

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

June 14, 2018

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

Dear Mr. Ramamurthy:

The Allegheny County Health Department hereby submits, using the State Planning Electronic Collaboration System (SPeCS) State Implementation Plan (SIP) submission system, a requested revision to Allegheny County's portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the National Ambient Air Quality Standards (NAAQS).

The purpose of this revision request is to certify that the Article XXI Control Techniques Guidelines-based regulations are Reasonably Available Control Technology (RACT) for the 2008 8-Hour Ozone NAAQS, and to transmit "Negative Declarations" for those CTGs where there are no related sources in Allegheny County. This SIP revision is being tracked as our internal Revision Tracking Number 84A.

This SIP Revision was the subject of a public comment period from May 4 until June 9, 2018, with a public hearing held on June 4, 2018. The County Board of Health approved the SIP revision at their meeting on May 2, 2018, pending absence of anything other than editorial comments. There were no comments of any kind during the public comment period.

ACHD followed all of the applicable procedural requirements of the Commonwealth's laws and constitution in conducting and completing the adoption/issuance of the SIP revision. ACHD also publishes the proposed SIP Revision on its website <https://www.alleghenycounty.us/Health-Department/Programs/Air-Quality/Regulations-and-SIPs.aspx> in accordance with PA State Act 27 of 2012. As required by federal SIP-processing regulations, enclosed certifications demonstrate that the required public notices were provided and that a public hearing was held.

We request that the Pennsylvania Department of Environmental Protection approve this revision and forward it to the U.S. EPA Region III with a recommendation for approval. If you have any questions, please contact me at (412) 578-8116 or email me at Sandra.Etzel@AlleghenyCounty.US.

Sincerely,



Sandra Etzel, Manager
Planning & Data Analysis Section
Air Quality Program

cc: Jayme Graham, Air Quality Program Manager, ACHD
Kirit Dalal (PADEP)
Stephen Hepler (PADEP)
Susan Hoyle (PADEP)

Attachment

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. 84A)

Amendment to
8-Hour Ozone National Ambient Air Quality Standard --
Certification that Article XXI Control Techniques Guidelines based
Regulations are RACT for the 2008 8-Hr Ozone NAAQS

Revision Tracking No. 84A
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A.

**Allegheny County Portion of the Pennsylvania RACT SIP Revision
for the
2008 8-Hour Ozone NAAQS – Certification of CTG Regulations**

1. INTRODUCTION

The following is a revision to the Allegheny County portion of the Pennsylvania SIP certifying that the Article XXI Control Techniques Guidelines based regulations are Reasonably Available Control Technology (RACT) for the 2008 8-Hour Ozone 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 increased 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 May 2012, EPA designated 46 areas of the country as “non-attainment,” unclassifiable, or unclassifiable/attainment under the 2008 8-Hour ozone NAAQS. Among the 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 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 for VOC sources, applies to moderate or worse ozone NAAs. This requires NAAs to implement RACT controls on all major VOC sources and on all VOC sources and source categories covered by a Control Technique Guideline (CTG) issued by EPA.
- The third requirement is in section 182(f), and subjects major stationary sources of NO_x to the same RACT requirements that are applicable to major sources of VOC. In addition, Section 184(b)(1)(B) of the CAA applies the RACT requirements in section 182(b)(2) for moderate nonattainment areas (and 182(f) by extension), to marginal nonattainment areas and attainment areas located within ozone transport regions (OTRs) established pursuant to section 184 of the CAA.

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 prior to 1990, 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. The EPA also issued CTG documents post 1990. (Sources not covered by the issued CTGs are referred to as non-CTG sources. Those are not the subject of this SIP revision.)

Section 182(b)(2) of the CAA requires states with ozone nonattainment 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 (as noted, non-CTG major sources are not the subject of this SIP revision). 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 2008 8-Hour ozone standard because it is in an Ozone Transport Region (OTR) specified under section 184 of the CAA, and is required by the CAA to attain the federal 2008 8-Hour ozone standard by July 20, 2018.

According to the EPA's Final Rule to Implement the 2008 8-Hour Ozone NAAQS (80 FR 12264, March 6, 2015), areas classified as moderate non-attainment or higher, or located in an OTR, must submit a demonstration that their current rules fulfill 2008 8-Hour ozone RACT requirements for all CTG categories and all major, non-CTG sources (as noted, a demonstration regarding the non-CTG major sources is not part of this SIP revision). 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 2008 8-Hour ozone standard.

