

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



Ms. Joyce Epps
Department of Environmental Protection
Bureau of Air Quality
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400 Market Street, P. O. Box 8468
Harrisburg, PA 17105-8468

AIR QUALITY PROGRAM

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March 6, 2009

BOARD OF HEALTH

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Lidia C. Turzai, M.D.

William Youngblood

Dear Ms. Epps:

The Allegheny County Health Department (ACHD) requests that the Pennsylvania Department of Environmental Protection withdraw the submittal of a revision to the Pennsylvania State Implementation Plan (SIP) made on behalf of ACHD and received by EPA on June 20, 2007. This revision concerned certification that Allegheny County's portion of the Pennsylvania SIP for Reasonably Available Control Technology (RACT) for the 8-Hour Ozone National Ambient Air Quality Standard requirements are met. It had been transmitted to PA DEP by our letter dated May 30, 2007.

Concurrently, ACHD is herewith submitting to PA DEP a revised version of the previously described SIP submittal in the form of the enclosed two paper copies and a disk containing a pdf version of this revision to Allegheny County's portion of the Pennsylvania State Implementation Plan demonstrating that Reasonably Available Control Technology (RACT) is in place for 8-Hour Ozone on subject sources in Allegheny County. As before, this revision is being tracked as our internal tracking number Revision 60.

The changes made to the 2007 submittal include the removal of the reference to "Dry Cleaning Facilities" covered by Article XXI Section 2105.18 from Table 1; the addition to Item 3, "Negative Declaration List," of a reference to the related Control Techniques Guideline Control of Volatile Organic Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009; and the addition of Appendix A which includes the January 8, 2009 Negative Declaration Letter for Large Petroleum Dry Cleaners previously sent to U.S. EPA.


The public comment period for this SIP Revision took place from January 19, 2009, through February 18, 2009 when the public hearing was held. There were no comments during the public comment period. The County Board of Health approved the SIP revision at their meeting on March 4, 2009.

Allegheny County Health Department – Air Quality Program
8-Hr Ozone RACT Plan SIP submittal
March 6, 2009
Page 2 of 2

We request that the Pennsylvania Department of Environmental Protection request withdrawal from U.S. EPA of the submittal of a revision to the Pennsylvania State Implementation Plan (SIP) made on behalf of ACHD and received by EPA on June 20, 2007. We also request that PA DEP approve the current revision as represented by the enclosed materials and forward the hard copies and disk to the U.S. EPA Region III with a recommendation for approval.

Copies of this submittal have also been sent to your Region V Pittsburgh Office for their information and review.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Thompson", is written over a light blue rectangular background.

James Thompson, Manager
Air Quality Program

cc: Arlene Shulman, DEP
Steve Hepler, DEP
Enclosures

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



Ms. Judith Katz
Air Protection Division
U.S. Environmental Protection Agency
Region III (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029

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William Youngblood

Dear Ms. Katz:

This is to inform you that the Allegheny County Health Department (ACHD) will be requesting that the Pennsylvania Department of Environmental Protection withdraw the submittal of a revision to the Pennsylvania State Implementation Plan (SIP) made on behalf of ACHD and received by EPA on June 20, 2007. This revision concerned certification that Allegheny County's portion of the Pennsylvania SIP for Reasonably Available Control Technology (RACT) for the 8-Hour Ozone National Ambient Air Quality Standard requirements are met.

Concurrent with this withdrawal request, ACHD will also be submitting to PA DEP a revised version (attached here for information only) of the document sent to you in June 2007, addressing the same subject, with several changes made to it, including the removal of the reference to "Dry Cleaning Facilities" covered by Article XXI Section 2105.18 from Table 1, the addition to Item 3, "Negative Declaration List," of a reference to the related Control Techniques Guideline Control of Volatile Organic Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, and the addition of Appendix A which includes the January 8, 2009 Negative Declaration Letter for Large Petroleum Dry Cleaners previously sent to EPA.

The enclosure is a revision to Allegheny County's portion of the Pennsylvania State Implementation Plan demonstrating that Reasonably Available Control Technology (RACT) is in place for 8-Hour Ozone on subject sources in Allegheny County. As before, this revision is being tracked as our internal tracking number Revision 60.

The public comment period for this SIP Revision took place from January 19, 2009, through February 18, 2009 when the public hearing was held. There were no comments during the public comment period. The County Board of Health approved the SIP revision at their meeting on March 4, 2009.

Allegheny County Health Department – Air Quality Program
8-Hr Ozone RACT Plan SIP submittal
March 6, 2009
Page 2 of 2

This SIP revision, in paper copy and in pdf format on a cd, has been sent to Ms. Joyce Epps of the Pennsylvania Department of Environmental Protection (DEP) Central Office and to Mr. Mark Wayner of DEP Region V for their review and approval, with a request that the document received by EPA on June 20, 2007 be withdrawn and the revised submittal described herein be forwarded to you with their recommendation for approval.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Thompson", is written over a light blue rectangular background.

James Thompson, Manager
Air Quality Program

Enclosure

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



Mr. Mark Wayner
Regional Air Quality Manager
Department of Environmental Protection
Southwest Regional Office – Region V
400 Waterfront Drive
Pittsburgh, PA 15222-4745

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Dear Mr. Wayner:

The Allegheny County Health Department (ACHD) requests that the Pennsylvania Department of Environmental Protection withdraw the submittal of a revision to the Pennsylvania State Implementation Plan (SIP) made on behalf of ACHD and received by EPA on June 20, 2007. This revision concerned certification that Allegheny County's portion of the Pennsylvania SIP for Reasonably Available Control Technology (RACT) for the 8-Hour Ozone National Ambient Air Quality Standard requirements are met. It had been transmitted to PA DEP by our letter dated May 30, 2007.

Concurrently, ACHD is herewith submitting to PA DEP a revised version of the previously described SIP submittal in the form of the enclosed two paper copies and a disk containing a pdf version of this revision to Allegheny County's portion of the Pennsylvania State Implementation Plan demonstrating that Reasonably Available Control Technology (RACT) is in place for 8-Hour Ozone on subject sources in Allegheny County. As before, this revision is being tracked as our internal tracking number Revision 60.

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The public comment period for this SIP Revision took place from January 19, 2009, through February 18, 2009 when the public hearing was held. There were no comments during the public comment period. The County Board of Health approved the SIP revision at their meeting on March 4, 2009.

