



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

APPENDIX 2

Comments Received from Federal Land Managers and DEP Responses

**Relating to Revision to the State Implementation Plan for
Regional Haze:
BART Limits for Cheswick Plant, Allegheny County
November 2013**

**Bureau of Air Quality
Department of Environmental Protection**

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**Comments Received from Federal Land Managers and DEP Responses,
Relating to Revision to the State Implementation Plan for Regional Haze:
BART Limits for Cheswick Plant, Allegheny County
November 2013**

In accordance with the regional haze rule (40 CFR 51.308(i)(3)), the Pennsylvania Department of Environmental Protection (DEP or Department) is making available the comments received from the Federal Land Managers (FLMs) on the proposed Regional Haze (RH) State Implementation Plan (SIP) revision, and the DEP's responses to those comments.

On July 25, 2013, the Department sent a letter containing a proposed SIP revision to FLMs from the United States Fish and Wildlife Service, the United States Department of Agriculture – Forest Service, and the United States Department of the Interior – National Park Service.

As noted below, the Department did not receive any formal comments from the Fish and Wildlife Service on the proposed SIP revision. A reproduction of the comment letters received by the Department from the Forest Service and National Park Service are provided below, with DEP's responses inserted:

**U.S. Fish and Wildlife Service Comments
Pennsylvania Draft Regional Haze Rule State Implementation Plan
September 11, 2013**

Note: The U.S. Fish and Wildlife Service (FWS) did not provide the Department with formal comments in response to the July 25, 2013 letter. On September 11, 2013, the Department contacted Mr. Tim Allen of the FWS, to confirm that FWS received the draft SIP revision and to see if there were any comments, questions or concerns. Mr. Allen indicated that FWS did not have any comments or concerns with the proposed revision to the SIP.

**U.S. Department of Interior – National Park Service Comments
Pennsylvania Draft Regional Haze Rule State Implementation Plan
September 10, 2013**

Thank you for the opportunity to review Pennsylvania's proposed revision to the Regional Haze State Implementation Plan (SIP) to modify the Best Available Retrofit Technology (BART) requirements for Cheswick Power Plant. The Environmental Protection Agency determined that reductions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x) from electric generating units (EGU) in states included in the Clean Air Interstate Rule would achieve greater visibility improvement than implementation of presumptive BART controls for individual sources in these states. Therefore we agree

that Pennsylvania does not need to include emission limits for SO₂ and NO_x for Cheswick Power Plant in the regional haze SIP.

We also agree that correcting the PM₁₀ emissions limit for Cheswick Power Plant should not interfere with reasonable progress goals for Pennsylvania and neighboring states. Pennsylvania changed the PM₁₀ emission limit from an annual limit on total tons to an hourly emissions rate that does not address generation. We request that Pennsylvania clarify the expected future annual generation for Cheswick Power Plant compared to generation in recent years.

We appreciate the opportunity to work closely with Pennsylvania to improve visibility in our Class I national parks and wilderness areas. If you have questions, please contact me at patricia_f_brewer@nps.gov or 303-969-2153.

1. Comment: We agree that Pennsylvania does not need to include emission limits for SO₂ and NO_x for Cheswick Power Plant in the regional haze SIP.

DEP Response: The Department appreciates the reviewer's comment supporting the assessment that the Department does not need to include emission limits for SO₂ and NO_x for the Cheswick Power Plant BART limits in the SIP revision.

2. Comment: We also agree that correcting the PM₁₀ emissions limit for the Cheswick Power Plant should not interfere with reasonable progress goals for Pennsylvania and neighboring states.

DEP Response: The Department appreciates the reviewer's comment supporting the Department's assessment that reasonable progress goals will not be interfered with by correcting the PM₁₀ emissions limit for the Cheswick Power Plant.

3. Comment: Pennsylvania changed the PM₁₀ emission limit from an annual limit on total tons to an hourly emissions rate that does not address generation. We request that Pennsylvania clarify the expected future annual generation for Cheswick Power Plant compared to generation in recent years.

