

To: Air Pollution Control Advisory Committee on August 11, 2025, for review and recommendation to Board of Health to proceed to public comment.

**PROPOSED REVISION  
to  
ALLEGHENY COUNTY'S PORTION  
of the  
PENNSYLVANIA STATE IMPLEMENTATION PLAN  
for the  
ATTAINMENT AND MAINTENANCE  
of the  
NATIONAL AMBIENT AIR QUALITY STANDARDS**

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**(Revision Tracking No. 98A)**

**Amendment to**

**8-Hour Ozone National Ambient Air Quality Standard --**

***Certification that Article XXI Control Techniques Guidelines based***

***Regulations are RACT for the 2015 8-Hr Ozone NAAQS***

## **Revision Tracking No. 98A**

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**A.**

**Allegheny County Portion of the Pennsylvania RACT SIP Revision  
for the  
2015 8-Hour Ozone NAAQS – Certification of CTG Regulations**

## **1. INTRODUCTION**

The following is a revision to the Allegheny County portion of the Pennsylvania SIP certifying that the Article XXI Control Techniques Guidelines based regulations are Reasonably Available Control Technology (RACT) for the 2015 8-Hour Ozone NAAQS.

### **Statutory Authority:**

25 Pennsylvania Code Subpart C Article III, Chapter 133: Local Air Pollution Agencies

### **Background and Requirements:**

The federal Clean Air Act (CAA) of 1990 gives the states primary responsibility for achieving the National Ambient Air Quality Standards (NAAQS). The NAAQS are established by the U.S. Environmental Protection Agency (EPA) as the maximum concentrations in the atmosphere for specific air contaminants, set to protect public health and welfare. The principal mechanism at the state and local level for complying with the CAA is the State Implementation Plan (SIP). A SIP outlines the programs, actions, and commitments that a state will carry out to fulfill its responsibilities under the CAA. Once approved by the EPA, a SIP is a legally binding document under both state and federal law.

Ground level ozone, one of the principal components of “smog,” is a serious air pollutant that is known to affect human health and the environment. High levels of ozone can damage the respiratory system causing breathing problems, throat irritation, coughing, chest pains, and increased susceptibility to respiratory infection. High levels of ozone also cause serious damage to forests and agricultural crops, which results in economic loss to logging and farming operations. On November 16, 2017, EPA designated 2,646 areas of the country as “attainment/ unclassifiable” under the 2015 8-Hour ozone NAAQS (82 FR 54232). Among the areas is the Allegheny County, Pennsylvania Attainment/Unclassifiable Area.

Ozone is generally not directly emitted to the atmosphere; rather it is formed in the atmosphere by photochemical reactions between volatile organic compounds (VOC), oxides of nitrogen (NO<sub>x</sub>), and carbon monoxide (CO) in the presence of sunlight. To reduce ozone concentrations in the ambient air, the CAA requires all non-attainment areas to apply controls on VOC/NO<sub>x</sub> emission sources to achieve emission reductions. CO’s role in forming ozone is relatively insignificant, therefore the CAA does not specify requirements on CO emission reductions regarding ozone attainment. Among effective control measures, the RACT controls are a major group for reducing VOC and NO<sub>x</sub> emissions from stationary sources.

The EPA has defined RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility (44 FR 53761 at 53762, September 17, 1979). Section 182 of the CAA sets forth separate RACT requirements for ozone non-attainment areas.

- The first requirement, contained in section 182(a)(2)(A) of the CAA, and referred to as RACT fix-up, requires the correction of RACT rules for which EPA identified deficiencies before the Act was amended in 1990. Allegheny County has no deficiencies to correct under this Section of the CAA.
- The second requirement, set forth in section 182(b)(2) of the CAA for VOC sources, applies to moderate or worse ozone NAAs. This requires NAAs to implement RACT controls on all major VOC sources and on all VOC sources and source categories covered by a Control Technique Guideline (CTG) issued by EPA.
- The third requirement is in section 182(f), and subjects major stationary sources of NO<sub>x</sub> to the same RACT requirements that are applicable to major sources of VOC. In addition, Section 184(b)(1)(B) of the CAA applies the RACT requirements in section 182(b)(2) for moderate nonattainment areas (and 182(f) by extension), to marginal nonattainment areas and attainment areas located within ozone transport regions (OTRs) established pursuant to section 184 of the CAA.

Under section 183 of the CAA, EPA was required to issue several guidance documents for RACT controls that would help states meet the requirements of section 182(b)(2). This requirement upon EPA includes developing (1) CTGs for controls of VOC emissions from stationary sources, and (2) Alternate Control Techniques (ACTs) for controls of VOC and NO<sub>x</sub> emissions from stationary sources.

The EPA issued three groups of CTG documents prior to 1990, establishing a “presumptive norm” for RACT for various categories of VOC sources: Group I, issued before January 1978 including 15 CTGs; Group II, issued in 1978 including 9 CTGs; and Group III, issued in the early 1980s with 5 CTGs. The EPA also issued CTG documents post 1990. (Sources not covered by the issued CTGs are referred to as non-CTG sources. Those are not the subject of this SIP revision.)

