

### RACT 2: Upcoming Compliance Deadlines for New Emission Control Requirements in Pennsylvania – May 2016

The Pennsylvania Department of Environmental Protection (DEP) recently finalized new rules that will impact at least 192 Pennsylvania facilities that are major sources of either oxides of nitrogen (NO<sub>x</sub>) or volatile organic compound (VOC) emissions. These facilities will need to implement reasonably available control technology (RACT), which may include specific good operating practices or emission limits for any of the following source categories:

- Combustion units
- Boilers
- Process heaters
- Turbines
- Engines
- Municipal solid-waste landfills
- Municipal-waste combustors
- Cement kilns
- Other sources that are not regulated elsewhere under 25 Pa Code Chapter 129

Applicability will depend on whether your facility has the potential to emit greater than 50 tons per year of VOCs or 100 tons per year of NO<sub>x</sub>. The new RACT rules will become effective upon publication in the Pennsylvania Bulletin, but the following compliance deadlines have already been set:

- Existing facilities have until **January 1, 2017** to meet the new RACT requirements and emission limits.
- New or existing facilities that recently became major sources of NO<sub>x</sub> or VOCs will have **one year from the date they became a major source** to meet the new RACT requirements and emission limits.
- Facilities that cannot meet a RACT requirement without installing an air-cleaning device must submit a proposed alternative compliance plan to DEP **within 6 months** of the effective date.
- Facilities proposing to comply with a RACT requirement by averaging facility-wide or system-wide emissions must submit an averaging plan to DEP **within 6 months** of the effective date.
- Demonstrations of compliance with the new RACT requirements must be completed and documented via continuous emissions monitoring systems (CEMS) or stack testing by **January 1, 2017**.

Langan is ready to help you comply with the new RACT requirements by providing the following air permitting and compliance services:

- Applicability determinations
- Plan approval applications for alternative compliance plans
- Facility-wide or system-wide averaging plans
- Compliance demonstrations and stack-testing support
- Environmental management systems

For more information on these regulatory changes or our environmental compliance services please contact:

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