

# CITY OF PHILADELPHIA DEPARTMENT OF PUBLIC HEALTH AIR MANAGEMENT SERVICES RACT II PLAN APPROVAL

RACT Plan Approval No. IP16-000246 Effective Date: April 20<sup>th</sup>, 2020 Expiration Date: None Replaces Permit No.: RACT Plan Approval issued on January 1, 2015

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 129.96 thru 129.100, 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:	Exelon Generation Company - Richmond Generating Station Exelon Generation Company 3901 North Delaware Avenue, Philadelphia, PA 19137 1 Industrial Highway, Eddystone, PA 19022 4911 4903	
Permittee: Location: Mailing Address: SIC Code(s): Plant ID:		
Facility Contact: Email: Phone:	Joseph Kuklinski Joseph.Kuklinski@exeloncorp.com (610) 595-8113 (office) (610) 662-2514 (cell)	
Permit Contact: Email: Phone:	Albert Hatton Albert.Hatton@exeloncorp.com (610) 765-5316 (office) (610) 213-9953 (cell)	
Responsible Official: Title:	Joseph Dick General Manager	

4/20/20

Edward Wiener, Chief of Source Registration

Date

In accordance with provisions of the Pennsylvania Code, Title 25, Chapter 129.96 through 129.100, Air Management Services (AMS) has approved the RACT proposal plans for Exelon – Richmond Generating Station on the above indicated air contamination source(s).

## The RACT Plan Approval is subject to the following conditions:

1. Purpose:

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

- A. Emission Sources
  - Two (2) General Electric Frame 7B combustion turbines, each combusting #2 oil and kerosene. The nominal output for each is 66 megawatts (MW), each equivalent to 838 MMBtu/hr.

#### 2. Approval and Authorization:

A. The following units will continue to adhere to the NO<sub>X</sub> emission limits as specified in the facility's RACT Plan Approval dated February 9, 2016 – PA Permit No. 51-4903, and current Title V Operating Permit OP17-000008, which are also listed below:

Unit	Limitations from RACT Plan Approval dated February 9, 2016 – PA Permit No. 51-4903	
Combustion Turbine #92	Maximum NO <sub>X</sub>	0.68 lbs/MMBtu 569.84 lbs/hr
	Maximum Rolling 12-Month Capacity Factor	15%
Combustion Turbine #91	Maximum NO <sub>X</sub>	0.68 lbs/MMBtu 569.84 lbs/hr
	Maximum Rolling 12-Month Capacity Factor	15%

For an electric generating unit, the annual capacity factor is the ratio of the unit's actual electric output (expressed in MWe/hr) to the unit's nameplate capacity (or maximum observed hourly gross load (in MWe/hr) if greater than the nameplate capacity) multiplied by 8,760 hours during a period of 12 consecutive calendar months. [25 Pa Code §129.97(c)(7)(ii)]

B. The installation, maintenance and operation of the combustion turbines in accordance with manufacturer's specifications.

## 3. RACT Implementation Schedule

A. Upon issuance of this Plan Approval, PECO (Exelon) shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.

## 4. Monitoring, Recordkeeping, and Reporting Requirements

- A. Exelon Richmond shall demonstrate compliance with the NO<sub>X</sub> emission limits in Condition 2.A by monitoring and testing in accordance with a Department-approved emissions source test that meets the requirements of Chapter 139, Subchapter A (relating to sampling and testing methods and procedures). The source test shall be conducted one time in each 5-year calendar period. [25 Pa Code §129.100(a)(4)]
- B. Exelon Richmond 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 §§129.96-129.100. These records shall include records of the monitoring requirements of this Plan Approval.
  - (1) Daily fuel usage, and net generation for each combustion turbine on a monthly basis.
  - (2) Rolling 12-month capacity factor for each combustion turbine, calculated on a monthly basis.
  - (3) Records of all emissions tests conducted on the turbines.
- C. Records shall be retained for at least five years and shall be made available to AMS on request.
- **5.** 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 §129.99(h).