Section 182(b)(2) of the CAA requires states with ozone nonattainment areas classified as moderate or worse to develop RACT controls for all pre-enactment (i.e., pre-1990) CTG source categories, for all sources subject to post-enactment (i.e., post-1990) CTGs, and for all non-CTG major sources in their non-attainment areas (as noted, non-CTG major sources are not the subject of this SIP revision). The EPA has also issued over a dozen ACTs for various categories of VOCs and NO<sub>x</sub> sources.

In general, states meet the CAA’s RACT requirements by imposing controls that meet the control requirements established in final CTG documents and considering the information in ACT documents to relevant VOC and NO<sub>x</sub> sources in their moderate or worse non-attainment areas.

The CAA requires that states achieve the NAAQS by specified dates, based on the severity of an area’s air quality problem. With regard to the 2015 Ozone NAAQS,

Allegheny County, along with the rest of the Commonwealth of Pennsylvania except five counties in the southeast portion of the state, is designated “Attainment/Unclassifiable,” with a designation date of January 16, 2018 (82 FR 54232, dated November 6, 2017, and 83 FR 25776 dated June 4, 2018). However, because Pennsylvania is in an Ozone Transport Region (OTR) specified under section 184 of the CAA, it is treated similar to a ‘moderate’ ozone non-attainment area for the new federal 2015 8-Hour ozone standard.

According to 40 CFR §51.1316:

*§ 51.1316 Requirements for an Ozone Transport Region.*

*(a) In general. CAA sections 176A and 184 apply for purposes of the 2015 ozone NAAQS.*

*(b) RACT requirements for certain portions of an ozone transport region.*

*(1) The state shall submit a SIP revision that meets the RACT requirements of CAA section 184(b) for all portions of the state located in an ozone transport region.*

*(2) SIP submission deadline.*

*(i) For a RACT SIP required pursuant to initial nonattainment area designations, the state shall submit the RACT SIP revision no later than 24 months after the effective date of designation for a specific ozone NAAQS.*

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*(3) RACT implementation deadline. (i) For RACT required pursuant to initial nonattainment area designations, the state shall provide for implementation of RACT as expeditiously as practicable, but no later than January 1 of the fifth year after the effective date of designation.*

For CTGs in effect at the time of initial area designations for a revised NAAQS, the EPA has interpreted the relevant CAA provisions to require implementation of related RACT SIP revisions as expeditiously as practicable, but no later than January 1 of the fifth year after the effective date of initial designations for the revised NAAQS (80 FR 12279; March 6, 2015). (Ref: 83 FR 63014, December 6, 2018)

According to the EPA’s Final Rule to Implement the 2015 8-Hour Ozone NAAQS (83 FR 62998, December 6, 2018), areas classified as moderate non-attainment or higher, or located in an OTR, must submit a demonstration that their current rules fulfill 2015 8-Hour ozone RACT requirements for all CTG categories and all major, non-CTG sources (as noted, a demonstration regarding the non-CTG major sources is not part of this SIP revision) as a revision to their SIPs. Such demonstrations can be made with either a new RACT determination or a certification that previously required RACT controls represent RACT for the 2015 8-Hour ozone standard.

The Allegheny County Health Department (ACHD) has developed a RACT SIP revision that demonstrates:

- 1) it is implementing required CTG-based RACT controls on all relevant stationary sources of VOC emissions;

- 2) all applicable CTG RACT controls have been adopted into ACHD regulations and have been approved by EPA into the SIP;
- 3) all CTG RACT controls are based on EPA's guidance and standards to represent RACT control levels under the new 2015 8-Hour ozone NAAQS; and
- 4) that there are no sources in Allegheny County for certain CTG source categories for which ACHD has not adopted CTG regulations (relates to "negative declarations").

## **2. CERTIFICATION OF VOC CTG RACT REQUIREMENTS**

The ACHD Air Quality Program operates under the approval of the Pennsylvania Department of Environmental Protection (DEP) in accordance with the provisions of 25 Pa Code Chapter 133. The Air Quality Program controls air pollution from sources by means of visible, mass, and concentration emission standards equal to, or more stringent than, those standards established by the DEP for emissions (25 Pa Code 133.4 (b) (2)). Since the early 1990s, Allegheny County has implemented numerous RACT controls to meet the CAA's RACT requirements. RACT controls for VOC were promulgated in Allegheny County's Article XXI, Part E "Source Emission and Operating Standards."

CTG-based RACT requirements were identified, implemented and approved into the SIP under the 2008 and 1997 8-Hr ozone NAAQS and the 1979 1-hour ozone NAAQS through Article XXI. Identification and certification of VOC CTG RACT controls for the 2015 8-Hr ozone NAAQS are provided in Tables 1 and 2, below.

### **Summary:**

ACHD is certifying through this SIP revision that for the Allegheny County portion of the Pennsylvania SIP, all CTG-covered source categories are addressed at the emission thresholds set in the CTG. This certification holds that previously adopted RACT controls in Allegheny County's portion of the Pennsylvania SIP that were approved by EPA under the 2008 and 1997 8-hr ozone NAAQS and 1979 1-hour ozone NAAQS are based on the currently available technically and economically feasible controls, and that they represent RACT for the 2015 8-Hour ozone implementation purposes.

