

**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

In the Matter of:

Synthomer Jefferson Hills, LLC

Violation No. 25\_\_\_\_\_

Violations of Article XXI ("Air Pollution Control") at property:

Synthomer Jefferson Hills, LLC  
2200 State Highway 837  
P.O. Box 545  
West Elizabeth, PA 15088

**ENFORCEMENT ORDER**

**NOW**, this 20th day of October 2025 the Allegheny County Health Department (hereinafter "ACHD") issues this Enforcement Order after it has found and determined the following:

**I. AUTHORITY**

1. The Director of ACHD has been delegated authority pursuant to the federal Clean Air Act, 42 U.S.C. Sections 7401 -7671q (hereinafter "CAA"), and the Pennsylvania Air Pollution Control Act, 35 P.S. Sections 4001-4014 (hereinafter "APCA"), and ACHD is a local health agency organized under the Local Health Administration Law, 19 P.S. §§ 12001-12028, whose powers and duties include the enforcement of laws relating to public health within Allegheny County, including, but not limited to, ACHD's Rules and Regulations, Article XXI, "Air Pollution Control" (Allegheny County Code of Ordinances Chapters 505, 507 and 535) (hereinafter "Article XXI").

## **II. BACKGROUND**

2. Synthomer Jefferson Hills, LLC (hereinafter “Synthomer”) produces synthetic hydrocarbon resins for use in adhesives and other products at a facility in West Elizabeth, Allegheny County, Pennsylvania.

3. On August 31, 2020, ACHD issued amended Installation Permit 0058-I011e to Eastman Chemical Resins (hereinafter “Eastman”), which owned and operated the West Elizabeth facility at the time.

4. On April 1, 2022, Synthomer acquired the West Elizabeth facility and assumed all permits, responsibilities, and liabilities pertaining thereto.

5. Condition V.A.1.k of Installation Permit 0058-I011e enumerates the annual limit for nitrogen oxides (hereinafter, “NO<sub>x</sub>”) of the C-5 Thermal Oxidizer (hereinafter the “TO”) as 5.99 pounds per hour (hereinafter, “lb/hr”).

6. During May 31, 2023 – June 1, 2023, Synthomer conducted a compliance test on the TO stack (the “May stack test”).

7. Synthomer submitted the report for the TO stack on July 27, 2023.

8. The results of the May stack test showed NO<sub>x</sub> emissions of 12.35 lb/hr, exceeding the limit from Installation Permit 0058-I011e.

9. During the time periods of July 12-14 and July 17-20, 2023, Synthomer, made process adjustments and completed diagnostic testing on the TO for the C-5 process.

10. The diagnostic testing showed that emissions of Nitrogen Oxides decreased by approximately 30% from compliance stack test levels but remained above the permit limit of 5.99 pounds per hour.

11. On August 31, 2023, Synthomer submitted an installation permit application and fee payment to ACHD.

12. On September 7, 2023, ACHD and Synthomer met and discussed the facility's compliance history with Synthomer introducing the possibility of modifying the C-5 process that would utilize sodium hydroxide as a caustic agent, along with ammonia, instead of ammonia alone.

13. Synthomer initially stored the sodium hydroxide in a tanker truck.

14. On September 8, 2023, Synthomer submitted a Request for Determination ("RFD") to begin the use of the caustic agent in the C-5 process.

15. On September 11, 2023, ACHD approved the RFD for a 14-day trial period and identified various parameters that must be monitored.

16. On September 14, 2023, Synthomer submitted an emissions testing protocol to perform compliance testing within the trial window for the caustic configuration set up and a reduced production all-ammonia configuration.

17. On September 15, 2023, ACHD approved the protocol.

18. Synthomer performed emissions testing during September 19-22, 2023 period using the tanker truck holding the caustic agent.

19. On September 27, 2023, Synthomer submitted a revision of the August 31, 2023 Installation Permit modification application.

20. On October 11, 2023, at ACHD's request, Synthomer provided information regarding resin production, process operating hours, and Funda filter operating hours for June 1 through September 19, 2023.

21. The provided information shows that the C-5 process operated after Synthomer received the report for the May stack test with both Funda filters operating under similar

conditions to those during the May stack test for at least part of each day during the following periods: June 2-24, 2023; July 4-8, 2023; July 12-14, 2023 (during diagnostic emissions testing); July 17-25, 2023 (including during diagnostic emissions testing on July 17-20); and July 30 through August 8, 2023.

22. Synthomer submitted a report for emissions testing using either caustic substitution or reduced production with all-ammonia on October 23, 2023. Synthomer submitted an amended report on October 31, 2023.

23. The test report showed that the three-run average emissions of Nitrogen Oxides for the caustic configuration was 5.2 pounds per hour and the three-run average for the reduced production ammonia configuration was 5.53 pounds per hour.

