

**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**

In the Matter of:

Liberty Pultrusions
1575 Lebanon School Road
West Mifflin, PA 15122

Violation No. 200201

Violations of Article XXI (“Air
Pollution Control”) at property:

Liberty Pultrusions

ENFORCEMENT ORDER

NOW, this 3rd day of February, 2020, the Allegheny County Health Department (hereinafter “ACHD”) issues this Enforcement Order after it has found and determined the following:

1. The Director of the ACHD has been delegated authority pursuant to the federal Clean Air Act, 42 U.S.C. Sections 7401-7671q (hereinafter “CAA”), and the Pennsylvania Air Pollution Control Act, 35 P.S. Sections 4001-4014 (hereinafter “APCA”), and the ACHD is a local health agency organized under Local Health Administration Law, 19 P.S. §§ 12001-12028, whose powers and duties include the enforcement of laws relating to public health within Allegheny County, including the ACHD’s Rules and Regulations, Article XXI, Air Pollution Control (Allegheny County Code of Ordinances Chapters 505, 507, and 535) (“Article XXI”).
2. On October 15 and 16, 2019, Liberty Pultrusions conducted an emissions test of the Pultrusion Process Lines 1 and 2.
3. On November 25, 2019, the ACHD received from Liberty Pultrusions an updated Styrene Emissions Testing, Pultrusion Process Lines 1 and 2 report.
4. After a review of the report, the ACHD determined that the emissions test conducted October 15 and 16, 2019 was not a valid compliance test due to not being conducted

under representative conditions. The test failed to meet the requirement of the test protocol approval issued October 10, 2019 and of Article XXI, §2108.02.e.2.A, which requires that “[a]ll tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions as are specified by the Department.”

5. The ACHD determined that Pultrusion Lines 1 and 2 were not operated during the testing at maximum routine operating conditions:

- a. Pultrusion Line 1 operated at a production rate of 68.85 lb/hr during the test conducted October 16, 2019. The average operating rate for Line 1 during the period July 2018 – June 2019 was 96.2 lb/hr. The maximum monthly average operating rate for Line 1 during this period was 167.6 lb/hr for June 2019.
- b. Pultrusion Line 2 operated at a production rate of 25.74 lb/hr during the test conducted October 16, 2019. The average operating rate for Line 2 during the period July 2018 – June 2019 was 175.9 lb/hr. The maximum monthly average operating rate for Line 2 during this period was 216.1 lb/hr for November 2018.

6. The ACHD determined that Liberty Pultrusions is in violation of Condition V.A.2.a of Operating Permit #0015 and Article XXI, §2108.02.a, for failing to perform a valid stack test to demonstrate compliance with the emission limits stated in the applicable ACHD permit.

ORDER

NOW THEREFORE, pursuant to the authority granted to the ACHD by Article XXI, §§ 2109.03.a.1, and the Local Health Administration Law, 19 P.S. § 12010, it is hereby **ORDERED** that:

7. Within ninety (90) days of the date of this Order, Liberty Pultrusions shall conduct a formal stack test of Pultrusion Lines 1 and 2. Liberty Pultrusions shall submit a written protocol at least 45 days prior to the first planned test date. The protocol shall state how Liberty Pultrusions will meet the requirement to test under maximum routine operating conditions or propose an alternative testing scenario which ensures that testing is conducted under conditions of maximum styrene emissions during routine operation. The results of the stack test shall be used to demonstrate compliance with the existing permit limits.

8. Failure to comply with this Order within the times specified herein is a violation of Article XXI giving rise to the remedies provided by Article XXI § 2109.02 including civil penalties of up to \$25,000 per violation per day.

9. Please be advised that the ACHD may issue a separate enforcement order which may result in a civil penalty.

10. Pursuant to Article XI (“Hearings and Appeals”) of the Allegheny County Health Department Rules and Regulations, you are notified that if you are aggrieved by this Order you have thirty (30) days from the date of issuance or receipt of this Order in which to file an appeal. Such a Notice of Appeal shall be filed in the Office of the Director at 542 Fourth Avenue, Pittsburgh, PA 15219. A copy of Article Article XI may be found at:
<https://www.alleghenycounty.us/Health-Department/Health-Department-Regulations.aspx>.

11. This Order is enforceable upon issuance and any appeal of this Order shall not act as a stay unless the Director of the ACHD so orders. In the absence of a timely appeal, the terms of this Order shall become final.

12. The provisions of this Order shall apply to, be binding upon, and inure to the benefit of the ACHD and Liberty Pultrusions, and upon their respective officers, directors, agents, contractors, employees, servants, successors, and assigns.

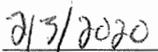
DONE and **ENTERED** this 3rd day of February, 2020, in Allegheny County, Pennsylvania.

For:

ALLEGHENY COUNTY HEALTH DEPARTMENT



Dean Deluca
Air Quality Program Manager



Date