

COUNTY OF



ALLEGHENY

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

WATCH/WARNING PLAN 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 **U. S. Steel Mon Valley Works – Clairton Plant**

Address **400 State Street**

City State Zip+4 **Clairton, PA 15025**

Permit # **0052** Phone **(412) 233-1467**

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

Name/Title **Michael G. Dzurinko**

Address **400 State Street**

City State Zip+4 **Clairton PA**

Email **mdzurinko@uss.com** Phone **(412) 233-1467**

03 Responsible Official Information

Name/Title **Kurt A. Barshick**

Address **P. O. Box 878**

City State Zip+4 **Dravosburg, PA 15034**



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Email	kbarshick@uss.com	Phone (412) 675-2600
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 3-2-2022
Typed/Printed Name:	Kurt A. Barshick	



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

1. Coke Battery No. 1
2. Coke Battery No. 2
3. Coke Battery No. 3
4. Coke Battery No. 13
5. Coke Battery No. 14
6. Coke Battery No. 15
7. Coke Battery No. 19
8. Coke Battery No. 20
9. Coke Battery B
10. Coke Battery C
11. Quench Tower No. 1 (Serves Batteries 1, 2 and 3)
12. Quench Tower No. 5 (Auxiliary Quench Tower for Batteries 13, 14 and 15)
13. Quench Tower No. 7 (Auxiliary Quench Tower for Batteries 19 and 20)
14. Quench Tower No. 5A (Serves Batteries 13, 14 and 15)
15. Quench Tower No. 7A (Serves Batteries 19 and 20)
16. Desulfurization Plant
17. Keystone Cooling Tower
18. Coke By-Product Recovery Plant
19. Continuous Barge Unloader No. 1
20. Continuous Barge Unloader No. 2
21. Pedestal Crane Unloader
22. Clam Shell Unloader
23. Coal Transfer
24. No. 1 Primary Pulverizer
25. No. 1 Secondary Primary Pulverizer
26. No. 2 Primary Pulverizer
27. No. 2 Secondary Primary Pulverize
28. Surge Bins and Bunkers (Coal)
29. Coke Transfer (1st Unit)
30. Coke Transfer (2nd Unit)
31. Coke Transfer (C Battery)
32. Coke Screening Station No. 1 (Batteries 1-3)
33. Coke Screening Station No. 2 (Batteries 13-15, 19 and 20)



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- 34. Coke Screening Station No. 4 (Batteries B and C)
- 35. Boom Conveyor (Coal Pile Destocking)
- 36. Coal and Coke recycle Screening
- 37. Coke Screening – Peters Creek
- 38. Boiler No. 1
- 39. Boiler No. 2
- 40. R1 Boiler
- 41. R2 Boiler
- 42. T1 Boiler
- 43. T2 Boiler
- 44. Ammonia Flare
- 45. Coal Storage Piles
- 46. Coke Storage Pile – Peters Creek
- 47. Coke Storage Pile – South Yard
- 48. Fugitive Emissions (Plant Roadways)
- 49. Misc. Fugitive Emissions (Abrasive Blasting of Coke Oven Doors)

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?

Processes and pollution control equipment will be checked/monitored to ensure they are operating in a manner consistent with optimal engineering practices. **See attachment 1 – Watch Plan.**

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

Each air pollution control device has electrical and mechanical preventative maintenance tasks, as applicable, scheduled to ensure the equipment is in optimal working condition.

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

- a. Watch Plan Checklist will be used to record the actions taken during the event. **See Attachment 1 – Watch Plan**
- b. The Watch Plan Check list will be made available for submission to ACHD.

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See Attachment 1 – Watch Plan



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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?

USS will ensure that there are sufficient staff and resources available to implement the Mon Valley Air Pollution Warning Phase within 24 hours of the Department’s notification to the source of a Mon Valley Air Pollution Watch.

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.

See Attachment 1 – Warning Plan.

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.

1. Coke Battery No. 1

- a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
- b. Ensure environmental work practices are being followed to minimize emissions - Feasible
- c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.

2. Coke Battery No. 2

- a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
- b. Ensure environmental work practices are being followed to minimize emissions - Feasible
- c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.

