



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

RACT PLAN APPROVAL

Effective Date: January 9, 2015
Expiration Date: None
Replaces Permit No. None

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: Veolia Energy Efficiency
Permittee: Veolia Energy Philadelphia, Inc
Location: 2600 Christian Street, Philadelphia, PA 19146
Mailing Address: 2600 Christian Street, Philadelphia, PA 19146
SIC Code(s): 4961
Plant ID: 10459
Facility Contact: Jessica Hartley
Phone: (267) 350-5865
Permit Contact: Floyd Ruppel
Phone: (267) 350-5819
Responsible Official: Michael J Smedley
Title: VP and GM

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

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 Oxides (NO_x) Reasonably Available Control Technology (RACT) for Veolia Energy Efficiency LLC. This includes the following emission sources and control equipment:

A. Emission Sources

- (1) Boiler #1: Steam boiler with a capacity of 297.91 MMBTU/hr. The boiler fired and burns #2 oil and Natural Gas.
- (2) Boiler #2: Steam boiler with a capacity of 297.91 MMBTU/hr. The boiler fired and burns #2 oil and Natural Gas.

B. Control Equipment

- (1) Boiler #1 and #2 shall be modified with ultra low NO_x burners.

2. This approval requires and authorizes:

- A. Boiler #1 and #2 shall be modified with ultra low NO_x burners.
- B. The combined quantity of fuel oil burned by Boiler #1 and Boiler #2 shall not exceed 5,350,000 gallons in any rolling 12-month period.

3. Stack Emission Limitations

- A. The maximum air contaminant emissions from these sources shall be limited at stack outlet to:

- (1) Nitrogen Oxides (NO_x):

Nitrogen Oxide (NO_x) emission from each boiler shall not exceed the following:

- (a) Natural Gas 0.01 lb/MMBTU heat input 30-day rolling average (9 ppm @ 3% O₂)
No. 2 fuel oil 0.08 lb/MMBTU heat input 30-day rolling average (62 ppm @ 3% O₂)
- (b) Nitrogen Oxides (NO_x) emissions from both boilers combined shall not exceed 52.31 tons per year, calculated on a 12-month rolling period.

4. RACT Implementation Schedule

- A. Upon issuance of this approval, Veolia Energy Efficiency shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.
- B. Veolia Energy Efficiency shall maintain ultra low NO_x burners (ULNB) on each Boiler.

5. Testing and Monitoring Requirements

- A. Continuous nitrogen oxides and oxygen monitors and recorders shall be operated on each Boiler in order to measure and record the concentrations of these gases emitted from the boiler outlet/stack inlet. 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.

6. Recordkeeping and Reporting Requirements

- A. Compliance with the NOx emission limits shall be monitored and recorded based on NOx CEM data and AMS-approved stack test data.
- B. The facility shall monitor and record compliance with them based on fuel type, fuel usage, and NOx CEMs for each boiler.
- C. Veolia Energy Efficiency 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. These records shall include fuel consumption, fuel sulfur content, and NOx emissions.
- 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. Revisions to any emission limitations incorporated in this RACT Approval 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)