

PACT Letterhead

January 11, 2023

Allegheny County Health Department (ACHD)
Air Quality Program
301 39th Street, Bldg #7
Pittsburgh, PA 15201-1811

Subject: RACT III for PACT

We are aware that, in response to the 2015 revised national ambient air quality standard for ozone, the ACHD has adopted the set of Reasonably Available Control Technology (RACT) regulations developed by the Pennsylvania Department of Environmental Protection (DEP). This most recent regulation is known as RACT III. The published date for compliance is January 1, 2023.

As you know, the Pittsburgh Allegheny County Thermal (PACT) boiler plant is gas-fired (oil as backup fuel) and operates in full compliance with both our ACHD Permit (#0044) and with previous RACT rule requirements.

The applicable requirements of RACT III for our plant would be either to comply with the new presumptive limit for NO_x (0.10 lb/MMBtu) or to conduct a case-by-case analysis for adopting cost-effective technology for complying with a less stringent limit.

As you may know, the PACT Distribution System has been sold to a new owner with PACT scheduled to de-commission the entire facility in July 2023. Based on our most recent (February 2021) compliance tests, our boilers, although operating efficiently and in compliance with our existing permit and RACT, would not meet the new tightened NO_x limits for gas-fired boilers firing more than 50 MM Btu/hr.

Even if we could demonstrate by a case-by-case analysis that cost effective NO_x control modifications could satisfy the RACT III requirements, it is likely that significant investments in advanced NO_x controls would be needed. Any such modifications are unwarranted considering the anticipated shutdown and demolition of the PACT facility in July 2023.

In view of the above, we hereby request that the requirement for RACT III NO_x compliance be suspended for PACT. We will formally submit our shutdown schedule to the ACHD as the details are further developed.

Please advise whether you concur with our recommended suspension of RACT III compliance for PACT and/or if you have any questions about our plans.

Sincerely,


Jerome Griger

Plant/System Manager