

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

Air Quality Program

301 39th Street, Clack Health Center Building 7, Pittsburgh, PA 15201-1811
ph: 412.578.8103 • 24-hr: 412.687.ACHD (2243) • www.alleghenycounty.us/healthdepartment

SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

APPLICANT INFORMATION

The Air Pollution Mitigation Plan is submitted by affected facilities to meet the requirements of Allegheny County regulations found in §2106.06 (Mon Valley Air Pollution Episode) of Article XXI.

01 Facility Information

Name of Facility	CP Industries	
Address	2214 Walnut Street	
City State Zip+4	McKeesport PA 15132	
Permit #	0203-OP21	Phone 570 862-8829

02 Environmental Contact Information (Person to contact regarding technical details of this mitigation plan)

Name/Title	Gordon Peterson / EHS Consultant	
Address	1523 Mt Cobb Road	
City State Zip+4	Jefferson TWSP 18436	
Email	gpeterson@krigerconstruction.com	Phone 570 862-8829

03 Responsible Official Information

Name/Title	Michael C. Larson / President	
Address	2214 Walnut Street	
City State Zip+4	McKeesport PA 15132	



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Email	NA	Phone	NA
04	AFFIDAVIT		
<p>I certify that, subject to the penalties of Title 18Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the operation of the facilities to which this air pollution mitigation plan applies and that the information provided in this mitigation plan is true, accurate and complete to the best of my knowledge, information and belief formed after reasonable inquiry.</p>			
Signature:		Date 12/25/2021	
Typed/Printed Name: Michael C. Larson			



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05 List all equipment or processes at your facility that emit PM₁₀ and/or PM_{2.5}

Natural Gas Combustion (B001-B005), Abrasive Blasting (P001,P002, and P003, Grinding Operations (P004 and P005), Painting (P006)

WATCH PHASE OF MITIGATION PLAN

06 How will your facility ensure that equipment which produces particulate emissions is operating in a manner consistent with optimal engineering practices?

As appropriate the operations are monitored to see that the control systems are in place and operating properly per the current Air Permit. Pressure drops are monitored on an ongoing basis on all bag houses when operating.

Additional Actions:

- Review meetings will be conducted with Maintenance Department Personnel ensure all equipment is properly operating in a way to minimize air emissions.
- On-call employees are assigned to ensure facility is fully staffed for a warning phase.

07 How will your facility ensure that air pollution control equipment is maintained in optimal working condition?

It is monitored per the available metering and emissions checked on an ongoing basis. All required maintenance on installed equipment is done in a complete and timely fashion.

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Additional Actions:

- CPI's maintenance department inspect equipment which may have a potential to increase emissions to ensure proper operation and maintenance. The facility is following the idling requirements under Act 124 of the PA Department of Environmental Protection regulations. This ensures the facility is operating in a manner consistent with good engineering practices.
- Review meetings and training are conducted on an as needed basis.

08 How will your facility ensure that actions taken in blocks 05 and 06 are properly monitored, recorded, and reported to the Health Department?

The Maintenance Department is already involved in monitoring and recording all control information as well as operating times. They will record all applicable information of the mitigation program and submit a summary of the information to ACHD at the end of the event.

WARNING PHASE OF MITIGATION PLAN

09 How will your facility ensure that procedures are in place so enough staff and resources are available to implement the Mon Valley Air Pollution Warning Phase within 24 hours of the notification from ACHD?

Should an event occur there will always be available staff as the shut down of the required operation can be easily handled by the Maintenance Department in less than 24 hours from the time of notification. The head of maintenance will specifically ensure this occurs for the needed period.

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- 10** For every process and piece of equipment, list all available methods to reduce PM_{2.5}/PM₁₀ emissions from your four-year hourly average. During an actual warning phase, the actions to reduce emissions must last the length of the episode.

The equipment producing PM 2.5 and PM 10.0 emissions were reviewed and evaluated. A results conference call was held with ACHD technical staff. The majority of the emissions are ambient with no additional control points. It was determined that a large portion of the emissions are associated with the grinding and the painting process. As the actual emissions from the painting operation is limited in concert with ACHD technical personnel it was determined that the most effect reduction that is feasible would be to halt operation of the grinding operations (P004 and P005, #1, #2, and #3 Automatic Grinders) during the event period. Cpi is committed to this solution and has developed procedures to see this occurs.

- 11** For each piece of equipment and process, determine which emission reduction methods are feasible. List whether each method is feasible or infeasible and provide a justification for your determination.

As discussed in section 10 it was determined that the only feasible option was the shut down of either the paint or grinding operation. The largest reduction comes from shutdown of the grinding operation which is permitted at maximum feasible emissions for 9.14 Tons/Year. ACHD agreed this would be an acceptable mitigation plan.

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12 How will your facility ensure that actions taken in block 10 are properly monitored, recorded, and reported to the Health Department

CPI will provide the Health Department a report, submitted after the warning phase has ended, itemizing what actions were taken to meet the requirements of the warning phase.

