

**CITY OF PHILADELPHIA  
Department of Public Health  
Environmental Protection Division  
Air Management Services**

**InterOffice Memo**

**To:** File  
**From:** Rahel Gebrekedian  
**Date:** May 8, 2015  
**Subject:** 8-Hour RACT Analysis for Allied Tube & Conduit

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**Introduction:**

The Clean Air Act (CAA) requires that moderate (or worse) ozone nonattainment areas implement reasonably available control technology (RACT) controls on all major sources of VOC and NO<sub>x</sub>. Philadelphia County is part of the Philadelphia-Wilmington-Atlantic City moderate ozone nonattainment area for the 1997 8-hour ozone NAAQS. This document presents the findings of a RACT evaluation for the 1997 8-hour ozone standard for this facility.

**Company Description:**

Allied Tube & Conduit Corporation operates a tube and conduit manufacturing facility located at 11350 Norcom Road, Philadelphia, PA 19154. The facility's air emission sources include three (3) mills, one (1) Mill 1 area space heater rated 3.76 MMBtu/Hr, and four (4) warehouse space heaters each rated 801,000 Btu/Hr.

**Applicability for NO<sub>x</sub> and VOC RACT:**

Allied Tube & Conduit is not a major source of Nitrogen Oxides (NO<sub>x</sub>) having potential NO<sub>x</sub> emissions less than 100 tons per year, the major source threshold in Philadelphia County that is applicable to NO<sub>x</sub> RACT for the 1997 8-hour ozone NAAQS.

Allied Tube & Conduit is a major source of Volatile Organic Compounds (VOC) having potential VOC emissions greater than 50 tons per year, the major source threshold in Philadelphia County that is applicable to VOC RACT for the 1997 8-hour ozone NAAQS.

**Process Descriptions:**

The three (3) mills route steel through a tube roll former. The mills emit VOCs during the inner-diameter (ID) coating part of the process which paints the inner-diameter of the conduit. Mill 1P has a capacity of 61,000 tons of product, Mill 2P has a capacity of 53,000 tons of product, and Mill 3P has a capacity of 50,000 tons of product.

The facility's air emission sources contributing to VOC emissions include:

- Three (3) Mills
- One (1) Mill 1 Area Space Heater with a capacity of 3.76 MMBtu/Hr. that burns natural gas;
- Four (4) Warehouse Space Heaters each with a capacity of 801,000 Btu/Hr. and burning natural gas;

**Presumptive RACT:**

The following sources are covered by Presumptive RACT regulations, as is specified in the "Presumptive RACT Regulation" column of the table below:

*Space Heaters*

Unit	Heat Input (BTU/hr)	Fuel Burned	Presumptive RACT Regulation
MIL 1 Area Space Heater #1 (CU02)	3,760,000	Natural Gas	25 PA Code 129.93(c )(1)
Warehouse Space Heater #1 (CU04)	801,000	Natural Gas	25 PA Code 129.93(c )(1)
Warehouse Space Heater #2 (CU04)	801,000	Natural Gas	25 PA Code 129.93(c )(1)
Warehouse Space Heater #3 (CU04)	801,000	Natural Gas	25 PA Code 129.93(c )(1)
Warehouse Space Heater #4 (CU04)	801,000	Natural Gas	25 PA Code 129.93(c )(1)

For each space heater, the presumptive RACT requirements are the installation, operation, and maintenance of the boiler as per the manufacturer's specifications.

#### CTG RACT:

The following sources are covered by CTG RACT regulations, as is specified in the "CTG RACT regulation" column of the spreadsheet below.

#### Mills

Unit	Capacity (tons of product)	CTG RACT Regulation
Mil 1P	61,000	25 PA Code 129.52(a)-(c )
Mil 2P	53,000	25 PA Code 129.52(a)-(c )
Mil 3P	50,000	25 PA Code 129.52(a)-(c )

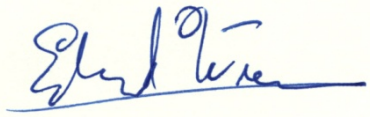
For each of the above sources, the CTG RACT limitation is the VOC content limit in units of pound per gallon of coating solids, and the maintenance of records kept on a daily basis in order to demonstrate compliance with the VOC limitations.

#### Case-by-Case RACT:

None.

#### Conclusions and Recommendations:

All VOC emitting sources are covered by presumptive and CTG RACT.



Edward Wiener, Chief of Source Registration

5/8/15

Date