



**CITY OF PHILADELPHIA  
DEPARTMENT OF PUBLIC HEALTH  
AIR MANAGEMENT SERVICES**

**RACT PLAN APPROVAL**

Effective Date: January 9, 2015

Expiration Date: None

Replaces Permit No. PA-51-1566 issued April 10, 1995

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of a Reasonably Available Control Technology (RACT) proposal received under the Pennsylvania Code, Title 25, Chapter 129.91 thru 129.95, of the rules and regulations of the Pennsylvania Department of Environmental Protection (PADEP), Air Management Services (AMS) approved the RACT proposal of the Facility below for the source(s) listed in section 1.A. Emission Sources of the attached RACT Plan Approval.

Facility: Paperworks, LLC

Owner: Paperworks Industries, inc

Location: 5000 Flat Rock Road, Philadelphia, PA 19127

Mailing Address: 5000 Flat Rock Road, Philadelphia, PA 19127

SIC Code(s): 2631

Plant ID: 01566

Facility Contact: Frank DelGrego

Phone: (215) 984-7000

Permit Contact: Frank DelGrego

Phone: (215) 984-7000

Responsible Official: Frank DelGrego

Title: General Manager

A handwritten signature in blue ink, appearing to read 'Edward Wiener'.

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Edward Wiener, Chief of Source Registration

1/9/2015

Date

**The RACT plan approval is subject to the following conditions:**

- 1) The purpose of this plan approval is to establish Nitrogen oxide and (NO<sub>x</sub>) Reasonably available control technology (RACT) for Paperworks, LLC. This includes the following emission source and control equipment.
  - A. Emission Sources
    - (i) Boiler#1, Riley boiler with heat input limit of 156 MMBTU/hr (previously rated capacity of 240 MMBTU/hr) and firing natural gas as primary fuel and #6 oil fuel as a back-up, equipped with Low NO<sub>x</sub> burners (LNB) with overfire air
    - (ii) Boiler #3: Rated 92.27 MMBTU/hr and burns natural gas equipped with Low NO<sub>x</sub> burners (LNB) and flue gas recirculation (FGR).
    - (iii)Boiler #4: Rated 92.27 MMBTU/hr and burns natural gas equipped with Low NO<sub>x</sub> burners (LNB) and flue gas recirculation (FGR).
- 2) Emission Limits
  - (i) NO<sub>x</sub> emissions from Boiler #1 shall not exceed the following:
    - (a) 0.20lbs/MMBTU on a 30 day rolling average basis when burning natural gas and
    - (b) 0.30 lbs/MMBTU on 30 day rolling average basis while burning No.6 oil
    - (c) 138 tons/ rolling 12 month period calculated monthly
  - (ii) NO<sub>x</sub> emissions from Boiler #3 & #4 shall not exceed the following:
    - (a) 0.025 lbs/MMBTU while burning natural gas
    - (b) 10.15 tons per rolling 12-month period for each boiler
- 3) Control Equipment
  - (i) Boiler #1 shall installed with or modified and operate Low NO<sub>x</sub> burners with overfire air
  - (ii) Boiler #3 & #4 shall be equipped with and operate LNB and FGR
- 4) Work Practice Standard
  - (i) Boiler No.1 shall only burn natural gas and No.6 fuel oil. Boiler #1 shall burn #6 fuel oil for no more than 168 hours per rolling 12-month period, solely for emergency, and to keep pipes from freezing in case of natural gas interruption.
  - (ii) The maximum heat input shall be limited to 156 MMBTU/hr for Boiler #1
  - (iii) Boiler No.3 & 4 shall only burn natural gas.
- 5) **Testing Requirements**
  - A. Continuous nitrogen oxides, and oxygen monitors and recorders shall be installed and operated in order to measure and record the concentrations of these gases emitted from the boiler stacks. The continuous emission monitors must conform to USEPA performance specifications in 40 CFR part 60, Appendix B and PA. DER continuous Source Monitoring Manual Rev. No.4, July 1987
  - B. Paperworks shall conduct a NO<sub>x</sub> performance test on Boiler #3 & #4 every five years.
  - C. Paperworks shall obtain approval of the test protocol prior to the test date.
- 6) **Monitoring, Recordkeeping and Reporting Requirements**
  - A. Boiler #1
    - (i) Daily and monthly natural gas usage,

- (ii) Daily and monthly No.6 oil usage for Boiler No.1
- (iii) 30-day rolling average of NOx emissions per lbs/mmbtu when burning No. 6 oil, and natural gas
- (iv) NOx emission calculation per rolling twelve month period calculated monthly
- (v) Average hourly heat input records for Boiler No.1, and
- (vi) Operating hours of the boiler while burning No.6 fuel oil and
- (vii) Records of the reasoning of burning fuel oil each time

**B. Boiler #3 & #4**

- (i) Paperworks shall monitor and record monthly fuel usage for each boiler, and calculate monthly NOx emission for each boiler per rolling 12-month period.
- C.** Paperworks shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with NOx/VOC RACT requirements of 25 PA Code 129.91 - 129.94.
- D.** The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of §129.91-129.94 are met.
- E.** Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- F.** Records shall be retained for at least five years and shall be made available to AMS on request.
- G.** The company shall not impose conditions upon or otherwise restrict AMS's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow AMS to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
- H.** Revisions to conditions approved as RACT by EPA will require resubmission as revision to the PA State Implementation Plan. The applicant shall bear the cost of public hearing and notification required for EPA approval as stipulated in 25 PA Code §129.91(h).

**7) RACT Implementation Schedule**

- A.** Upon issuance of this approval Paperwork shall begin immediate implementation of the measures necessary to comply with the approved RACT requirements.