

TO Air Quality Permit File: OP-26-00534
Fayette Thermal, LLC / Fayette Thermal Steam Plant

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THROUGH Barbara R. Hatch, P.E. Mark Wayner, P.E.
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DATE June 6, 2013

RE Comments and Response Document for State Only Operating Permit
Fayette Thermal, LLC / Fayette Thermal Steam Plant
Luzerne Township, Fayette County
APS #557522; AUTH #598316; PF# 563618

The Department published a Notice of Intent to Issue a State Only Operating Permit to Fayette Thermal, LLC for the Fayette Thermal Steam Plant in the Pa. Bulletin on May 4, 2013, which initiated a 30-day public comment period. A single letter signed by two commenters was received during this period. It contains four comments.

ATTACHMENT 1 contains the list of commenters. ATTACHMENT 2 shows the changes made to the draft Operating Permit.

Comment 1: Installation of particulate leak detection equipment is required on the CFB fabric filter dust collectors by 40 CFR Part 63, Subpart JJJJJJ and this requirement has not been included in the draft permit.

Response 1: Table 3 to Subpart JJJJJJ of Part 63—Operating Limits for Boilers With Emission Limits requires sources that demonstrate compliance with applicable emission limits under Subpart JJJJJJ using fabric filter control to:

- “a. Maintain opacity to less than or equal to 10 percent opacity (daily block average); OR
- b. Install and operate a bag leak detection system according to § 63.11224 and operate the fabric filter such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during each 6-month period.”

However, the CFB Boilers at Fayette Thermal are existing, biomass subcategory boilers. Table 1 to Subpart JJJJJJ of Part 63—Emission Limits contains the emission limits for boilers subject to the subpart. Existing, biomass subcategory boilers have no emission limits in Table 1.

Therefore, the fabric filters controlling emissions from these boilers have no applicable requirements in Table 3 and the requirements of this table should not be included in the Operating Permit.

Comment 2: There is a reference to the Greensburg Thermal Steam Plant in the Technical Review Document (TRD) that should be changed to the Fayette Thermal Steam Plant.

Response 2: The Department agrees and the TRD has been corrected.

Comment 3: In Table 1 of the TRD, NO_x emission rate column for “Ton/Hr” should read “Ton/Yr.”

Response 3: The Department agrees and the TRD has been corrected.

Comment 4: Section C, Condition #012 of the draft Operating Permit requires onsite maintenance of records of source operation hours and fuel use. This limits the public from independently determining whether annual emission rate limits are being adhered to.

Response 4: For the purposes of verifying compliance with permit limitations, it is not necessary that all relevant company records be physically held by the Department. These records are subject to Department inspection. In this case, while these records must be held by Fayette Thermal as required in the condition, under 40 CFR, Part 60, Subpart Dc, § 40.48c(j), they must also be submitted to EPA, with copies to the Department, each six months. Compliance with notification and reporting requirements is required in Section C, Condition #020. Fayette Thermal is also required to submit an annual emission inventory for the facility. This requirement is contained in Section C, Condition #015. Therefore, it is possible for the public to independently determine whether annual emission rate limits by scheduling a file review.

**ATTACHMENT 1
List of Commenters**

1. Joseph Otis Minott, Esq.
Clean Air Council
2. Joe Osborne
Group Against Smog & Pollution

**ATTACHMENT 2
Changes made to the proposed SOOP for the Fayette Thermal Steam Plant.**

SECTION A. Site Inventory List

No Changes.

SECTION B. General Requirements

No Changes.

SECTION C. Site Level Requirements

No Changes

SECTION D. Source Level Requirements

No Changes.

SECTION E. Source Group Restrictions

No Changes.

SECTION H. Miscellaneous

No Changes.