

A. Bethlehem Structural Products Corporation

Bethlehem Structural Products Corporation (BSPC) is a coke and coal chemical production facility located in Northampton County, Pennsylvania and is considered a major VOC and NO_x emitting facility. In this instance, RACT has been established and imposed by PADEP in an operating permit. On December 21, 2001, PADEP submitted operating permit No. OP-48-0013 to EPA as a SIP revision. This permit requires BSPC sources and any associated air cleaning devices to be operated and maintained in a manner consistent with good operating and maintenance practices. This permit contains the following NO_x emission limits: (a) Battery "A" combustion stack—0.71 lb./MMBTU heat input for a 30-day rolling average; (b) Battery "2A" combustion stack—0.24 lb./MMBTU heat input for a 30-day rolling average; (c) Desulfurizer—4.25 tons per year; (d) Coke bleeders (operations)—0.85 tons per day; and (e) Coke Plant Boilerhouse—Boiler Nos. 1, 2, 3 and 4—0.25 lb./MMBTU heat input (daily average). This permit also contains VOC emission limits for the coke side from Battery "A" that shall not exceed 438 tons per year.

This permit contains testing requirements for the following: (a) Source tests for NO_x for the boiler house, Battery "A" combustion stack and for Battery "2A" (each of under fire stacks 2 and 3) shall be conducted in accordance with 25 Pa. Code Chapter 139 as per PADEP's source testing procedures described in the latest Source Testing Manual or source testing procedure approved by PADEP prior to testing. Compliance shall be based on average of these consecutive source tests and the source tests are to be conducted on an annual basis; (b) At least 60 days prior to the tests, pre-test protocol shall be submitted to PADEP for approval; and (c) Within 60 days of completion of the tests, two copies of the complete test reports, including all operating conditions shall be submitted to PADEP for approval.

The permit also contains requirements for the coke and chemical production sources:

(1) Battery "A" and "2A" Under fire—The NO_x RACT shall be the operation and maintenance of low excess air technology, by minimizing fuel use and maintaining the best air-to-fuel ratio that satisfies the process. The company shall maintain records in accordance with the record keeping requirements of 25 Pa. Code section 129.95 and shall include as a minimum, data which clearly

demonstrate that the NO_x emission limits are met. All records shall be maintained for at least two years and made available to PADEP upon request.

(2) Desulfurizer—NO_x and VOC RACT for the desulfurizer operation, specifically the tail-gas incinerator of the desulfurizer, shall be the operation and maintenance of the source according to the manufacturers specifications. The facility shall not be less than 22,000,000 SCFD of the minimum daily amount of coke oven gas entering the oven gas desulfurizer unit and shall not exceed 70,000,000 SCFD of the maximum daily amount of coke oven gas entering the coke oven gas desulfurizer unit. The facility shall record the daily amount of coke oven gas produced by the coke oven batteries and those records be maintained for a period of two years and made available to PADEP upon request. Within 14 days of the completion of the annual desulfurizer plant outage for the boiler inspection and plant maintenance, the facility shall submit a written notification to PADEP giving the details of the maintenance work performed on the plant, and the dates of the outage. The facility shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code section 129.95 and shall include as a minimum, data which clearly demonstrate that the NO_x emission limits are met. All records shall be maintained for a period of at least two years and made available to PADEP upon request.

(3) Coke Bleeders—The NO_x RACT for the Coke Bleeders shall be the operation and maintenance of the sources according to the current operating practice. The facility shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code section 129.95 and shall include as a minimum, data which clearly demonstrate that the NO_x emission limits are met. All records shall be maintained for a period of at least two years and made available to PADEP upon request.

(4) Coke Plant Boiler house—Boiler Nos. 1, 2 and 3 can be fired by a combination of tar derivatives, used oil, and No. 6 fuel oil; a combination of tar and grease derived fuel oil; and a combination of desulfurized coke oven gas and natural gas. Boiler No. 4 can be fired by a combination of No. 6 fuel oil, tar derivatives and used oil or a combination of desulfurized coke oven gas and natural gas. NO_x RACT shall be the operation and maintenance of the boilers according to manufacturers specifications. In addition, an annual tune-up of each boiler's combustion process shall be performed. The facility

shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code section 129.95 and shall include as a minimum, data which clearly demonstrate that the NO_x emission limits are met. All records shall be maintained for a period of at least two years and made available to PADEP upon request.

(5) Coal Chemical Process—VOC RACT of the coal chemical process shall be the operation and maintenance of the sources according to the manufacturer's specifications. Sources shall also be operated and maintained in accordance with good air pollution control practices. The coal chemical process consists of sources and associated gas blanketing systems identified in the permit. The facility shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code section 129.95. All records shall be maintained for at least two years and made available to PADEP upon request.

(6) Coke Oven Batteries "A" and "2A"—VOC RACT for the Coke Oven Batteries "A" and "2A", push and coke sides, shall be the operation and maintenance of the sources according to the manufacturer's specifications. Sources shall also be operated and maintained in accordance with good air pollution control practices. The facility shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code section 129.95 and shall include as a minimum, data which clearly demonstrate that the VOC emission limit is met. All records shall be maintained for a period of at least two years and made available to PADEP upon request.

(7) VOC RACT for in-plant painting and the compressed air system shall be the operation and maintenance of the sources according to manufacturers' specifications.

B. International Paper Company, Erie Mill

International Paper Company, Erie Mill, operates an integrated pulp and paper manufacturing facility located in Lancaster County, Pennsylvania and is considered a major VOC and NO_x emitting facility. Boilers 18, 19, 21, and 23 provide power for the facility. In this instance, RACT has been established and imposed by PADEP in a plan approval. On December 21, 2001, PADEP submitted plan approval No. PA-25-028 to EPA as a SIP revision. The plan approval is for the installation of Low NO_x Burners on Boilers 18 and 19. Stack testing shall be done in accordance with 25 Pa. Code Chapter 139 for determining the amount of NO_x emissions. The facility shall conduct