13 Provide an active spreadsheet containing the following:

- Calculations of your facility's PM_{2.5} and PM₁₀ emissions for each of the past four years (2017-2020) in tons/year for every piece of equipment and process;
- Calculation of average four year emissions of PM_{2.5} and PM₁₀ in lbs/hr for each piece of equipment and process;
- Feasible PM_{2.5} and PM₁₀ emission reductions in lbs/hr that will occur during a warning phase for every piece of equipment and process as well as the facility total; and
- Feasible PM_{2.5} and PM₁₀ emission reductions in percent reduced from the hourly four year average for every piece of equipment and process as well as the facility total percent reduction.

Spreadsheet has been submitted separately to ACHD.

14 How much time will be required for your facility to implement the emission reductions in block 10?

The emission reductions will be in place by January 6, 2022.

Emissions inventory calculations Particulate

Maximum Potential Emissions	PM 10/2.5	
	MAX (tons/yr)	MAX (lb/hr)
P004 #1 or #2 ID Grinder	9.14	18.7
P005 #3 ID Grinder	9.14	18.7
P006 Painting	8.81	4.6
P001 Cabinet Abrasive Blasting	3.43	0.78
P002 OD Abrasive Blasting	1.18	0.27
P003 ID Abrasive Blasting	1.19	0.27

	Tons/yr	lb/hr
P004		
2020 Estimated Actual Emissions	1.12422	2.3001
2019 Estimated Actual Emissions	0.64894	1.3277
2018 Estimated Actual Emissions	1.06938	2.1879
2017 Estimated Actual Emissions	0.99626	2.0383
P005		
2020 Estimated Actual Emissions	1.12422	2.3001
2019 Estimated Actual Emissions	0.64894	1.3277
2018 Estimated Actual Emissions	1.06938	2.1879
2017 Estimated Actual Emissions	0.99626	2.0383

	lbs/hr
Proposed Hourly Average emissions reduction P004	1.96
Proposed Hourly Average emissions reduction P005	1.96

Emissions inventory calculations Particulate

Maximum Potential Emissions	PM 10/2.5	
	MAX (tons/yr)	MAX (lb/hr)
P004 #1 or #2 ID Grinder	9.14	18.7
P005 #3 ID Grinder	9.14	18.7
P006 Painting	8.81	4.6
P001 Cabinet Abrasive Blasting	3.43	0.78
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P003 ID Abrasive Blasting	1.19	0.27

	Tons/yr	lb/hr
P004		
2020 Estimated Actual Emissions	1.12422	2.3001
2019 Estimated Actual Emissions	0.64894	1.3277
2018 Estimated Actual Emissions	1.06938	2.1879
2017 Estimated Actual Emissions	0.99626	2.0383
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2020 Estimated Actual Emissions	1.12422	2.3001
2019 Estimated Actual Emissions	0.64894	1.3277
2018 Estimated Actual Emissions	1.06938	2.1879
2017 Estimated Actual Emissions	0.99626	2.0383

	lbs/hr
Proposed Hourly Average emissions reduction P004	1.96
Proposed Hourly Average emissions reduction P005	1.96

Emissions inventory calculations Particulate

Maximum Potential Emissions	PM 10/2.5			
	MAX (tons/yr)	MAX (lb/hr)	emission/production factors	
P004 #1 or #2 ID Grinder	9.14	18.7		
P005 #3 ID Grinder	9.14	18.7	2020	0.123
P006 Painting	8.81	4.6	2019	0.071
P001 Cabinet Abrasive Blasting	3.43	0.78	2018	0.117
P002 OD Abrasive Blasting	1.18	0.27	2017	0.109
P003 ID Abrasive Blasting	1.19	0.27		

	Tons/yr	lb/hr
P004		
2020 Estimated Actual Emissions	1.12422	2.3001
2019 Estimated Actual Emissions	0.64894	1.3277
2018 Estimated Actual Emmissions	1.06938	2.1879
2017 Estimated Actual Emissions	0.99626	2.0383
P005		
2020 Estimated Actual Emissions	1.12422	2.3001
2019 Estimated Actual Emissions	0.64894	1.3277

2018 Estimated Actual Emissions	1.06938	2.1879
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2017 Estimated Actual Emissions	0.99626	2.0383
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lbs/hr

Proposed Hourly Average emissions reduction P004	1.96
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Proposed Hourly Average emissions reduction P005	1.96
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Other P10/2.5 emissions

P006

2020 Estimated Actual Emissions	1.08363	0.5658
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2019 Estimated Actual Emissions	0.62551	0.3266
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2018 Estimated Actual Emissions	1.03077	0.5382
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2017 Estimated Actual Emissions	0.96029	0.5014
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P001

2020 Estimated Actual Emissions	0.42189	0.09594
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2019 Estimated Actual Emissions	0.24353	0.05538
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2018 Estimated Actual Emissions	0.40131	0.09126
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2017 Estimated Actual Emissions	0.37387	0.08502
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P002

2020 Estimated Actual Emissions	0.14514	0.03321
2019 Estimated Actual Emissions	0.08378	0.01917
2018 Estimated Actual Emissions	0.13806	0.03159
2017 Estimated Actual Emissions	0.12862	0.02943

P003

2020 Estimated Actual Emissions	0.14637	0.03321
2019 Estimated Actual Emissions	0.08449	0.01917
2018 Estimated Actual Emissions	0.13923	0.03159
2017 Estimated Actual Emissions	0.12971	0.02943