ALLEGHENY COUNTY HEALTH DEPARTMENT

Bellefield Boiler Plant) ENFORCEMENT ORDER 4400 Forbes Avenue) NO. 248
Pittsburgh, PA 15213-4080
Allegheny County

NOW, this 19th day of December, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that the Bellefield Boiler Plant (hereafter referred to as "Bellefield"), 4400 Forbes Avenue, Pittsburgh, Allegheny County, PA 15213-4080, as the operator of a steam generation facility at 4400 Forbes Avenue, Pittsburgh, Allegheny County, PA 15213-4080 (hereafter referred to as "the facility"), is a major stationary source of "oxides of nitrogen" emissions (hereafter referred to as "NO_x") as defined in Section 2101.20 of Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control (hereafter referred to as "Article XXI"), and

WHEREAS, the Department has determined that Section 2105.06.a. of Article XXI, entitled "Major Sources of NO, & VOCs" is applicable to Bellefield's operations by virtue of Bellefields's emissions of NO,; and

WHEREAS, Bellefield has timely submitted to the Department all documents required by Section 2105.06.b of Article XXI (hereafter referred to as "the proposal"); and

WHEREAS, the Department has determined, after a review of the submitted proposal, the proposal to be complete; and

whereas, the Department has further determined, after review of the submitted proposal, that it constitutes Reasonably Available Control Technology (hereafter referred to as "RACT") for control of NO, emissions from the facility; and

WHEREAS, the Department requires NO_x Lbs/MMBTU emission limitations on each boiler at the facility as a component of NO_x RACT for the facility; and

WHEREAS, pursuant to Section 2109.03 of Article XXI, the Director of the Allegheny County Health Department or his designated representative may issue such orders as are necessary to aid in the enforcement of the provisions of Article XXI, notwithstanding the absence of any violation of any provision of Article XXI and of any condition causing, contributing to, or creating danger of air pollution;

NOW, THEREFORE, this day first written above, the Department, pursuant of Section 2109.03 of Article XXI, hereby issues this Enforcement Order No. 248:

I. ORDER

1.1 At no time shall Bellefield allow emissions of NO, from boilers one (1) through seven (7) at this facility to exceed the following NO, emission limitations:

NO, Emissions:

Boiler Number	Lbs/MMBTU	Tons/Year
29		
1	0.92	376
2	0.47	258
3	0.63	242
4	0.47	241
5	0.59	261
6	0.28	191
7	0.20	65

1.2. Bellefield shall not allow the annual average heat input to the natural gas burner in Boiler No. 3, to exceed 64 MMBTU/Hr or 560,640 MMBTU

/Yr, based on a natural gas heat content of 1,028 BTU/Ft³. Bellefield shall determine compliance with this condition by maintaining records of natural gas use for the burner.

- 1.3. Bellefield shall not, at any time, operate boilers one (1) through seven (7) unless the subject boilers are properly operated and maintained according to good engineering and air pollution control practices.
- 1.4. Bellefield shall perform NO, emission testing on boiler number(s) one (1) through six (6) every five years in order to demonstrate compliance with the NO, emission limitations of paragraph 1.1 above. Such testing shall be conducted in accordance with any applicable U.S. EPA approved test methods and Section 2108.02 of Article XXI. Compliance with the above referenced Lbs/MMBTU NO, standards shall be determined by an average of three one-hour stack tests.
- 1.5. Bellefield shall not operate boiler number seven

 (7) unless a NO_x continuous emission monitoring

 system (CEM) is at all times in place on the

 subject boiler and properly operated and

maintained according to 40 CFR, Part 60, Subpart Db.

- 1.6. Records shall be kept by the facility to demonstrate compliance with the requirements of Section 2105.06 of Article XXI and this Order.

 Such records shall provide sufficient data and calculations to clearly demonstrate that all requirements of section 2105.06 of article XXI and this Order are met.
- 1.7. Data and information required to determine compliance shall be recorded and maintained by the facility in a time frame consistent with the averaging period of the requirements. Such records shall include, but not be limited to the following:
 - A. Type and amount of fuel usage per boiler, (Tons/day and/or MMSCF/day);
 - B. Steam load per boiler, (lbs/day); and
 - C. Operating hours per boiler, (hours/day and days/year).

- D. All records of maintenance activities, inspections calibrations and/or replacement of fuel-burning equipment--(e. g. replacement of burners, adjustments of flame patterns and/or air-to-fuel ratios).
- E. All records and reports required by 40 CFR, Part 60, Subpart Db, for boiler number seven (7).
- 1.8. Bellefield shall retain records required by both Section 2105.06 of Article XXI and this Order for the facility for at least two (2) years and shall make the same available to the Department upon request.
- 1.9. The contents of this Order shall be submitted to the U.S. Environmental Protection Agency as a revision to the Commonwealth of Pennsylvania's State Implementation Plan.
- 1.10. Failure to comply with any portion of this Order within the times specified herein, is a violation of Article XXI giving rise to the remedies provided by Section 2109.02 of Article XXI, that may subject Bellefield to civil proceedings,

including injunctive relief, by the Department.

- 1.11. This Order does not, in any way, preclude, limit or otherwise affect any other remedies available to the Department for violations of this Order or of Article XXI, including, but not limited to, actions to require the installation of additional pollution control equipment and the implementation of additional corrective operating practices.
- 1.12. This Order shall be enforceable upon issuance. If Bellefield is aggrieved by all or any part of this Order, Bellefield has the right to file a Notice of Appeal within ten (10) days of service in accordance with Article XXI. This Order shall become final ten (10) days after service if no appeal has been perfected within that period. Appeal of this Order shall not act as a stay unless so ordered by the Director of the Department.

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: _	Biodism	18/19/96	

Bruce W. Dixon, M.D., Director Allegheny County Health Department

and By: Thomas | Pagned

Thomas J. Puzniak, Manager Engineering Air Quality Program