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November 10, 1993

Joseph P. Pezze
Regional Manager
Air Quality Control
Pennsylvania DER
Southwest Region - Field Operations
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745

RECEIVED
NOV 16 1993
DER, Southwest Region
Air Quality Control

RE: 25 PA Code - § 123.51: NOx CEMs

Dear Joe:

This letter summarizes our actions to date relative to the above regulation, and is for your information.

On March 29, 1993, we advised companies in Allegheny County subject to the regulations (copy of typical letter attached) of the October 30, 1993, deadline. Nine sources were identified:

U.S. Steel

Clairton:	No. 1 Boiler No. 2 Boiler Coke Battery "B"
E. T. Works:	Riley No. 1 Boiler Riley No. 2 Boiler Riley No. 3 Boiler

Shenango

Neville Island:	No. 9 Boiler No. 10 Boiler

Duquesne Light

Cheswick:	Main Boiler

To date, no formal reply has been received from Shenango; they are in bankruptcy and are expected to plead hardship.

Duquesne Light has installed a CEM at the Cheswick Station.

This letter addresses primarily the ongoing communications with U.S. Steel (USS).

Appendix I contains copies of the various correspondence between USS and ACHD/BEQ. USS prefers to measure NOx emissions through monitoring of fuel consumption and use of NOx emission factors derived from stack tests ("parametric method"). They claim this alternative method will supply accurate information but at significantly less capital and operating costs than through CEMs. USS prepared a protocol for testing and statistical analysis intended to demonstrate the accuracy of their proposed parametric method (App. I - item G) which was reviewed by ACHD/BEQ. Testing was conducted in October, and the results and analysis are expected from USS during the latter part of November.

ACHD/BEQ is sensitive to economic considerations in measuring emissions, and subject to USS proving the accuracy of the method via their stack testing is receptive to using the parametric alternative to CEMs.

We would appreciate your comments and guidance relative to the above program. Thank you.

Very truly yours,

Ronald J. Chleboski
Deputy Director

AHF/ccr
Enclosure
cc: J. M. Salvaggio (w/enc)
C. J. Coetz/J. R. Serpa
A. H. Fieser/E.J. Taylor