 12/19/2022

**Additional RACT Requirements for Major Sources of NOx and VOCs**

25 Pa Code § 129.114(i) - Demonstrating that compliance with § 129.99(e) assures compliance with § 129.114(a)-(c) and (e)-(h).

This form is intended to assist applicants in providing the information needed by the Department to evaluate whether a source or sources at a facility demonstrate that compliance with the alternative RACT requirement or alternative RACT emission limitation approved by the Department or the appropriate approved local air pollution control agency under § 129.99(e) (relating to alternative RACT proposal and petition for alternative compliance schedule) assures compliance with the provisions in subsections 25 Pa Code *§ 129.114(a)-(c) and (e)-(h)*, except for sources subject to § 129.112(c)(11) or (i)—(k).

This provision allows for RACT III compliance using an abbreviated analysis by providing the Department with the analysis done on the same source for RACT II.

This form must be submitted to the Department as soon as practicable, but no later than December 31st, 2022.

Please provide a list of sources that the owner or operator proposes to comply with RACT III through 129.114(i) in Table 1 using the instructions below.

The basic information requested here can be found in section A and H of the facility’s operating permit.

If the source was evaluated for multiple control devices, please list the same source multiple times so that every source/control device combination is listed.

If one control device was evaluated to control multiple sources, please list all source ID’s which the control device would control in the source ID section while skipping the source name, make, model, and location sections. Please treat the “source group” as a source for the purposes of the rest of this form.

Please choose one of the following provisions of 129.114(i) with which the source/evaluated control device combination will comply with:

1. 129.114(i)(1)(i) – Please choose this option if no new air pollution control device is available or if the cost analysis done for RACT II (129.99(e)) resulted in a cost-effectiveness equal to or greater than $7,500 for NOx or $12,000 per ton of VOC reduced. In addition, the owner or operator may choose this option if…
2. A control option during RACT II evaluation was determined to be technically infeasible.
3. No cost analysis was performed for another reason, such as a higher ranked control technology was installed.
4. 129.114(i)(1)(ii) – Please choose this option if the cost analysis done for RACT II (129.99(e)) resulted in a cost-effectiveness less than $7,500 for NOx emissions reduced or $12000 per ton of VOC emissions reduced.
5. 129.114(i)(2) – Please choose this option for any sources which have new or upgraded control device, beyond what was evaluated for RACT II (129.99(e)), which needs to be evaluated.

**Table 1**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Source ID** | **Source Name** | **NOx Control device evaluated** | **Cost per ton of NOx determined** | **VOC Control device evaluated** | **Cost per ton of VOC determined** | **Provision of 129.114(i) which the source/evaluated control device will comply with (a, b or c)** |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

**For all source/control device combinations listed in Table 1 subject to 129.114(i)(1)(i), please provide the following:**

* A statement that explains how the owner or operator determined that there is no new pollutant specific air cleaning device, air pollution control technology or technique available.
* A copy of the final version of the cost analysis done for RACT II which was approved by the Department. If a copy of the final analysis is not available, you may submit a new cost analysis calculated consistent with the “EPA air pollution control cost manual” (sixth edition), EPA/452/b-02-001, January 2002, as amended.
* A statement that an evaluation of each economic feasibility analysis summarized as required above demonstrates that the cost effectiveness remains equal to or greater than $7,500 per ton of NOx emissions reduced or $12,000 per ton of VOC emissions reduced.
* If the owner or operator feels that the Department should have any additional information to assist them in evaluating their application, please provide it.

**For all source/control device combinations listed in Table 1 subject to 129.114(i)(1)(ii), please provide the following:**

* A statement that explains how the owner or operator determined that there is no new pollutant specific air cleaning device, air pollution control technology or technique available.
* A copy of the final version of the cost analysis done for RACT II which was approved by the Department. If a copy of the final analysis is not available, the owner or operator may submit a new cost analysis calculated consistent with the “EPA air pollution control cost manual” (sixth edition), EPA/452/b-02-001, January 2002, as amended.
* A new economic feasibility analysis for each source/control device combination.
* A statement that an evaluation of each economic feasibility analysis summarized as required above demonstrates that the cost effectiveness remains less than $7,500 per ton of NOx emissions reduced or $12,000 per ton of VOC emissions reduced.
* If the owner or operator feels that the Department should have any additional information to assist them in evaluating your application, please provide it.

**For all source/control device combinations listed in Table 1 subject to 129.114(i)(2), please provide the following:**

* A technical feasibility analysis and an economic feasibility analysis in accordance with § 129.92(b) (this is a standard RACT analysis).
* Submit the RACT analyses to the department or appropriate approved local air pollution control agency for review.
* If the owner or operator feels that the Department should have any additional information to assist them in evaluating your application, please provide it below.