



Bureau of Air Quality

Overview of RACT 3

Air Quality Technical Advisory Committee
October 17, 2019
Harrisburg, PA

Tom Wolf, Governor

Patrick McDonnell, Secretary

Background

- On October 26, 2015, the United States Environmental Protection Agency (EPA) revised the primary and secondary National Ambient Air Quality Standard (NAAQS) for ozone.
- Re-evaluation of Reasonably Available Control Technology (RACT) is a requirement to be fulfilled each time an ozone NAAQS is promulgated for nonattainment areas.
- Because the entire Commonwealth is in the Ozone Transport Region and is treated as a moderate nonattainment area, RACT is applicable to major sources of nitrogen oxides (NO_x) and/or volatile organic compounds (VOC) statewide.

RACT Implementation

- Nonattainment designations for the 2015 ozone NAAQS were promulgated by EPA on June 4, 2018, effective on August 3, 2018.
- EPA published the Nonattainment Area State Implementation Plan Requirements for the 2015 Ozone NAAQS on December 6, 2018.
- The Commonwealth has two years from designation to submit a State Implementation Plan (SIP) revision to EPA. The statutory deadline to submit this SIP revision is August 3, 2020.

RACT Rule

- DEP will be developing a rule, known as RACT 3, as part of the SIP revision to satisfy the federal requirements.
- In general, DEP will be re-evaluating existing applicable RACT requirements. The provisions of the rule must meet RACT standards for the 2015 Ozone NAAQS.
- DEP will be taking into account “lessons learned” from the RACT 2 rulemaking.

Case-By-Case RACT Requirements

- DEP is processing approximately 130 case-by-case determinations for RACT 2.
- Case-by-case RACT 2 determinations submitted to EPA as SIP revisions will be resubmitted to EPA as satisfying RACT 3 requirements.
- Case-by-case RACT 2 determinations not yet submitted to EPA will be noticed to the public as fulfilling the RACT requirements for the 1997, 2008, and 2015 ozone NAAQS.

Presumptive RACT Requirements

- DEP may propose presumptive RACT requirements in the RACT 3 rulemaking that are consistent with case-by-case determinations.
- DEP will be re-evaluating all presumptive RACT requirements from RACT 2 to see if they still meet RACT for the 2015 Ozone NAAQS.
- DEP will specifically evaluate NO_x presumptive RACT limits for the glass melting and cement manufacturing source categories.

Presumptive RACT Requirements

- DEP will clarify RACT requirements for combustion units firing multiple fuels.
- DEP will evaluate NOx RACT requirements for large combined-cycle natural gas-fired turbines.
- Boiler tune-up procedures will be streamlined. The streamlined RACT 3 provision will ensure compliance with both RACT 1 and RACT 2 requirements.

EGU Presumptive RACT Requirements

- For large electric generating units (EGU), DEP will re-evaluate presumptive emission limitations and averaging periods.
- DEP will evaluate both 24-hour (for ozone season) and 30-day (annual) presumptive NO_x limits, particularly for large EGU.
- NO_x emission limitations for large coal-fired EGU could range from 0.12 to 0.08 pounds per million Btu of heat input.

Other RACT Requirements

- The rule will specify that facility-wide and system-wide averaging plans are to be submitted to EPA as site-specific SIP revisions, similar to case-by-case determinations.
- DEP will be including notification requirements for all facilities that are subject to RACT 3. Owners and/or operators will need to explain how they will comply with the requirements, even if all sources are subject to presumptive RACT.
- Recordkeeping and reporting requirements may be streamlined for RACT 3. This would include submission of supporting information to determine when certain RACT requirements apply.



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Contact

Sean Wenrich
Environmental Engineer Manager
New Source Review Section
(717) 772-3979
sewenrich@pa.gov