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RACT
PLAN APPROVAL

Facility: Nabisco Biscuit Co. PLID: 3201 511
Address: 12000 E. Roosevelt Blvd. Owner: Nabisco Biscuit Co.
Philadelphia, PA 19116
Attention: Yvette C. Harding

Source(s): Boiler #1; Boiler #2; Oven #1, #1A, #2, #3, #4, #5, #6, and #7; Propane Vaporizer #1 and #2; Storage Tank; Proof room

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 Nabisco Biscuit Co. 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)/Volatile Organic Compound (VOC) Reasonably Available Control Technology (RACT) for Nabisco Biscuit Co. This includes the following emission sources and control equipment:

A. Emission Sources

- (1) Boiler #1 and boiler #2: Boilers each with a rated capacity of 38 MMBTU/hr fire natural gas, propane or #6 fuel oil.
- (2) Baking ovens #1A and #4: Oven heaters fire natural gas or propane. Miscellaneous baking products (yeast products) produce an ethanol byproduct.
- (3) Baking ovens #1, #2, #3, #5, #6, and #7: Oven heaters fire natural gas or propane. Baking products on these lines are not yeast (VOC producing) products.
- (4) Propane Vaporizer #1 and #2: Vaporizes liquefied propane for use in baking ovens and boilers.
- (5) Storage Tank: #6 Fuel Oil stored in tank.
- (6) Proof room: Troughs of wet dough are allowed to rise in Proof room.

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Section (SADM)

B. Control Equipment

- (1) Catalytic oxidizer on ovens #1A and #4.

EPA, REGION III

2. This approval authorizes:

- A. The catalytic oxidizer will control VOC emissions on ovens #1A and #4 to comply with RACT requirements of 25 PA Code 129.91(f).
- B. Boiler #1 and boiler #2 will comply with presumptive RACT requirements of 25 PA Code 129.93(b)(2).
- C. Oven #1, #1A, #2, #3, #4, #5, #6, and #7 heaters and propane vaporizer #1 and #2 will comply with presumptive RACT requirements of 25 PA Code 129.93(c).

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) Volatile Organic Compounds (VOC).

The catalytic oxidizer on Ovens #1a and #4: The oxidizer shall have a minimum of 90% destruction efficiency

4. RACT Implementation Schedule

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

B. Nabisco Biscuit Co. shall operate the catalytic oxidizer on ovens #1A and #4 by July 31, 1995.

5. Testing Requirements

A. By November 1, 1995, Nabisco Biscuit Co. must conduct performance testing of the VOC emission control system to determine the destruction efficiency of the system.

B. At least (30) days prior to the test, Nabisco Biscuit Co. shall submit to AMS for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

6. Recordkeeping and Reporting Requirements

A. Nabisco Biscuit Co. shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with VOC/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 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 123.11 or sulfur 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 stipulated in 25 PA Code §129.91(h).