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3. Coke Battery No. 3
 - a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible
 - c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
4. Coke Battery No. 13
 - a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible
 - c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
5. Coke Battery No. 14
 - a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible
 - c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
6. Coke Battery No. 15
 - a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible



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- c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
- 7. Coke Battery No. 19
 - a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible
 - c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
- 8. Coke Battery No. 20
 - a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible
 - c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
- 9. Coke Battery B
 - a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible
 - c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.



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- ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
10. Coke Battery C
- a. Follow work practices/Environmental Management System procedures to minimize fugitive emissions - Feasible
 - b. Ensure environmental work practices are being followed to minimize emissions - Feasible
 - c. Extend coking times – feasible for up to four (4) hours on full schedule; feasible for up to two (2) hours on extended coking time.
 - i. Extending coking times beyond 4 hours causes issues with the coke oven gas that lead to additional environmental and safety concerns.
 - ii. Extending coking times beyond 2 hours, on battery extended coking times, causes issues with the coke oven gas that lead to additional environmental and safety concerns.
11. Quench Tower No. 1 (Serves Batteries 1, 2 and 3)
- a. Increase baffle washing - Feasible if the temperature is above 32 degrees F.
 - b. Suspend quenching operations – feasible while the batteries are on extended coking times.
12. Quench Tower No. 5 (Auxiliary Quench Tower for Batteries 13, 14 and 15)
- a. Increase baffle washing - Feasible if the temperature is above 32 degrees F.
 - b. Suspend quenching operations – feasible while the batteries are on extended coking times.
13. Quench Tower No. 7 (Auxiliary Quench Tower for Batteries 19 and 20)
- a. Increase baffle washing - Feasible if the temperature is above 32 degrees F.
 - b. Suspend quenching operations – feasible while the batteries are on extended coking times.
14. Quench Tower No. 5A (Serves Batteries 13, 14 and 15)
- a. Increase baffle washing - Feasible if the temperature is above 32 degrees F.
 - b. Suspend quenching operations – feasible while the batteries are on extended coking times.
15. Quench Tower No. 7A (Serves Batteries 19 and 20)
- a. Increase baffle washing - Feasible if the temperature is above 32 degrees F.
 - b. Suspend quenching operations – feasible while the batteries are on extended coking times.
16. Desulfurization Plant
- a. None – this plant processes the coke oven gas and must continue to operate (H₂S).
17. Keystone Cooling Tower
- a. Shut off cooling water circulation and fans – Infeasible; the cooling tower provides cooling water to the plant and must support the processes that remain in operation.
 - b. Reduce cooling water circulation flow rate and fan speed - Infeasible; the cooling tower provides cooling water to the plant and must support the processes that remain in operation.
 - c. Increase blow down and introduce fresh water to reduce solids in the cooling water - Feasible



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18. Coke By-Product Recovery Plant

- a. None – this plant processes the coke oven gas and must continue to operate (H₂S).

19. Unloading Activities

- a. Continuous Barge Unloader No. 1
 - i. Approximately 0.31 LBS/Day PM₁₀
 - ii. Approximately 0.05 LBS/Day PM_{2.5}
 - iii. Nothing feasible
- b. Continuous Barge Unloader No. 2
 - i. Approximately 0.018 LBS/Day PM₁₀
 - ii. Approximately 0.03 LBS/Day PM_{2.5}
 - iii. Nothing feasible
- c. Pedestal Crane Unloader
 - i. Approximately 0.03 LBS/Day PM₁₀
 - ii. Approximately 0.0003 LBS/Day PM_{2.5}
 - iii. Nothing feasible
- d. Clam Shell Unloader
 - i. 0 LBS/YR PM₁₀
 - ii. 0 LBS/YR PM_{2.5}

20. Coal Transfer

- a. None – the operation is enclosed.

21. Pulverizing Activities

- a. No. 1 Primary Pulverizer
 - i. None – the operation in enclosed.
- b. No. 1 Secondary Primary Pulverizer
 - i. None – the operation in enclosed.
- c. No. 2 Primary Pulverizer
 - i. None – the operation is enclosed
- d. No. 2 Secondary Primary Pulverizer
 - i. None – the operation in enclosed.

