



Questions for PADEP – RACT III Rule Proposed August 7, 2021 in the PA Bulletin

1. Will PADEP revise the definitions of "major NO_x emitting facility" and "major VOC emitting facility" to exclude the 25 tpy thresholds for Bucks, Chester, Delaware, Montgomery, and Philadelphia counties like they did for RACT II? Or is it PADEP's intention to bring facilities in these counties that may not have been subject to RACT 2 (i.e., because NO_x PTE is < 100 tpy but > 25 tpy or VOC PTE is < 50 tpy but > 25 tpy) into the applicability for RACT III?
2. PADEP needs to define "in existence" in the applicability section of RACT III. Under RACT II, PADEP provided comment that "in existence" means installed. "Installed" is also not defined, so it is unclear if "installed" means "began operation" or "began installation."
3. RACT III does not exclude sources subject to 25 Pa. Code §129.74, while RACT II did. Is it PADEP's intention through this exclusion that fiberglass boat manufacturing operations (e.g., gel coat and resin material application operations) must be evaluated under RACT III, potentially on a case-by-case basis? What is the reason for removing this exemption from the RACT III rule?
4. Process heaters between 20-50 MMBtu/hr do not appear to be addressed by presumptive requirements. Is it PADEP's intention that these units will be subject to case-by-case RACT under RACT III, similar to RACT II?
5. Under the proposed RACT III rule presumptive requirements, do "lean burn" engines firing liquid fuel include diesel-fired engines? Typically, the terms "lean burn" and "rich burn" are reserved for spark ignition (e.g., natural gas-fired) engines, but are not typically used to describe compression ignition (e.g., diesel-fired) engines.
6. Potential typo at §129.114(i), which references to §129.112(h)(4) and (h)(5). However, §129.112(h)(4) and (h)(5) don't appear to exist. Can you clarify what this is intended to reference?
7. §129.114(i) appears to state that a new case-by-case RACT analysis is not required to be submitted so long as nothing has changed. If a facility submitted a case-by-case analysis for RACT II and also is subject to case-by-case RACT III, what is the expectation for the submission? Is it simply an affirmative statement in the RACT III Notification that the company does not believe the conclusions would change and reference that analysis? Or, is it "refreshing" and re-submitting the analysis (with updated cost information, for example)?
8. CEMS compliance demonstration for combustion units or process heaters:
 - a. Does PADEP intend to exclude SSM?
 - b. Daily block average or 24-hour rolling average?
 - c. Operating days only?
 - d. Arithmetic average of emissions rates (lb/MMBtu) or daily sum of NO_x emitted (lbs) divided by daily sum of heat input (MMBtu)?
 - i. If arithmetic average of emissions rates, will there be a certain number of valid hours required to calculate a valid average (e.g., CSMM Revision 8 currently requires 18 valid, online hours to calculate valid daily average)?
 - ii. If daily sum of mass divided by daily sum of heat input, would a day that only has one hour of unit operation be used for compliance with the limit?