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March 6, 2009
Page 2 of 2

Copies of this submittal have been sent to Ms. Joyce Epps in Harrisburg for review, along with a request that the Pennsylvania Department of Environmental Protection request withdrawal from U.S. EPA of the submittal of a revision to the Pennsylvania State Implementation Plan (SIP) made on behalf of ACHD and received by EPA on June 20, 2007, and that PA DEP approve the current revision as represented by the enclosed materials and forward it to the U.S. EPA Region III with a recommendation for approval.

Sincerely,

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James Thompson, Manager
Air Quality Program

cc: Steve Hepler, DEP
Enclosure

REVISION TO ALLEGHENY COUNTY'S PORTION
of the
PENNSYLVANIA STATE IMPLEMENTATION PLAN
for the
ATTAINMENT AND MAINTENANCE
of the
NATIONAL AMBIENT AIR QUALITY STANDARDS

(Revision Tracking No. 60)

Amendment to
Reasonably Available Control Technology (RACT) Plans
For the
8-Hour Ozone National Ambient Air Quality Standard

(Revision Tracking No. 60)
Table of Contents

- A. Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision for the 8-Hour Ozone National Ambient Air Quality Standard (NAAQS)
 - 1. Introduction
 - 2. Certification of VOC and NO_x RACT Requirements
 - Table 1: VOC RACT List and Certification under the 8-Hour Ozone NAAQS
 - 3. Negative Declaration List
 - 4. Certification of NO_x RACT Requirements
 - Table 2: NO_x RACT List and Certification Under the 8-Hour Ozone NAAQS
 - 5. Case-By-Case Evaluation
 - Table 3: Case-By-Case 8-Hour RACT Evaluation
 - B. Documentation of First Public Hearing and Certifications
 - Public Hearing Notice
 - Proof of Publication of Hearing
 - Notices to US EPA and PA DEP
 - Certification of Hearing
 - Summary of Comments and Responses
 - C. Documentation of Second Public Hearing and Certifications
 - Public Hearing Notice
 - Proof of Publication of Hearing
 - Notices to US EPA and PA DEP
 - Certification of Hearing
 - Summary of Comments and Responses
- APPENDIX A. Petroleum Solvent Dry Cleaners Negative Declaration Letters

A.

Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision for the 8-Hour Ozone National Ambient Air Quality Standard (NAAQS)

Reasonably Available Control Technology (RACT) State Implementation Plan (SIP)
Revision for the 8-Hour Ozone National Ambient Air Quality Standard (NAAQS)

1. INTRODUCTION

Proposed revision to the State Implementation Plan (SIP) identifying Reasonably Available Control Technology (RACT) under the 8-Hour Ozone National Ambient Air Quality Standards (NAAQS).

Statutory Authority:

25 Pennsylvania Code Subpart C Article III, Chapter 133: Local Air Pollution Agencies

Background and Requirements:

The federal Clean Air Act (CAA) of 1990 gives the states primary responsibility for achieving the National Ambient Air Quality Standards (NAAQS). The NAAQS are established by the U.S. Environmental Protection Agency (EPA) as the maximum concentrations in the atmosphere for specific air contaminants, set to protect public health and welfare. The principal mechanism at the state and local level for complying with the CAA is the State Implementation Plan (SIP). A SIP outlines the programs, actions, and commitments that a state will carry out to fulfill its responsibilities under the CAA. Once approved by the EPA, a SIP is a legally binding document under both state and federal law.

Ground level ozone, one of the principal components of “smog,” is a serious air pollutant that is known to affect human health and the environment. High levels of ozone can damage the respiratory system causing breathing problems, throat irritation, coughing, chest pains, and increase susceptibility to respiratory infection. High levels of ozone also cause serious damage to forests and agricultural crops, which results in economic loss to logging and farming operations. In June 2004, EPA designated 126 areas of the country as “non-attainment” under the 8-hour ozone NAAQS. Among those non-attainment areas is the Pittsburgh-Beaver Valley Ozone Non-Attainment Area (NAA) located in Pennsylvania.

Ozone is generally not directly emitted to the atmosphere; rather it is formed in the atmosphere by photochemical reactions between volatile organic compounds (VOC), oxides of nitrogen (NO_x), and carbon monoxide (CO) in the presence of sunlight. In order to reduce ozone concentrations in the ambient air, the CAA requires all non-attainment areas to apply controls on VOC/NO_x emission sources to achieve emission reductions. CO's role in forming ozone is relatively insignificant; therefore the CAA does not specify requirements on CO emission reductions regarding ozone attainment. Among effective control measures, the Reasonably Available Control Technology (RACT) controls are a major group for reducing VOC and NO_x emissions from stationary sources.

The US Environmental Protection Agency (EPA) has defined RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility (44 FR 53761 at 53762, September 17, 1979). Section 182 of the CAA sets forth two separate RACT requirements for ozone non-attainment areas. The first requirement, contained in section 182(a)(2)(A) of the CAA, and referred to as RACT fix-up, requires the correction of RACT rules for which EPA identified deficiencies before the Act was amended in 1990. Allegheny County has no deficiencies to correct under this Section of the CAA. The second requirement, set forth in section 182(b)(2) of the CAA, applies to moderate or worse ozone NAAs as well as to marginal and attainment areas in ozone transport regions (OTRs) established pursuant to section 184 of the CAA. This requires NAAs to implement RACT controls on all major VOC and NO_x emission sources and on all sources and source categories covered by a Control Technique Guideline (CTG) issued by EPA.

Under section 183 of the CAA, EPA was required to issue several guidance documents for RACT controls that would help states meet the requirements of section 182(b)(2). This requirement upon EPA includes developing (1) CTGs for controls of VOC emissions from stationary sources, and (2) Alternate Control Techniques (ACTs) for controls of VOC and NO_x emissions from stationary sources.