22. Surge Bins and Bunkers (Coal)

- a. Approximately 14 LBS/YR PM₁₀
- b. Approximately 14 LBS/YR PM_{2.5}
- c. Nothing feasible

23. Coke Transfer and Screening Activities - 5% Reduction based on extended coking times

- a. Coke Transfer (1st Unit)



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- b. Coke Transfer (2nd Unit)
- c. Coke Transfer (C Battery)
- d. Coke Screening Station No. 1 (Batteries 1-3)
- e. Coke Screening Station No. 2 (Batteries 13-15, 19 and 20)
- f. Coke Screening Station No. 4 (Batteries B and C)
- 24. Boom Conveyor (Coal Pile Destocking) – Approximate 5% reduction
 - a. 49 LBS/YR PM₁₀
 - b. 7 LBS/YR PM_{2,5}
 - c. Curtail operation on a case-by-case inversion event - feasible
- 25. Coal and Coke recycle Screening- Approximate 5% reduction
 - a. Curtail coal and coke screening as appropriate - Feasible
- 26. Coke Screening – Peters Creek
 - a. Suspend Peters Creek coke screening operations - feasible
- 27. Boiler No. 1
 - a. None – necessary for plant operation
- 28. Boiler No. 2
 - a. None – necessary for plant operation
- 29. R1 Boiler
 - a. None – necessary for plant operation
- 30. R2 Boiler
 - a. None – necessary for plant operation
- 31. T1 Boiler
 - a. None – necessary for plant operation
- 32. T2 Boiler
 - a. None – necessary for plant operation
- 33. Ammonia Flare
 - a. None – safety device that needs to operate when pressure setpoint is exceeded.
 - b. Operating hours limited to 2,920 hours per year for the wastewater surge tanks and 1,400 hours per year for the ammonia loading station.
- 34. Coal Storage Piles
- 35. Coke Storage Pile – Peters Creek
- 36. Coke Storage Pile – South Yard
- 37. Fugitive Emissions (Plant Roadways)
 - a. Water roadways during event – Feasible if the temperature is above 32 degrees F.
- 38. Misc. Fugitive Emissions (Abrasive Blasting of Coke Oven Doors)

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- a. Curtail abrasive blasting activities – Feasible

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

- a. Warning Plan Checklist will be used to record the actions taken during the event. **See Attachment 1 – Warning Plan**
- b. The Warning Plan Check list will be made available for submission to ACHD. **See Attachment 1 – Warning Plan**

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.

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

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

USS will ensure that there is sufficient staff and resources available to implement the Mon Valley Air Pollution Warning Phase within 24 hours of the Department's notification to the source of a Mon Valley Air Pollution Watch.

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INSTRUCTIONS	
Submission Form for the Air Pollution Mitigation Plan	
Block 01 Facility Information	The facility name for the operation at that particular address should be used and not the name of the larger corporation. Use the address for the actual facility and not the company headquarters, if different. The most recent permit number should be included. If it is not known, it can be left blank.
Block 02 Environmental Contact Information	Fill in the contact information of the individual (e.g. employee or consultant) who will be contacted to provide environmental technical information for the Air Pollution Mitigation Plan
Block 03 Responsible Official Information	This address and phone number are for the office where the responsible official works the majority of the time. See block 04 instructions for information regarding the responsible official.
Block 04 Affidavit	This affidavit must be signed by the responsible official. A Responsible Official is a President, Vice President, Secretary, Treasurer, General Partner, General Manager, a member of a Board of Directors, or Owner, depending on business structure. CORPORATION – President, Vice President, Secretary, Treasurer, or duly authorized person BUSINESS – Sole Proprietor or General Partner GOVERNMENT ENTITY – Ranking elected official or principal executive officer
Blocks 05–08 Watch Phase of Mitigation Plan	The responses that you provide in blocks 05 through 08 will be specific to your equipment and facility. Below are some general ideas that may help you in how to approach these requirements. <ul style="list-style-type: none"> • Staff related <ul style="list-style-type: none"> • Review procedures with employees to ensure all equipment is properly operating in a way to minimize air emissions. • Schedule additional or on-call employees for upcoming shifts to ensure facility is fully staffed for a warning phase. • Conduct a shift meeting(s) to remind employees to prioritize the environmental impact of their operations to reduce emissions. • Share any other procedures which would help ensure sufficient staff levels and available resources to implement a warning phase. • Equipment related



