

**ALLEGHENY COUNTY HEALTH DEPARTMENT**

IN RE:

U.S. Steel Clairton Works	)	PLAN APPROVAL ORDER
400 State Street	)	AND AGREEMENT No. 234
Clairton, PA 15025	)	<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 United States Steel hereafter referred to as "USS"), Clairton, PA, Allegheny County, as the operator and the owner of a coking facility at 400 State Street, Clairton PA, 15025 (hereafter referred to as "the facility"), is a major stationary source of oxides of nitrogen volatile organic compounds, (hereafter referred to as "NO<sub>x</sub>" 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 NO<sub>x</sub> & VOCs" is applicable to USS's operations; and

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

WHEREAS, USS 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 NO<sub>x</sub> and VOC emissions from the facility; and

WHEREAS, the Department and USS desire to make enforceable the details of the Proposal by entry of this RACT Plan Approval Order and Agreement Upon Consent; and

WHEREAS, pursuant to Section 2109.03 of 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, notwithstanding the absence of any violation of any provision of Article XXI and of any condition causing, contributing to, or creating danger of air pollution;

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 issues the following RACT Plan Approval Order and Agreement upon Consent.

I. ORDER

1.1. The following process equipment shall be properly maintained and operated according to good engineering and air pollution control practices at all times:

- A. Coke Batteries No. 1, 2, 3, 7, 8, 9, 13, 14, 15, 19, 20 and battery B
- B. Pushing Emission Control System for the batteries specified in A. above.
- C. Boilers No. 1, 2, 13, 14, R1, R2, T1 and T2
- D. By-Products Plant Clean Coke Oven Gas Blanketing System and all process units blanketed by this system
- E. Scot Plant Incinerator

F. Wastewater Treatment Plant

1.2. Boilers no. 1, 2, 13, 14, R1, R2, T1 and T2 shall not, at any time, exceed the following NO<sub>x</sub> emission limitations:

<u>Boiler:</u>	<u>Lbs/MMBTU:</u>	<u>Tons/Year:</u>
No. 1	0.54	1,740
No. 2	0.54	1,285
No. 13	0.54	282
No. 14	0.54	282
R1	0.54	525
R2	0.54	525
T1	0.54	358
T2	0.54	358

1.3. The facility shall determine initial compliance with the NO<sub>x</sub> Lbs/MMBTU emission limitations specified in paragraph 1.2 above for boilers no. 13, 14, R1, R2 T1 and T2 by NO<sub>x</sub> emission testing. Such testing shall be performed every two years and conducted according to U. S. EPA approved test methods and Section 2108.02 of article XXI.

1.4. Boilers no. 1 and 2 at the facility shall have

properly maintained and operated Continuous Monitoring Systems or approved alternatives (hereafter referred to as "CEM"), meeting all requirements of Section 2108.03 of Article XXI at all times with the exception of emergency or planned outages, repairs or maintenance.

1.5. The NO<sub>x</sub> emission limitations for boilers no. 1 and 2, specified in paragraph 1.2 above, shall be determined by a thirty day rolling average and by an twelve month rolling average of CEM data for the Lbs/MMBTU and Tons/Yr emission limitation respectively.

1.6 At no time shall the facility operate the By-products plant unless the clean coke oven 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 coke batteries or boilers or by downstream consumers.

- 1.7. The facility shall maintain all appropriate records to demonstrate compliance with the requirements of Section 2105.06 of Article XXI and Order No. 234. Such records shall provide sufficient data and calculations to clearly demonstrate that all requirements of this section are being met.
- 1.8. The facility shall retain all records required by both §2105.06 of Article XXI and Order No. 234 for at least two years and they shall be made available to the Department upon request.

## II. AGREEMENT

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

- 2.1. The contents of this Order shall be submitted to the U.S. Environmental Protection Agency as a revision to the Commonwealth of Pennsylvania's State Implementation Plan (hereafter referred to



as "SIP").

2.2. Failure to comply with any portion of this Order or Agreement is a violation of Article XXI that may subject USS 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. USS 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 this Agreement on behalf of USS.

~~2.5. USS acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of NO<sub>x</sub> and VOCs from this facility. USS further acknowledges and understands the possibility that the U.S. EPA may~~

~~decide to not accept the Agreement portion of  
the 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.

USX CORPORATION, U. S. STEEL GROUP

By: *Thomas W. Gattke*  
(signature)

Print or type Name: Thomas W. GATTKE

Title: Gen'l Mgr - Central Area

Date: 12/16/96

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: *Bruce W. Dixon* 12/30/96

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

and By: *Thomas J. Puzniak*

Thomas J. Puzniak, Engineering Manager  
Air Quality Program

