



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

Effective Date: March 31, 2020

Expiration Date: None

Replaces Permit No.

Plan Approval No. 16-000223

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.

<u>Facility:</u>	Newman and Company, Inc
<u>Owner:</u>	Newman and Company, Inc
<u>Location:</u>	6101 Tacony Street, Philadelphia, PA 19135
<u>Mailing Address:</u>	6101 Tacony Street, Philadelphia, PA 19135
<u>SIC Code(s):</u>	2631
<u>Plant ID:</u>	03489
<u>Facility Contact:</u>	Michael Ferman
<u>Phone:</u>	(215) 333-8700
<u>Permit Contact:</u>	Michael Ferman
<u>Phone:</u>	(215) 333-8700
<u>Responsible</u>	Michael Ferman
<u>Official:</u>	
<u>Title:</u>	Vice President

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

3/31/20

Edward Wiener, Chief of Source Registration

Date

The RACT plan approval is subject to the following conditions:

- 1) The purpose of this plan approval is to establish Nitrogen oxide and (NOx) Reasonably available control technology (RACT) for Newman and Company, Inc. This includes the following emission source and control equipment.

A. Emission Sources

- (i) Union Cogeneration Boiler with oxygen trim system, 118 MMBTU/hr, is firing natural gas and No.6 oil.
- 2) **This approval authorizes,**
 - A. Emission limits
 - (i) Newman shall comply with following emission limits requirements for boiler #1.
 - (a) NOx emission limits not to exceed 0.43 lbs/MMBTU when firing #6 oil;
 - (b) 0.37 lbs/MMBTU when firing natural gas, and
 - (c) The total NOx emissions limit of 121 tons per rolling 12-month period.

3) Testing Requirements

- A. Newman and Company, Inc shall conduct a NOx performance test on boiler #1 every five calendar years while burning No. 6 oil and natural gas.
- B. At least (30) days prior to the test, Newman and Company, Inc shall submit to AMS for approval the procedures for the test and sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

4) Monitoring, Recordkeeping and Reporting Requirements

- A. Newman and Company, Inc shall maintain a file containing all the records and the data that are required to be collected to demonstrate compliance with NOx RACT requirement of 25 PA Code §129.96-129.100.
- B. The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of §129.96-129.100 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. The Permittee shall monitor and record the monthly fuel usage for each boiler.
- E. The Permittee shall monitor and record verification of compliance with the NOx emission

limits. Compliance with the NO_x limit shall be based on AMS approved stack test data.

F. Records shall be retained for at least two years and shall be made available to AMS on request.

5) RACT Implementation Schedule

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

- 6) 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.
- 7) Revisions to any conditions approved as RACT by EPA 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).