ACHD is also certifying that its CTG based regulations are as stringent as the corresponding CTG based regulations found in 25 Pa. Code Chapter 129. Meanwhile, the Pennsylvania Department of Environmental Protection (DEP) has conducted a "due diligence review" (see Appendix B) in accordance with the U.S. Environmental Protection Agency (EPA) issued, "Ozone NAAQS Resource Document: Due Diligence Review Framework for Air Agencies Developing RACT SIP Revisions," dated December 19, 2024, and concluded that new or revised 25 Pa. Code Chapter 129 RACT regulations are not necessary to meet RACT requirements for the revised ozone NAAQS (2015). Based on the conclusion reached by the DEP, and the equivalency of ACHD CTG based regulations to PA DEP CTG based regulations demonstrated in this document and the attached *"Appendix A: Comparison of ACHD Article XXI CTG-based VOC*

*regulations to PA DEP 25 Pa. Code CTG-based VOC regulations,”* ACHD certifies that Article XXI CTG based RACT regulations are adequate to meet the applicable OTR RACT requirements for the 2015 Ozone NAAQS.

Based on the foregoing, all ACHD rules that apply to ozone precursor emissions fulfill RACT requirements for the 2015 8-Hour ozone NAAQS. All CTG sources under ACHD jurisdiction are controlled to RACT or better standards.

Finally, a negative declaration has been made for those CTGs for which there are no applicable sources. (Reference Tables 3 and 4.)

**Notice of Public Comment:**

SIP Revision 98A will be the subject of a public comment period and a public hearing. Public hearing documentation will be included in this document after the comment period occurs.

**Responsible Agency:**

The agency with direct responsibility for preparing and submitting this document is the Allegheny County Health Department (ACHD), under Director Dr. Iulia Vann.



**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

Explanations for each column of Table 1 are as follows:

- Column 1: Identifies each CTG-based section of Article XXI.
- Column 2: Identifies the effective date(s) of the initial issuance of the Article XXI CTG-based RACT regulation and/or any updates.
- Column 3: Identifies the date the regulation was approved into the Pennsylvania SIP, along with the federal register citation.
- Column 4: Identifies the corresponding regulation in 25 Pa. Code.
- Column 5: Identifies the effective date(s) of the initial issuance of the 25 Pa. Code CTG-based RACT regulation and/or any updates.
- Column 6: Identifies whether the Article XXI RACT regulation is equivalent to the corresponding 25 Pa. Code regulation.
- Column 7: Identifies the applicable RACT basis document, i.e., CTG or ACT.
- Column 8: Explains RACT control applicability and requirements.
- Column 9: Certifies whether the current rule represents RACT under the 2015 8-Hour ozone NAAQS. Where Allegheny County has certified that a current SIP approved regulation represents RACT under the 2015 8-Hour ozone standard, ACHD affirms that it is not aware of any significant changes in control technology that affect the original RACT determination, unless otherwise explained in Column 9.

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2) Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corresponding 25 Pa. Code Regulation	(5) Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8) RACT Rule Applicability and Requirements	(9) Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
VOC Sources	10/20/95	11/14/02 67FR 68935	25 Pa. Code § 129.52	Many. Latest is 1/21/2023	<b>Yes.</b>  See also Appendix A.	CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks, EPA-450/2-77-008, May 1977 <a href="#">EPA 450/2-77-008 Control of Volatile Organic Emissions from Existing Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper,</a>	This section of Article XXI applies to any can, coil, fabric, vinyl or magnetic wire coating unit and establishes maximum allowable VOC emissions per unit of coating solids.  This section of Article XXI no longer applies to:	Yes.  This section Of Article XXI fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.
Surface Coating Processes	7/10/03	6/24/05 70 FR 36511						
Article XXI §2105.10	6/14/10	12/28/10 75FR81480 (Revision to Applicability, Paragraphs 2105.10.a.1 & 2)						
	6/8/13	11/26/14, 79 FR 70471						

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
	11/5/22	(Revision to <i>Applicability</i> , paragraphs 2105.10(a)2 & 3.)  SIP96; not yet approved, but change does not impact comparison.				<a href="#">Fabrics, Automobiles and Light Duty Trucks</a>  CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating for Insulation of Magnet Wire, EPA-450/2-77-033, December 1977	1. The coating of metal furniture. See now §2105.77.  2. The coating of large appliances. See now §2105.77.  3. The coating of paper. See now §2105.79.  4. The coating of miscellaneous metal parts. See now §2105.83.  5. Coating operations at automobile and light-duty truck assembly plants. See §2105.84.	