The EPA issued three groups of CTG documents, establishing a “presumptive norm” for RACT for various categories of VOC sources: Group I, issued before January 1978 including 15 CTGs; Group II, issued in 1978 including 9 CTGs; and Group III, issued in the early 1980s with 5 CTGs. Sources not covered by the issued CTGs are referred to as non-CTG sources. Section 182(b)(2) of the CAA requires states with ozone non-attainment areas classified as moderate or worse to develop RACT controls for all pre-enactment (i.e., pre-1990) CTG source categories, for all sources subject to post-enactment (i.e., post-1990) CTGs, and for all non-CTG major sources in their non-attainment areas. The EPA has also issued over a dozen ACTs for various categories of VOCs and NO_x sources.

In general, states meet the CAA’s RACT requirements by imposing controls that meet the control requirements established in final CTG documents and considering the information in ACT documents to relevant VOC and NO_x sources in their moderate or worse non-attainment areas.

The CAA requires that states achieve the NAAQS by specified dates, based on the severity of an area’s air quality problem. The entire Commonwealth of Pennsylvania is considered a ‘moderate’ ozone non-attainment area for the new federal 8-hour ozone standard because it is in an Ozone Transport Region, and is required by the CAA to attain the federal 8-hour ozone standard by June 15, 2010.

According to the EPA's Final Rule to Implement the 8-Hour Ozone NAAQS (70 FR 71612, November 29, 2005), areas classified as moderate non-attainment or higher must submit a demonstration that their current rules fulfill 8-hour ozone RACT requirements for all CTG categories and all major, non-CTG sources as a revision to their SIPs. Such demonstrations can be made with either a new RACT determination or a certification that previously required RACT controls represent RACT for the 8-hour ozone standard. A certification shall be accompanied by appropriate supporting information such as consideration of information received during the public comment period and consideration of new data. These documents supplement existing RACT guidance documents that were developed for the 1-hour standard, to demonstrate that SIPs accurately reflect RACT for the 8-hour ozone NAAQS based on current availability of technically and economically feasible controls. The RACT SIP submittal is in addition to the area's 8-hour ozone attainment demonstration plan, which is also a SIP submittal.

Allegheny County Health Department has developed a RACT SIP revision that demonstrates as of the July 2007 SIP deadline, that: 1) it has implemented required RACT controls on all relevant stationary sources of VOC and NO_x emissions; 2) with exceptions noted below, all RACT controls have been approved by EPA under the 1-hour ozone NAAQS; and 3) with exceptions noted below, all RACT controls have been certified, based on EPA's guidance and standards, to represent RACT control levels under the new 8-hour ozone NAAQS.

Summary:

Allegheny County Health Department (ACHD) is certifying through this SIP revision that the Allegheny County portion of the Pennsylvania SIP meets the CAA RACT requirements for the 50 ton per year (tpy) non-CTG major VOC sources and for 100 tpy NO_x sources, and that all CTG-covered source categories are addressed at the emission thresholds set in the CTG. This certification is based on a combination of: 1) certification that previously adopted RACT controls in Allegheny County's portion of the Pennsylvania SIP that were approved by EPA under the 1-hour ozone NAAQS are based on the currently available technically and economically feasible controls, and that they represent RACT for 8-hour implementation purposes, and 2) the adoption of new or more stringent regulations that represent RACT control levels. Based on the foregoing, all ACHD rules that apply to ozone precursor emissions fulfill RACT requirements for the 8-hour ozone NAAQS. All CTG sources and major, non-CTG sources under ACHD jurisdiction are controlled to RACT or better standards.

Notice of Public Comment:

SIP Revision 60 was the subject of two rounds of public comment periods and public hearings. For the first round, during which the entire SIP revision was the subject, a Notice of Public Hearing and comment period was published in the April 23, 2007 edition of the Pittsburgh Post Gazette, and the public comment period was from April 24, 2007 through May 25, 2007. A public hearing was held on May 24, 2007 at the Clack Health Center, 301 39th Street, Pittsburgh, PA 15201. There were no public comments.

The Department subsequently made a change for petroleum solvent dry cleaners to remove reference to Article XXI, Section 2105.18, and instead reference two negative declaration letters of 1985 and 2009. A public comment period was held from January 19, 2009 until February 18, 2009. A public hearing was held February 18, 2009.

Responsible Agency:

The agency with direct responsibility for preparing and submitting this document is Allegheny County Health Department, under the Department's Director, Dr. Bruce Dixon. The working responsibility for air quality planning falls within Air Quality under Mr. James Thompson.

2. CERTIFICATION OF VOC AND NO_x RACT REQUIREMENTS**Discussion:**

The Air Quality Program operates under the approval of the Pennsylvania Department of Environmental Protection in accordance with the provisions of 25 Pa Code Chapter 133. The Air Quality Program controls air pollution from sources by means of visible, mass, and concentration emission standards equal to, or more stringent than, those standards established by the DEP for emissions (25 Pa Code 133.4 (b) (2)). Since the early 1990s, Allegheny County has implemented numerous RACT controls to meet the CAA's RACT requirements. RACT controls for VOC and NO_x were promulgated in Allegheny County's Article XXI, Part E "Source Emission and Operating Standards."

Adoption of new RACT regulation(s) will occur when the County has new stationary sources not covered by existing RACT regulations, or when new data or technical information indicates that a previously adopted RACT measure does not represent a newly-available RACT control level. RACT Requirements were identified, implemented and approved into the SIP under the 1-hour ozone NAAQS through case-by-case RACT and Article XXI. Environmental Protection of the Pennsylvania Code Identification and certification of VOC RACT controls are provided in Table 1 below.

Identification and certification of NO_x RACT controls are provided in Table 2 below.

Explanations for each column of Table 1 are as follows:

- Column 1: Identifies each section of Article XXI or PA DEP Code. These require, in general, major VOC emitting sources to comply with the relevant provisions by May 31, 1995. Under the 1-hour ozone standard, the VOC RACT regulation defines a major VOC emitting source as a stationary source that emits VOCs at a rate equal to or greater than 10 tons per year (TPY). (Note - Some sections are general implementing provisions necessary to implement RACT, not actual RACT controls.)
- Column 2: Identifies the underlying basis for the RACT determination (CTG, ACT, ect)
- Column 4: Identifies the date the rule was approved into the Pennsylvania SIP, along with the Federal Register citation.
- Column 5: Explains RACT control applicability and requirements.
- Column 6: Certifies whether or not the current rule represents RACT under the 8-hour ozone NAAQS. Where Allegheny County has certified that a current SIP approved regulation represents RACT under the 8-hour ozone standard, ACHD affirms that it is not aware of any significant changes in control technology that affect the original RACT determination, unless otherwise explained in Column 6. Also, note that any discussion on cost effectiveness is relative only to this RACT SIP, and is not relevant as to whether or not control of a particular source or source category is cost effective relative to the entire SIP. Allegheny County's minor source permitting program requires a detailed administrative and technical review of sources that emit air contaminants far below the "major" threshold" and CTG cutoffs. This permitting program gives confidence that all major and CTG covered sources are controlled by RACT level or better controls.