Allegheny County Health Department has developed a RACT SIP revision that demonstrates:

- 1) is implementing required CTG-based RACT controls on all relevant stationary sources of VOC emissions;
- 2) all applicable CTG RACT controls have been adopted into ACHD regulations and have been approved by EPA into the SIP;
- 3) all CTG RACT controls are based on EPA's guidance and standards to represent RACT control levels under the new 2008 8-Hour ozone NAAQS; and
- 4) that there are no sources in Allegheny County for certain CTG source categories for which ACHD has not adopted CTG regulations.

Summary:

Allegheny County Health Department (ACHD) is certifying through this SIP revision that for the Allegheny County portion of the Pennsylvania SIP, all CTG-covered source categories are addressed at the emission thresholds set in the CTG. This certification holds that previously adopted RACT controls in Allegheny County's portion of the Pennsylvania SIP that were approved by EPA under the 1997 8-hr ozone NAAQS and 1979 1-hour ozone NAAQS are based on the currently available technically and economically feasible controls, and that they represent RACT for the 2008 8-Hour ozone implementation purposes. Based on the foregoing, all ACHD rules that apply to ozone precursor emissions fulfill RACT requirements for the 2008 8-Hour ozone NAAQS. All CTG sources under ACHD jurisdiction are controlled to RACT or better standards. A negative declaration has been made for those CTGs for which there are no applicable sources.

Notice of Public Comment:

SIP Revision 84A was the subject of a public comment period and a public hearing. Public Hearing documentation is included.

Responsible Agency:

The agency with direct responsibility for preparing and submitting this document is Allegheny County Health Department, under the Department's Director, Dr. Karen Hacker. The working responsibility for air quality planning falls within Air Quality under Ms. Jayme Graham.

2. CERTIFICATION OF VOC CTG 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 were promulgated in Allegheny County's Article XXI, Part E "Source Emission and Operating Standards."

CTG-based RACT requirements were identified, implemented and approved into the SIP under the 1997 8-Hr ozone NAAQS and the 1979 1-hour ozone NAAQS through Article XXI. Identification and certification of VOC CTG RACT controls for the 2008 8-Hr ozone NAAQS are provided in Table 1 below.

Explanations for each column of Table 1 are as follows:

- Column 1: Identifies each CTG-based section of Article XXI.
- Column 2: Identifies the underlying basis for the RACT determination (CTG or ACT)
- Column 3: Identifies the effective date of the Article XXI RACT regulation.
- 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 2008 8-Hour ozone NAAQS. Where Allegheny County has certified that a current SIP approved regulation represents RACT under the 2008 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.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
VOC Sources Surface Coating Processes Allegheny County Article XXI §2105.10	<p>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</p> <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>10/20/95</p> <p>7/10/03</p> <p>6/14/10</p> <p>6/8/13</p>	<p>11/14/02 67FR 68935</p> <p>6/24/05 70 FR 36511</p> <p>12/28/10 75FR81480 (Revision to Applicability, Paragraphs 2105.10.a.1 & 2)</p> <p>11/26/14, 79 FR 70471 (Revision to <i>Applicability</i>, paragraphs 2105.10(a)2 & 3.)</p>	<p>This section applies, and to any can, coil, paper, fabric, or vinyl coating unit and establishes maximum allowable VOC emissions per unit of coating solids.</p> <p>This section no longer applies to:</p> <ol style="list-style-type: none"> 1. Coating operations at automobile and light-duty truck assembly plants. See §2105.84. 2. The coating of metal furniture. See now §2105.77. 3. The coating of large appliances. See now §2105.77. 4. The coating of miscellaneous metal parts. See now §2105.83. <p>This section also applies to the coating of magnetic wire and establishes max allowable VOC emissions per unit of coating solids.</p>	<p>Yes.</p> <p>This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone RACT.</p>