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(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
VOC Sources  Graphic Arts Systems  Article XXI §2105.11	10/20/95  6/8/2013  11/5/2022	11/14/02 67 FR 68935  Find  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.67	Many. Latest is 10/22/2016.	<b>Yes.</b>  See also Appendix A.	CTG: Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VIII: Graphic Arts - Rotogravure and Flexography, EPA-450/2-78-033, December 1978	This section applies to any rotogravure or flexographic printing process at a facility with potential uncontrolled VOC emission greater than 100 tons per year. The rule establishes the limits of VOC contents in coatings and inks used in the covered facilities and specifies standards for control devices for various printing processes.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
VOC Sources  Volatile Organic Compound Storage Tanks Article XXI §2105.12	10/20/95  11/5/2022	11/14/02 67 FR 68935  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.56 and § 129.57	9/5/1998  6/20/1981	<b>Yes.</b>  See also Appendix A.	CTG: Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks, EPA-450/2-78-047, December 1978  CTG: Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks, EPA-450/2-77-036, December 1977	This section applies to petroleum liquid tanks fixed roofs and with a capacity greater than or equal to 2,000 gallons but less than or equal to 40,000 gallons.  This section applies to petroleum liquid tanks with external floating or fixed roofs with a capacity greater than 40,000 gallons.  The rule establishes sealing standards for storage tanks, including a vapor collection and recovery system.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Gasoline Loading Facilities  Article XXI §2105.13	10/20/95  7/12/2022  11/5/2022	11/14/02 67FR 68935  Find  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.59 § 129.60 § 129.61 and § 129.62	8/3/1991 8/3/1991 3/26/2022  5/23/1992	<b>Yes.</b>  See also Appendix A.	CTG: Control of Volatile Organic Emissions from Bulk Gasoline Plants, EPA-450/2-77- 035, December 1977  CTG: Control of Hydrocarbons from Tank Truck Loading Terminals EPA-450/2-77-026 October 1977  CTG: Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, EPA-450/R-75-102 November 1975  CTG: Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems EPA-450/2-78-051 December 1978	This section applies to all unloading, loading, and storage operations at bulk gasoline plants and to any gasoline tank truck delivering or receiving gasoline at a bulk gasoline plant.          Requirements include the use of vapor balance, and various equipment and work practice standards.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Degreasing Operations  Article XXI §2105.15	10/20/95	11/14/02 67FR 68935	25 Pa. Code § 129.63	12/22/2001	<b>Yes.</b>  See also Appendix A.	CTG: Control of Volatile Organic Emissions from Solvent Metal Cleaning, EPA-450/2-77-022, November 1977 <a href="#">ZyPDF.cgi</a>	This section applies to solvent cleaning machines that exceed 10 square feet. This regulation establishes standards for (1) batch cold cleaning machines, (2) batch vapor cleaning machines, and (3) inline cleaning machines.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.
Cutback Asphalt Paving  Article XXI §2105.16	10/20/95	11/14/02 67FR 68935	25 Pa. Code § 129.64	8/13/1983	<b>Yes.</b>  See also Appendix A.	CTG: Control of Volatile Organic Compounds from Use of Cutback Asphalt, EPA-450/2-77-037, December 1977	This section establishes requirements related to the use of cutback asphalt and establishes VOC content limits for emulsified asphalt.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Synthetic Organic Chemical and Polymer Manufacturing – Fugitive Emissions  Article XXI §2105.19	10/20/95  11/5/2022	11/14/02 67FR 68935  SIP96: not yet approved, but change does not impact comparison.	25 Pa. Code § 129.71	5/23/1992	<b>Yes.</b>  See also Appendix A.  Also, Appendix A notes that there are no longer any sources in the County to which §2105.19 applies.	CTG: Control of Volatile Organic Compound Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment, EPA- 450/3-83-006, March 1984	This section establishes provisions for minimizing leaks and establishes a leak detection and repair program for process equipment.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.
Petroleum Refineries  Article XXI §2105.70	10/20/95  11/5/2022	11/14/02 67 FR 68935  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.55  § 129.58	6/20/1981  8/13/1983	<b>Yes.</b>  See also Appendix A.	CTG: Control of Refinery Vacuum Producing Systems, Wastewater Separators and Process Unit Turnarounds EPA-450/2-77-025 October 1977  CTG: Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment EPA-450/2-78-036 June 1978	This section applies to vacuum-producing systems, wastewater separators, and process unit turnaround at petroleum refineries.  This section applies to leaks at petroleum refineries.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.

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(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
<p>Pharmaceutical Products</p> <p>Article XXI §2105.71</p>	10/20/95	11/14/02 67 FR 68935	25 Pa. Code § 129.68	8/3/1991	<p><b>Yes.</b></p> <p>See also Appendix A.</p> <p>Also, Appendix A indicates County no longer has any pharm tablet coating sources. Nor does the State.</p>	CTG: Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products, EPA-450/2-78-029, December 1978	This section applies to VOC sources at synthesized pharmaceutical manufacturing facilities including reactors, distillation operations, crystallizers, centrifuges, and vacuum dryers. The rule establishes standards for controlling & reducing VOC emissions from all covered sources.	<p>Yes.</p> <p>This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.</p>



**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Manufacture of Pneumatic Rubber Tires  Article XXI §2105.72	10/20/95	11/14/02 67 FR 68935	25 Pa. Code § 129.69	5/23/1992	<b>Yes.</b>  See also Appendix A.	CTG: Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires, EPA-450/2- 78-030, December 1978	This section establishes VOC emissions limits for pneumatic rubber tire manufacturing operations.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone RACT.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2) Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corresponding 25 Pa. Code Regulation	(5) Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8) RACT Rule Applicability and Requirements	(9) Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
<p>Aerospace Manufacturing and Rework</p> <p>Article XXI §2105.74</p>	7/10/2003	6/24/2005 70FR 36511	25 Pa. Code § 129.73	8/11/2018	<p><b>Yes.</b></p> <p>See also Appendix A.</p>	<p>CTG: Aerospace (CTG &amp; MACT) (See 59 FR 29216, June 6, 1994); CTG (Final), EPA-453/R-97-004, December 1997</p>	<p>This section applies to any aerospace manufacturing and rework facility. The regulation establishes vapor pressure limits, VOC content limits, emission limits and/or work practice standards for:</p> <ul style="list-style-type: none"> <li>(a) handwipe, spray gun, or flush cleaning operations,</li> <li>(b) primer, topcoat, self-priming topcoat, and specialty coating operations,</li> <li>(c) chemical milling maskant application,</li> <li>(d) de- painting of aerospace vehicles, and</li> <li>(e) handling and storing of VOC.</li> </ul>	<p>Yes.</p> <p>This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.</p>

