

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

LTV Steel Company, Inc.)	PLAN APPROVAL ORDER
Allegheny County)	AND AGREEMENT No. 259
Pittsburgh, PA 15207)	<u>UPON CONSENT</u>

AND NOW, this 30th day of December, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that the LTV Steel, Company, Inc. (hereafter referred to as "LTV"), 4650 Second Avenue, Allegheny County, Pittsburgh, PA 15207, as the operator and the owner of a coke production facility at 4650 Second Avenue, Allegheny County, Pittsburgh, PA 15207 (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", respectively) 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 of Article XXI, entitled "Major Sources of Nitrogen Oxides and Volatile Organic Compounds is applicable to LTV's operations; and

WHEREAS, LTV has been in full compliance at all relevant times with all relevant requirements of Section 2105.06 of Article XXI; and

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

WHEREAS, the Department has determined, after review, that the proposal is complete; and

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

WHEREAS, the Department and LTV desire to memorialize the details of the proposal by entry of this RACT Plan Approval Order and Agreement Upon Consent; and

WHEREAS, pursuant to Article XXI, the Director of the Allegheny County Health Department or his designated representative may issue such orders as are necessary to aid in the enforcement of the provisions of Article XXI;

NOW, THEREFORE, this day first written above, the Department, pursuant to Article XXI, and upon agreement of the parties as hereinafter set forth, hereby issues the following RACT Plan Approval Order and Agreement upon Consent.

I. ORDER

1.1. LTV shall maintain and operate the following units in accordance with good engineering and air pollution control practices.

1. Coke batteries P-1, P-2, P-3N, P-3S and P-4
2. Babcock and Wilcox boilers 1 through 5
(Southside Boilers)
3. Riley boilers 1 through 3
4. Keeler boilers 4 through 6
5. Package boiler
6. Byproduct plant

1.2 At no time shall LTV allow NO_x emissions from the designated equipment to exceed the following limitations:

Unit Designation		NO _x Emissions	
		Lbs/MMBTUs	TONs/Yr
Boilers	B&W 1	0.329	331
Boilers	B&W 2	0.329	331
Boilers	B&W 3	0.329	331
Boilers	B&W 4	0.329	331
Boilers	B&W 5	0.329	331

- 1.3 At no time shall the facility operate the Byproduct plant unless the nitrogen gas blanketing system is being properly maintained and operated at all times while the plant process units blanketed by the system are emitting VOCs, with the exception of emergency or planned outages, repairs or maintenance. All VOC emissions processed by the blanketing system shall be incinerated by combustion in the facility's combustion units.
- 1.4 LTV shall determine the compliance of Southside boilers 1 through 5 by emission testing for No_x every two years. The emission testing shall be conducted according to EPA-approved methods and Section 2108.02 of Article XXI. LTV shall complete initial testing of the above equipment by March 1, 1997.
- 1.5. LTV shall retain all records required by both §2105.06 of Article XXI and this order for at least two years and they shall be made available to the Department upon request.
- 1.6. LTV shall maintain all appropriate records to demonstrate compliance with the requirements of

Section 2105.06 of Article XXI and this Order.
Records shall include fuel type and usage for the
units specified in paragraph 1.1.

II. AGREEMENT

The foregoing Plan Approval Order shall be enforced in accordance with and is subject to the following agreements of the parties, to wit:

- 2.1. The contents of this Order shall be submitted to the U.S. EPA as a revision to 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 LTV to civil proceedings, including injunctive relief, by the Department.
- 2.3. This Order does not, in any way, preclude, limit or otherwise affect any other remedies available to the Department for violations of this 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.

2.4. LTV hereby consents to the foregoing Order and hereby knowingly waives all rights to appeal said Order, and the undersigned represents that he is authorized to consent to the Order and to enter into the RACT Plan Approval Order and Agreement Upon Consent on behalf of LTV.

~~2.5. LTV acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of NO_x and VOCs from the facility. LTV further acknowledges and understands the possibility that the U.S. EPA may decide to not accept the Agreement portion of this RACT Plan Approval Order and Agreement by Consent as a revision to 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 Order and Agreement as of the date of the above
written.

LTV STEEL COMPANY, INC.

By: _____

(signature)

Print or type Name: J. J. Murray

General Manager, Raw

Title: Materials & Coke Operations

Date: December 20, 1996

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: _____

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

and By: _____

Thomas J. Puzniak, Manager Engineering
Air Quality Program

