



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

Effective Date: XXXX

Amended Date: XXXX

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 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.

<u>Facility:</u>	Plains Products Terminals, LLC
<u>Owner:</u>	Plains Products Terminals, LLC
<u>Location:</u>	3400 S 67 th Street, Philadelphia, PA 19153
<u>Mailing Address:</u>	6850 Essington Avenue, Philadelphia, PA 19153
<u>SIC Code(s):</u>	4226
<u>Plant ID:</u>	05013
<u>Facility Contact:</u>	Steven Sontag
<u>Phone:</u>	(609)317-5571
<u>Permit Contact:</u>	Steven Sontag
<u>Phone:</u>	(609)317-5571
<u>Responsible Official:</u>	Steven Sontag
<u>Title:</u>	Compliance Manager

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 reasonably available control technology (RACT) for volatile organic compound (VOC) emissions for Plains Products Terminals, LLC. This includes the following emission sources and control equipment.

A. Emission Sources

North Terminal

- (i) One (1) 20 MMBTU/hr thermal fluid heater;
- (ii) One (1) 4.74 MMBtu/Hr boiler;
- (iii) 3 petroleum/organic products storage tanks, each with a capacity greater than or equal to 40,000 gallons;
- (iv) 7 petroleum/organic products storage tanks each with a capacity less than or equal to 40,000 gallons;
- (v) Truck loading process at Rack;
- (vi) Non-gasoline marine loading of petroleum/organic products with a Reid Vapor Pressure (RVP) of less than 4.0;
- (vii) 2 recovery tanks, each with a capacity of 8814 gallons;

South Terminal

- (viii) Six (6) 0.25 MMBTU/hr space heating units (listed as “insignificant sources” on Title V Operating Permit V10-025);
- (ix) 10 petroleum/organic products storage tanks each with a capacity greater than or equal to 10,566 gallons;
- (x) Fugitive emissions from light liquids and gasoline from pumps, valves, & flanges;
- (xi) 23 storage tanks each with a capacity each less than 4,725,000 gallons (listed as “insignificant sources” on Title V Operating Permit V10-025);
- (xii) Tank cleaning and repair (listed as “insignificant sources” on Title V Operating Permit V10-025);
- (xiii) Lubricity additive systems, one at the North Terminal and one at the South Terminal (both listed as “insignificant sources” on Title V Operating Permit V10-025);

B. Control Equipment

- (i) One (1) Vapor Incinerator – controls North Terminal truck loading rack;
- (ii) One (1) Carbon Absorption Vapor Recovery Unit equipped with two (2) carbon beds – controls South Terminal truck loading rack.

2. Emission limits

- A. VOC emissions from marine vessel loading operations shall not exceed 6.6 tons per 12-month rolling period.

3. Monitoring, Recordkeeping and Reporting Requirements

- A. PPT shall monitor and record on a monthly basis verification that VOC emissions from marine vessel loading operations are in compliance with Condition 2.A.
- B. PPT shall maintain a file containing all the records and data that are required to be collected to demonstrate compliance with VOC RACT requirement of 25 PA Code §129.91-129.94
- C. Records shall be retained for at least five years and shall be made available to AMS on request.
- D. The company shall not impose conditions upon or otherwise restrict AMS's access to the aforementioned sources and/or any associated air cleaning devices and shall allow AMS to have

access at any time to said sources and associated air cleaning devices 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.

- E. 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)

4. RACT Implementation Schedule

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