



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY

March 9, 2016

Mr. Nikos Singelis
Acting Director, Air Protection Division
U.S. Environmental Protection Agency, Region III
1650 Arch Street (Mail Code: 3AP00)
Philadelphia, PA 19103-2029

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Division Director (3AP00)

RE: Revised List of SO₂ Sources Identified Pursuant to the Data Requirements Rule

Dear Mr. Singelis

I am writing to request revisions to “Pennsylvania’s List of SO₂ Sources Identified Pursuant to the Data Requirements Rule” (hereinafter “PA List of SO₂ Sources”) submitted to the U.S. Environmental Protection Agency (EPA) on January 15, 2016. Pursuant to 40 CFR § 51.1203 (relating to air agency requirements) of the Data Requirements Rule for the 2010 1-hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS), “[t]his list may be revised by the Regional Administrator after review based on available SO₂ emissions data” (80 FR 51087, August 21, 2016). To this end, the revised PA List of SO₂ Sources is enclosed for EPA’s review and consideration.

Based on the Pennsylvania Department of Environmental Protection’s (DEP) review of 2015 SO₂ emission data and other relevant information, the following facilities should be removed from the PA List of SO₂ Sources: American Refining Group (previously listed as American Refuel Group/Bradford); ArcelorMittal Monessen LLC/Monessen Coke Plant; Penn State University (PSU); and Scrubgrass Generating CO LP/Kinnerdell Plant. The rationale for the removal of the facilities from the list is provided as follows:

1. American Refining Group, Inc. Actual SO₂ emissions from the American Refining Group facility in Bradford (McKean County), PA declined from 1413 tons per year (tpy) in 2014 to approximately 574 tpy of SO₂ in 2015. The facility’s federally enforceable Title V Operating Permit (TVOP No. 420000) also requires the permanent shutdown and replacement of coal-fired Boiler No. 5 with a new gas-fired boiler (Boiler No. 6) by no later than January 31, 2017. The gas-fired boiler, which is expected to emit no more than 2.11 tpy of SO₂, will assure compliance with the “Boiler MACT” requirements in 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters). Operation of the gas-fired boiler should also address any potential impacts on the 1-hour SO₂ NAAQS.
2. ArcelorMittal Monessen, LLC. In 2014, the ArcelorMittal Monessen facility in Monessen (Westmoreland County), PA emitted 550 tpy of SO₂ from its coke work

operations. The preliminary review of 2015 emissions data indicates that SO₂ emissions declined to 523 tpy in 2015. However, ArcelorMittal will complete extensive source testing at the Monessen facility including testing of SO₂-emitting sources by early April 2016, at the request of EPA and DEP. Following a review of the source test results, the agencies will determine if corrective measures including the installation of control technology will be necessary to assure compliance with applicable requirements and to prevent any adverse impacts on the 2010 SO₂ NAAQS.

3. Pennsylvania State University. Pennsylvania State University (PSU) in State College (Centre County), PA emitted approximately 1,018 tpy of SO₂ in 2014 from its centralized heating facility; submission and review of 2015 emissions data is ongoing. However, PSU has commenced a natural gas conversion project at its West Campus Steam Plant (WCSP) in order to comply with the "Boiler MACT" requirements. The WCSP Improvement Project, authorized by DEP under federally enforceable Plan Approval # 14-00003F, includes conditions for converting two coal-fired boilers to burn natural gas and the replacement of two coal-fired boilers with two new natural gas-fired boilers that will be operational by the end of 2016. Following the commencement of operation of the gas-fired boilers, the facility's actual SO₂ emissions will be less than 10 tpy; federally enforceable SO₂ emission limitations will be established by DEP. This natural gas conversion project should address any potential impacts on the 1-hour SO₂ NAAQS.
4. Scrubgrass Generating CO, LP. Actual SO₂ emissions reported to EPA's Clean Air Markets Division for the Scrubgrass facility in Kennerdell (Venango County), PA declined from 1887 tpy in 2010 to 724 tpy in 2015. Additionally, compliance with the Mercury and Air Toxics Standards (MATS) will further reduce SO₂ emissions at the facility. This approach should address any potential impacts on the 1-hour SO₂ NAAQS.

Thank you in advance for your consideration of the revised PA List of SO₂ Sources. We believe that more recent SO₂ emissions data, natural gas conversions and applicability of the Boiler MACT and MATS requirements support the removal of the previously mentioned facilities from the original list of SO₂ sources submitted to EPA on January 15, 2016.

Should you have any questions or need additional information, please contact me by e-mail at jeepps@pa.gov or by telephone at 717.787.9702.

Sincerely,



Joyce E. Epps
Director

Enclosure

ENCLOSURE**PA's Revised List of SO₂ Sources Identified Pursuant to the Data Requirements Rule**

County	Facility
Allegheny	NRG Midwest LP/Cheswick Generating Station
Blair	Team Ten/Tyrone Paper Mill
Cambria	Cambria Cogen/ Ebensburg
Cambria	Inter Power Alhcon/Colver Power Plant
Cambria	Ebensburg Power Co/Ebensburg Cogeneration Plant
Carbon	Panther Creek Power OPR LLC/Nesquehoning
Clearfield	NRG Rema LLC/Shawville Generating Station
Delaware	Kimberly Clark PA LLC
Delaware	Covanta Delaware Valley LP/Delaware Valley Res Rec
Delaware	Exelon Generation Company/Eddystone
Lawrence	NRG Power Midwest LP/ New Castle Power Plant
Lehigh	Lafarge Corp/Whitehall Plant
Montour	Talen Energy LL/Montour Power Plant
Northampton	NRG Rema LLC/Portland Generating Station
Northampton	Hercules Cement Company LP/Stockertown
Northampton	Keystone Portland Cement/East Allen
Northampton	ESSROC/Nazareth Lower Cement Plant
Northampton	Northampton Generation Company/Northampton
Philadelphia	Philadelphia Energy Sol Ref/PES
Schuylkill	Schuylkill Energy Res/ St Nicholas Cogen
Schuylkill	Gilberton Power Co/John B. Rich Mem Power Station
Schuylkill	Wheelabrator Frackville/Morea Plant
Schuylkill	Northeastern Power Co/ Mcadoo Cogen
York	PH Glatfelter Co/Spring Grove
York	Magnesita Refractories/York
York	Talen Energy, LLC/Brunner Island Power Plant