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	<ul style="list-style-type: none"> • Inspect any equipment or processes which may have a potential to increase emissions to ensure proper operation and maintenance. • Implement improved operation and maintenance practices beyond standard operating procedures. • Ensure the facility is following the idling requirements under Act 124 of the PA Department of Environmental Protection regulations. • Conduct maintenance on all pollution control equipment. • Share any other procedures which help ensure the facility is operating in a manner consistent with good engineering practices. • Share any other procedures which help ensure the air pollution control equipment is maintained in good working condition.
<p><u>Block 09</u> Warning Phase of Mitigation Plan</p>	<p>A good starting point in completing this block is to refer to the table found in section II of your facility’s air quality permit titled “Emission Unit Identification” and identify which units emit particulate matter. There may be other equipment, not listed in the section II table, that can be included in the block 09 list.</p>
<p><u>Block 10</u> Warning Phase of Mitigation Plan</p>	<p>Block 10 should explain what actions the facility could possible take to ensure that hourly emissions are reduced.</p> <p>Possible methods include:</p> <ul style="list-style-type: none"> • Reduction in material throughput • Reduction in operating time • Increased use of controls or suppression equipment • Changes in raw materials <p>Examples of possible actions include:</p> <ul style="list-style-type: none"> • Reduce production by a certain percentage or rate from normal operating conditions. A reduction from a potential maximum production rate will not be accepted if it is too high compared to normal operating rates for the relevant time period, thereby not resulting in an actual reduction in pollution. • Reduce usage of diesel fuel or other PM_{2.5} or PM₁₀ creating fuel types or switch fuel types to lower PM_{2.5} or PM₁₀ as allowed by the relevant permits. • Bring in additional employees to allow the facility to operate in the best environmentally responsible manner. • Delay production to a future day when a mitigation plan is not needed. • Delay any non-essential activities to a future day when a mitigation plan is not needed.



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	<ul style="list-style-type: none"> • Fully or partially enclose material movement and other work activities which produce dust and other particulate matter (PM_{2.5} or PM₁₀ emissions). • Modify work practices to decrease PM_{2.5} or PM₁₀ emissions such as: <ul style="list-style-type: none"> ○ Slowing material handling ○ Fully or partially enclose material movement and other work activities which produce dust and other particulate matter (PM_{2.5} or PM₁₀ emissions). • Stop or decrease unnecessary transportation activities and reduce travel speed on necessary transportation. • Employ additional roadway wetting or other activities to minimize road dust creation. • Add any other measures which reduce PM_{2.5} or PM₁₀ emissions.
<p><u>Block 11</u> Warning Phase of Mitigation Plan</p>	<p>Emission reduction methods that are feasible can be eliminated from consideration for other reasons as long as adequate justification is given.</p>
<p><u>Block 12</u> Warning Phase of Mitigation Plan</p>	<p>The Health Department will require a report, submitted after the warning phase has ended, itemizing what actions were taken to meet the requirements of the warning phase.</p>
<p><u>Block 13</u> Warning Phase of Mitigation Plan</p>	<p>The spreadsheet must include actual plant emissions of PM_{2.5} and PM₁₀ for all equipment listed in block 09 for each of the past four years (2017-2020) in tons/year. These calculations can be copied directly from the spreadsheets submitted to the Health Department for emissions inventories.</p> <p>For each piece of equipment and process, emissions from the last four years must be provided in tons/year.</p> <p>For each piece of equipment and process, proposed feasible emission reductions must be provided in lbs/hr.</p> <p>The hourly average will be calculated for each unit and process by adding yearly emissions together and dividing by the total number of hours that the unit emitted over four years.</p> <p>In the case of a batch process, calculations will need to take into account the number of hours in each batch and the number of batches in a year.</p>

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Block 14 Warning Phase of Mitigation Plan	Section 2106.06 of county air quality regulations requires that an affected facility is able to implement the requirements of the warning phase within 24 hours.
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Mitigation Plan Checklist

The following checklist is provided as a list of items required for a complete mitigation plan submission. If at any time you have questions about your application, please call JoAnn Truchan 412-578-7981 or Jayme Graham 412-578-8129.

- Has the responsible official signed and dated the first page (block 04)?
- Have you provided an active spreadsheet showing actual emissions for every piece of equipment and process of PM_{2.5} and PM₁₀ for the past four years in tons per year?
- Does the spreadsheet include the average actual PM_{2.5} and PM₁₀ emissions from every piece of equipment and process for the past four years in lbs/hr?
- Does the spreadsheet include the PM₁₀ and PM_{2.5} reduction that will be achieved from every piece of equipment and process in lbs/hr and % from the four year hourly average during the warning phase?
- Have you provided a complete response for each of the fourteen blocks?

