RACT PLAN APPROVAL

Facility:	Bellevue Cogeneration Plant	

Address: 200 South Broad Street

Owner: The Bellevue

PLID:

Philadelphia, PA 19102

June Dellevue

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Attention: Perry Safian

Source(s): Cooper Superior dual fuel engine, Boiler #1, Boiler #2

In accordance with provisions of the Pennsylvania Code, Title 25, Chapter 129.91 thru 129.95, Air Management Services (AMS) has approved the RACT proposal plans for Bellevue on the above indicated air contamination source(s).

The RACT plan approval is subject to the following conditions:

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

#### A. Emission Sources

(1) Cooper Superior Model 40GDX16 dual fuel reciprocation engine is rated at 2200 HP and burns natural gas as the primary fuel and #2 oil as the pilot fuel.

(2) Dual Fuel High Pressure Steam Boiler #1 is rated 318 HP (about 10.6 MMBTU/hr) and burns natural gas and #2 oil.  $R \in C \in I V \in O$ 

(3) Dual Fuel High Pressure Steam Boiler #2 is rated 318 HP (about 10.6 MMBTU/hr) and burns patteral gas and #2 oil.

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# B. Control Equipment

(1) The Cooper engine has injection timing retard to assure that NOx emissions do not exceed the rough median

# 2. This approval authorizes:

A. The Cooper engine will continue injection timing retard to assure that NOx emissions do not exceed 4.1 gr/bhph as determined by a case-by-case analysis.

B. Boiler #1 and Boiler #2 will follow the presumptive RACT limitation of the installation, maintenance and operation of the boilers in accordance with manufacturers specifications, as set in 25 Pa. Code 129.93(c)(1).

# 3. Stack Emission Limitations

A. The maximum air contaminant emissions from these sources, controlled by the equipment above shall be limited at stack outlet to:

(1) Nitrogen Oxides (NOx):

The Cooper engine emission rate of NOx shall not exceed 4.1 grams per brake horsepower-hour.

# 4. RACT Implementation Schedule

A. Upon issuance of this approval, Bellevue shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.

B. Bellevue shall continue operation of the Cooper engine as per previous installation permit approval conditions. Bellevue shall implement the record keeping system submitted with the RACT proposal by May 31, 1995.

#### 5. Testing and Monitoring Requirements

A. The Cooper engine was stack tested after it was installed.

B. The Cooper engine shall continue to be equipped with a NOx continuous emission monitor and recorder as per installation permit approval conditions.

#### 6. Recordkeeping and Reporting Requirements

A. Bellevue 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 the fuel consumption, diesel-to-gas ratio, engine operating conditions, and NOx emissions.

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 consistentwith the averaging period of the requirement.

D. Records shall be retained for at least two years and shall be made available to the Department on request.

7. The operation of the aforementioned sources shall not at any time result in the emission of visible air contaminants in excess of the limitations specified in Section 123.41, particulate matter in excess of the limitations specified in Section 123.21, or suifur oxides in excess of the limitations specified in Section 123.22, all Sections of Chapter 123 of Article III of the Rules and Regulations of the Department of Environmental Resources, or in the emission of any of these or any other type of air contaminant in excess of the limitations specified in, or established pursuant to, any other applicable rule or regulation contained in Article III.

8. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department 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.

9. 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).