

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

**NOTICE OF VIOLATION**

December 6, 2021

**CERTIFIED MAIL - 9489 0090 0027 6037 9320 44**

Mr. Douglas Jackson  
Director of Operations & Maintenance  
Deputy Executive Director  
Allegheny County Sanitary Authority  
3300 Preble Avenue  
Pittsburgh, PA 15233

**RE: Notice of Violation #211203** - Violation of 40 CFR 62 Subpart LLL at ALCOSAN,  
3300 Preble Avenue, Pittsburgh, PA 15233

Dear Mr. Jackson:

After a review of the Fluidized Bed Incinerator 2 (FBI-2) Emission Testing report received on August 24, 2021, the Allegheny County Health Department (ACHD) has determined the Allegheny County Sanitary Authority (ALCOSAN) exceeded the federal limits for lead and cadmium. 40 CFR § Part 62 Subpart LLL - Federal Plan Requirements for Sewage Sludge Incineration Units Constructed on or Before October 14, 2010 – lists the compliance limits in Table 2. The test results for the June 22-24, 2021 compliance test and the emission limit for these pollutants detailed in 40CFR 62, subpart LLL are shown below.

| <b>Sewage Sludge Incinerator Emission Test (all units mg/dscm @7% O<sub>2</sub>)</b> |                  |                       |                         |                   |
|--|------------------|-----------------------|-------------------------|-------------------|
| <b>Testing Date</b>  | <b>Pollutant</b> | <b>Average Result</b> | <b>Compliance Limit</b> | <b>Exceedance</b> |
| <b>June 22, 2021</b>   | <b>Lead</b>      | 0.1130                | 0.0074                  | +1430%            |
| <b>June 22, 2021</b>   | <b>Cadmium</b>   | 0.0032                | 0.0016                  | +100%             |

The ACHD has determined that ALCOSAN is in violation of Federal Plan Requirements for Sewage Sludge Incineration Units by exceeding the compliance limit for lead and cadmium shown in Table 2 of the beforementioned subpart.

**This Notice of Violation is neither an order nor any other final action of the Allegheny County Health Department. It neither imposes nor waives any enforcement action**



DEBRA BOGEN, MD, DIRECTOR  
**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)



**available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action. Please be aware that any violation of the Article XXI regulations subjects a person to a variety of enforcement actions, including a civil penalty of up to \$25,000 per violation per day.**

The Allegheny County Health Department is currently reviewing this violation to determine whether corrective actions are required and if a civil penalty is appropriate. Should you have any questions or require additional information, please contact Hudson Tiffany at (412) 578-8119 or email at [Hudson.Tiffany@AlleghenyCounty.US](mailto:Hudson.Tiffany@AlleghenyCounty.US).

Sincerely,

A handwritten signature in blue ink that reads "Shannon Sandberg". The signature is written in a cursive, flowing style.

Shannon Sandberg  
Enforcement Section Chief  
Air Quality Program