



December 16, 2022

Ms. JoAnn Truchan, P.E.
Section Chief, Engineering
Allegheny County Health Department Air Quality Program
301 39th Street, Building #7
Pittsburgh, Pennsylvania 15201

Dear Ms. Truchan:

Subject: RACT III Notification
Energy Center Pittsburgh, LLC
ACHD Permit #: 0022-OP17e
CEC Project 181-975

Civil & Environmental Consultants, Inc. (CEC) on behalf of Energy Center Pittsburgh, LLC (ECP) is submitting this written notification of their plan to demonstrate compliance with the Reasonably Available Control Technology (RACT) requirements of 25 Pa. Code Sections §129.111 through §129.115 for their North Shore Plant located in Pittsburgh, Pennsylvania.

On November 12, 2022, the Pennsylvania Department of Environmental Protection (PADEP) finalized amendments to 25 Pa. Code Chapters 121 (§121.1 relating to definitions) and 129 (§129.111 - §129.115), Additional RACT Requirements for Major Sources of NO_x and VOCs for the 2015 Ozone NAAQS (known as RACT III). The requirements of 25 Pa. Code §129.111 - §129.115 apply to owners and operators of all facilities in Pennsylvania that emit or have the potential to emit greater than 100 tons per year (tpy) of NO_x and/or 50 tpy of VOCs. Per 25 Pa. Code §129.111 and 129.115(a), an owner and operator of an air contamination source subject to the final-form RACT III regulations must submit a notification describing how the facility intends to comply with the final-form RACT III requirements, and other information identified in 25 Pa. Code §129.115(a).

North Shore is a commercial district heating and cooling plant located in the city of Pittsburgh, Allegheny County. The plant supplies steam for space heating and hospital sterilization and chilled water for refrigeration and summer air conditioning to commercial and institutional sites in that area. The plant is composed of five (5) boilers, which fire natural gas as their primary fuel and have the capacity to fire No. 2 fuel oil, in lieu of natural gas at times of emergency or natural gas curtailment with the exception of Boilers 4 and 5 which does not have the capability to fire No. 2 fuel oil. Boiler 5 is only used for emergency purposes, and is located on the premises of Allegheny General Hospital. Additional equipment used for chilled water production includes various turbines, chillers and compressors, and cooling towers. The facility is considered a major source of NO_x emissions; therefore, these combustion units must demonstrate compliance with RACT III requirements. As such, ECP is submitting this RACT III notification.

Ms. JoAnn Truchan, P.E.
CEC Project 181-975
Page 2
December 16, 2022

The attached RACT III written notification template as provided by the PADEP details how ECP intends to comply with RACT III. The attached form provides the information required by §129.115(a). In summary, Boilers 4 and 5 and Engines 1, 2 and 3 meet the presumptive RACT requirements of §129.112. For Boilers 1, 2 and 3, a case-by-case RACT analysis will be submitted.

Please contact Amanda Black at 412-780-8698 or ablack@cecinc.com if you have any questions or require additional information.

Very truly yours,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Amber M. Isaac, P.E.
Project Manager



Amanda Black
Principal

Enclosures

181-975-North Shore RACT III Notification-12.16.22

ATTACHMENT A

WRITTEN NOTIFICATION FORM



**CHAPTER 129. STANDARDS FOR SOURCES ADDITIONAL RACT REQUIREMENTS
FOR MAJOR SOURCES OF NO_x AND VOCs FOR THE 2015 OZONE NAAQS**

Written notification, 25 Pa. Code §§129.111 and 129.115(a)

25 Pa. Code Sections 129.111 and 129.115(a) require that the owner and operator of an air contamination source subject to the final-form RACT III regulations submit a notification describing how you intend to comply with the final-form RACT III requirements, and other information spelled out in subsection 129.115(a). The owner or operator may use this template to notify DEP. Notification must be submitted in writing or electronically to the appropriate Regional Manager located at the appropriate DEP regional office. In addition to the notification required by §§ 129.111 and 129.115(a), you also need to submit an applicable analysis or RACT determination as per § 129.114(a) or (i).