DEP Response: The Department wants to clarify the PM₁₀ emissions limits with regard to generation in the reviewer's perceived assessment. The hourly emissions rate of 180 pounds per hour is the potential to emit limit, which is equivalent to 788 tons per year. The equivalency is based on a maximum operating generation time of 8,760 hours per year. Both limits are included in the federally-enforceable permits issued for the Cheswick plant. The generation time did not change with this SIP revision. Therefore, the facility has an expected future annual generation of less than or equal to 180 pounds per hour or 788 tons per year.

**USDA Forest Service Comments Regarding
Pennsylvania Draft Regional Haze Rule State Implementation Plan
August 28, 2013**

The USDA Forest Service has completed our review of Pennsylvania's proposed Regional Haze SIP Revision. Thank you for the opportunity to review the document, as outlined in 40 CFR 51.308(i), and the chance to work cooperatively with your staff.

My staff has reviewed the revision and has no comment regarding the permit limit changes; I will not be requesting additional information. I advise the removal of the language in the SIP revision that suggests "imperceptibility" as a reason to not require the application of BART (see page 5). The perceptibility of visibility improvement is not important to the selection of a control option under BART. Once a source has been determined to be subject to BART, further modeling is useful only to compare BART control alternatives. In the BART guidelines EPA states, "Even though visibility improvement from an individual source may not be perceptible, it should still be considered in setting BART because the contribution to haze may be significant relative to other source contributions in the Class I area. Thus, we disagree that the degree of improvement should be contingent upon perceptibility. Failing to consider less-than-perceptible contributions to visibility impairment would ignore the CAA's intent to have BART requirements apply to sources that contribute to, as well as cause, such impairment" (see page 39129, FR 7/6/05).

I look forward to our continued close cooperation toward the national goal of no "man-made" visibility impairment to the Class I areas in our region by 2064. For further information, please contact air quality specialist Claire O'Dea at (703) 605-5283.

Again, I appreciate the opportunity to work closely with the Commonwealth of Pennsylvania. The Forest Service compliments you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

Clyde N. Thompson

1. Comment: The revision has been reviewed by staff at the USDA Forest Service and has no comment regarding the permit limit changes.

DEP Response: The Department appreciates the reviewers' time in assessing the draft proposed SIP revision and its support of the permit limit changes.

2. Comment: The USDA Forest Service advises the removal of the language in the SIP revision that suggests “imperceptibility” as a reason to not require the application of BART (see page 5). The perceptibility of visibility improvement is not important to the selection of a control option under BART. Once a source has been determined to be subject to BART, further modeling is useful only to compare BART control alternatives.

DEP Response: The Department does not agree with the reviewer’s understanding of the referenced language on page 5, but will alter the wording in this SIP revision to clarify what the review memo was pointing out. The November 7, 2012, review memo from the Allegheny County Health Department (ACHD) applies BART to the Cheswick plant and recommends BART for PM₁₀ of 180 pounds per hour; BART requirements for SO₂ and NO_x are satisfied by CAIR. In the November 7, 2012, review memo, ACHD recommended the PM₁₀ BART emission rate after considering the five Clean Air Act statutory factors for BART and following EPA’s BART Guidelines, in 40 C.F.R. Part 51, Appendix Y. In its review, ACHD evaluated retrofit control technologies, eliminated technically infeasible options and evaluated effectiveness and impacts of the remaining options. The ACHD’s conclusion for Cheswick was that the plant already had the most stringent controls available for a coal-fired boiler, had federally-enforceable permit limits for PM₁₀, as well as other flue gas desulfurization (FGD) operating conditions and had “minimal” visibility impact from PM₁₀ emissions to Class I areas (0.0336 deciviews even prior to operation of the FGD and its lower stack). The ACHD determined that further analysis for PM₁₀ was not required, consistent with EPA’s BART Guidelines, and concluded that additional controls were not warranted given the visibility impact from Cheswick and cost ineffectiveness of additional controls given the visibility impact of 0.0336 deciviews. The EPA BART Guidelines allow state and local agencies to determine the weight and significance to be assigned to each factor when conducting a BART review and in applying the five statutory factors for BART. The Department has revised the wording in this SIP revision to reflect and clarify that visibility impacts from Cheswick are minimal.