



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

**RACT PLAN APPROVAL**

Effective Date: December 16, 2014

Expiration Date: None

Replaces Permit No. PA Permit Number 51-4902 dated December 1, 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: Veolia Energy Philadelphia - Edison Station  
Owner: Veolia Energy Philadelphia, Inc.  
Location: 908 Sansom Street, Philadelphia, PA 19107  
Mailing Address: 2600 Christian Street, Philadelphia, PA 19146  
SIC Code(s): 4961  
Plant ID: 04902  
Facility Contact: Jessica Hartley  
Phone: (267) 350-5819  
Permit Contact: Jessica Hartley  
Phone: (267) 350-5819  
Responsible Official: Michael J. Smedley  
Title: Vice President & General Manager

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

12/16/2014

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Edward Wiener, Chief of Source Registration

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Date

The RACT plan approval is subject to the following conditions:

1. The purpose of this Plan Approval is to establish Nitrogen Oxides (NO<sub>x</sub>) Reasonably Available Control Technology (RACT) for Veolia – Edison Station. This includes the following emission sources and control equipment:

**A. Emission Sources**

- (1) Boiler #1: Riley/Stoker Corporation boiler with a capacity of 283 MMBTU/hr. The boiler is front fired and burns #6 oil as its primary fuel and #2 oil as an ignition fuel.
- (2) Boiler #2: Riley/Stoker Corporation boiler with a capacity of 283 MMBTU/hr. The boiler is front fired and burns #6 oil as its primary fuel and #2 oil as an ignition fuel.
- (3) Boiler #3: Babcock and Wilcox boiler with a capacity of 335 MMBTU/hr. The boiler is front fired and burns #6 oil as its primary fuel and #2 oil as an ignition fuel.
- (4) Boiler #4: Babcock and Wilcox boiler with a capacity of 335 MMBTU/hr. The boiler is front fired and burns #6 oil as its primary fuel and #2 oil as an ignition fuel.

**2. This approval requires and authorizes:**

The Boiler #1, Boiler #2, Boiler #3 and Boiler #4 shall not exceed

**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 (NO<sub>x</sub>):

- (a) Emissions from each of Boiler #1 and Boiler #2 shall not exceed 0.39 lbs/MMBTU or 110.37 lbs/hr.
- (b) Emissions from each of Boiler #1 and Boiler #2 shall not exceed 145.02 tons per rolling of 12-month period
- (c) Emissions from each of boiler #3 and Boiler #4, shall not exceed 0.38 lbs/MMBTU or 127.3 lbs/hr.
- (d) Emissions from each of Boiler #3 and Boiler #4 shall not exceed 167.28 tons per rolling of 12-month period.

**4. RACT Implementation Schedule**

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

**5. Testing Requirements and Stack Emission Limitations**

- A. Veolia - Edison Station must conduct annual emission performance tests on Boilers #1, #2, #3, and #4.
- B. Veolia - Edison Station shall obtain approval of the test protocol prior to the test date. AMS must be notified at least 30 days prior to the actual testing in order that representatives from the agency may schedule to observe the conduct of the tests.

## **6. Recordkeeping and Reporting Requirements**

- A. Veolia - Edison Station shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with NO<sub>x</sub> RACT requirements of 25 PA Code §129.91-129.94.; including monthly records of fuel consumption and NO<sub>x</sub> 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 monthly and maintained in a time frame consistent with the averaging period of the requirement which the 30 day rolling weighted average must be the average of the 24 hour daily weighted rate of the past 29 days and the evaluation day.. Compliance determination shall consist of the arithmetic means of results of at least three separate runs for each source test using U.S.E.P.A. Reference Methods 5 and 202, 7E, and 10. NO<sub>x</sub> emissions using annual emission performance stack test data.
  - D. Records shall be retained for at least two years and shall be made available to AMS 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 AMS's 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 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).