

ALLEGHENY COUNTY HEALTH DEPARTMENT
BUREAU OF ENVIRONMENTAL QUALITY
DIVISION OF AIR QUALITY

IN RE:

USX Corporation)	
USS, A Division of USX)	ENFORCEMENT ORDER
Corporation)	NO. 200
600 Grant Street)	<u>UPON CONSENT</u>
Pittsburgh, PA 15219-2749)	

WHEREAS the United States Environmental Protection Agency (hereinafter "EPA") proposed, on September 22, 1992 (57FR43850), to redesignate portions of Allegheny County located in and around the City of Clairton ("the Clairton area") as nonattainment for sulfur dioxide; and

WHEREAS the Allegheny County Health Department ("the Department") objected to the proposed redesignation of the Clairton area because, among other things, certain significant improvements have been made to the coke oven gas desulfurization facility at the Clairton Works of USX Corporation ("USX") as recognized by the Department and the Allegheny County Air Pollution Control Advisory Committee (~~see Attachments A and B~~); and because of recent improvements in air quality in the Clairton area; and

WHEREAS USX has voluntarily installed certain equipment and made certain modifications to its Clairton Works coke oven gas desulfurization facility as part of its overall pollution prevention efforts; and

WHEREAS EPA, on December 21, 1993 (58FR67334), deferred action on its proposed redesignation of the Clairton area pending codification of the significant improvements to the Clairton Works coke oven gas desulfurization facility into a federally-approved State Implementation Plan ("SIP") for Allegheny County; and

WHEREAS USX and the Department wish to enter into an enforcement order upon consent which will legally require USX to make certain additional improvements and to properly operate and/or maintain the improvements previously made to its Clairton Works coke oven gas desulfurization facility; and

WHEREAS USX and the Department desire that such an enforcement order upon consent be submitted through the Commonwealth of Pennsylvania to the EPA as a proposed revision to the SIP for sulfur dioxide for Allegheny County.

NOW, THEREFORE, this 17th day of November, 1994, the Department, pursuant to Section 301 of Article XX, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control, ("Article XX") and upon agreement of the parties as herein set forth, hereby issues this Enforcement Order:

I. ORDER

A. Claus Plant

1. USX shall, at all times, properly maintain two Claus Plants at the Clairton Works coke oven gas desulfurization facility. Each Claus Plant shall be capable of independently processing all of the coke oven

gas produced by the Clairton Coke Plant at full production.

2. USX shall operate one Claus Plant at all times when coke oven gas is being produced at the Clairton Works.
3. a. USX shall, at all times, have its second Claus Plant ready for start-up and operation when a breakdown of the first Claus Plant occurs, except when the second Claus Plant is down for repairs, maintenance or modification. All repairs, maintenance and modifications to Claus Plants shall be made as expeditiously as practicable.
b. The second Claus Plant shall start up and be fully operational within 18 hours of each breakdown on the first Claus Plant if the plant production is below 5,000 tons of coke per day at the time of the breakdown, or within 30 minutes of each such breakdown if the production is 5,000 tons of coke per day or greater.

B. HCN Destruct Unit

1. USX shall operate and maintain an HCN (hydrogen cyanide) Destruct Unit at all times that coke oven gas is being produced at the Clairton Works.
2. The HCN Destruct Unit shall have two catalytic reactors, each of which is capable of independently processing all of the feed gas to the HCN Destruct Unit when the Clairton Coke Plant is operating at full production.

3. USX shall have its second catalytic reactor ready for immediate operation at all times except when the second catalytic reactor is down for repairs. All repairs to catalytic reactors shall be made as expeditiously as practicable.

C. Vacuum Carbonate Unit

1. Absorber Columns and Axi Compressors

- a. USX shall operate and maintain a Vacuum Carbonate Unit at all times that coke oven gas is being produced at the Clairton Works.
- b. The Vacuum Carbonate Unit shall have two absorber columns, each of which is capable of independently processing all of the gas flow through the Vacuum Carbonate Unit when the Clairton Coke Plant is operating at full production.
- c. The Vacuum Carbonate Unit shall have two axi compressors, each of which is capable of independently processing all of the acid gases generated at the Vacuum Carbonate Unit when the Clairton Coke Plant is operating at full production.
- d. USX shall operate one absorber column and one axi compressor at all times when coke oven gas is being produced at the Clairton Works.
- e. USX shall have its second absorber column and its second axi compressor ready at all times for

operation within two hours except when the second absorber column or second axi compressor is down for repairs, maintenance or modifications, or when there is a sudden, unexpected failure of a primary unit(s). If there is a sudden, unexpected failure of the primary absorber column or the primary axi compressor, the secondary unit(s) shall be operational within eight hours of such failure(s). All repairs, maintenance and modifications to absorber columns and the axi compressors shall be made as expeditiously as practicable.

2. Strippers

- a. USX shall, at all times, properly maintain two strippers in the Vacuum Carbonate Unit at the Clairton Works coke oven gas desulfurization facility.
- b. Each stripper shall be capable of independently processing all of the solution from the absorber column.
- c. USX shall operate one stripper in its Vacuum Carbonate Unit at all times when coke oven gas is being produced at the Clairton Works.
- d. USX shall, at all times, have its second stripper ready for operation within three (3) hours except when the second stripper is down for repairs, maintenance or modification. All repairs,

maintenance and modifications to the strippers shall be made as expeditiously as practicable.

D. Heat Exchangers and Pumps

1. USX shall, at all times, maintain in good working order spare heat exchangers in the Vacuum Carbonate Units at the Clairton Works coke oven gas desulfurization facility as set forth in Attachment C.
2. USX shall, at all times, maintain in good working order spare pumps in the Vacuum Carbonate Units at the Clairton Works coke oven gas desulfurization facility as set forth in Attachment D.