Is the facility major for NO_x?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Is the facility major for VOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

FACILITY INFORMATION					
Facility Name	Energy Center Pittsburgh LLC – North Shore Plant				
Permit Number	ACHD Permit # 0022-OP17e		PF ID if known		
Address Line1	111 South Commons				
Address Line2					
City	Pittsburgh	State	PA	Zip	15212
Municipality	City of Pittsburgh		County	Allegheny	
OWNER INFORMATION					
Owner	Energy Center Pittsburgh LLC				
Address Line1	111 South Commons				
Address Line2					
City	Pittsburgh	State	PA	Zip	15212
Email	Matthew.Brassard@cordiaenergy.com		Phone	757-708-4179	
CONTACT INFORMATION					
Permit Contact Name	Matthew Brassard				
Permit Contact Title	Plant Manager				
Address Line	111 South Commons				
City	Pittsburgh	State	PA	Zip	15212
Email	Matthew.Brassard@cordiaenergy.com		Phone	757-708-4179	

Complete Table 1, including all air contamination sources that commenced operation on or before August 3rd, 2018. Air contamination sources determined to be exempt from permitting requirements also must be included. You may find this information in section A and H of your operating permit.

Table 1 - Source Information

Source ID	Source Name	Make	Model	Physical location of a source (i.e, building#, plant#, etc.)	Was this source subject to RACT II?
P001	Three (3) Emergency Generators	Cummins	Unknown	Main Plant	Yes
B001	Boiler 1	Babcock & Wilcox	FM-1158	Main Plant	Yes
B002	Boiler 2	Babcock & Wilcox	FM-1158	Main Plant	Yes
B003	Boiler 3	Babcock & Wilcox	FM-2199	Main Plant	Yes
B004	Boiler 4	Unilux	Unknown	Main Plant	Yes
B005	Boiler 5	Nebraska	Unknown	Allegheny General Hospital	Yes
CT001	Main Cooling Tower	NA	NA	West of Main Plant	No
CT002	Annex Cooling Towers (No. 6 & 7)	NA	NA	West of Main Plant	No
Exempt	Three 25,000 gallon No. 2 Fuel Oil USTs	NA	NA	East of Main Plant	No

Complete Table 2 or 3 if the facility is a major NO_x or VOC emitting facility. For the column with the title “How do you intend to comply”, compliance options are:

- Presumptive RACT requirement under §129.112 (**PRES**),
- Facility-wide averaging (**FAC**) §129.113,
- System-wide averaging (**SYS**) §129.113, or
- Case by case determination §129.114 (**CbC**).

Please provide the applicable subsection if source will comply with the presumptive requirement under §129.112.

Table 2 – Method of RACT III Compliance, NOx

Source ID	Source Name	NOx PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply? (PRES, CbC, FAC or SYS)	Specific citation of rule if presumptive option is chosen
P001	Three (3) Emergency Generators	6.17	No	PRES	§129.112(c)(10)
B001	Boiler 1	24.40	No	CbC	
B002	Boiler 2	36.70	No	CbC	
B003	Boiler 3	58.30	No	CbC	
B004	Boiler 4	4.00	No	PRES	§129.112(b)(1)(ii)
B005	Boiler 5	1.15	No	PRES	§129.112(c)(9)

Please complete Table 3 if the facility is a major VOC emitting facility. Please provide the applicable section if a source is complying with any RACT regulation listed in 25 Pa Code §§ 129.51, 129.52(a)—(k) and Table I categories 1—11, 129.52a—129.52e, 129.54—129.63a, 129.64—129.69, 129.71—129.73, 129.75 129.71—129.75, 129.77 and 129.101—129.107.

Table 3 – Method of RACT III Compliance, VOC

Source ID	Source Name	VOC PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply?	Specify citation of rule or subject to 25 Pa Code RACT regulation, (list the applicable sections)
NA					