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
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 2008 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 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 2008 8-Hour ozone RACT.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Gasoline Loading Facilities Allegheny County Article XXI §2105.13	<p>CTG: Control of Volatile Organic Emissions from Bulk Gasoline Plants, EPA-450/2-77-035, December 1977</p> <p>CTG: Control of Hydrocarbons from Tank Truck Loading Terminals EPA-450/2-77-026 October 1977</p> <p>CTG: Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, EPA-450/R-75-102 November 1975</p> <p>CTG: Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems EPA-450/2-78-051 December 1978</p>	10/20/95	11/14/02 67FR 68935	<p>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.</p> <p>Requirements include the use of vapor balance, and various equipment and work practice standards.</p>	<p>Yes.</p> <p>This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone RACT.</p>

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
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) inline cleaning machines.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone RACT.
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 2008 8-Hour ozone NAAQS.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Synthetic Organic Chemical and Polymer Manufacturing – Fugitive Emissions Allegheny County Article XXI §2105.19	<p>CTG: Control of Volatile Organic Compound Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment, EPA- 450/3-83-006, March 1984</p> <p>CTG: Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins, EPA- 450/3-83-00, November 1983</p>	10/20/95	11/14/02 67FR 68935	This section establishes provisions for minimizing leaks, and establishes a leak detection and repair program for process equipment.	<p>Yes.</p> <p>This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.</p>

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Petroleum Refineries Allegheny County Article XXI §2105.70	CTG: Control of Refinery Vacuum Producing Systems, Wastewater Separators and Process Unit Turnarounds EPA-450/2-77-025 October 1977 CTG: Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment EPA-450/2-78-036 June 1978	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. This section applies to leaks at petroleum refineries.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone RACT.
Pharmaceutical Products Allegheny County Article XXI §2105.71	CTG: Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products, EPA-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 & 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 2008 8-Hour ozone RACT.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 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 2008 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) de- painting 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 2008 8-Hour ozone NAAQS.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Wood Furniture Manufacturing Operations Allegheny County Article XXI §2105.76	CTG: Wood Furniture (CTG & MACT) - 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 2008 8-Hour ozone NAAQS.
Control of VOC Emissions from Large Appliance and Metal Furniture Surface Coating Processes Article XXI §2105.77	CTG: Control Techniques Guidelines for Large Appliance Coatings EPA-453/R-07-004 September 2007 CTG: Control Techniques Guidelines for Metal Furniture Coatings EPA-453/R-07-005 September 2007 CTG: Control of Volatile Organic Emissions from Existing Stationary Sources Volume III: Surface Coating of Metal Furniture EPA-450/2-77-032	5/24/2010	12/28/2010 75FR81480	This section applies to the coating of large appliances and establishes max 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. This CTG was a predecessor of EPA-453/R-07-004.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
	December 1977 CTG: Control of Volatile Organic Emissions from Existing Stationary Sources Volume V: Surface Coating of Large Appliances EPA-450/2-77-034 December 1977			This CTG was a predecessor of EPA-453/R-07-004	
Control of VOC Emissions from Flat Wood Paneling Coating Processes Article XXI §2105.78	CTG: Control Techniques Guidelines for Flat Wood Paneling Coatings EPA-453/R-06-004 September 2006 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.	5/24/2010	12/28/2010 75FR81480	This section applies to the coating of flat wood paneling, 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 2008 8-Hour ozone NAAQS.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Control of VOC Emissions from Paper, Film, And Foil Surface Coating Processes Article XXI §2105.79	CTG: Control Techniques Guidelines for Paper, Film, and Foil Coatings EPA-453/R-07-003 September 2007	5/24/2010	12/28/2010 75FR81480	This section applies to the coating of paper, film, and foil, 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 2008 8-Hour ozone NAAQS.
Control of VOC Emissions from Offset Lithographic Printing and Letterpress Printing Article XXI §2105.80	CTG: Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing EPA-453/R-06-002 September 2006	6/8/2013	10/6/2014 79FR60059	This section applies to offset lithographic and letterpress printing operations, and establishes VOC content limitations via alcohol content limitations.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Control of VOC Emissions from Flexible Package Printing Article XXI §2105.81	CTG: Control Techniques Guidelines for Flexible Package Printing EPA-453/R-06-003 September 2006	6/8/2013	10/6/2014 79FR60059	This section applies to flexible package printing, and establishes maximum allowable VOC emissions per unit of coating solids, control efficiency, and limits on the VOC content of material used.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.
Control of VOC Emissions from Industrial Solvent Cleaning Operations Article XXI §2105.82	CTG: Control Techniques Guidelines for Industrial Cleaning Solvents EPA-453/R-06-001 September 2006	6/8/2013	10/6/2014 79FR60059	This section applies industrial cleaning solvents, and establishes VOC emission limits via solvent VOC content limits and work procedures.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Control of VOC Emissions from Miscellaneous Metal and/or Plastic Parts Surface Coating Processes Article XXI §2105.83	CTG: Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings EPA-453/R-08-003 September 2008 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	6/8/13	11/26/2014 79FR70470 1/20/16 81 FR 2993	This section applies to any miscellaneous metal parts coating line, and establishes max allowable VOC emissions per unit of coating solids. This CTG was a predecessor of EPA-453/R-08-003	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.
Control of VOC Emissions from Automobile and Light-Duty Truck Assembly Coatings Article XXI §2105.84	CTG: Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings EPA-453/R-08-006 September 2008	6/8/13	11/26/2014 79FR70470 1/20/16 81 FR 2993	This section applies to automobile and light-duty truck assembly coatings, and establishes max 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 2008 8-Hour ozone NAAQS.