Table 1: VOC RACT List and Certification under the 8-Hour Ozone NAAQS

Source Information	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 8-hour ozone RACT?
Major Source of Nitrogen Oxides and Volatile Organic Compounds Article XXI §2105.06		10/20/95	10/7/02 67FR62389	This section applies to all major sources of NOx or VOC in existence as of November 1, 1992, for which no applicable emission limitations have been established by regulation under Article XXI.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone RACT.
VOC Sources Surface Coating Processes Allegheny County Article XXI §2105.10	CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks, EPA-450/2-77-008, May 1977 CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume III: Surface Coating of Metal Furniture, EPA-450/2-77-032, December 1977	10/20/95 7/10/03	11/14/02 67FR 68935 6/24/05 70 FR 36511	This section applies to coating operations at automobile and light-duty truck assembly plants, and to any can, coil, paper, fabric, or vinyl coating unit and establishes maximum allowable VOC emissions per unit of coating solids. This section applies to the coating of metal furniture, and establishes maximum allowable VOC emissions per unit of coating solids.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone RACT.

	<p>CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating for Insulation of Magnet Wire, EPA-450/2-77-033, December 1977</p> <p>CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume V: Surface Coating of Large Appliances, EPA-450/2-77-034, December 1977</p> <p>CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VI: Surface Coating of Miscellaneous Metal Parts and Products, EPA-450/2-78-015, June 1978</p>			<p>This section applies to the coating of magnetic wire and establishes max allowable VOC emissions per unit of coating solids.</p> <p>This section applies to the coating of large appliances and establishes max allowable VOC emissions per unit of coating solids.</p> <p>This section applies to any miscellaneous metal parts coating line, and establishes max allowable VOC emissions per unit of coating solids.</p>	
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VOC Sources Graphic Arts Systems Allegheny County Article XXI §2105.11	CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VIII: Graphic Arts - Rotogravure and Flexography, EPA- 450/2-78-033, December 1978	10/20/95	11/14/02 67 FR 68935	This section applies to any rotogravure or flexographic printing process at a facility with potential uncontrolled VOC emission greater than 100 tons per year. The rule establishes the limits of VOC contents in coatings and inks used in the covered facilities and specifies standards for control devices for various printing processes.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone RACT.
VOC Sources Volatile Organic Compound Storage Tanks Allegheny County Article XXI §2105.12	CTG: Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks, EPA-450/2- 78-047, December 1978 CTG: Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks, EPA-450/2- 77-036, December 1977	10/20/95	11/14/02 67 FR 68935	This section applies to petroleum liquid tanks with external floating or fixed roofs and with a capacity greater than or equal to 2,000 gallons but less than or equal to 40,000 gallons. This section applies to petroleum liquid tanks with external floating or fixed roofs with a capacity greater than 40,000 gallons. The rule establishes sealing standards for storage tanks, including a vapor collection and recovery system.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone RACT.

Gasoline Loading Facilities Allegheny County Article XXI §2105.13	CTG: Control of Volatile Organic Emissions from Bulk Gasoline Plants, EPA-450/2-77-035, December 1977 CTG: Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, November 1975	10/20/95	11/14/02 67FR 68935	This section applies to all unloading, loading, and storage operations at bulk gasoline plants and to any gasoline tank truck delivering or receiving gasoline at a bulk gasoline plant. Requirements include the use of vapor balance, and various equipment and work practice standards.	
Degreasing Operations Allegheny County Article XXI §2105.15	CTG: Control of Volatile Organic Emissions from Solvent Metal Cleaning, EPA-450/2-77-022, November 1977	10/20/95	11/14/02 67FR 68935	This section applies to solvent cleaning machines that exceed 10 square feet. This regulation establishes standards for (1) batch cold cleaning machines, (2) batch vapor cleaning machines, and (3) (3) inline cleaning machines.	
Cutback Asphalt Paving Allegheny County Article XXI §2105.16	CTG: Control of Volatile Organic Compounds from Use of Cutback Asphalt, EPA-450/2-77-037, December 1977	10/20/95	11/14/02 67FR 68935	This section establishes requirements related to the use of cutback asphalt and establishes VOC content limits for emulsified asphalt.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone NAAQS.
Ethylene Production Facilities Allegheny County Article XXI §2105.17		10/20/95	11/14/02 67FR 68935	This section establishes control requirements for waste gas streams from ethylene production plants.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone NAAQS.

Synthetic Organic Chemical and Polymer Manufacturing – Fugitive Emissions Allegheny County Article XXI §2105.19	CTG: Control of Volatile Organic Compound Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment, EPA-450/3-83-006, March 1984	10/20/95	11/14/02 68FR 68935	This section establishes provisions for minimizing leaks, and establishes a leak detection and repair program for process equipment.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone NAAQS.
Petroleum Refineries Allegheny County Article XXI §2105.70		10/20/95	11/14/02 67 FR 68935	This section applies to vacuum-producing systems, wastewater separators, and process unit turnaround at petroleum refineries.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone RACT.
Section §2105.71: Pharmaceutical Products	CTG: Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products, 450/2- 78-029, December 1978	10/20/95	11/14/02 67 FR 68935	This section applies to VOC sources at synthesized pharmaceutical manufacturing facilities including: reactors, distillation operations, crystallizers, centrifuges, and vacuum dryers. The rule establishes standards for controlling and reducing VOC emissions from all covered sources.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone RACT.
Manufacture of Pneumatic Rubber Tires Allegheny County Article XXI §2105.72	CTG: Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires, EPA-450/2- 78-030, December 1978	10/20/95	11/14/02 67 FR 68935	This section establishes VOC emissions limits for pneumatic rubber tire manufacturing operations.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone RACT.

