

**COUNTY OF**



**ALLEGHENY**

August 28, 2023

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

The Allegheny County Health Department (ACHD) 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 2015 Ozone National Ambient Air Quality Standards. This SIP revision request consists of the addition of §2105.08, "Additional RACT Requirements for Major Sources of Nitrogen Oxides and Volatile Organic Compounds for the 2015 Ozone NAAQS," with the exception of the last sentence of §2105.08.a, to Article XXI, Air Pollution Control Rules and Regulations, and County Ordinance 16782.

New §2105.08 incorporates by reference the additional RACT requirements for major sources of nitrogen oxides and volatile organic compounds recently promulgated by the Pennsylvania Environmental Quality Board (EQB) and Department of Environmental Protection (PA DEP) under the Pennsylvania Air Pollution Control Act at 25 Pa. Code §§ 129.111—129.115, and the related definitions at 25 Pa. Code § 121.1. However, as described in PA DEP Secretary Ramez Ziadeh's January 13, 2023 letter (attached) transmitting these Pennsylvania regulations to the U.S. Environmental Protection Agency (EPA) as a revision to the Pennsylvania SIP, § 129.115(c)(2), (c)(3), and (c)(4), applicable to the owner or operator of a combined cycle combustion turbine, are not included as revisions with the PA DEP SIP submission. These three paragraphs contain errors in the mass-equivalent basis limits or the cross references, or both, and are excluded by the PA DEP from its SIP revision submission. The PA DEP Secretary's letter states that these provisions will not be implemented as presumptive RACT requirements until the EQB addresses corrections to these three paragraphs in the future. Accordingly, ACHD will likewise not implement the provisions of § 129.115(c)(2), (c)(3), and (c)(4), incorporated by reference into Article XXI at §2105.08, until they are corrected in 25 Pa. Code § 129.115. Also, accordingly, ACHD requests that those provisions be excluded from this ACHD SIP submittal. When the PA DEP regulations are revised, ACHD's Article XXI will automatically incorporate those revisions by reference.



**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

301 39<sup>TH</sup> STREET • CLACK HEALTH CENTER • BUILDING 7  
PITTSBURGH, PA 15201-1811  
PHONE (412) 578-8103 • FAX (412) 578-8144  
24-HR (412) 687-ACHD (2243)  
[WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT](http://WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT)

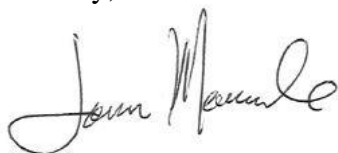


This SIP Revision, being tracked by our internal Revision Tracking Number 98, was the subject of a public comment period from July 18, 2022, through and including August 18, 2022, with a public hearing held on August 18, 2022. The Allegheny County Board of Health approved it on September 7, 2022. Allegheny County Council enacted it on October 25, 2022, it was signed by the Allegheny County Executive on October 26, 2022, and it became effective January 1, 2023.

ACHD followed all 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://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 PA DEP approve this revision and forward it to the U.S. EPA Region III Administrator with a recommendation for approval. If you have any questions, please contact me at (412) 578-8104 or [jason.maranche@alleghenycounty.us](mailto:jason.maranche@alleghenycounty.us).

Sincerely,



Jason Maranche, Manager  
Air Quality Planning and Data Assessment Program  
Allegheny County Health Department

cc: Geoffrey Rabinowitz (ACHD)  
Kirit Dalal (PA DEP)  
Stephen Hepler (PA DEP)  
Susan Hoyle (PA DEP)

Attachments:

- SIP 98, Addition of §2105.08,  
“Additional RACT Requirements for Major Sources  
of Nitrogen Oxides and Volatile Organic Compounds  
for the 2015 Ozone NAAQS”
- PA DEP January 13 Letter, Ziadeh to Ortiz