

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

NOTICE OF VIOLATION

July 9, 2021

CERTIFIED MAIL - 9489 0090 0027 6047 4907 32

Mr. Patrick McQuillen, President
Servsteel Inc.
214 Westbridge Drive
Morgan, PA 15064

RE: Notice of Violation #210701– Violations of Installation Permit 0297-I003 Condition V.A.1.d and Article XXI (“Air Pollution Control”), §2102.04.b.6 and §2103.12.a.2.B; at property 214 Westbridge Drive, Morgan, PA 15064.

Dear Mr. McQuillen:

The Department has reviewed the Source Test Report for the Thermal Oxidizer (TO-001) controlling emissions from the tar impregnation process, for the test conducted April 20, 2021. The Department finds that emissions from the Thermal Oxidizer stack exceeded the limits from Installation Permit 0297-I003, Condition V.A.1.f, Table V-A-1 as follows:

Pollutant	Emission Limit (lb/hr)	Measured Emissions, lb/hr
Particulate Matter	0.08	0.13
Particulate Matter <10µm (PM10)	0.08	0.13
Particulate Matter <2.5µm (PM2.5)	0.08	0.13
Nitrogen Oxides (NOX)	0.56	1.6
Sulfur Oxides (SOX)	0.007	0.037

Additionally, Servsteel failed to demonstrate a destruction efficiency for VOC of greater than or equal to 98%. The measured destruction efficiency was 79.1%.



DEBRA BOGEN, MD, DIRECTOR
ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM
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The subject compliance test was performed more than 15 months after the start date of operation of the Thermal Oxidizer. This is in violation of Article XXI, §2108.02.a, which states:

No later than 60 days after achieving full production or 120 days after startup, whichever is earlier, the person responsible for any new, modified, reconstructed or reactivated source for which a permit is required by Part B of this Article shall conduct, or cause to be conducted, such emissions tests as are specified by the Department to demonstrate compliance with all applicable requirements of this Article and shall submit the results of such tests to the Department in writing. Upon written application setting forth all information necessary to evaluate the application, the Department may, for good cause shown, extend the time for conducting such tests beyond 120 days after startup, but shall not extend the time beyond 60 days after achieving full production.

The Department requests that Servsteel contact the Department to arrange a meeting to discuss these violations and corrective actions.

This Notice of Violation is neither an order nor any other final action of the Allegheny County Health Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action. Please be aware that any violation of the Article XXI regulations subjects a person to a variety of enforcement actions, including a civil penalty of up to \$25,000 per violation per day.

The Allegheny County Health Department is currently reviewing this violation to determine whether corrective actions are required and if a civil penalty is appropriate. Should you have any questions or require additional information, please contact Shannon Sandberg at (412) 578-7969 or email at shannon.sandberg@alleghenycounty.us.

Sincerely,



Shannon Sandberg
Enforcement Section Chief
Air Quality Program