

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF AIR QUALITY PLANNING AND STANDARDS

April 6, 2022

[Salutation]. [First Name] [Last Name] [Title] [Company] [Street Address] [City], [State] [ZIP Code]

Dear [Salutation]. [Last Name]:

Pursuant to section 114 of the Clean Air Act (CAA), 42 U.S.C. §7414(a), the U.S. Environmental Protection Agency (EPA) is collecting information related to hazardous air pollutant (HAP) and criteria pollutant emissions from stationary combustion turbines to inform its review under CAA section 112(d)(6) of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines. As part of this effort, the EPA requires your assistance in providing information related to these emissions in order to support an effective rulemaking. Stationary combustion turbines are subject to the provisions of 40 CFR part 63, subpart YYYY.

This section 114 request has two components: (1) an electronic survey; and (2) emissions testing that must be completed for your turbines as specified in Enclosure 1.

The first component is a survey that requests information on each stationary combustion turbine at the facilities listed in Enclosure 1. We are asking you to report information on processes, control devices, and control costs for each turbine. The request is a survey in Microsoft® Excel format. We request that you complete and return the survey by 3 months after receipt of this letter. Please download the spreadsheet and corresponding instruction document at: <a href="https://www.epa.gov/stationary-sources-air-pollution/stationary-combustion-turbines-national-emission-standards">https://www.epa.gov/stationary-sources-air-pollution/stationary-combustion-turbines-national-emission-standards</a>.

The second component of this section 114 request requires testing and reporting of emissions and other test data from turbines as specified in Enclosure 1 for specific HAP and criteria pollutants according to the testing procedures provided on the stationary combustion turbines website (<a href="https://www.epa.gov/stationary-sources-air-pollution/stationary-combustion-turbines-national-emission-standards">https://www.epa.gov/stationary-sources-air-pollution/stationary-combustion-turbines-national-emission-standards</a>). You must complete and submit test results no later than 9 months after receipt of this letter. Process and emissions testing data must be reported using the EPA Electronic Reporting Tool (ERT) where applicable.

Supplemental information is contained in the following additional enclosures:

Description	Enclosure #
EPA's Information Gathering Authority Under Section 114 of the Clean Air Act	Enclosure 2
Disclosure of Emissions Data Claimed as Confidential Under Sections 110 and	Enclosure 3
114(c) of the Clean Air Act	
Summary of Procedures for Safeguarding Clean Air Act Confidential Business	Enclosure 4
Information	
Designation of RTI International as Authorized Representative	Enclosure 5

Please note that emissions data provided under section 114 of the CAA is not entitled to confidential treatment under 40 CFR part 2. As you complete the survey, if you believe that providing any specific information would reveal a trade secret or compromise confidential business information (CBI), please identify this information clearly as CBI in your response. Please refer to Enclosure 4, the process survey instruction document, and/or the emissions test plan for more information. Clearly label any attachments submitted with your section 114 response that contain CBI. If only a portion of your response includes trade secrets, do not label your entire response as CBI. Facilities that claim large amounts of information to be CBI and/or trade secret(s), especially if other facilities report similar information without such claims, will likely be contacted by the EPA to validate these claims. Any information determined to be a trade secret will be protected by federal law (18 U.S.C. §1905). Please be aware that any information submitted in response to this request that is not claimed or determined to be confidential may be made available to the public without notifying you further (40 CFR part 2.203, September 1, 1976).

You are required to return all requested information to the EPA on or before the due dates specified in this letter. When you are ready to submit your data to the EPA, compile electronic copies of all *nonconfidential* requested files (including files that do not contain any Confidential Business Information (CBI) as well as files that have been redacted to remove CBI). Email the files to the following address:

## Turbines.Survey@RTI.org

If you elect to submit your confidential information for a given component of this request electronically as described in Enclosure 4, create a separate submission containing all files associated with that component of this request (*i.e.*, all information claimed to be confidential and nonconfidential portions combined). Clearly mark the files and/or individual pages with the words "Confidential Business Information" and use the following email address:

Tiffany Purifoy, OAQPS DCO ATTN: Project Stationary Combustion Turbines (Project #023) oagpscbi@epa.gov

Otherwise, to submit your confidential information for a given component of this request, please send a separate CD or DVD containing all files associated with that component of this

<sup>&</sup>lt;sup>1</sup> For additional information on emission data, please see 40 C.F.R. §2.301 and Enclosure 4.

request (*i.e.*, all information claimed to be confidential and nonconfidential portions combined) or other confidential business information to Ms. Tiffany Purifoy of the EPA at one of the addresses below. Clearly mark the CD/DVD, flash drive/USB, and/or printed materials with the words "Confidential Business Information" and send either via U.S. Postal Service Express Mail, registered mail, or private courier to:

Ms. Tiffany Purifoy, Government Information Specialist (C404-02) ATTN: Project Stationary Combustion Turbines (Project #023) U.S. Environmental Protection Agency Office of Air Quality Planning and Standards Research Triangle Park, NC 27711

Please use the street address below if you are using FedEx for submitting your Confidential Business Information:

Tiffany Purifoy, OAQPS DCO ATTN: Project Stationary Combustion Turbines (Project #023) U.S. Environmental Protection Agency Mail Code C404-02 109 T.W. Alexander Drive Research Triangle Park, NC 27711

Please use the street address below for UPS for submitting your Confidential Business Information:

Tiffany Purifoy, OAQPS DCO ATTN: Project Stationary Combustion Turbines (Project #023) U.S. Environmental Protection Agency Mail Code C404-02 4930 Old Page Road Durham, NC 27703-8089

For the security of your data, the EPA recommends sending your data files as described in Section 6 of Enclosure 4 of your section 114 cover letter. If you prefer to compile the materials onto a CD, DVD, or USB flash drive to mail to the CBI office, the EPA recommends sending it via Registered U.S. Mail using either a return receipt request, Federal Express, or other method for which someone must provide a signature upon receipt.

This request is one step in an established public process for collecting foundational information as part of NESHAP reviews. The public and stakeholders will continue to have an opportunity to comment on the stationary combustion turbine NESHAP review in the future, including a formal notice-and-comment period on any proposed action.

If you have questions regarding this survey, please contact Melanie King in the EPA's Energy Strategies Group at 919-541-2469 or <a href="mailto:king.melanie@epa.gov">king.melanie@epa.gov</a>.

Thank you for your assistance in this effort. The data will provide comprehensive information about the stationary combustion turbine source category, which will lead to more effective rulemaking.

Sincerely,

Penny Lassiter Division Director Sector Policies and Programs Division

5 Enclosures