24. On November 1, 2023, Synthomer and ACHD entered into a Consent Order allowing Synthomer to continue to operate using the temporary caustic configuration until the Installation Permit modification was approved and installation of a permanent storage tank to supply caustic to the C-5 neutralizer in substitution of ammonia was completed.

25. The November 1, 2023 Consent Order required submission of monthly reports regarding operation of the C-5 process with the temporary caustic configuration using tanker trucks.

26. On November 16, 2023, ACHD issued Installation Permit #0058-I011f to Synthomer for installation of a permanent caustic neutralization system.

27. The reports required under the Consent Order were timely submitted and showed that Synthomer operated the C-5 process in compliance with the Consent Order at all times.

28. Synthomer notified ACHD on February 20, 2024 that the permanent caustic neutralization had been installed, thereby terminating the Consent Order.

### **III. FINDINGS OF VIOLATIONS**

29. Synthomer performed a test of the C-5 Thermal Oxidizer stack that resulted in exceedance of their emission limit from Installation Permit 0058-I011e.
30. Synthomer continued to operate the C-5 Process Unit under similar conditions to those resulting in the failed test during June, July, and August of 2023.
31. Such exceedance of the emission limit and continued operation in violation of the emission limit constitutes a violation of Article XXI, §2103.12.a.2 and 2101.11.a.1.

#### **IV. ORDER**

**NOW THEREFORE**, pursuant to the authority granted to the ACHD by Article XXI §§ 2109.02 and 2109.06 and the Local Health Administration Law, 19 P.S. § 12010, it is hereby ORDERED that:

32. For the violations set forth in the preceding paragraphs, Synthomer is hereby assessed a civil penalty of **FORTY SIX THOUSAND FOUR HUNDRED DOLLARS** (\$46,400.00). The civil penalty is as follows:

**A. Gravity Based Component**

<b>Violation</b>	<b>Gravity Based Penalty</b>	<b>Violations</b>	<b>Total Gravity Penalty</b>
Exceedance of IP 0058-I011e emission limit for NO <sub>x</sub> during TO stack test (Article XXI, § 2103.12.a.2)	\$5,000.00	1	\$5,000.00
Operation of the C-5 Process with a failed stack test in June, July and August of 2023. (Article XXI, §2101.11.a.1)	\$9,000.00	3	\$27,000.00
<b>GRAVITY COMPONENT SUBTOTAL</b>			<b>\$32,000.00</b>

**B. Adjustment Factors**

<b>Compliance History: One enforcement action</b>	\$8,000.00
<b>Title V Source: Title V Source</b>	\$ 6,400.00
	<b>TOTAL CIVIL PENALTY</b>

33. Synthomer shall pay the civil penalty amount within thirty (30) days of receipt of this Order. Payment shall be made by corporate or certified check, or the like, made payable to the “Allegheny County Clean Air Fund,” and sent to Air Quality Program Manager, Allegheny County Health Department, 836 Fulton Street, Pittsburgh, PA 15233.

34. The ACHD has determined the above civil penalty to be in accordance with Article XXI § 2109.06.b., reflecting relevant factors, including, but not limited to: the nature, severity and frequency of the alleged violations; the maximum amount of civil and criminal penalties authorized by law; the willfulness of such violations; the impact of such violations on the public and the environment; the actions taken by Synthomer to minimize such violations and to prevent future violations; and Synthomer's compliance history.

35. Pursuant to Article XXI § 2109.06.a.5. and Article XI § 1104.A ("Hearings and Appeals"), of the Allegheny County Health Department Rules and Regulations, you are notified that if you are aggrieved by this Order, you must file a Notice of Appeal no later than thirty (30) days after receipt of written notice or issuance of this Order. Such a Notice of Appeal shall be filed in the Office of the Director at 542 Fourth Avenue, Pittsburgh, PA 15219. This Order is enforceable upon issuance, and any appeal of this Order shall not act as a stay unless the Director of the ACHD or the Hearing Officer so orders. If you do not timely appeal, the terms of this Order shall become final.

36. Please be aware that if you wish to appeal this Order, within thirty (30) days of receipt of this Order, you must also either forward the penalty amount to the ACHD for placement in an escrow account, post an appeal bond to the ACHD in the amount of the penalty, or claim an inability to prepay the penalty or post a bond. Failure to take such steps shall result in a waiver of any right to challenge this Order. Please review the specific requirements for prepaying the penalty or posting the appeal bond found in Article XXI §§ 2109.06.a.2-3. A copy of Article XXI and Article XI may be found at <https://www.alleghenycounty.us/Health-Department/Health-Department-Regulations.aspx>.

**DONE** and **ENTERED** this 20th day of October 2025, in Allegheny County,

Pennsylvania.

  
\_\_\_\_\_  
Allason Holt  
Air Quality Program  
Compliance and Enforcement Program Manager

10/20/2025

Date