreed Order is to establish RACT for the control of emissions of NO_x and VOCs from this facility. The parties further acknowledge and understand the possibility that the U.S. EPA may decide to not accept the Agreement portion of the Agreed Order by Consent as a revision to the Allegheny County's portion of the Commonwealth of Pennsylvania's SIP.~~

IN WITNESS WHEREOF, and intending to be legally bound, the parties hereby consent to all of the terms and conditions of the foregoing Agreed Order as of the date of the above written.

ALLEGHENY LUDLUM CORPORATION

By: *D.A. Kittenbrink*

(signature)

Print or type Name: D. A. KITTENBRINK

Title: VICE PRESIDENT - ENGR.
AND INFORMATION TECH.

Date: 12-15-96

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: *Bruce W. Dixon 1/19/96*

Bruce W. Dixon, M.D., Director
Allegheny County Health Department

and By: *Thomas J. Puzniak*

Thomas J. Puzniak, Engineering Manager
Air Quality Program