Aerospace Manufacturing And Rework Allegheny County Article XXI §2105.74	CTG: Aerospace (CTG & MACT) (see 59 FR 29216, June 6, 1994); CTG (Final), EPA-453/R-97-004, December 1997	7/10/2003	6/24/2005 70FR 36511	This section applies to any aerospace manufacturing and rework facility. The regulation establishes vapor pressure limits, VOC content limits, emission limits and/or work practice standards for: (a) handwipe, spray gun, or flush cleaning operations, (b) primer, topcoat, self-priming topcoat, and specialty coating operations, (c) chemical milling maskant application, (d) depainting of aerospace vehicles, and (e) handling and storing of VOC.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone NAAQS.
Mobile Equipment Repair and Refinishing Allegheny County Article XXI §2105.75	ACT: Automobile Body refinishing ACT (EPA 453/R- 94-031, April 1994)	7/10/2003	6/24/2003 70FR 36511	This section applies to any person who applies coatings to mobile equipment.	
Wood Furniture Manufacturing Operations Allegheny County Article XXI §2105.76	CTG: Wood Furniture (CTGMACT) - draft MACT out 5-94; Final CTG, EPA-453/R-96-007, April 1996; see also 61 FR 25223, and, 61 FR 50823, September 27, 1996	7/10/2003	6/24/2005 70FR 36511	This section establishes VOC emission limitations and work practice standards for wood furniture manufacturing operations with the potential to emit 25 tpy or greater of VOC.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 8-hour ozone NAAQS.

3. NEGATIVE DECLARATION LIST

Allegheny County found no emission sources that require this CTG requirement: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VII: Factory Surface Coating of Flat Wood Paneling, EPA-450/2-78-032, June 1978. Page 26 of 28

Processing Plants, EPA-450/2-83-007, December 1983.

Shipbuilding/Repair ACT (EPA 453/R-94-032, April 1994) and CTG, see 61 FR 44050, August 27, 1996.

Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry, EPA-450/3-84-015, December 1984.

Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry, EPA-450/4-91-031, August 1993.

Control of Volatile Organic Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, September 1982.

An updated negative declaration letter for the Large Petroleum Dry Cleaners was sent in January, 2009. A copy of this letter, as well as the original 1985 letter is attached in Appendix A.

4. CERTIFICATION OF NOX RACT REQUIREMENTS

Table 2 of this document lists each Department NO_x RACT control regulation, the RACT basis for the regulation, SIP revision approval by EPA citations, the RACT Rule applicability and requirements, and certification that the existing regulation represents RACT under the 8-hour ozone NAAQS. Where Allegheny County has certified that a current SIP approved regulation represents RACT under the 8-hour ozone standard, ACHD states that it is not aware of any significant changes in control technology that affect the original RACT determination. Consistent to Pennsylvania Department of Environmental Protection, the Department previously used a cost of \$1,500/ton of NO_x as a benchmark value when determining cost-effective control technology for NO_x sources subject to the RACT requirements adopted for the 1-hour ozone NAAQS. These cost-effective controls continue to represent RACT for the 8-hour ozone NAAQS because NO_x control technologies have not substantially changed since the mid-1990s.

Although the capital costs for certain control technologies, such as SCR and low-NO_x burners, have remained fairly constant, the annual operating costs have significantly increased due to price increases for urea, electricity, and operating labor. Generally, replacement low NO_x burners are not available for older existing 100 MMBtu/hr boilers and smaller, but when they are available, they are not cost-effective as RACT. The RACT determinations made for the 1-hour ozone standard are representative of RACT for the 8-hour NAAQS.

Table 2 - NOx RACT List and Certification Under the 8-Hour Ozone NAAQS

Allegheny County Regulation	RACT Basis Document	SIP Revision Approved by EPA	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 8-hour ozone RACT?
Major Source of Nitrogen Oxides and Volatile Organic Compounds Article XXI §2105.06	NOx RACT, CAA Section 182(b)(2) and Section 182(f)	10/7/02 67FR62389	This section establishes provisions for case-by-case determinations of RACT for major NOx sources. In addition, it establishes requirements for case-by-case RACT determinations for certain major NOx sources and establishes presumptive RACT limitations for certain classes of combustion units.	Yes. This provision represents current NOx RACT control requirement under the 8-hour ozone NAAQS.
NOx Allowance Requirements 2105.100	These sections ensure that sources subject to the cap-and-trade program achieve RACT-level reductions because they meet the NOx SIP Call requirements. EPA believes that the SIP provisions for those sources subject to the State's emission cap-and-trade program where the cap-and-trade program has been adopted by the State that meets the NOx SIP Call requirements meet the ozone NOx RACT requirement (70 FR 71652).	Effective 3/31/98. By County ordinance. Referenced state rule approved by EPA, 8/21/01, 66FR 43795 effective 9/20/01	This Section requires compliance with the PaDEP NOx budget and NOx allowance trading program for NOx affected sources located in Allegheny County and subject to 25 Pa Code Sections 123.101 through 123.120 and Appendix A, for the purpose of achieving the health based ozone ambient air quality standard.	Yes. This provision represents current NOx RACT control requirement under the 8-hour ozone NAAQS.
Clean Air Interstate Rule (CAIR)			This rule will require additional NOx reductions from EGU facilities. Allegheny County sources will be subject to the state rule.	

5. CASE-BY-CASE EVALUATIONS

The Department has evaluated all eligible sources case-by-case for applicability to NOx RACT. All sources that were subject to, and instituted, a 1-hour RACT plan, were re-evaluated as to the adequacy of that plan to the 8-hour RACT requirements. The Department certifies that these sources have an adequate RACT demonstration for 8-hour ozone in their 1-hour plan. One source, Laurel Mountain Whirlpool, Inc. did not have a 1-hour RACT plan. This source, however, is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR subpart www. The Department certifies that the requirements of 40CFR Subpart www are adequate for the 8-hour ozone RACT for this source.

