



**GROUP AGAINST SMOG &  
POLLUTION**

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**VIA EMAIL**

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Air Quality Program  
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Pittsburgh, PA 15201  
[aqpermits@alleghenycounty.us](mailto:aqpermits@alleghenycounty.us)

**Re: Comments of Group Against Smog and Pollution Regarding the  
Draft Title V Operating Permit for the Bellefield Boiler Plant  
(Permit # 0047-OP20)**

Dear Sir or Madam:

Please accept these comments regarding the draft Title V Operating Permit (#0047-OP20) (the "Permit") for the Bellefield Boiler Plant (the "Facility"), which I am submitting on behalf of the Group Against Smog and Pollution. According to the notice posted on its website, the Allegheny County Health Department ("ACHD") is accepting comments on the Permit through October 19, 2020.

Very truly yours,

/s

John K. Baillie  
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION**  
**REGARDING THE DRAFT TITLE V OPERATING PERMIT FOR**  
**THE BELLEFIELD BOILER PLANT (#0047-OP20)**

**I. A TITLE V OPERATING PERMIT MUST CONTAIN MONITORING AND TESTING REQUIREMENTS THAT ASSURE COMPLIANCE WITH THE PERMIT'S TERMS AND CONDITIONS**

A Title V Operating Permit must contain monitoring requirements that are sufficient “to assure compliance with the permit terms and conditions.”<sup>1</sup> A test that is performed once every five years may be sufficient to assure compliance with the terms and conditions of a Title V Operating Permit if the Permit requires that the test be used to establish operating parameters relating to the emissions of each pollutant, and also requires that those parameters be monitored on a basis sufficient to assure compliance.<sup>2</sup> However, in the absence of such monitoring, “infrequent testing” may not be sufficient to assure compliance with the Permit’s emission limits.<sup>3</sup>

**II. THE PERMIT’S RECORDKEEPING AND TESTING REQUIREMENTS FOR BOILERS 1, 3, 5, AND 6 DO NOT ASSURE COMPLIANCE WITH THE HOURLY EMISSION LIMITS**

The Permit establishes hourly emission limits for particulate matter (“PM”), nitrogen oxide (“NO<sub>x</sub>”), carbon monoxide (“CO”), sulfur dioxide (“SO<sub>2</sub>”), and volatile organic compounds (“VOCs”) for each of the Facility’s Boilers 1, 3, 5, and 6.<sup>4</sup> The Department’s Review Memo for the Permit states that compliance with those limits will be determined in two

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<sup>1</sup> 42 U.S.C. § 7661c(c); 40 C.F.R. § 70.6(a)(3)(i)(A); *see* Art. XXI, § 2103.12.h.1.

<sup>2</sup> *See In the Matter of Kentucky Syngas, LLC*, 2012 EPA CAA Title V LEXIS 4, \*165 (June 22, 2012); *see also In the Matter of Northampton Generating Co.*, 2020 EPA CAA Title V LEXIS 5, \*25-28 (July 15, 2020) (testing once every five years insufficient to assure compliance with hourly emission limits in the absence of any monitoring requirement; permit record did not establish that monitoring or testing emissions of certain pollutants was sufficient to assure compliance with hourly emission limits for other pollutants).

<sup>3</sup> *See In the Matter of Luke Paper Co.*, 2010 EPA CAA Title V LEXIS 7, \*14-15 (Oct. 18, 2010).

<sup>4</sup> *See* Permit, §§ V.A.1.d; V.B.1.f; V.C.1.e; and V.D.1.e.

ways, specifically, by recording each boiler's daily fuel consumption and continuously monitoring the oxygen content in each boiler's flue gas:

**METHOD OF DEMONSTRATING COMPLIANCE**

The Facility will demonstrate compliance by complying with daily recording of fuel type and consumption. **The facility shall also continuously monitor and record flue gas oxygen content for all the boilers and to ensure the boilers are being operated and maintained properly** and recordkeeping and reporting requirements that include inspection, maintenance and repair data. In addition, NO<sub>x</sub> compliance may be demonstrated by the specified periodic NO<sub>x</sub> emission tests.<sup>5</sup>

The Review Memo does not establish a relationship between the oxygen content in the Boilers' flue gas and emissions of PM, NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOCs from the Boilers.

The Permit requires the Facility to keep records of daily fuel consumption by each of Boilers 1, 3, 5, and 6,<sup>6</sup> and to conduct NO<sub>x</sub> emission testing on each of the boilers once every five years.<sup>7</sup> However, despite the emphasized language from the Review Memo, the Permit does not require continuous monitoring of the oxygen content in the flue gas from Boilers 1, 3, 5, and 6. Moreover, the Review Memo does not explain how records of daily fuel consumption and NO<sub>x</sub> emission testing that are conducted once every five years on Boilers 1, 3, 5, and 6 are sufficient to assure compliance with all hourly emission limits for those Boilers, either with or without continuous monitoring of the oxygen content in the Boilers' flue gas.