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Wood Furniture Manufacturing Operations  Article XXI §2105.76	7/10/2003	6/24/2005 70FR 36511	25 Pa. Code § 129.101 § 129.102 § 129.103 § 129.104 § 129.105 § 129.106 and § 129.107	6/10/2000 for all.	<b>Yes.</b>  See also Appendix A.	CTG: Wood Furniture (CTG & MACT) - draft MACT out 5-94; Final CTG, EPA-453/R-96-007, April 1996; See also 61 FR 25223, and, 61 FR 50823, September 27, 1996	This section establishes VOC emission limitations and work practice standards for wood furniture manufacturing operations with the potential to emit 25 tpy or greater of VOC.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Control of VOC Emissions from Large Appliance and Metal Furniture Surface Coating Processes  Article XXI §2105.77	5/24/2010  11/5/2022	12/28/2010 75FR81480  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.52a	9/11/2010	<b>Yes.</b>  See also Appendix A.  Note: Article XXI §2105.77 was added by SIP65.	CTG: Control Techniques Guidelines for Large Appliance Coatings EPA-453/R-07-004 September 2007 <a href="#">Microsoft Word - Final Large Appliances CTG 092407 0400pm.doc</a>  CTG: Control Techniques Guidelines for Metal Furniture Coatings EPA-453/R-07-005 September 2007  CTG: Control of Volatile Organic Emissions from Existing Stationary Sources Volume III: Surface Coating of Metal Furniture EPA-450/2-77-032 December 1977  CTG: Control of Volatile Organic Emissions from Existing Stationary Sources Volume V: Surface Coating of Large Appliances EPA-450/2-77-034 December 1977	This section applies to the coating of large appliances and establishes max allowable VOC emissions per unit of coating solids.  This section applies to the coating of metal furniture and establishes maximum allowable VOC emissions per unit of coating solids.  This CTG was a predecessor of EPA-453/R-07-004.  This CTG was a predecessor of EPA-453/R-07-004	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Control of VOC Emissions from Flat Wood Paneling Coating Processes  Article XXI §2105.78	5/24/2010  11/5/2022	12/28/2010 75FR81480  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.52c	12/18/2010	<b>Yes.</b>  See also Appendix A.  Note: Article XXI §2105.78 added by SIP65.	CTG: Control Techniques Guidelines for Flat Wood Paneling Coatings EPA-453/R-06-004 September 2006 <a href="#">!</a>  Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VII: Factory Surface Coating of Flat Wood Paneling, EPA-450/2-78-032, June 1978. <a href="#">EPA 450/2-78-032 Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VII: Factory Surface Coating of Flat Wood Interior Paneling</a>	This section applies to the coating of flat wood paneling and establishes maximum allowable VOC emissions per unit of coating solids.	Yes.  This section fully implements the CTG specified control and represents the current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Control of VOC Emissions from Paper, Film, And Foil Surface Coating Processes  Article XXI §2105.79	5/24/2010  11/5/2022	12/28/2010 75FR81480  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.52b	11/20/2010	<b>Yes.</b>  See also Appendix A.  Note: Article XXI §2105.79 added by SIP65.	CTG: Control Techniques Guidelines for Paper, Film, and Foil Coatings EPA-453/R-07-003 September 2007 <a href="#">Microsoft Word - Final Paper Film Foil CTG 09272007.doc</a>	This section applies to the coating of paper, film, and foil, and establishes maximum allowable VOC emissions per unit of coating solids.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.
Control of VOC Emissions from Offset Lithographic Printing and Letterpress Printing  Article XXI §2105.80	6/8/2013  11/5/2022	10/6/2014 79FR60059  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.67b	6/28/2014	Yes.  See also Appendix A.	CTG: Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing EPA-453/R-06-002 September 2006	This section applies to offset lithographic and letterpress printing operations and establishes VOC content limitations via alcohol content limitations.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Control of VOC Emissions from Flexible Package Printing  Article XXI §2105.81	6/8/2013  11/5/2022	10/6/2014 79FR60059  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.67a	6/28/2014	Yes.  See also Appendix A.	CTG: Control Techniques Guidelines for Flexible Package Printing EPA-453/R-06-003 September 2006	This section applies to flexible package printing and establishes maximum allowable VOC emissions per unit of coating solids, control efficiency, and limits on the VOC content of material used.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.
Control of VOC Emissions from Industrial Solvent Cleaning Operations  Article XXI §2105.82	6/8/2013  11/5/2022	10/6/2014 79FR60059  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.63a	8/11/2018	Yes.  See also Appendix A.	CTG: Control Techniques Guidelines for Industrial Cleaning Solvents EPA-453/R-06-001 September 2006	This section applies industrial cleaning solvents and establishes VOC emission limits via solvent VOC content limits and work procedures.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Control of VOC Emissions from Miscellaneous Metal and/or Plastic Parts Surface Coating Processes  Article XXI §2105.83	6/8/13  11/5/2022	11/26/2014 79FR70470  1/20/16 81 FR 2993  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.52d	10/22/2016	Yes.  See also Appendix A.	CTG: Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings EPA-453/R-08-003 September 2008  CTG: Control of Volatile Organic Emissions from Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products EPA-450/2-78-015 June 1978	This section applies to any miscellaneous metal parts coating line and establishes max allowable VOC emissions per unit of coating solids.  This CTG was a predecessor of EPA-453/R-08-003	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.
Control of VOC Emissions from Automobile and Light-Duty Truck Assembly Coatings  Article XXI §2105.84	6/8/13  11/5/2022	11/26/2014 79FR70470  1/20/16 81 FR 2993  10/22/2016	25 Pa. Code § 129.52e	10/22/2016	Yes.  See also Appendix A.	CTG: Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings EPA-453/R-08-006 September 2008 <a href="#">ZyPDF.cgi</a>	This section applies to automobile and light-duty truck assembly coatings, and establishes max allowable VOC emissions per unit of coating solids	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.