TABLE 3: CASE-BY-CASE 8-HOUR RACT EVALUATION

2006 VOC & NOx RACT - Allegheny County							
Plan No.	Permit No.	Facility	VOC	NOx	Has a Ozone 1-hr RACT Plan	Sufficient for 8 hr RACT?	Notes
1	0059	Allegheny Ludlum Corp.	x	x	Yes	Yes	
2	0037	Ashland Specialty Chemical Co.	x	x	Yes	Yes	
3	0079	Bay Valley Foods		x	Yes	Yes	
4	0047	Bellefield Boiler Plant		x	Yes	Yes	
5	0058	Eastman Chemical Resins, Inc.	x	x	Yes	Yes	
6	0005	GE Lighting LLC		x	Yes	Yes	
7	0023	Guardian Industries Corp.		x	Yes	Yes	
8	0029	Koppers Industries, Inc.	x		Yes	Yes	
9	0014	Laurel Mountain Whirlpool, Inc.	x		No	--	*1
10	0060	Neville Chemical Co.	x	x	Yes	Yes	
11	0022	NRG Energy Center		x	Yes	Yes	
12	0056	Orion Power Brunot Island	x	x	Yes	Yes	
13	0054	Orion Power Cheswick		x	Yes	Yes	
14	0044	PACT		x	Yes	Yes	
15	0008	Port Glenshaw Glass, LLC	x	x	Yes	Yes	
16	0057	PPG Industries, Inc Springdale	x		Yes	Yes	
17	0032	Pressure Chemical Company	x		Yes	Yes	
18	0025	Shenango Inc.	x	x	Yes	Yes	
19	0052	USSteel Clairton	x	x	Yes	Yes	
20	0051	USSteel ET	x	x	Yes	Yes	
21	0050	USSteel Irvin	x	x	Yes	Yes	
	Notes						
	*1 Laurel Mountain Whirlpool is subject to the MACT standards of 40CFR 63 subpart wwww;						
	this is sufficient for VOC RACT.						

B.

Documentation of First Public Hearing and Certifications

Public hearing notice
Proof of publication of notice of hearing
Transmittals of hearing notice to EPA & PA DEP
Certification of hearing
Comment and response document

NOTICE OF PUBLIC HEARING
FOR PROPOSED
ALLEGHENY COUNTY PLAN FOR
REASONABLY AVAILABLE CONTROL TECHNOLOGY FOR OZONE

The Allegheny County Health Department will hold a public hearing on a proposed change to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) to demonstrate that Reasonably Available Control Technology (RACT) is in place for 8-hour ozone on subject sources in Allegheny County, on **Thursday, May 24, 2007** beginning at 10:00 AM in the Conference Room of Building #7 of Clack Health Center, 301 39th St., Pittsburgh, PA, 15201.

The plan does not impose any new requirements on any Allegheny County source. The final plan will be submitted to U.S. EPA as a revision to the Pennsylvania State Implementation Plan.

Copies of the proposed amendments may be examined beginning Tuesday, April 24th, 2007, at the Allegheny County Health Department Library, Building 7, Clack Health Center, from 8:30 AM until 3:30 PM Monday thru Friday; on the Allegheny County Health Department web site: www.achd.net; or by calling 412-578-8120 to request a mailed printed copy.

Oral testimony must be pre-scheduled by calling 412-578-8008 no less than 24 hours in advance of the public hearing. Speakers will be limited to five minutes and should bring a written copy of their comments.

The Board will accept written testimony beginning **Tuesday, April 24, 2007**, and concluding **Friday, May 25, 2007**, by mail to:

Board of Health
3333 Forbes Avenue
Pittsburgh, PA 15213
By email to BOH@achd.net
By Fax to 412-578-8325

No. _____ Term, _____
Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss M. Goodwin, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

23 of April, 2007

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

COPY OF NOTICE OR PUBLICATION

NOTICE OF
PUBLIC HEARING
FOR PROPOSED
ALLEGHENY COUNTY
PLAN FOR
REASONABLY
AVAILABLE CONTROL
TECHNOLOGY
FOR OZONE

The Allegheny County Health Department will hold a public hearing on a proposed change to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) to demonstrate that Reasonably Available Control Technology (RACT) is in place for 8-hour ozone on subject sources in Allegheny County, on Thursday, May 24, 2007 beginning at 10:00 AM in the Conference Room of Building #2 of Clack Health Center, 301 39th St., Pittsburgh, PA 15201. Oral testimony must be pre-scheduled by calling 412-578-8008 no less than 24 hours prior to the hearing. Written copies of comments are requested.

The plan does not impose any new requirements on any Allegheny County source. The final plan will be submitted to U.S. EPA as a revision to the Pennsylvania State Implementation Plan.

Copies of the proposed amendments may be examined beginning Tuesday, April 24th, 2007, at the Allegheny County Health Department Library, Building 7, Clack Health Center, from 8:30 AM until 3:30 PM Monday thru Friday, on the Allegheny County Health Department web site: www.achd.net or by calling 412-578-8120 to request a mailed printed copy.

Oral testimony must be pre-scheduled by calling 412-578-8008 no less than 24 hours in advance of the public hearing. Speakers will be limited to five minutes and should bring a written copy of their comments.

The Board will accept written testimony beginning Tuesday, April 24, 2007, and concluding Friday, May 25, 2007, by mail to:
Board of Health
3333 Forbes Avenue
Pittsburgh, PA 15213

M. Goodwin
PG Publishing Company
Sworn to and subscribed before me this day of:
April 23, 2007

Linda M. Gaertner
COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Linda M. Gaertner, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires Jan. 31, 2011
Member, Pennsylvania Association of Notaries

STATEMENT OF ADVERTISING COSTS
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JANET NORKUS
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PITTSBURGH PA 15213

To PG Publishing Company

Total ----- \$541.20

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PG Publishing Company, a Corporation, Publisher of
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By _____

I hereby certify that the original Proof of Publication and receipt for the Advertising costs in the subject matter of

Attorney For

AIR QUALITY PROGRAM
301 Thirty-Ninth Street
Pittsburgh, Pennsylvania 15201-1891

April 17, 2007

Ms. Judith Katz, Director
Air Protection Division
U.S. Environmental Protection Agency
Region III (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Katz:

Enclosed is a Notice of Public Hearing and a draft submittal to the County's portion of the PA State Implementation Plan related to the Ozone 8-Hour RACT plan analysis for Allegheny County sources.

Your comments are welcome.