Table 1: VOC CTG RACT List and Certification under the 2008 8-Hour Ozone NAAQS

Source Category and Applicable Rule	RACT Basis Document	Effective Date of Article XXI	EPA Approval Date	RACT Rule Applicability and Requirements	Requirements at least as stringent as the 2008 8-Hour Ozone RACT?
Control of VOC Emissions from Miscellaneous Industrial Adhesives Article XXI §2105.85	CTG: Control Techniques Guidelines for Miscellaneous Industrial Adhesives EPA-453/R-08-005 September 2008	6/8/2013	11/26/2014 79FR70470 1/20/16 81 FR 2993	This section applies to miscellaneous industrial adhesives and establishes max allowable VOC emissions per unit of adhesives.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.
Control of VOC Emissions from Fiberglass Boat Manufacturing Materials Article XXI §2105.86	CTG: Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials EPA-453/R-08-004 September 2008	6/8/2013 6/19/2015	11/26/2014 79FR70470 1/20/16 81 FR 2993	This section applies to fiberglass boat manufacturing materials and establishes max allowable VOC emissions by limiting the monomer VOC content.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2008 8-Hour ozone NAAQS.

3. Negative Declarations – CTGs for which there are no applicable sources in Allegheny County

Allegheny County found no emission sources that require the following CTG requirements:

CTG Title	Effective Date of Article XXI	EPA Approved Date	RACT Rule Applicability and Requirements.	Requirements as least as stringent as the 2008 8-Hr Ozone RACT?
Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, September 1982.	Na	Na	Negative Declaration	Na. Negative Declaration
Control of Volatile Organic Compound Emissions Leaks from Natural Gas/Gasoline Processing Plants, EPA-450/3-83-007, December 1983.	Na	Na	Negative Declaration	Na. Negative Declaration
Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry, EPA-450/3-84-015, December 1984.	Na	Na	Negative Declaration	Na. Negative Declaration
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.	Na	Na	Negative Declaration	Na. Negative Declaration
Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) ACT (EPA 453/R-94-032, April 1994) and CTG, see 61 FR 44050, August 27, 1996.	Na	Na	Negative Declaration	Na. Negative Declaration

The table below shows the major NO_x and VOC sources operating in Allegheny County. The ACHD has reviewed the operating permits for these sources and certifies that none of them are subject to the five applicable Control Techniques Guidelines shown above as having a Negative Declaration.

