

RACT
PLAN APPROVAL

Facility: Newman and Company

PLID: 3489

Address: 6101 Taconv St.
Philadelphia, PA 19135

Effective date: June 11, 1997
Owner: Newman and Company

Attention: A. Nathan Ferman

Source(s): 118 MMBTU/hr Union Ironwork Watertube Boiler.

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 Newman and Company 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 Newman and Company. This includes the following emission sources and control equipment:
 - A. Emission Sources
 - (1) Boiler #1: Union Ironwork Watertube Boiler firing natural gas or #6 fuel oil with a rated firing rate of 118 MMBTU/hr.
 - (2) All other NOx emission sources within the facility are considered presumptive and will be installed, maintained, and operated according to manufacturer's specifications.
2. This approval authorizes:
 - A. The operation of (1) Union Ironwork Watertube Boiler firing natural gas or #6 fuel oil.
3. Stack Emission Limitations
 - A. The maximum air contaminant emissions from this source, shall be limited at the stack outlet to:
 - (1) Nitrogen Oxides (NOx):

The average emission rate, determined during annual source testing as specified in Condition 5A, shall not exceed 0.43 lbs/MMBTU when firing #6 oil

The average emission rate, determined during annual source testing as specified in Condition 5A, shall not exceed 0.37 lbs/MMBTU when firing natural gas

Total emissions from the boiler shall not exceed 121 tons per year in a rolling 12 month period.
4. RACT Implementation Schedule
 - A. Upon issuance of this approval, Newman and Company shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.
5. Testing and Monitoring
 - A. Stack testing is to be performed at least once every five years on Newman's Union Ironwork Watertube Boiler to determine emissions factors in lbs NOx/MMBTU

- 1) A test protocol for the required emission test will be submitted for review and written AMS approval approximately 60 days prior to the anticipated date of testing.
- 2) Included in the testing protocol will be a description of sampling point locations, sampling equipment, sampling and analytical procedures, and the operating conditions required for the testing.
- 3) Compliance stack testing will be conducted in accordance with the procedures set forth in Appendix A of 40 CFR Part 60 or another method approved by AMS and/or the EPA.
- 4) An emission test report will be submitted to AMS within 60 days from the date of testing.
- 5) Newman shall use emissions factors in lbs NO_x/MMBTU from the most recent stack testing to calculate a rolling twelve month total for NO_x emissions with regards to their Union Ironworks boiler.

B. Newman shall perform an annual tune-up on their 118 MMBTU Union Ironworks boiler to ensure the equipment is meeting the operating standards as specified by the manufacturer. At a minimum the annual tune-up will meet the specifications as defined in Pennsylvania Code, Title 25, Chapter 129.93 (b) (2) thru (5).

6. Recordkeeping and Reporting Requirements

A. Newman Company shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with NO_x RACT requirements of 25 PA Code §129.91-129.94. These records shall include a daily record of the quantity and type of fuel being fired by the boiler. In addition, the fuel nitrogen content, as measured during the annual test required under Condition 5.A or as reported to Newman by the fuel vendors shall be recorded.

B. Quarterly reports shall be submitted to AMS, including the type and amount of fuels burned each day, the heat content of each fuel, the total heating value of the fuel consumed for each day, and the 12-month rolling NO_x totals for each individual month in the quarter.

C. Newman shall maintain a rolling 12 month total of NO_x emissions to demonstrate compliance with their federally enforceable permit limit.

D. Newman shall retain records for a period of five years and shall be made available to Air Management Services upon request.

7. 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.

8. 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)