

December 28, 2022

Via Electronic Mail

Mr. Edward Wiener
Chief, Source Registration
Philadelphia Air Management Services
321 University Avenue, 2nd Floor
Philadelphia, PA 19104-4543

Dear Mr. Wiener:

Subject: RACT III Notification
Constellation Energy Generation, LLC
Richmond Generating Station
Title V Operating Permit No. 17-000008

Constellation Energy Generation, LLC (Constellation) is submitting this written notification of their plan to demonstrate compliance with the Reasonably Available Control Technology (RACT) requirements of 25 Pa. Code Sections §129.111 through §129.115 for their Richmond Generating Station (Richmond) located in Philadelphia, Pennsylvania.

On November 12, 2022, the Pennsylvania Department of Environmental Protection (PADEP) finalized amendments to 25 Pa. Code Chapters 121 (§121.1 relating to definitions) and 129 (§129.111 - §129.115), Additional RACT Requirements for Major Sources of NO_x and VOCs for the 2015 Ozone NAAQS (known as RACT III). The requirements of 25 Pa. Code §129.111 - §129.115 apply to owners and operators of all facilities in Pennsylvania that emit or have the potential to emit greater than 100 tons per year (tpy) of NO_x and/or 50 tpy of VOCs. Per 25 Pa. Code §129.111 and 129.115(a), an owner and operator of an air contamination source subject to the RACT III regulations must submit a notification describing how the facility intends to comply with the RACT III requirements and other information identified in 25 Pa. Code §129.115(a).

The Richmond Generating Station is located at 3901 North Delaware Avenue in Philadelphia, Pennsylvania. The station consists of two (2) General Electric Frame 7B combustion turbine-generator units nominally rated at 66 megawatts (MW) each fired on No. 2 fuel oil and/or kerosene and commissioned in 1974 (Combustion Turbines 91 and 92). Richmond is operated in accordance with Title V Operating Permit No. 17-000008 issued by the City of Philadelphia, Air Management Services (AMS) on May 30, 2019. The facility is considered a major source of NO_x emissions; therefore, these combustion units must demonstrate compliance with RACT III requirements. As such, Richmond is submitting this RACT III notification.

The attached RACT III written notification template as provided by the PADEP details how Richmond intends to comply with RACT III. In summary, Constellation will submit a limited case-by-case RACT analysis per the requirements of §129.114(i) to demonstrate compliance with RACT III for Combustion Turbines 91 and 92.

Please contact Albert M. Hatton III at 610-213-9958 or Albert.Hatton@constellation.com if you have any questions or require additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph Dick". The signature is written in a cursive, flowing style with a prominent initial "J".

Joseph Dick
General Manager

ATTACHMENT A
WRITTEN NOTIFICATION FORM



**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	Richmond Generating Station				
Permit Number	17-000008	PF ID if known			
Address Line1	3901 North Delaware Avenue				
Address Line2					
City	Philadelphia	State	PA	Zip	19137
Municipality	City of Philadelphia		County	Philadelphia	
OWNER INFORMATION					
Owner	Constellation Energy Generation, LLC				
Address Line1	200 Exelon Way				
Address Line2					
City	Kennett Square	State	PA	Zip	19348
Email	Albert.Hatton@constellation.com		Phone	610 213 9958	
CONTACT INFORMATION					
Permit Contact Name	Albert M. Hatton III				
Permit Contact Title	Manager, Environmental Programs				
Address Line	200 Exelon Way				
City	Kennett Square	State	PA	Zip	19348
Email	Albert.Hatton@constellation.com		Phone	610 213 9958	

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?
CU37	Combustion Turbine #92	General Electric	Frame 7B	Main Plant	Yes
CU38	Combustion Turbine #91	General Electric	Frame 7B	Main Plant	Yes
P01	Lube Oil Storage Tank and Vents	N/A	N/A	Main Plant	No
P02	Ancillary Fuel Oil Storage	N/A	N/A	Main Plant	No
P03	False Start Tanks	N/A	N/A	Main Plant	No
P05	Fugitive Emissions from Trucks	N/A	N/A	Main Plant	No
P06	No.2 Fuel Oil offloading from trucks to FML01	N/A	N/A	Main Plant	No
P07	One Ultrasonic cleaner degreaser	N/A	N/A	Main Plant	No
P08	Welders and Other Equipment	N/A	N/A	Main Plant	No

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
CU37	Combustion Turbine #92	374.38	No	CbC	
CU38	Combustion Turbine #91	374.38	No	CbC	

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)
N/A					