Permit No.	Facility	SIC 1	SIC 2	SIC 3	Description
0637	AKJ Industries				Sludge mixing operation. Major by law, not by emissions.
0035	ALCOSAN	49			A publicly-owned waste water treatment plant located along the Ohio River in Pittsburgh, PA. Major by law not emissions.
0059	Allegheny Ludlum Corp.	3312	3316	3398	Producer of specialty metals, irons, & steels (ingots, slabs, & coils)
0037	Ashland Specialty Chemical Co.	2821	5169		Industrial chemicals manufacturing plant for polyester resins; distribution of plasticizer, 2-ethylhexanol, & phthalic anhydride
0047	Bellefield Boiler Plant	4961			The boiler plant provides steam to a consortium of hospitals, universities & museums
0265	Braddock Recovery				Byproducts recovery facility for a steel mill. Major by operations.
0040	Buckeye Terminals	4613	4226		Refined petroleum pipeline breakout station and bulk terminal
0041	Coraopolis Terminals – DE. LLC				Bulk gasoline terminal
0058	Eastman Chemical Resins, Inc.	2821			Polymerizes petroleum distillates & aromatic monomers into resins using Friedel Crafts type catalysts in hydrocarbon diluents.
0062	Gulf Oil, L.P. – Neville Island Term				Bulk gasoline terminal
0068	Imperial Landfill				Landfill gas recovery operation
0190	Kelly Run Sanitation Landfill				Landfill gas recovery operation
0029	Koppers Industries, Inc.	3312			Materials are debenzolized and distilled in pitch & various other products
0015	Liberty Polyglas Pultrusions				Produces fiberglass reinforced plastics.
0215	Monroeville Landfill				Landfill gas recovery operation
0060	Neville Chemical Co.	2821	2869		Manufacturing of synthetic hydrocarbon resins, plasticizers, & Plasticizing oils
0012	Neville Island Terminal -DE. LLC				Bulk gasoline terminal

0022	NRG Energy Center	4961			Steam & chilled water supply for a district energy system. Boilers are fired primarily with natural gas
0056	NRG (Orion) Power Brunot Island	4911			Electricity generation
0054	NRG (Orion) Power Cheswick	4911			Electricity utility
0044	Pittsburgh Allegheny County Thermal (PACT)	4961			District steam heating supply for multiple commercial, institutional & government buildings
0057	PPG Industries, Inc Springdale	2851	5198		Manufactures coatings for the industrial markets and includes administrative offices, manufacturing, warehousing, research & support laboratory operations
0079	Riverbend Foods	2032	2099		Food processing & packaging of Soup & Baby Food
0580	Springdale Energy Supply				Gas turbine power plant
0007	Sun Oil – Pittsburgh Terminal				Bulk gasoline terminal
0225	TMS (USS Edgar Thomson)				Byproducts recovery facility for a steel mill. Major by operations
0027	Universal Stainless & Alloy Products				Steel mill
0647	University of Pittsburgh (Main Campus)				Boilers
0029	U.S. Steel Clairton	3312			Manufactures metallurgical coke for use in the steelmaking process at various steel mills
0051	U.S. Steel ET	3312			Iron & steel producing facility
0022	U.S. Steel Irvin	3312			Manufacturing of steel slabs, hot rolled, cold reduced, & finished steel coils

B.

Documentation of First Public Hearing and Certifications

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

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 2008 8-Hour ozone on subject sources of volatile organic compounds (VOC) in Allegheny County, on **Monday, June 4, 2018** beginning at 10:00 AM in the Conference Room of Building #7 of Clack Health Center, 301 39th St., Pittsburgh, PA, 15201.

The proposed change to the plan does not impose any new requirements on any Allegheny County source. Rather, it certifies that the Article XXI Control Techniques Guidelines based regulations are RACT for the 2008 8-Hour Ozone NAAQS.

The proposed certification 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 Friday May 4, 2018, 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 412-578-8115 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 **Friday May 4, 2018**, and concluding **Saturday June 9, 2018**, by mail to:

Board of Health
c/o Air Program
301 39th Street
Pittsburgh, PA 15201
By email to aqcomments@alleghenycounty.us
By Fax to 412-578-8144

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

May 3, 2018

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

Dear Ms. Fernandez:

Enclosed is a Notice of Public Hearing and proposed revision to Allegheny County's portion of the Pennsylvania State Implementation Plan certifying that Article XXI Control Techniques Guidelines based regulations are RACT for the 2008 8-Hr Ozone NAAQS. This SIP revision is being tracked internally under our Revision Tracking Number 84.

The public comment period begins May 4, 2018 and concludes June 9, 2018. The public hearing will be held June 4, 2018. Your comments are welcome.

Sincerely,

Sandra Etzel, Manager
Air Quality Program Planning Section

cc: Emlyn Velez-Rosa

Enclosures

- Public Hearing Notice
- Proposed ACHD SIP Revision

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

May 3, 2018

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

Dear Mr. Ramamurthy:

Enclosed is a Notice of Public Hearing and proposed revision to Allegheny County's portion of the Pennsylvania State Implementation Plan certifying that Article XXI Control Techniques Guidelines based regulations are RACT for the 2008 8-Hr Ozone NAAQS. This SIP revision is being tracked internally under our Revision Tracking Number 84.

