



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

RACT PLAN APPROVAL

Effective Date: January 9, 2015

Expiration Date: None

Replaces PA Permit Number 51-4922 effective July 7, 1999

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: Philadelphia Gas Works, Richmond Plant
Owner: City of Philadelphia
Location: 3100 E. Venango St. Philadelphia, PA 19134
Mailing Address: 3100 Passyunk Avenue, Philadelphia, PA 19145
SIC Code(s): 4925
Plant ID: 4922
Facility Contact: James McLaughlin
Phone: (215) 787-5065
Permit Contact: Lisa Popovics
Phone: (215) 684-6551
Responsible Official: Raymond Snyder
Title: Director, Gas Processing

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

1/9/15

Edward Wiener, Chief of Source Registration

Date

The RACT plan approval is subject to the following conditions:

1. The purpose of this Plan Approval is to establish Nitrogen Oxides (NO_x) Reasonably Available Control Technology (RACT) for PGW This includes the following emission sources and control equipment:

A. Emission Sources:

<u>Unit Description</u>	<u>Fuel Type</u>	<u>Full Rated Capacity</u>
LNG vaporization Heater	Natural Gas	94.1 MMBTU/hr
LNG vaporization Heater	Natural Gas	94.1 MMBTU/hr
LNG vaporization Heater	Natural Gas	96.6 MMBTU/hr
LNG vaporization Heater	Natural Gas	102.1 MMBTU/hr
LNG vaporization Heater	Natural Gas	105.0 MMBTU/hr
LNG vaporization Heater	Natural Gas	105.0 MMBTU/hr

B. Control Equipment

- (1) Limit the following units' operating schedule to five percent of their maximum operating capacity:

LNG vaporization Heater 94.1 MMBTU/hr
 LNG vaporization Heater 94.1 MMBTU/hr
 LNG vaporization Heater 96.6 MMBTU/hr
 LNG vaporization Heater 102.1 MMBTU/hr
 LNG vaporization Heater 105.0 MMBTU/hr
 LNG vaporization Heater 105.0 MMBTU/hr

- (2) Set and maintain the timing of the three Caterpillar Engines 135G2U 295 horsepower Units engine at four degree retarded relative to the standard timing.

2. This approval requires and authorizes:

A. PGW shall comply with the requirements as specified in the RACT requirements of 25 PA Code 129.91(f); pertaining to expeditious compliance.

B. The following sources shall comply with presumptive RACT requirement requirements of 25 PA Code 129.93(c)(5):

- (1) Calculated on a 12-month rolling period the total annual fuel usage for the Six LNG vaporization Heaters 103 MMBTU/hr Units is limited to 257 MMCF of natural gas.

3. Emission Limitations:

A. None

4. RACT Implementation Schedule:

A. Upon issuance of this approval, PGW shall begin immediate implementation of the measures necessary to comply with this RACT permit.

B. removing

5. Testing Requirements:

A. If at any time AMS has cause to believe that air contaminant emissions from any source(s) listed in Section A of this permit may be in excess of the limitations specified in this permit, or established pursuant to, any applicable rule or

regulation contained in 25 PA Code Article III, the Permittee shall be required to conduct whatever tests are deemed necessary by AMS to determine the actual emission rate(s).

6. Recordkeeping and Reporting Requirements:
 - A. PGW shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with NOx RACT requirements of 25 PA Code §129.91- 129.94.
 - B. The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of §129.91-129.94 are met.
 - C. Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
 - D. Records shall be retained for at least two years and shall be made available to AMS on request.
7. The company shall not impose conditions upon or otherwise restrict the AMS' 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 AMS deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
8. Revisions to any emission limitations incorporated in this RACT Approval shall 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).