



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

## **APPENDIX 3**

### **Changes to the Regional Haze State Implementation Plan Revision: BART Limits for Cheswick Power Plant, Allegheny County**

#### **Comment and Response Document**

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

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## Changes to the Regional Haze State Implementation Plan Revision: BART Limits for the Cheswick Power Plant, Allegheny County

On December 21, 2013, the Pennsylvania Department of Environmental Protection (“DEP”) requested public comments and provided notice of public hearings on its “Changes to the Regional Haze State Implementation Plan Revision: BART Limits for the Cheswick Power Plant, Allegheny County”. 43 *Pennsylvania Bulletin* 7506.

The comment period opened on December 21, 2013, and closed on January 22, 2014. Three public hearings were scheduled for January 21, 2014, on the proposed revision, but were cancelled as no person indicated their interest in testifying at any of the hearings. Therefore, no testimony was received.

This document summarizes the written comments received during the public comment period. One commentator provided comments to the proposed SIP revision:

John Shimshock, Senior Environmental Scientist  
NRG Energy, Inc.  
121 Champion Way  
Canonsburg, PA 15317

### COMMENTS AND RESPONSES

**1. Comment:** *The commentator supports and appreciates the Department’s efforts regarding the SIP revision.*

**Response:** The DEP appreciates the commentators support.

**2. Comment:** *The commentator requested that the Department consider making a change to the owner/operator name of the Cheswick facility from “GenOn Power Midwest LP Cheswick Plant” to “NRG Power Midwest LP Cheswick Generating Station” as a result of a name change. The commentator stated that NRG Energy, Inc. submitted a request to the Allegheny County Health Department to administratively amend the current air operating permits to reflect the name change.*

**Response:** The DEP appreciates the comment and acknowledges the name change of the Cheswick facility from “GenOn Power Midwest LP Cheswick Plant” (GenOn) to “NRG Power Midwest LP Cheswick Generating Station” (NRG). DEP has confirmed that the administrative amendment was received by the Allegheny County Health Department, but as of the date of this document, has not been issued. An explanation of the name changes from Orion Power Midwest LP to GenOn to NRG has been included on page 1 of the SIP revision document. However, since the Best Available Retrofit Technology (BART) review memo,

completed by ACHD on November 7, 2012, referred to the facility owner as GenOn Power Midwest LP and since the facility permits are still issued to GenOn Power Midwest LP, the DEP has left the references to GenOn Power Midwest LP throughout the SIP revision document to avoid any confusion.

**3. Comment:** *The commentator requested that the Department revise the table presented on page 4 of the SIP revision to include an asterisk after the Pollutant and Emission Limit of PM<sub>10</sub>: 180 lb/hr, to state that “PM<sub>10</sub> includes condensable PM and excludes sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) as noted in the ACHD BART Review Memo November 7, 2012 (included as part of Appendix 1 to the proposed SIP revision).”*

**Response:** The DEP agrees that the PM<sub>10</sub> emission limit of 180 lb/hr includes condensable PM and excludes sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>). This PM<sub>10</sub> information is included in both the ACHD BART Review Memo dated November 7, 2012, and Installation Permit 0054-I004a (issued April 20, 2010). Condition V.A.1.j. of Installation Permit 0054-I004a states, “The PM<sub>10</sub> and PM<sub>2.5</sub> emission limits do not include sulfuric acid mist until the final permit limits are established as specified in V.A.1.i.” Condition V.A.1.i. indicates that the PM<sub>10</sub>, PM<sub>2.5</sub> and sulfuric acid mist limits will be reestablished using source testing results. DEP has included language in the last row of the revised Table 8.6 in the SIP revision document to state that the pollutant and emission limit for PM<sub>10</sub> is 180 lb/hr and that this includes condensable PM and excludes sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>).