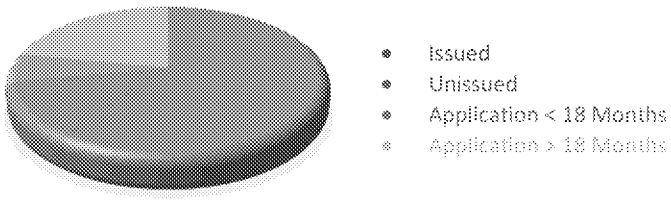
Allegheny County Health Department
Air Quality Program – JoAnn Truchan, P.E.
June 26, 2018

Corrective Action Plan to Eliminate Title V Operating Permit Backlog

Below is an overview of the Allegheny County Health Department's (ACHD's) plan to eliminate the backlog of Title V Operating Permits in the next three years. "Backlog" in this document is defined as any facility that has never received an operating permit, or any application more than 18-months old.

Background

Currently, of 32 sources, 19 are issued and within term, 2 are within 18 months (one of which is in EPA 45-day review as of the writing of this document), 7 are older than 18 months, and 4 have never been issued. Total backlog is 11 permits (one of the unissued permits was just received this January but is still considered part of the backlog). Current backlog is 34.4%.



Since September 2016, 13 permits and 6 amendments have been issued. This includes 3 previously unissued permits and 11 previously backlogged permits. In that time, 6 permits have fallen into the backlog. See Appendix A for the most recent (as of 06/26/18) list of Title V Operating permits and their status.

Year 1 – In Progress

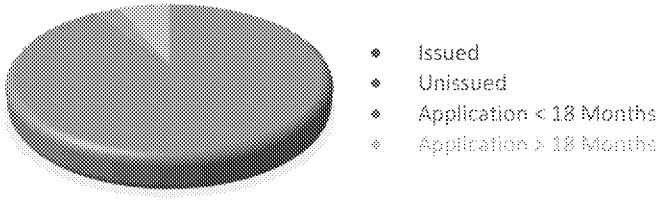
Due to attrition of engineers, some engineers were disproportionately assigned a larger number of Title V permits than others. By re-assigning sources, some backlogged permits have been processed faster, while freeing up engineers working on some of the more complex permits (such as ATI (Allegheny Ludlum) and Eastman Chemical).

Two permits, PPG Springdale and Coraopolis Terminals, have been issued in 2018. One permit, Ashland Inc., is in EPA 45-day review until August 6, 2018. Allied Waste – Imperial Landfill and Kelly Run Sanitation Landfill will be advertised in the next public comment notice. Currently being drafted are Sun Oil, Buckeye Pipeline, and Alcosan. We anticipate that all 6 of these permits will be issued before the end of the year.

The addition of another engineer will either allow re-assignment of the RACT II permits (allowing the other engineers to work on other Title V operating permits). We anticipate the third landfill permit will also be issued before the end of the year.

Additionally, we have an application to combine Gulf Oil with Pittsburgh Terminals – Neville Island. This should also be completed by the end of the year. Neither of these permits are part of the backlog, however.

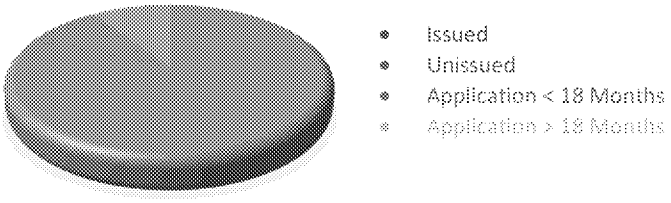
Anticipated backlog at the end of 2018 is 18.75%.



Year 2 – 2019

Bellefield Boiler and University of Pittsburgh (whose applications are currently less than 18 months old) will likely fall into the backlog. These permits, as well as US Steel – Clairton and NRG Brunot Island, should be completed in 2019.

Anticipated backlog at the end of 2019 is 9.4%.



