

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

April 23, 2020

Mr. Virendra Trivedi, Acting Director
Department of Environmental Protection
Bureau of Air Quality
Rachel Carson Building
400 Market Street, P.O. Box 8468
Harrisburg, PA 17105-8468

Dear Mr. Trivedi:

The Allegheny County Health Department hereby submits a requested revision to Allegheny County's portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the 1997 and 2008 8-hour ozone National Ambient Air Quality Standards consisting of this certification letter and the attached documents.

This letter certifies that all case-by-case reasonably available control technology (RACT) determinations and Nitrogen Oxide (NO_x) averaging plans have been submitted to the U.S. Environmental Protection Agency (EPA) to meet certain of Pennsylvania's Clean Air Act (CAA) obligations under the 1997 and 2008 8-hour ozone National Ambient Air Quality Standard (NAAQS).

The Pennsylvania Department of Environmental Protection (PA DEP) submitted its April 23, 2016 final rule, entitled *Additional RACT Requirements for Major Sources of NO_x and VOCs* (46 Pa.B. 2036) (RACT II Regulations) as a SIP revision to meet RACT requirements for volatile organic compound (VOC) and oxides of nitrogen (NO_x) emissions under sections 172(c)(1), 182(b)(2)(C) and 182(f) of the Clean Air Act (42 U.S.C.A. §§ 7502(c)(1), 7511a(b)(2), 7511a(f)) and the 2008 ozone NAAQS implementation rule (80 FR 12,264; March 6, 2015).

On May 9, 2019, the EPA published a final rule entitled *Approval and Promulgation of Air Quality Implementation Plans; Pennsylvania; Regulatory Amendments Addressing Reasonably Available Control Technology Under the 1997 and 2008 8-Hour Ozone National Ambient Air Quality Standards*, (84 FR 20,274), which conditionally approved certain provisions of Pennsylvania's RACT II Regulations (RACT II Conditional Approval). Through this SIP revision, ACHD certifies that the terms of EPA's RACT II Conditional Approval have been satisfied with regard to air pollution sources located in Allegheny County.



ALLEGHENY COUNTY HEALTH DEPARTMENT
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Section IV of the EPA's RACT II Conditional Approval required PA DEP to submit the following by May 9, 2020:

1. All facility-wide or system-wide averaging plans approved by PADEP under 25 Pa Code § 129.98 including but not limited to any terms and conditions that ensure the enforceability of the averaging plan as a practical matter, and;
2. All source-specific RACT determinations approved by PADEP under 25 Pa Code § 129.99, including any alternative compliance schedules approved under §§ 129.97(k) and 129.99(i); the source-specific RACT determinations submitted to EPA for approval into the SIP shall include any terms and conditions that ensure the enforceability of the source-specific RACT emission limitation as a practical matter.

PA DEP previously submitted a letter to EPA on September 29, 2017 which committed Pennsylvania to fulfilling the above-referenced requirements of the RACT II Conditional Approval.

The Allegheny County Health Department (ACHD), a separate local air pollution control agencies approved by PA DEP in accordance with Section 12 of the Air Pollution Control Act (35 P.S. § 4012), conducted a review of the major VOC and NOx sources operating in Allegheny County, and has prepared its own case-by-case RACT determinations for the sources listed in Section B of the attached document. The ACHD now certifies that, with this SIP revision request submittal, it has submitted all of the case by case RACT determinations and averaging plans to the PA DEP required by the RACT II Conditional Approval, and that the additional enforceable measures in the RACT permits resolve the requirements of the EPA's RACT II Conditional Approval.

This certification letter and the case-by-case RACT determinations and averaging plans for the sources listed in Section B of the attached document have been submitted to the EPA electronically through the EPA central data exchange (cdx) web portal, *State Planning electronic Collaboration System* (SPeCS) for SIPs.

This SIP revision is being tracked as our internal Revision Tracking Number 84C. It was the subject of the public comment periods and public hearings listed in Section B and documented in Section D of the attached document.



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ACHD followed all the applicable procedural requirements of the Commonwealth's laws and constitution in conducting and completing the adoption/issuance of the SIP revision. ACHD also publishes the proposed SIP Revision on its website <http://www.achd.net/air/regulations.html> in accordance with PA State Act 27 of 2012. As required by federal SIP-processing regulations, enclosed certifications demonstrate that the required public notices were provided and that public hearings were held.

We request that the Pennsylvania Department of Environmental Protection approve this revision and forward it to the U.S. EPA Region III with a recommendation for approval. If you have any questions, please contact Ms. Jayme Graham at 412-578-8129 or jayme.graham@alleghenycounty.us.

Sincerely,

Debra Bogen, MD, Director
Allegheny County Health Department

cc: Jayme Graham, Manager, ACHD Air Quality Program
Sandra Etzel, Manager, ACHD Planning & Data Analysis Section
JoAnn Truchan, Manager, ACHD Permitting Section
Kirit Dalal (Pa DEP)
Stephen Hepler (Pa DEP)
Vincent Pascucci (Pa DEP)

Attachment



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