Consequently, it appears that the Permit does not contain monitoring requirements that are sufficient to assure compliance with all of the hourly emission limits for Boilers 1, 3, 5, and 6. The Department must either revise the Permit so that it requires monitoring or recordkeeping that assures compliance with the hourly emission limits for Boilers 1, 3, 5, and 6, or explain how

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<sup>5</sup> Memorandum, "Review of Application for Renewal of the Title V Operating Permit for the Bellefield Boiler Plant, at 3 (Sept. 18, 2020) (emphasis added).

<sup>6</sup> Permit, §§ V.A.4.a.1; V.B.4.b.1; V.C.4.a.1; and V.D.4.b.1.

<sup>7</sup> *Id.*, §§ V.A.2.a; V.B.2.a; V.C.3.a; and V.D.2.a.

records of daily fuel consumption and performance tests that are conducted once every five years are sufficient by themselves to assure the Facility's compliance with those hourly emission limits.

### **III. THE MONITORING AND RECORDKEEPING FOR BOILER 7 DO NOT ASSURE COMPLIANCE WITH ALL APPLICABLE HOURLY EMISSION LIMITS**

The Permit also establishes hourly emission limits for PM, NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOCs for Boiler 7.<sup>8</sup> The Permit requires that NO<sub>x</sub> emissions from Boiler 7 be monitored continuously,<sup>9</sup> but (as with Boilers 1, 3, 5, and 6) the Permit does not require that emissions of PM, CO, SO<sub>2</sub>, or VOCs from Boiler 7 be monitored on either a continuous or an hourly basis. The Permit does require that the records be kept of "hourly average, maximum hourly concentration each month, and monthly average concentration" for the oxygen content of the flue gas from Boiler 7.<sup>10</sup>

The Department's Review Memo for the Permit does not establish a relationship between the oxygen content in Boiler 7's flue gas and emissions of PM, NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOCs, or a relationship between Boiler 7's NO<sub>x</sub> emissions and its emissions of PM, CO, SO<sub>2</sub>, and VOCs.

Consequently, it appears that the Permit does not contain monitoring requirements that are sufficient to assure compliance with the hourly emission limits for PM, CO, SO<sub>2</sub>, and VOCs from Boiler 7. The Department must either revise the Permit so that it requires monitoring or recordkeeping that assures compliance with all hourly emission limits for Boiler 7, or explain how monitored NO<sub>x</sub> emissions, records of daily fuel consumption, and performance tests that are

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<sup>8</sup> § V.E.1.j.

<sup>9</sup> §§ V.E.3.a and V.E.3.f.

<sup>10</sup> § V.E.4.b.3.

conducted once every five years are sufficient to assure compliance with all hourly emission limits for Boiler 7.

**IV. THE MONITORING AND RECORDKEEPING FOR BOILER 8a DO NOT ASSURE COMPLIANCE WITH ALL APPLICABLE HOURLY EMISSION LIMITS**

The Permit also establishes hourly emission limits for PM, NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOCs for Boiler 8a.<sup>11</sup> The Permit requires that fuel flow and emissions of NO<sub>x</sub> and CO from Boiler 8a be monitored continuously,<sup>12</sup> but the Permit does not require that emissions of PM, SO<sub>2</sub>, or VOCs from Boiler 8a be monitored on either a continuous or an hourly basis. The Permit does require that the Boiler 8a be equipped with “instrumentation to monitor the oxygen content, CO and NO<sub>x</sub> of the boiler exhaust on a monthly basis during operation.”<sup>13</sup>

The Department’s Review Memo for the Permit does not establish a relationship between the oxygen content in Boiler 8a’s flue gas and emissions of PM, SO<sub>2</sub>, or VOCs, or a relationship between Boiler 8’s NO<sub>x</sub> or CO emissions or the oxygen content of its exhaust and its emissions of PM, SO<sub>2</sub>, or VOCs.

Consequently, it appears that the Permit does not contain monitoring requirements that are sufficient to assure compliance with the hourly emission limits for PM, SO<sub>2</sub>, and VOCs from Boiler 8a. The Department must either revise the Permit so that it requires monitoring or recordkeeping that assures compliance with all hourly emission limits for Boiler 8a, or explain how monitored NO<sub>x</sub> and CO emissions and the oxygen content of Boiler 8a’s exhaust, records of

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<sup>11</sup> § V.F.1.h.

<sup>12</sup> § V.F.3.a.

<sup>13</sup> § V.F.3.e.

daily fuel consumption, and performance tests that are conducted once every five years are sufficient to assure compliance with all hourly emission limits for Boiler 8a.