Very truly yours,

Roger C. Westman
Manager

cc: File

Enclosures

- Notice of Public Hearing
- Proposed ACHD Document 60

AIR QUALITY PROGRAM
301 Thirty-Ninth Street
Pittsburgh, Pennsylvania 15201-1891

April 17, 2007

Ms. Joyce Epps, Director
Bureau of Air Quality
Department of Environmental Protection
Rachel Carson Building
400 Market Street
P O Box 8468
Harrisburg, PA 17105-8468

Dear Ms. Epps:

Enclosed is a Notice of Public Hearing and a draft submittal to the County's portion of the PA State Implementation Plan related to the Ozone 8-Hour RACT plan analysis for Allegheny County sources.

Copies of the Notice and related documents have also been sent to the DEP office at Region V.

Your comments are welcome.

Very truly yours,

Roger C. Westman
Manager

cc: File

Enclosures

- Notice of Public Hearing
- Proposed ACHD Document number 60

AIR QUALITY PROGRAM
301 Thirty-Ninth Street
Pittsburgh, Pennsylvania 15201-1891

April 17, 2007

Mark Wayner, Manager – Air Quality
Department of Environmental Protection
Southwest Regional Office - Air Quality
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Dear Mr. Wayner:

Enclosed is a Notice of Public Hearing and a draft submittal to the County's portion of the PA State Implementation Plan related to the Ozone 8-Hour RACT plan analysis for Allegheny County sources.

Copies of these documents have been sent to DEP in Harrisburg.

Your comments on these changes are welcome.

Very truly yours,

Roger C. Westman
Manager

cc: Stephen Hepler

Enclosures

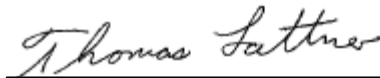
- Notice of Public Hearing
- Proposed ACHD Document 60

SIP Revision 60

Certification of Hearing

Thomas F. Lattner deposes and says that he is an Air Pollution Control Engineer in the Air Quality Program of the Allegheny County Health Department and hereby certifies that a Public Hearing was held on May 24, 2007 on the revision to Allegheny County's portion of the Pennsylvania State Implementation Plan (SIP) to demonstrate that Reasonably Available Control Technology (RACT) is in place for 8-Hour ozone on subject sources in Allegheny County; that the opportunity for written comments was given in accordance with the requirements of 40 CFR 51.102; that notice of such hearing was given by publication in a newspaper of general circulation on April 23, 2007; and to the best of his knowledge, belief and understanding, such proceedings were in full compliance with all applicable State and Federal laws, regulations, and other requirements.

Thomas F. Lattner
Air Pollution Control Engineer
Air Quality Program
Allegheny County Health Department

A handwritten signature in cursive script, reading "Thomas Lattner", is positioned above a solid horizontal line.

Date May 30, 2007

**Comment And Response Document For The Proposed SIP Revision 60
RACT Plan Amendments for 8-Hour Ozone NAAQS.
May 24, 2007 Public Hearing**

No comments were received during the public hearing, nor during the entire public comment period of April 24 through May 25, 2007.

C.

Documentation of Second Public Hearing and Certifications

Public hearing notice

Proof of publication of notice of hearing

Transmittals of hearing notice to EPA & PA DEP

Certification of hearing

Comment and response document

NOTICE OF PUBLIC HEARING
FOR PROPOSED UPDATE TO
ALLEGHENY COUNTY PLAN FOR
REASONABLY AVAILABLE CONTROL TECHNOLOGY FOR OZONE

The Allegheny County Health Department will hold a public hearing on a proposed Update to the Amendment to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) to demonstrate that Reasonably Available Control Technology (RACT) is in place for 8-hour ozone on subject sources in Allegheny County, on **Wednesday, February 18, 2009** beginning at 10:00 AM in the Conference Room of Building #7 of Clack Health Center, 301 39th St., Pittsburgh, PA, 15201.

The Update to the Amendment to the Plan removes references to Petroleum Solvent Dry Cleaners, since none exists in the County, and does not impose any new requirements on any Allegheny County source. The final updated plan will be submitted to U.S. EPA as a revision to the Pennsylvania State Implementation Plan.

Copies of the proposed amendments may be examined beginning Monday, January 19, 2009, at the Allegheny County Health Department Library, Building 7, Clack Health Center, from 8:30 AM until 3:30 PM Monday thru Friday; at the Allegheny County Law Library, 921 City County Building, 414 Grant Street; on the Allegheny County Health Department web site: www.achd.net; or by calling 412-578-8120 to request a mailed printed copy.

Oral testimony must be pre-scheduled by calling 412-578-8008 no less than 24 hours in advance of the public hearing. Speakers will be limited to five minutes and should bring a written copy of their comments.

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Board of Health
3333 Forbes Avenue
Pittsburgh, PA 15213
By email to BOH@achd.net
By Fax to 412-578-8325

No. _____ Term, _____

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13 of January, 2009

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

COPY OF NOTICE OR PUBLICATION

NOTICE OF PUBLIC HEARING
FOR PROPOSED UPDATE
TO
ALLEGHENY COUNTY
PLAN FOR
REASONABLY AVAILABLE
CONTROL TECHNOLOGY
FOR OZONE

The Allegheny County Health Department will hold a public hearing on a proposed update to the Amendment to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) to demonstrate that Reasonably Available Control Technology (RACT) is in place for 8-hour ozone on subject sources in Allegheny County, on Wednesday, February 18, 2009 beginning at 10:00 AM in the Conference Room of Building #7 of Clack Health Center, 301 39th St., Pittsburgh, PA 15201.

The Update to the Amendment to the Plan removes references to Petroleum Solvent Dry Cleaners, since none exists in the County, and does not impose any new requirements on any Allegheny County source. The final updated plan will be submitted to U.S. EPA as a revision to the Pennsylvania State Implementation Plan.

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The Board will accept written testimony beginning Monday, January 19, 2009, and concluding Wednesday, February 18, 2009, by mail to: Board of Health, 3333 Forbes Avenue, Pittsburgh, PA 15213. By email to BOH@achd.net or by fax to

M. Goodwin
PG Publishing Company

Sworn to and subscribed before me this day of:
January 13, 2009

Linda M. Gaertner

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Linda M. Gaertner, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires Jan. 31, 2011

Member, Pennsylvania Association of Notaries

STATEMENT OF ADVERTISING COSTS

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PITTSBURGH
Phone 41

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said notice.

