



**CHAPTER 129. STANDARDS FOR SOURCES ADDITIONAL RACT REQUIREMENTS
FOR MAJOR SOURCES OF NO_x AND VOCs FOR THE 2015 OZONE NAAQS**

Written notification, 25 Pa. Code §§129.111 and 129.115(a)

25 Pa. Code Sections 129.111 and 129.115(a) require that the owner and operator of an air contamination source subject to the final-form RACT III regulations submit a notification describing how you intend to comply with the final-form RACT III requirements, and other information spelled out in subsection 129.115(a). The owner or operator may use this template to notify DEP. Notification must be submitted in writing or electronically to the appropriate Regional Manager located at the appropriate DEP regional office. In addition to the notification required by §§ 129.111 and 129.115(a), you also need to submit an applicable analysis or RACT determination as per § 129.114(a) or (i).

Is the facility major for NO_x?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Is the facility major for VOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

FACILITY INFORMATION						
Facility Name	Befesa Zinc US Inc.					
Permit Number	13-0001	PF ID if known 818294				
Address Line1	900 Delaware Ave					
Address Line2						
City	Palmerton	State	PA	Zip	18071	
Municipality	Palmerton	County	Carbon			
OWNER INFORMATION						
Owner	Befesa Zinc US Inc.					
Address Line1	3000 GSK Drive, Suite 201					
Address Line2						
City	Moon Township	State	PA	Zip	15108	
Email	eric.hunsberger@befesa.com		Phone	724-773-9021		
CONTACT INFORMATION						
Permit Contact Name	Joe Falko					
Permit Contact Title	Environmental Affairs Manager					
Address Line	900 Delaware Ave					
City	Palmerton	State	PA	Zip	18071	
Email	Joe.falko@befesa.com			Phone	610-826-8714	

Complete Table 1, including all air contamination sources that commenced operation on or before August 3rd, 2018. Air contamination sources determined to be exempt from permitting requirements also must be included. You may find this information in section A and H of your operating permit.

Table 1 - Source Information

Source ID	Source Name	Make	Model	Physical location of a source (i.e., building#, plant#, etc.)	Was this source subject to RACT II?
101	Kiln #2 – ID Fan Emergency Drive Engines	Waukesha	L5108GSI	Kiln #2 Stack	No
102	Kiln #5 – ID Fan Emergency Drive Engines	Waukesha	L5108GSI	Kiln #5 Stack	No
103	Kiln #1 Emergency Generator	Katolight	24V71TA	Substation 10	No
149	Kiln #1 – Waelzing System	Traylor Engineering		Kiln Process Area	Yes
150	Kiln #2 – Waelzing System	Traylor Engineering		Kiln Process Area	Yes
152	Kiln #5 – Waelzing System	Traylor Engineering		Kiln Process Area	Yes

Complete Table 2 or 3 if the facility is a major NO_x or VOC emitting facility. For the column with the title “How do you intend to comply”, compliance options are:

- Presumptive RACT requirement under §129.112 (**PRES**),
- Facility-wide averaging (**FAC**) §129.113,
- System-wide averaging (**SYS**) §129.113, or
- Case by case determination §129.114 (**CbC**).

Please provide the applicable subsection if source will comply with the presumptive requirement under §129.112.

Table 2 – Method of RACT III Compliance, NOx

Source ID	Source Name	NOx PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply? (PRES, CbC, FAC or SYS)	Specific citation of rule if presumptive option is chosen
101	Kiln #2 – ID Fan Emergency Drive Engines	< 1	Yes		
102	Kiln #5 – ID Fan Emergency Drive Engines	< 1	Yes		
103	Kiln #1 Emergency Generator	< 1	Yes		
149	Kiln #1 – Waelzing System	35.92	No	* CbC	
150	Kiln #2 – Waelzing System	43.36	No	* CbC	
152	Kiln #5 – Waelzing System	53.87	No	* CbC	

* Note:

RACT II technologies were evaluated in 2016 to address PADEP’s RACT II regulations (specifically Selective Non-Catalytic Reduction and Selective Catalytic Reduction).

Selective non-catalytic reduction (SNCR) involves the direct injection of ammonia or urea in the flue gas stream. The injection of urea or ammonia can have a detrimental effect on the product. Because of the potential detrimental effect of ammonia on the product, the use of SNCR to control NOx emissions at Palmerton is not technically feasible.

Exhaust temperatures from each kiln’s product collectors are significantly lower than the required temperature for effective NOx control using Selective Catalytic Reduction (SCR). Installation of a stack re-heat system is not feasible. Based on these circumstances, SCR is not technically feasible for the kiln Waelzing systems.

Since no new technologies have been developed since the RACT II determination, Befesa is proposing that the RACT II limits be incorporated into the RACT III determination.

Please complete Table 3 if the facility is a major VOC emitting facility. Please provide the applicable section if a source is complying with any RACT regulation listed in 25 Pa Code §§ 129.51, 129.52(a)—(k) and Table I categories 1—11, 129.52a—129.52e, 129.54—129.63a, 129.64—129.69, 129.71—129.73, 129.75 129.71—129.75, 129.77 and 129.101—129.107.

Table 3 – Method of RACT III Compliance, VOC

Source ID	Source Name	VOC PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply?	Specify citation of rule or subject to 25 Pa Code RACT regulation, (list the applicable sections)