**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Control of VOC Emissions from Miscellaneous Industrial Adhesives  Article XXI §2105.85	6/8/2013  11/5/2022	11/26/2014 79FR70470  1/20/16 81 FR 2993  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.77	6/28/2014	<b>Yes.</b>  See also Appendix A.	CTG: Control Techniques Guidelines for Miscellaneous Industrial Adhesives EPA-453/R-08-005 September 2008 <a href="#">Microsoft Word - Misc Industrial Adhesives CTG Final 09 25 08.doc</a>	This section applies to miscellaneous industrial adhesives and establishes max allowable VOC emissions per unit of adhesives.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.
Control of VOC Emissions from Fiberglass Boat Manufacturing Materials  Article XXI §2105.86	6/8/2013  6/19/2015  11/5/2022	11/26/2014 79FR70470  1/20/16 81 FR 2993  SIP96; not yet approved, but change does not impact comparison.	25 Pa. Code § 129.74	12/19/2015	<b>Yes.</b>  See also Appendix A.	CTG: Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials EPA-453/R-08-004 September 2008 <a href="#">Microsoft Word - Fiberglass Boat Manufacturing Materials CTG Final 09 30 08.doc</a>	This section applies to fiberglass boat manufacturing materials and establishes max allowable VOC emissions by limiting the monomer VOC content.	Yes.  This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 1: VOC CTG RACT List and Certification under the 2015 8-Hour Ozone NAAQS**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-Ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they Equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements	(9)Requirements at least as stringent as the 2015 8-Hour Ozone RACT?
Control of VOC Emissions from Unconventional and Conventional Oil and Natural Gas Sources  Article XXI §2105.87	2/5/2023	SIP94; not yet approved.	25 Pa. Code §§ 129.121-140	12/10/2022	Yes. Article XXI incorporates by reference 25 Pa. Code §§ 129.121-140.  See also Appendix A.	CTG: Control Techniques Guidelines for the Oil and Natural Gas Industry EPA-453/B-16-001	As indicated by the title of the CTG, this section applies to both conventional and unconventional oil & natural gas sources.	Yes. This section fully implements the CTG specified control and represents current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 2: CTGs for which ACHD is in the process of promulgating a regulation under SIP103**

Explanations for each column of Table 2 are as follows:

- Column 1: Identifies each CTG-based section of Article XXI.
- Column 2: Identifies the effective date(s) of the initial issuance of the Article XXI CTG-based RACT regulation and/or any updates.
- Column 3: Identifies the date the regulation was approved into the Pennsylvania SIP, along with the federal register citation.
- Column 4: Identifies the corresponding regulation in 25 Pa. Code.
- Column 5: Identifies the effective date(s) of the initial issuance of the 25 Pa. Code CTG-based RACT regulation and/or any updates.
- Column 6: Identifies whether the Article XXI RACT regulation is equivalent to the corresponding 25 Pa. Code regulation.
- Column 7: Identifies the applicable RACT basis document, i.e., CTG or ACT.
- Column 8: Explains RACT control applicability and requirements.
- Column 9: Certifies whether the current rule represents RACT under the 2015 8-Hour ozone NAAQS. Where Allegheny County has certified that a current SIP approved regulation represents RACT under the 2015 8-Hour ozone standard, ACHD affirms that it is not aware of any significant changes in control technology that affect the original RACT determination, unless otherwise explained in Column 9.