PG Publishing Company, a Corporation, Publisher of
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By _____

the original Proof of Publication and receipt for the Advertising costs in the subject matter of

Attorney For

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



AIR QUALITY PROGRAM

301 39th Street – Bldg. #7
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115
Fax: (412) 578-8144

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Lidia C. Turzaj, M.D.
William Youngblood

January 8, 2009

Ms. Judith Katz, Director
Air Protection Division
U.S. Environmental Protection Agency
Region III (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Katz:

Enclosed are a Notice of Public Hearing and a draft submittal to the County's portion of the PA State Implementation Plan related to the Ozone 8-Hour RACT plan analysis for Allegheny County sources. This draft submittal deletes references to Petroleum Based Solvent Dry Cleaners, since there are no sources of this type in Allegheny County, and as such, is an update to a previous submittal which was the subject of an earlier public hearing on May 24, 2007.

Your comments are welcome.

Sincerely,

James E. Thompson
Manager

cc: File

Enclosures

- Notice of Public Hearing
- Proposed ACHD Document 60

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



AIR QUALITY PROGRAM

301 39th Street – Bldg. #7
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115
Fax: (412) 578-8144

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Hon. Joan Cleary, R.N.

James M. Flynn, Jr.

Lidia C. Turzai, M.D.

William Youngblood

January 8, 2009

Ms. Joyce Epps, Director
Bureau of Air Quality
Department of Environmental Protection
Rachel Carson Building
400 Market Street
P O Box 8468
Harrisburg, PA 17105-8468

Dear Ms. Epps:

Enclosed are a Notice of Public Hearing and a draft submittal to the County's portion of the PA State Implementation Plan related to the Ozone 8-Hour RACT plan analysis for Allegheny County sources. This draft submittal deletes references to Petroleum Based Solvent Dry Cleaners, since there are no sources of this type in Allegheny County, and as such, is an update to a previous submittal which was the subject of an earlier public hearing on May 24, 2007.

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Sincerely,

James E. Thompson
Manager

cc: File

Enclosures

- Notice of Public Hearing
- Proposed ACHD Document 60

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



AIR QUALITY PROGRAM

301 39th Street – Bldg. #7
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115
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BOARD OF HEALTH

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Hon. Joan Cleary, R.N.
James M. Flynn, Jr.
Lidia C. Turzai, M.D.
William Youngblood

January 8, 2009

Mark Wayner, Manager – Air Quality
Department of Environmental Protection
Southwest Regional Office - Air Quality
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Dear Mr. Wayner:

Enclosed are a Notice of Public Hearing and a draft submittal to the County's portion of the PA State Implementation Plan related to the Ozone 8-Hour RACT plan analysis for Allegheny County sources. This draft submittal deletes references to Petroleum Based Solvent Dry Cleaners, since there are no sources of this type in Allegheny County, and as such, is an update to a previous submittal which was the subject of an earlier public hearing on May 24, 2007.

Your comments are welcome.

Sincerely,

James E. Thompson
Manager

cc: S. Hepler (DEP)
File

Enclosures

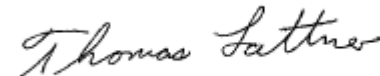
- Notice of Public Hearing
- Proposed ACHD Document 60

SIP Revision 60

Certification of Hearing (Second Hearing)

Thomas F. Lattner deposes and says that he is an Air Pollution Control Engineer in the Air Quality Program of the Allegheny County Health Department and hereby certifies that a Public Hearing was held on February 18, 2009 on the revision to Allegheny County's portion of the Pennsylvania State Implementation Plan (SIP) to demonstrate that Reasonably Available Control Technology (RACT) is in place for 8-Hour ozone on subject sources in Allegheny County; that the opportunity for written comments was given in accordance with the requirements of 40 CFR 51.102; that notice of such hearing was given by publication in a newspaper of general circulation on January 13, 2009; and to the best of his knowledge, belief and understanding, such proceedings were in full compliance with all applicable State and Federal laws, regulations, and other requirements.

Thomas F. Lattner
Air Pollution Control Engineer
Air Quality Program
Allegheny County Health Department

A handwritten signature in cursive script, reading "Thomas Lattner", is positioned above a solid horizontal line.

Date: February 19, 2009

**Comment And Response Document For The Proposed SIP Revision 60
RACT Plan Amendments for 8-Hour Ozone NAAQS.
February 18, 2009 Public Hearing (Second Hearing)**

No comments were received during the public hearing, nor during the entire public comment period of January 19, 2009 through February 18, 2009.

APPENDIX A.

Petroleum Solvent Dry Cleaners Negative Declaration Letters

January 8, 2009
February 12, 1985

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



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January 8, 2009

Ms. Judith Katz
Air Protection Division
U.S. Environmental Protection Agency
Region III (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Katz

The Air Quality Division wishes to provide definitive information with regard to one of the categories of CTG - related sources in Allegheny County. The situation is summarized herewith:

Volatile Organic Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009

A large petroleum dry cleaner as categorized by this CTG is one that emits more than 100 tons per year of VOC. There are no plants of this size in Allegheny County, consequently no regulation is required.

Sincerely,

Jim Thompson, Chief
Air Quality Program

cc: File (SIP Rev. 60)

Allegheny County Health Department

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BUREAU OF AIR POLLUTION CONTROL
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February 12, 1985

Mr. Glenn Hanson
Chief, Pa/WVa Section
U.S. EPA, Region III
6th and Walnut Streets
Philadelphia, PA 19106

Dear Mr. Hanson:

The Bureau wishes to provide definitive information with regard to two categories of Group III CTG's sources in Allegheny County. The situation is summarized herewith:


Volatile Organic Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009

A large petroleum dry cleaner as categorized by this CTG is one that emits more than 100 tons per year of VOC. There are no plants of this size in Allegheny County, consequently no regulation is required.

Control of Volatile Organic Compound Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment - EPA-450/3-83-006

There is one plant in Allegheny County in the group covered by this CTG, that produces maleic anhydride from petroleum-based feedstock. Accordingly, the Bureau will develop a regulation to meet the requirements of the CTG. Our intent will be to maintain consistency with the provisions of the comparable regulation that is currently being developed by Pennsylvania DER.

Sincerely yours,


Ronald J. Chlebowski, Deputy Director
Air Pollution Control Bureau

SF:pk

cc: C. J. Goetz
R. C. Westman