



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

Effective Date: April 8, 2020

Expiration Date: None

Replaces Permit No. None

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 additional Reasonably Available Control Technology known as (RACT II) 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: Philly Shipyard Inc. (PSI)
Owner: Philly Shipyard Inc.
Location: 2100 Kitty Hawk Avenue, Philadelphia, PA 19112
Mailing Address: 2100 Kitty Hawk Avenue, Philadelphia, PA 19112
SIC Code(s): 3731
Plant ID: 01569
Facility Contact: Carl Danley
Phone: (215) 875-2649
Permit Contact: Carl Danley
Phone: (215) 875-2649
Responsible Official: Robert Fitzpatrick
Title: Vice President of Production

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

4/8/20

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 Volatile Organic compound (VOC) Reasonably available control technology (RACT) for PSI. This includes the following emission source and control equipment.

A. Emission Sources

- (i) Cleaning Solution used at the Dry Dock, Building 763 Paint Booth, and Main Building Painting Operation.

B. Work practice standard

- (i) The Permittee shall ensure that the following coating operating practices are in effect at all times:
 - (a) All handling and transfer of VOC/VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.
 - (b) All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.
 - (c) Institute a procedure which controls the distribution of VOC containing thinner and solvent within the facility. The provided thinner used in each batch of coatings shall not exceed the established maximum allowable thinner ratio calculated in accordance with 40 CFR 63.785(c)(2).
 - (d) Paint line and spray guns must be cleaned in a closed system that is able to recirculate and collect spent solvent during the cleaning process for proper disposal; and
 - (e) Waste paint, spent solvent, solvent contaminated rag or materials, and sludge from gun cleaners must be stored in gasket sealed containers until properly disposed.

C. Monitoring, Recordkeeping and Reporting Requirements

- (i) PSI shall monitor and record the following;
 - (a) The name of each cleaning solvent and its associated vapor pressure;
 - (b) Total cleaning solvent purchase, usage and removal;
 - (c) Daily integrity inspection record of VOC containers;
 - (d) Certified Product Data Sheets (CPDS) for each cleaning solvent used in the facility shall be maintained at the Facility for review by AMS, for five (5) years. .
 - (e) Training certifications for all painters working at the Facility shall be kept on site, and shall be available for inspection by AMS, for five (5) years.
 - (f) Records shall be retained for at least five years and shall be made available to AMS on request.
 - (g) 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.

(d) Revisions to any emission limitations incorporated in this RACT Approval will require resubmission as revision to the PA State Implementation Plan. **RACT Implementation Schedule**

- (i) Upon issuance of this approval PSI shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.