

**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**

In the Matter of:

ATI Flat Rolled Products Holdings, LLC
Brackenridge Facility
100 River Road
Brackenridge, PA 15014

Violation No. 200703

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

ATI Flat Rolled Products
Holdings, LLC
Brackenridge Facility
100 River Road
Brackenridge, PA 15014

ENFORCEMENT ORDER

NOW, this 30th day of July, 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 the 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, but not limited to, the ACHD’s Rules and Regulations, Article XXI, Air Pollution Control (Allegheny County Code of Ordinances Chapters 505, 507 and 535) (hereinafter “Article XXI”).

2. ATI Flat Rolled Products Holdings, LLC (hereinafter “ATI”) facility is a primary steel manufacturer which produces specialty steel from scrap steel and iron, and consists of two electric arc furnaces (EAFs), an argon-oxygen decarburization vessel (AOD), hot rolling mills, pickling and annealing lines and related equipment.

3. On November 8, 2002, the ACHD issued Installation Permit No. 0059-I006 (hereinafter “IP-6”) for the installation of two electric arc furnaces (hereinafter referred to as “EAFs # 1 and # 2” or “F1 and F2”) in ATI’s Brackenridge Plant.

4. IP-6, Condition V.A.1.a.2, states as follows:

The permittee shall not cause to be discharged into the atmosphere from EAF #1 or #2 any gases which:

Exit from the 1A, 1B, 2A or 2B DEC baghouses, D004 canopy or D007 canopy baghouses and exhibit 3 percent opacity or greater; and (60.272a(a)(2)).

5. On January 30, 2020, ATI submitted a semiannual report for the F1 and F2 furnaces to the ACHD. The semiannual report states as follows:

After an extended outage, F2 baghouse daily visible emissions (VE) observations were performed, as required, on 07/07/19. **VE observations from 6:47 p.m. to 6:52 p.m. documented an opacity of 8.75%. The opacity limit is 3%.** It was noted that steam was also exiting the baghouse roof monitor, which is not typical. F2 was immediately shut down for 32 minutes while maintenance personnel conducted an investigation. Maintenance personnel inspected bags inside the DEC baghouse and no leaks in bags were identified in the baghouse at that time and it was verified that the bags were properly attached to their mounting structure. No abnormal conditions were identified in the baghouse at that time. Without corrective action, F2 resumed operation and abnormal visible emissions were not present, however, white steam was still visible exiting the baghouse. VE observations were performed again from 8:10 p.m. to 8:40 p.m. and documented 0% opacity. This was F2’s first heat after an extended outage; significant rainfall had occurred over the weekend and it is believed that water infiltrated under the baghouse roof (32 side) and entered the baghouse. It is suspected that puddled water inside the baghouse contributed to excessive moisture during the first heat after the extended outage and contributed to the VE anomaly. The DEC baghouse (32 side) continued to be monitored by maintenance personnel to verify proper operation. No 32 DEC was inspected by maintenance personnel again on 07/08/19, abnormal conditions were not identified and VE’s were not observed. The abnormal condition corrected itself without intervention from the maintenance department.

6. ATI submitted the following visible emissions observation sheet for July 7, 2019:

VISIBLE EMISSIONS OBSERVATION FORM

80-150 Air Quality Station Baghouse 32 B. J. Johnson Bridge		
Stack/ID: PA 18014	EAI: normal	Emission: normal
LRP: 100 100	LRP: 100 100	LRP: 100 100
2000 ft from Baghouse Roof Vents Rot, Brown, Long MFR Cond. & Cooling Loops, Hillside Observations		
75°	11 mph	NW

WIND DIRECTION

WIND SPEED

WIND GUST

MONTROSE

	0	15	30	45					
START TIME	17:51								
1	0	0	0	0					
2	0	0	0	0					
3	0	0	0	0					
4	0	0	0	0					
5	0	0	0	0					
6	0	0	0	0					
STOP TIME	18:37								
START TIME	18:57								
1	0	0	0	0					
2	10	10	10	10					
3	10	10	10	10					
4	10	10	10	10					
5	10	10	10	10					
6	10	10	10	10					
STOP TIME	19:53								
START TIME	19:47								
1	0	0	0	0					
2	10	10	10	10					
3	10	10	10	10					
4	10	10	10	10					
5	10	10	10	10					
6	10	10	10	10					
STOP TIME	19:53								

Frank Barton

Montrose

Compliance Assurance Associates

7/8/2019

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7. The ACHD has determined that ATI violated Article XXI, § 2102.03.c, of the ACHD’s Rules and Regulations by failing to meet the compliance limits stated in IP-6, Condition V.A.1.a.2, during the July 7, 2019 observation period. Article XXI, § 2102.03.c, reads as follows:

§ 2102.03 Permits Generally

c. Conditions

It shall be a violation of this Article giving rise to the remedies provided by Part I of this Article for any person to fail to comply with any terms or conditions set forth in any permit issued pursuant to this Part.

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:

8. For the violation set forth in the preceding paragraphs, ATI is hereby assessed a civil penalty of ONE THOUSAND THREE HUNDRED TWENTY DOLLARS (\$1,320.00). The civil penalty is as follows:

A. Gravity Based Component

Violation	Gravity Based Penalty	Violation Counts	Total Penalty
§ 2102.03 Excessive Visible Emissions (July 7, 2019)	\$1,100.00	1	\$1,100.00
Gravity Component Subtotal			\$1,100.00

B. Adjustment Factors

Title V Source:	\$220.00
TOTAL CIVIL PENALTY	\$1,320.00

9. ATI shall pay the total civil penalty amount within thirty (30) days of receipt of this Order. Payment shall be made by corporate or certified check, or the like, made payable to the

“Allegheny County Clean Air Fund”, and sent to Air Quality Program Manager, Allegheny County Health Department, 301 39th Street, Bldg. #7, Pittsburgh, PA 15201.

10. The ACHD has determined the above civil penalty to be in accordance with Article XXI § 2109.06.b. reflecting relevant factors including, but not limited to: the nature, severity and frequency of the alleged violations; the maximum amount of civil and criminal penalties authorized by law; the willfulness of such violations; the impact of such violations on the public and the environment; the actions taken by ATI to minimize such violations and to prevent future violations; and ATI’s compliance history.

11. Please be advised that 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.

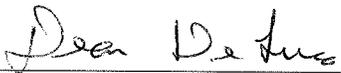
12. Pursuant to Article XI, § 1104.A (“Hearings and Appeals”), of the Allegheny County Health Department Rules and Regulations, you are notified that if you are aggrieved by this Order, a Notice of Appeal shall be filed no later than thirty (30) days after receipt of written notice or issuance of this Order. Such a Notice of Appeal shall be filed in the Office of the Director at 542 Fourth Avenue, Pittsburgh, PA 15219. 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.

13. Please be aware that if you wish to appeal this Order, you are required within 30 days of receipt of this Order to either forward the penalty amount to the ACHD for placement in an escrow account or post an appeal bond to the ACHD in the amount of the penalty. Please review the specific requirements for prepaying the penalty or posting the appeal bond found in

Article XXI, §§ 2109.06.a.2-3. A copy of Article XXI and Article XI may be found at <https://www.alleghenycounty.us/Health-Department/Health-Department-Regulations.aspx>.

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

DONE and **ENTERED** this 30th day of July, 2020, in Allegheny County, Pennsylvania.



Dean DeLuca
Air Quality Program Manager

7/30/2020
Date