

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

U.S. Air, Inc.) PLAN APPROVAL ORDER
Pittsburgh International) AND AGREEMENT NO. 255
Airport) UPON CONSENT
Pittsburgh, PA 15213-0346)

AND NOW, this 14th day of January, 1996, 97

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that U.S. Air, Inc. (hereafter referred to as "USAir"), Pittsburgh International Airport Pittsburgh, PA 15213-0346, is the owner and operator of a commercial aircraft operations and maintenance facility at the Pittsburgh International Airport, Allegheny County, PA 15213-0346, (hereafter referred to as "the facility"), is a major stationary source of volatile organic compounds (hereafter referred to as "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 USAir's operations at this facility; and

WHEREAS, USAir 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 VOC emissions from the facility; and

WHEREAS, the Department and USAir desire to make enforceable, 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 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:

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I. ORDER

1.1 USAir shall properly maintain and operate the following processes at the facility, according to good engineering and air pollution control practices at all times while these processes are emitting VOCs:

- (1) Spray Paint Booths
- (2) Cleaning Operations
- (3) Blade & Masking Shop
- (4) Paint Drying Ovens
- (5) Fiberglass Shop
- (6) Plasma Room
- (7) C-B Boiler #1
- (8) C-B Boiler #2
- (9) Tank Storage
- (10) Jet Fuel Tank Purge
- (11) Aircraft Defueling
- (12) Hydraulic Test Area
- (13) Fuel Nozzle Test Stand
- (14) Fuel Nozzle Cleaning Area
- (15) Rotating Department Heat Treating
- (16) Machine Shop

1.2. USAir shall at no time, allow any of the coatings used at the facility to exceed their respective VOC grams/liter

limitations as set forth in Draft EPA Guidelines entitled "Control of Volatile Organic Compound Emissions from Coatings of Aerospace Manufacturing and Rework Operations", dated July 1996 with the following exceptions:

- (1) Touchup, aerosol and U.S. Department of Defense classified coatings
- (2) Coatings used on space vehicles; and
- (3) If the facility uses separate formulations in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such formulations, applied annually

1.3. All fresh and used cleaning solvents, except semiaqueous cleaning solvents, used at the facility, used in cleaning operations shall be stored in nonabsorbent, nonleaking containers that shall be kept closed at all times except when filling or transferring.

1.4. All handling and transfer procedures of the subject solvents referenced in paragraph 1.3 above, shall minimize spills during the filling and transferring of the solvents, to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or used cleaning solvents.

- 1.5. All spills of liquid or dry VOC containing material shall be cleaned up as soon as practicable.
- 1.6. The facility shall at all times maintain sufficient data and calculations to clearly demonstrate that all requirements of both Section 2105.06 of Article XXI and Order no. 255 are being met.
- 1.7. The facility shall retain all records required by both Section 2105.06 of Article XXI and Order No. 255 for the facility for at least 2 years and shall make the same 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 US EPA as a revision to the Commonwealth of Pennsylvania's SIP.
- 2.2. Failure to comply with any portion of this Order or Agreement is a violation of Article XXI that may subject USAir 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 Plan Approval Order and Agreement 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. USAir 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 USAir.

~~2.5. USAir acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of VOCs from this facility. USAir 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.~~

2.6

Upon promulgation of a regulation that defines VOC RACT for Aerospace Manufacturing and Rework Operations, as part of the Allegheny County Health Department Rules and Regulations, Air Pollution Control, presently entitled Article XXI, the County shall, upon request by USAir, accept and evaluate a request for an amendment to Allegheny County's portion of the SIP in order that it be consistent with the promulgated regulation and if appropriate, submit the amendment to the U.S. EPA for incorporation into the 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.

USAir, Inc.

By: *Daryl E. Hartzell*
(signature)

Print or type Name: DARYL E. HARTZELL

Title: S.R. DIR AIRCRAFT MAINT.

Date: 12/17/96

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: *Bruce W. Dixon 1/14/97*

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

and By: *Thomas J. Puzniak*

Thomas J. Puzniak, Engineering Manager
Air Quality Program

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