Year 3 – 2020

The remaining permits are Eastman Chemical, ATI, and Harsco. Eastman is working steadily towards resolving the issues in the EPA compliance decree. We are currently drafting installation permits in such a way that they can be readily integrated into an operating permit. A timeline of work done on Eastman since September 2016, including their anticipated schedule for 2018-19, can be found below in Appendix B.

Issuance of Harsco is dependent upon resolution of their compliance issues, and may be completed as early as 2019. But at this time, it's not possible to make a time estimate.

ATI has been out to public comment several times. The current issue is with the NSR/PSD analysis for IP6 (which affects the operating permit). We are working with the EPA and the company to resolve the issue, which may include drastic compliance measures. This has pushed back the timeline to 2020.

In working to clear the current backlog, I anticipate several of the permits currently not part of the backlog to fall into it. These include USS Clairton, Bellefield Boiler, and University of Pittsburgh. These permits will be renewed in 2020.

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Unknowns

The following issues may affect the proposed schedule:

- An influx of installation permits.
- Issues with RACT II.
- Problems integrating a new engineer into Title V.
- Interference from environmental groups in the form of excessive comments or other (including legal) actions.
- Complex minor source permits such as Bunting Graphics, Servsteel, or McConway & Torley.
- Receipt of Title V applications from other sources such as TMS International at Universal Stainless (which has been requested).

Please note that this work will necessitate allowing some minor source permits to become more backlogged. We will pick them up as the Title V and RACT permit backlogs are being addressed.

Summary

To be issued in 2018:

- PPG Springdale (Issued 05/10/18)
- Coraopolis Terminals (Issued 06/22/18)
- Ashland (In EPA 45-day Review)
- Kelly Run Sanitation Landfill
- Allied Waste Imperial Landfill
- Buckeye Pipeline Coraopolis Terminal
- Sun Oil
- Pittsburgh Terminals/Gulf Oil (combining of 2 existing permits)
- Alcosan
- USA Waste

To be issued in 2019

- NRG – Brunot Island
- Harsco (assuming resolution of compliance issues)
- US Steel Clairton
- Bellefield Boiler
- University of Pittsburgh

To be issued in 2020

- ATI Allegheny Ludlum
- Eastman Chemical

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Appendix A: Title V Operating Permit Status (as of 06/26/18)

Permit No.	Facility Name	Latest Permit Issue Date	Application Receipt Date
0041	CORAOPOLIS TERMINIALS	06/21/18	
0057	PPG INDUSTRIES, INC. - SPRINGDALE COMPLEX	05/10/18	
0054	NRG POWER - CHESWICK	11/21/17	
0027	UNIVERSAL STAINLESS & ALLOY PRODUCTS	11/21/17	
0022	NRG ENERGY CENTER	08/25/17	
0012	PITTSBURGH TERMINALS - NEVILLE ISLAND	07/27/17	
0580	SPRINGDALE ENERGY (formerly Allegheny Energy Supply) - SPRINGDALE	07/21/17	
0225	TMS INTERNATIONAL (formerly Tube City IMS) - U.S. STEEL ET WORKS	06/27/17	
0079	RIVERBEND FOODS (formerly Bay Valley Foods)	02/23/17	
0637	AKJ - U.S. STEEL CLAIRTON	02/08/17	
0050	US STEEL - IRVIN PLANT	12/09/16	
0015	LIBERTY POLYGLAS PULTRUSIONS	11/03/16	
0265	BRADDOCK RECOVERY - U.S. STEEL ET WORKS	10/24/16	
0029	KOPPERS INDUSTRIES, INC. - CLAIRTON PLANT	08/10/16	
0051	US STEEL - EDGAR THOMSON PLANT	04/13/16	
0060	NEVILLE CHEMICAL COMPANY	09/28/15	
0044	PITTSBURGH ALLEGHENY COUNTY THERMAL, LTD (PACT)	03/24/15	
0062	NEVILLE ISLAND TERMINALS (formerly Gulf Oil)	07/11/14	
0647	UNIVERSITY OF PITTSBURGH	12/19/13	06/19/18
0047	BELLEFIELD BOILER PLANT	12/18/13	06/15/18
0037	ASHLAND LLC	02/22/13	08/22/17
0052	US STEEL - CLAIRTON PLANT	03/27/12	09/26/16
0215	USA WASTE (CHAMBERS DEVELOPMENT MONROEVILLE)	10/05/11	03/29/16
0190	KELLY RUN SANITATION LANDFILL	10/05/11	03/22/16
0058	ALLIED WASTE - IMPERIAL LANDFILL (formerly BFI)	10/13/11	01/13/16
0007	SUN OIL - PITTSBURGH TERMINAL	06/30/11	12/30/15
0056	NRG POWER - BRUNOT ISLAND	02/15/11	06/24/15
0040	BUCKEYE PIPE LINE - CORAOPOLIS TERMINAL	02/11/03	08/10/07
0370	HARSCO METALS		01/16/18
0035	ALCOSAN (SSI Part 70)		06/19/14
0059	ALLEGHENY LUDLUM CORPORATION		07/10/13
0058	EASTMAN CHEMICALS & RESINS (consent decree - testing then TVOP)		

