

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	North Central Processing Inc.		
Address	PO Box 93941		
City State Zip+4	Cleveland OH 44101		
Permit #	0927-I001	Phone	216-832-7027

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

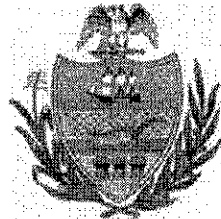
Name/Title	Jim Holdren / VP		
Address	PO Boc 93941		
City State Zip+4	Cleveland OH 44101		
Email	jim@ncepcarbon.com	Phone	216-832-7027

03 Responsible Official Information

Name/Title	Jim Holdren / VP		
Address	PO Box 93941		
City State Zip+4	Cleveland OH 44101		



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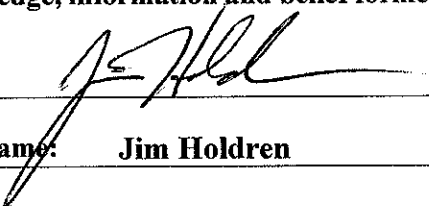
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Email	<u>jim@nepcarbon.com</u>	Phone	216-832-7027
04 AFFIDAVIT			
I certify that, subject to the penalties of Title 18Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the operation 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.			
Signature:		Date	12/10/2021
Typed/Printed Name:	Jim Holdren		



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

Dryer

Shaker/Screen/process

Storage Piles

Roadways

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?

All NCP employees are trained to observe that the equipment is operating as designed. If equipment is faulty, the employee must inform the manager, record the incident and fix it immediately or shut down the operation.

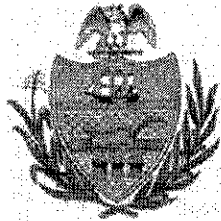
07 How will your facility ensure that air pollution control equipment is maintained in optimal working condition?

All NCP employees are trained to observe that the air pollution control equipment is operating as designed. Daily and weekly maintenance is performed on the air pollution equipment. Faulty equipment is fixed immediately or the plant operation is shut down.

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

NCP keeps records and reports them to the county per our permit.

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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?

NCP is a small operation. We have 2-3 employees on staff during operation. 2 more employees are located at our Cleveland facility and can be onsite if needed within 24 hours.

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.

Dryer = Reduce the throughput 20% to reduce the emissions.

Screen/Process = Reduce the throughput 20% to reduce the emissions.

Storage Piles = Water the piles to reduce the emissions

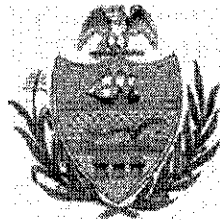
Roadways = Water the roads to reduce the emissions

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.

The first two methods above are feasible for a warning phase. The last two methods are feasible all the time.

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

The watering of roads and piles are already recorded. If a warning phase event happens NCP will record the time and reduce the process at least 20% within 8 hours. NCP will record the event and all actions taken on its daily reports.



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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.

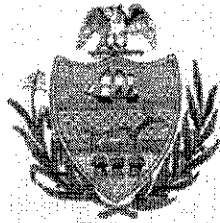
	Ave tons/yr		Ave lbs / hr		Reduction	Reduced lbs / hr	
	PM 2.5	PM 10	PM 2.5	PM 10		PM 2.5	PM 10
Dryer	6.5	6.5	1.48	1.48	20%	1.19	1.19
Process	2.98	2.98	0.68	0.68	20%	0.54	0.54
Piles	0.28	0.24	0.06	0.05	75%	0.02	0.01
Roads	0.24	0.06	0.05	0.01	75%	0.01	0.00
Total	10	9.78	2.28	2.23	22%	1.76	1.75

Warning Start:
 Warning Stop:
 Reduced or stopped:
 Reduced production rate:
 Actual Run time:

Actual Reduction in emissions

This spreadsheet will be used to calculate actual emission reductions that will be reported to the Health Department after warning phases have ended.

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

8 hours

Max per Permit			
<u>Processing rates</u>			
Tons pre year =	50000		
Tons per hour =	20		
	<u>PM lbs/hr</u>	<u>Hours</u>	<u>Tons/yr</u>
Dryer	1.69	8760	7.40
Process	0.68	8760	2.98
Handling/piles	0.08	8760	0.34
Roads	0.27	8760	1.19
Total	2.72		11.91

Reduction Rate 20%
New Run rate 16

	<u>PM lbs/hr</u>	<u>PM lbs/hr</u>	<u>Diff</u>
Dryer	1.69	1.35	0.34
Process	0.68	0.54	0.14
Handling/piles	0.08	0.06	0.02
Roads	0.27	0.22	0.05
Total	2.72	2.17	0.54

2019 (1st year) actual			
Tons:	39000		
Run rate:	20		
	<u>PM lbs/hr</u>	<u>Hours</u>	<u>Tons/yr</u>
Dryer	1.69	1950	1.65
Process	0.68	1950	0.66
Handling/piles	0.08	8760	0.34
Roads	0.27	1950	0.26
Total	2.72		2.91

2020 actual			
Tons:	22000		
Run rate:	20		
	<u>PM lbs/hr</u>	<u>Hours</u>	<u>Tons/yr</u>
	1.69	1100	0.93
	0.68	1100	0.37
	0.08	8760	0.34
	0.27	1100	0.15
Total	2.72		1.79

2021 actual			
Tons:	42000		
Run rate:	20		
	<u>PM lbs/hr</u>	<u>Hours</u>	<u>Tons/yr</u>
	1.69	2100	1.77
	0.68	2100	0.71
	0.08	8760	0.34
	0.27	2100	0.28
Total	2.72		3.11

Average		
	<u>PM lbs/hr</u>	<u>Tons/yr</u>
	1.69	1.45
	0.68	0.58
	0.08	0.34
	0.27	0.23
Total	2.72	2.60