

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

USX Corporation ) PLAN APPROVAL ORDER  
US Steel Group ) AND AGREEMENT NO. 235  
Edgar Thomson Works ) UPON CONSENT  
Allegheny County  
Braddock, PA 15034

AND NOW, this 30<sup>th</sup> day of December, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that the USX Corporation, US Steel Group, (hereafter referred to as "USX"), 600 Grant Avenue, Pittsburgh, Allegheny County, PA 15222, is the owner and operator of a steel production facility at 13th. Street Braddock, Allegheny County, PA 15034 (hereafter referred to as "the facility"), is a major stationary source of oxides of nitrogen a potential major source of volatile organic compounds (hereafter referred to as "NO<sub>x</sub> & 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<sub>x</sub> & VOCs" is applicable to USX's operations at this facility; and

WHEREAS, USX promptly submitted to the Department all documents required by Section 2105.06.b of Article XXI. (hereafter

referred to as "the proposal"); and

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

**WHEREAS**, the Department has further determined, after review of the submitted proposal, that it 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 USX desire to memorialize the details of the submitted proposal by entry of an Plan Approval Order and Agreement Upon Consent; and

**WHEREAS**, pursuant to Section 2109.03 of Article XXI, whenever the Director of the Allegheny County Health Department or his designated representative finds, on the basis of any information available to him, that any source is being operated in violation of any provision of Article XXI, he may order the person or persons responsible for the source to comply with Article XXI; and

**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 this Plan Approval Order and Agreement upon Consent:

I. ORDER

1.1. At no time shall USX operate the following equipment at the facility unless they are properly operated and maintained according to good engineering and air pollution control practices, with the exception of actions to mitigate emergency conditions:

- A. Boilers 1 through 3
- B. Blast Furnace Stoves and casthouses # 1 & #3
- C. Dual Strand Continuous Caster
- D. Basic Oxygen Furnace vessels # 1 and # 2
- E. Blast Furnace Gas Flare
- F. Hot Metal Transfer and Desulfurization unit
- G. Blast Furnace Ramming mix operations

1.2. At no time shall Boilers 1, 2 & 3 exceed the following limits for NO<sub>x</sub> emissions, with the exception of actions to mitigate emergency situations:

<u>Boiler #</u>	<u>lb/MMBTUs</u>	<u>TON(s)/Yr</u>
1	0.55	800
2	0.55	800
3	0.55	800

1.3. The facility shall not exceed, at any time, with the

exception of actions to mitigate emergency conditions, the following annual natural gas capacity factors for boilers no. 1, 2, and 3 at the facility:

<u>Boiler #</u>	<u>Capacity Factor</u>
1	78.4%
2	78.4%
3	78.4%

- 1.4. Boilers no. 1, 2 and 3 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, 2 and 3 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. USX shall retain all records required by both §2105.06 of Article XXI and this order for at least two years and shall be made available to the Department upon request.

- 1.7. USX shall maintain all appropriate records to demonstrate compliance with the requirements of §2105.06 of Article XXI. Such records shall provide sufficient data clearly demonstrate that all requirements of this section are being met.

## 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 USX 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. USX 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 USX.

~~2.5. USX 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. USX 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 Plan Approval Order and Agreement as of the date of  
the above written.

USX CORPORATION  
US STEEL GROUP

By: David Lohr

(signature)

Print or type Name: D. H. Lohr

Title: General Manager  
Mon Valley Works

Date: 12/17/96

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, Manager Engineering  
Air Quality Program