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2) Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corresponding 25 Pa. Code Regulation	(5) Effective Date of 25 Pa. Code Section	(6) Are they equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8) RACT Rule Applicability and Requirements.	(9) Requirements as least as stringent as the 2015 8-Hr Ozone RACT?
VOC Sources  Surface Coating Processes relate to Shipbuilding and Ship Repair.  Article XXI Update of §2105.10 to add Category 12, "Shipbuilding and Ship Repair" to Table 2105.10	Not yet effective. In the process of being added. County Council is reviewing. Will become SIP103.	TBD. Approval of proposed SIP103 is pending ACHD submittal to DEP and EPA.	25 Pa. Code § 129.52	1/21/2023	The updates being made to Article XXI Section 2105.10 reflect the updates to 129.52 made in 53 Pa.B.465 Jan 21, 2023.  See also Appendix A.	Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) ACT (EPA 453/R-94-032, April 1994) and CTG, see 61 FR 44050, August 27, 1996.	This section applies to shipbuilding and ship repair. Allegheny County has no such sources.  In the past, a "Negative Declaration" was made. However, ACHD is currently in the process of promulgating a revised §2105.10. One step from full approval.	Yes. This section, when made effective, will fully implement the CTG specified control and will represent current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 2: CTGs for which ACHD is in the process of promulgating a regulation under SIP103**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements.	(9)Requirements as least as stringent as the 2015 8-Hr Ozone RACT?
Dry Cleaning Facilities  Article XXI Update of §2105.18.b, "Petroleum Dry Cleaning Facilities" to add recordkeeping requirements.	10/20/1995 11/5/2022  Update is in progress. County Council is reviewing. Will be SIP103.	SIP96; not yet approved, but change does not impact comparison.  TBD. Approval of proposed SIP103 is pending ACHD submittal to DEP and EPA.	25 Pa. Code § 129.63b	1/21/2023	Yes. See also Appendix A.  Note that 2105.18.b, though not written specifically for "large" petroleum dry cleaners, already covers them by covering dry cleaners that use over 100 gals per day. ACHD has no "large" petroleum dry cleaners.	Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, September 1982.	This section applies to large petroleum dry cleaners. The update will add recordkeeping requirements to document small cleaners and prove they are not "large." ACHD has no large petroleum dry cleaning facilities.  In the past, a "Negative Declaration" was made.	Yes.  This section already fully implements the CTG specified control and will represent current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.

**Table 2: CTGs for which ACHD is in the process of promulgating a regulation under SIP103**

(1) Source Category and Applicable Allegheny County Article XXI Rule	(2)Effective Date of Article XXI Section	(3) EPA Approval Date and Federal Register	(4) Corres-ponding 25 Pa. Code Regulation	(5)Effective Date of 25 Pa. Code Section	(6) Are they equivalent?	(7) Applicable RACT Basis Document (CTG or ACT)	(8)RACT Rule Applicability and Requirements.	(9)Requirements as least as stringent as the 2015 8-Hr Ozone RACT?
<p>Synthetic Organic Chemical and Polymer Manufacturing Industry – Air Oxidation, Distillation and Reactor Processes</p> <p>Article XXI Addition of §2105.19A</p>	<p>Not yet effective. In the process of being added. County Council is reviewing.</p> <p>Will become SIP103.</p>	<p>TBD. Approval of proposed SIP103 is pending ACHD submittal to DEP and EPA.</p>	<p>25 Pa. Code § 129.71a</p>	<p>1/21/2023</p>	<p>Yes.</p> <p>Article XXI incorporates by reference the requirements of 129.71a.</p> <p>See also Appendix A.</p>	<p>Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry, EPA-450/3-84-015, December 1984.</p> <p>Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry, EPA-450/4-91-031, August 1993.</p>	<p>This section applies to SOCM I air oxidation, distillation, and reactor processes. Allegheny County has no such sources.</p> <p>In the past, a “Negative Declaration” was made. However, ACHD is currently in the process revising §2105.19A to incorporate by reference the PA DEP regulation. One step from full approval.</p>	<p>Yes.</p> <p>This section, when made effective, will fully implement the CTG specified control and will represent current RACT control level over the affected sources under the 2015 8-Hour ozone NAAQS.</p>

**Table 3: Negative Declaration – CTG for which there are no applicable sources in Allegheny County**

ACHD found no emission sources in Allegheny County for which the following Control Techniques Guideline would be applicable:

- Control of Volatile Organic Compound Emissions Leaks from Natural Gas/Gasoline Processing Plants, EPA-450/3-83-007, December 1983. <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=000029Q6.txt>

Control Techniques Guideline EPA-450/3-83-007, Section 2.0, Sources of VOC Emissions, states that “For the purposes of this document, natural gas processing plants are defined as facilities engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products, such as ethane, propane, butane, and natural gasoline.”

ACHD reviewed the operating permits of the major NO<sub>x</sub> and VOC sources operating in Allegheny County listed in Table 3 below. Based upon that review, ACHD certifies that none of them are subject to the Control Techniques Guidelines EPA-450/3-83-007.

- Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins, EPA- 450/3-83-008, November 1983. <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=000029VI.txt>  
ACHD reviewed the operating permits of the major NO<sub>x</sub> and VOC sources operating in Allegheny County listed in Table 3 below. Based upon that review, ACHD certifies that none of them are subject to the Control Techniques Guidelines EPA-450/3-83-008.

