

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

USX Corporation)
U.S. Steel Group) PLAN APPROVAL ORDER
Irvin Works PA 15207) AND AGREEMENT No. 258
Allegheny County) UPON CONSENT
Dravosburg, PA 15034

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

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that the USX Corporations, U.S. Steel Group, (hereafter referred to as "USX"), 600 Grant Avenue, Allegheny County, Pittsburgh, PA 15219, as the operator and the owner of a steel processing facility at Camp Hollow Road, Allegheny County, West Mifflin, PA 15122, (hereafter referred to as the "Irvin Plant"), 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 of Article XXI, entitled "Major Sources of Nitrogen Oxides and Volatile Organic Compounds is applicable to Irvin Plant's operations; and

WHEREAS, USX 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 Irvin Plant; and

WHEREAS, the Department and USX desire to memorialize 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;

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. Irvin Plant shall maintain and operate the following equipment in accordance with good combustion and air pollution control practices and air pollution control practices, at all times with the exception of emergency or planned outages, repairs or maintenance.

1. Boilers #1, #2, #3 and #4
2. 80" Hot Strip Mill Reheat Furnaces 1 through 5
3. No. 1 Galvanizing Line Furnace
4. No. 1 Galvanneal Furnace 6
5. No. 2 Galvalume Furnace
6. Terne Line Pot Heater
7. Open Coil Annealing Furnace
8. No. 2 Continuous Annealing Furnace
9. HPH Box Annealing Furnace
10. 80" Hot Strip Mill Rolling Stands
11. Five Stand Cold Rolling Mill

1.2 Irvin Plant shall conduct an annual adjustment on the combustion processes of the following equipment:

1. 80" Hot Strip Mill Reheat Furnaces #1

through #5

2. Boilers #1, #2, #3 and #4
3. No. 2 Continuous Annealing Furnace

Such annual adjustment 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.

Irvin Plant shall maintain the following records of the 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

1.3 Irvin Plant shall operate the No. 3 Five Stand Cold Rolling Mill and the 80" Hot Strip Mill Rolling Stand with lubricating oil, which is an oil-water emulsion and does not exceed a maximum VOC content by weight, of 2% and 4%, respectively.

1.4. Irvin Plant shall maintain all appropriate records to demonstrate compliance with the requirements of both Section 2105.06 Article XXI and this Order.

1.5. Irvin Plant shall retain all records required by both Section 2105.06 of Article XXI and this 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 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 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. 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. USX acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of NO_x and VOC emissions from the Irvin Plant. USX 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.

USX CORPORATION
U. S. STEEL GROUP

By: David W. 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, Engineering Manager
Air Quality Program