E. Reporting of Breakdown or Unavailability of Equipment

1. USX shall report, in accordance with the requirements of Section 202.C of Article XX, any event that causes the breakdown or unavailability of: (a) any Claus plant, stripper, absorber column or axi compressor required by this Order to be operated, to be ready for immediate operation, or to be available as spare equipment; (b) both a heat exchanger and its respective spare, as set forth in Attachment C; or (c) both a pump and its respective spare, as set forth in Attachment D.

~~II. AGREEMENT~~

~~The foregoing Order shall be enforced in accordance with and is subject to the following agreement of the parties, to wit:~~

~~A. If USX fails to comply, in a timely manner, with any of the~~

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~~requirements of the foregoing Order except for Paragraph I.B.1, USX shall pay, upon demand, a stipulated penalty of \$1,500 per day for each day that each violation continues. Stipulated penalties accruing under this Order and Agreement shall be paid within twenty (20) days of demand by the Department. Payment shall be made by check payable to the "Allegheny County Health Department Clean Air Fund" and shall be sent to:~~

~~Enforcement Division Chief
Bureau of Environmental Quality
Allegheny County Health Department
301 39th Street, Building 7
Pittsburgh, PA 15201-1891~~

- ~~B. Failure to comply with any provision of this Order and Agreement within the time specified herein is a violation of Article XX that may also subject USX to criminal and civil proceedings, including injunctive relief, by the Department, in addition to the stipulated penalties under Paragraph II.A.~~
- ~~C. If any event occurs which is beyond the control of USX and which causes or may cause delays in the achievement of the actions required under this Order, then:~~
- ~~1. USX shall notify the Department in writing within ten (10) days of the delay or anticipated delay, describing in detail the nature of the delay, the anticipated length of the delay, the precise cause or causes of the delay, the measures taken and to be taken by USX to prevent or minimize the delay, and the timetable by which those measures will be implemented. USX shall adopt all~~

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~~reasonable measures to avoid or minimize any such delay. Failure by USX to comply with the notice requirement of this subparagraph (II.C.1.) specifically shall render the remaining provisions of this paragraph (II. C.2 and II. E.3) void and of no effect as to the particular incident involved.~~

~~2. If the Department agrees that the delay or anticipated delay in complying with this Order has been or will be caused by circumstances beyond the control of USX, the time for performance hereunder may be extended for a period no longer than the delay resulting from such circumstances.~~

~~3. The burden of proving that any delay is caused by circumstances beyond the control of USX shall rest with USX. Increased costs or expenses associated with the implementation of actions called for by this Order shall not, in any event, be a basis for changes in this Order or extensions of time under this paragraph. Delay in achievement of one interim step shall not necessarily justify or excuse delay in achievement of subsequent steps.~~

~~D. 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 XX, including, but not~~

~~limited to, actions to require the installation of additional pollution control equipment and the implementation of additional corrective operating practices.~~

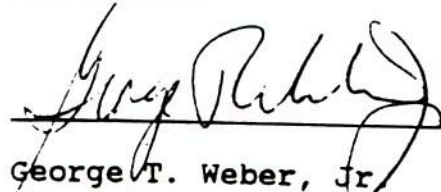
~~E. Paragraph II. A of this Order and Agreement shall terminate six (6) months after the effective date of this Enforcement Order.~~

~~F. USX hereby consents to the foregoing Order and hereby knowingly waives all rights to appeal said Order, and the undersigned represents that he is authorized to consent to the Order and to enter into this Agreement on behalf of USX.~~

IN WITNESS WHEREOF, and intending to be legally bound, the parties hereby consent to all of the terms and conditions of the foregoing Order and Agreement as of the date above written.

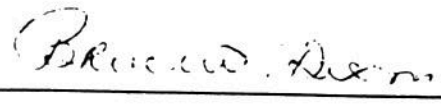
USX CORPORATION

By :



George T. Weber, Jr.
General Manager - Coking Operations

ALLEGHENY COUNTY HEALTH DEPARTMENT

BY:


Bruce W. Dixon, MD
Director

By:


Ronald J. Chleboski
Deputy Director
Bureau of Environmental Quality.

ATTACHMENT C

Listing of Critical Heat Exchangers and Spare Heat Exchangers
for the Vacuum Carbonate Unit at the Clairton Works
Coke Oven Gas Desulfurization Facility

<u>Unit</u>	<u>Heat Exchangers</u>
100 Vacuum Carbonate Unit Carbonate Reboiler	101-CA 101-CB
Process Water Cooler	102-C1 102-C2
Carbonate Solution Heat Exchanger	103-CA 103-CB
600 Vacuum Carbonate Unit Solution Reboiler	E-652A E-652B
Carbonate Solution Heat Exchanger	E-654A E-654B
Process Water Cooler	E-655A E-655B
For Both 100 and 600 Vacuum Carbonate Units Vacuum Pump Aftercooler	E-667 102-F

ATTACHMENT D

Listing of Critical Pumps and Spare Pumps
for the Vacuum Carbonate Units at the Clairton Works
Coke Oven Gas Desulfurization Facility

<u>Unit</u>	<u>Pumps</u>
100 Vacuum Carbonate Unit Compressor Lube Oil	P-101J P-101J Coppus
Turbine Lube Oil	P-101JT P-101JTT
Lean Carbonate Solution	P-111J P-111JA
Direct Condenser	P-113J P-113JA
Rich Carbonate Solution	P-662A P-662B
600 Vacuum Carbonate Unit Rich Solution	P-662
Lean Carbonate Solution	P-663A
Direct Condenser Water	P-664
Common spare for Rich Solution, Lean Carbonate Solution, and Direct Condenser Water	P-663B
Lube Oil	C-658A C-658B