	Issued permits that have not expired; no action required
	Issued permits with renewal applications less than 18 months old
	Issued permits with renewal applications more than 18 months old
	No Title V permit issued

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Appendix B: Timeline for Eastman Chemical (since September 2016)

2016

- September 19, 2016 – RFD for Condenser E-701-5
- September 19, 2016 – RFD for Condensers E-300-4 & E-301-4 tube bundle replacement
- October 3, 2016 – RFD for Condenser E-701-5 tube bundle replacement
- October 11, 2016 – RFD for silo baghouse replacement

2017

- February 10, 2017 – RFD for Tank 252
- February 14, 2017 – RFD for Tank 150
- March 2, 2017 – $AlCl_3$ Baghouse modification application (IP #0058-I008b) received
- March 2, 2017 – C-5 Unit modification application (IP #0058-I011c) received
- May 1, 2017 – MP Poly Process application (IP #0058-I022) received
- May 3, 2017 – $AlCl_3$ Baghouse modification IP #0058-I008b issued
- May 9, 2017 – RFD for replacement of condensers
- May 31, 2017 – RFD for replacement of Hydro Unit Cooling Tower
- June 27, 2017 – C-5 Unit modification IP #0058-I011c issued
- July 6, 2017 – RFD for replacement of Condenser E-701-5
- August 14, 2017 – RFD for Neutralizer Condenser E-500-5
- October 9, 2017 – RFD for Tank 252 material storage
- October 10, 2017 – RFD for Condenser E-700-4 tube bundle replacement
- December 21, 2017 – RFD for Tank 52

2018

- March 2, 2018 – Water White Poly Process application (IP #0058-I023) received
- March 16, 2018 – RFD for LTC #2 Condenser tube bundle replacement
- March 19, 2018 – RFD for lime bag dump station & conveyor
- May 11, 2018 – Limited Thermal Contact Unit application (IP #0058-I024) received
- May 24, 2018 – RFD for Tank 265 replacement
- June 1, 2018 – MP Poly Process IP #0058-I022 issued
- August 2018 – C-5 Pastillator Belt modification application (IP #0058-I025) expected
- September 2018 – RFD for C-5 process expected
- October 2018 – anticipated issuance of IP #0058-I023

2019

- February 2019 – anticipated issuance of IP #0058-I024
- February 2019 – anticipated issuance of IP #0058-I025
- June 2019 – Wastewater Treatment application (IP #0058-I026) expected
- August 2019 – any miscellaneous IPs required for Consent Decree expected
- December 2019 – all IPs issued

2020

- May 2020 – expected receipt of Title V Operating Permit Application
- End of 2020 – expected issuance of Title V Operating Permit

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