**Table 3**

<b>Permit No.</b>	<b>Facility</b>	<b>Description</b>
0637	AKJ Industries	Sludge mixing operation. Major by law, not by emissions.
0035	ALCOSAN	A publicly owned wastewater treatment plant. Major by law not emissions.
0068	Allied Waste - Imperial Landfill	Land fill gas collection system
0059	ATI Flat Rolled Products (formerly Allegheny Ludlum)	Producer of specialty metals, irons, & steels (ingots, slabs, & coils)
0037	Alta (formerly INEOS, formerly Ashland)	Industrial chemicals manufacturing plant for polyester resins; distribution of plasticizer, 2-ethylhexanol, & phthalic anhydride
0047	Bellefield Boiler Plant	The boiler plant provides steam to a consortium of hospitals, universities & museums
0040	Buckeye Terminals – Coraopolis Terminal	Refined petroleum pipeline breakout station and bulk terminal

**Table 3: Negative Declaration – CTG for which there are no applicable sources in Allegheny County**

0022	Energy Center North Shore (formerly NRG Energy Center)	Steam & chilled water supply for a district energy system. Boilers are fired primarily with natural gas
0974	Fortistar	Landfill gas collection and flaring system. Associated with Imperial Landfill.
0056	Genon Brunot Island (formerly NRG (Orion) Power Brunot Island)	Electricity generation
0370	HARSCO Metals	Slag processing
0068	Imperial Landfill	Landfill gas recovery operation
0190	Kelly Run Sanitation Landfill	Landfill gas recovery operation
0041	LHT Coraopolis (formerly Pittsburgh Terminals)	Bulk gasoline terminal
0012	LHT Terminals (formerly Neville Island Terminals & Gulf Oil)	Bulk gasoline terminal
0015	Liberty Pultrusions	Produces fiberglass reinforced plastics.
0265	Magnus Products (formerly Braddock Recovery)	Byproducts recovery facility for a steel mill. Major by operation of law.
0060	Neville Chemical Co.	Manufacturing of synthetic hydrocarbon resins, plasticizers, & Plasticizing oils
0044	Pittsburgh Allegheny County Thermal (PACT)	District steam heating supply for multiple commercial, institutional & government buildings
0057	PPG Industries, Inc Springdale	Manufactures coatings for the industrial markets and includes administrative offices, manufacturing, warehousing, research & support lab operations
0580	Springdale Energy Supply	Gas turbine power plant
0007	Sun Oil – Pittsburgh Terminal	Bulk gasoline terminal
0058	Synthomer (formerly Eastman Chemical Resins, Inc.)	Polymerizes petroleum distillates & aromatic monomers into resins using Friedel Crafts type catalysts in hydrocarbon diluents.
0225	TMS International (USS Edgar Thomson)	Byproducts recovery facility for a steel mill. Major by operations
0027	Universal Stainless & Alloy Products	Steel mill
0647	University of Pittsburgh (Main Campus)	Boilers
0215	USA Waste (Chamber Development)	Landfill gas recovery operation
0029	U.S. Steel Clairton	Manufactures metallurgical coke for use in the steelmaking process at various steel mills

**Table 3: Negative Declaration – CTG for which there are no applicable sources in Allegheny County**

0051	U.S. Steel ET	Iron & steel producing facility
0050	U.S. Steel Irvin	Manufacturing of steel slabs, hot rolled, cold reduced, & finished steel coils



**B.**

**Documentation of Public Hearing and Certifications  
("Later" unless otherwise noted)**

Public hearing notice (**draft**)

Transmittals of hearing notice to EPA & PA DEP

Proof of publication of notice of hearing

Certification of hearing

Comment and response document

Certification of Approval and Adoption

## **PROPOSED DRAFT**

### NOTICE OF PUBLIC HEARING FOR PROPOSED ALLEGHENY COUNTY PLAN FOR REASONABLY AVAILABLE CONTROL TECHNOLOGY FOR OZONE

The Allegheny County Health Department (ACHD) will hold a public hearing on a proposed change to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) to demonstrate that Reasonably Available Control Technology (RACT) is in place for 2015 8-Hour ozone on subject sources of volatile organic compounds (VOC) in Allegheny County, on **Day of week, Month, Date, 2025 beginning at 5:30 PM** in the Conference Room of the Fulton Building, 836 Fulton Street, Pittsburgh, PA, 15233.

The proposed change to the PA SIP does not impose any new requirements on any Allegheny County source. Rather, it certifies that the Article XXI Control Techniques Guidelines based regulations are RACT for the 2015 8-Hour Ozone National Ambient Air Quality Standards (NAAQS).

The proposed SIP revision is available on the ACHD Air Quality web site at [www.alleghenycounty.us/regs-sips](http://www.alleghenycounty.us/regs-sips). Written copies may be obtained by calling 412-578-8115.

- Persons wishing to present testimony at the hearing must register by going to the ACHD's Air Quality website at [www.alleghenycounty.us/regs-sips](http://www.alleghenycounty.us/regs-sips). Persons who do not have access to the internet may register by calling 412-578-8115.
- You must register to present testimony no less than 24 hours in advance of the hearing.
- Testimony is limited to 3 minutes. Witnesses are requested to submit written copies of the testimony by email to [aqcomments@alleghenycounty.us](mailto:aqcomments@alleghenycounty.us).

The Board will also accept written comments, beginning on **Day of week, Month, Date, 2025**, and concluding at 4:00 PM on **Day of week, Month, Date, 2025**, by mail to ACHD Air Program, 836 Fulton Street, Pittsburgh, PA 15233, or by email to [aqcomments@alleghenycounty.us](mailto:aqcomments@alleghenycounty.us).

Please call 412-578-8115, if you have any questions or if you have any difficulty registering for the hearing.