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Sincerely,

Sandra Etzel, Manager
Air Quality Program Planning Section

cc: Kirit Dalal
Steve Hepler

Enclosures

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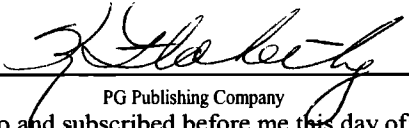
Proof of Publication of Notice in Pittsburgh Post-Gazette

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 K. Flaherty, 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:

04 of May, 2018

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.


 PG Publishing Company
 Sworn to and subscribed before me this day of:
 May 04, 2018



Commonwealth of Pennsylvania - Notary Seal
 Elizabeth R. Chmura, Notary Public
 Allegheny County
 My commission expires February 8, 2022
 Commission number 1326781
 Member, Pennsylvania Association of Notaries

STATEMENT OF ADVERTISING COSTS
 ALLEGHENY COUNTY HEALTH DEPT-LEG
 542 4TH AVENUE
 PITTSBURGH PA 15219

To PG Publishing Company

Total ----- \$82.95

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office
 2201 Sweeney Drive
 CLINTON, PA 15026
 Phone 412-263-1338

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

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

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 2008 8-Hour ozone on subject sources of volatile organic compounds (VOC) in Allegheny County, on Monday, June 4, 2018 beginning at 10:00 AM in the Conference Room of Building #7 of Clack Health Center, 301 39th St., Pittsburgh, PA, 15201.

The proposed change to the plan does not impose any new requirements on any Allegheny County source. Rather, it certifies that the Article XXI Control Techniques Guidelines based regulations are RACT for the 2008 8-Hour Ozone NAAQS.

The proposed certification will be submitted to U.S. EPA as a revision to the Pennsylvania State Implementation Plan.

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 Board of Health
 c/o Air Program
 301 39th Street
 Pittsburgh, PA 15201
 By email to aqcomments@alleghenycounty.us
 By Fax to 412-578-8144

Amendment to Allegheny County's Portion of the
Pennsylvania State Implementation Plan for the
8-Hour Ozone National Ambient Air Quality Standard --
Certification that Article XXI Control Techniques Guidelines based
Regulations are RACT for the 2008 8-Hr Ozone NAAQS

Thomas 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 June 4, 2018 on the proposed amendment to Allegheny County's portion of the PA SIP demonstrating that the Article XXI CTG-based regulations are RACT for the 2008 8-Hr Ozone NAAQS; 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 May 4, 2018; 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 Lattner 6-12-2018
Thomas Lattner, Date
Air Pollution Control Engineer
Air Quality Program
Allegheny County Health Department

SUMMARY OF COMMENTS AND RESPONSES

for

SIP Revision 84A

**Amendment to Allegheny County's Portion of the
Pennsylvania State Implementation Plan for the
8-Hour Ozone National Ambient Air Quality Standard --
Certification that Article XXI Control Techniques Guidelines based
Regulations are RACT for the 2008 8-Hr Ozone NAAQS**


Public Comment Period: May 4 to June 9, 2018

Public Hearing: June 4, 2018

No comments were received during the public comment period.

CERTIFICATION of APPROVAL and ADOPTION

To the best of my knowledge, information, and belief, I the undersigned hereby certify that the amendment to the County's portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the National Ambient Air Quality Standards, "Certification of Article XXI Control Techniques Guidelines based regulations are RACT for the 2008 8-Hr Ozone National" adopted by the Allegheny County Board of Health on May 2, 2018, was duly and properly enacted as prescribed by the Local Health Administration Law and the Allegheny County Home Rule Charter, and as such, are fully and legally enforceable by the Allegheny County Health Department and the County of Allegheny as provided for by the within authority.



Michael A. Parker, Esq.
Solicitor
Allegheny County Health Department

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF ALLEGHENY

On the 13th day of June, 2018,

Michael A. Parker personally appeared before me, the undersigned authority, satisfactorily proven to me to be the person whose name appears above, and did in my presence execute the above certification for the purposes contained therein.

WHEREFORE, I have hereunto set my hand and official seal the 13th day of June, 2018.



Bernadette Kovac
Notary Public
Allegheny County Health Department

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

Bernadette G. Kovac, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Aug. 20, 2019

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES