

August 4, 2023

Ms. Sheida Sahandy
Chief Sustainability Officer
Encina Fort Union, LLC
1095 Evergreen Circle, Suite 510
Woodlands, TX 77380

Re: Plan Approval Application 49-00069A
Point Township Circular Manufacturing Facility
Point Township, Northumberland County

Dear Ms. Sahandy:

On May 25, 2023, the Department received a revised plan approval application for the construction of a plastics sorting operation which is Phase 1 of a two-phase project to be constructed at the proposed Point Township Circular Manufacturing Facility to be located in Point Township, Northumberland County. The revised application includes an increase in size of the emergency generator from 676 bhp to 1,676 bhp and the initially proposed 510 bhp fire pump engine has been changed to two identical 315 bhp engines. The revised application also contains updated fugitive dust emissions calculations for the facility roadways. The Department has commenced the technical review of the revised application and has identified the following technical deficiencies. This information is required pursuant to 25 Pa. Code §§ 127.1 and 127.12.

1. Section 6 of the revised application details the Best Available Technology (BAT) analysis for the sources in the proposed plan approval, including the reciprocating internal combustion engines (RICE) associated with the emergency generator and two fire pumps. The included analysis states that purchasing RICE certified to NSPS standards (Subpart IIII) and operating the engines in accordance with the manufacturer's operating procedures is BAT for the RICE. The BAT analysis provided in the plan approval application for these RICE is incomplete. Pursuant to 25 Pa. Code § 127.12(a)(5), a plan approval application shall show that the emissions from proposed sources will be the minimum attainable through the use of the best available technology. A complete BAT analysis for the RICE should include an evaluation of the technical and economic feasibility of installing add-on control technologies as well as purchasing engines certified to emission standards more stringent than the NSPS minimum requirements (e.g. Tier IV certified engines).

Please provide a response containing a complete and detailed BAT analysis for the proposed stationary RICE within 30 days. If you believe that the stated deficiency is not significant, instead of submitting a response to the deficiency, you have the option of asking the Department to make a decision based on the information that you have already made available with regard to

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that deficiency. If you choose this option, you should explain and justify how your current submission satisfies that deficiency.

If you have any questions or concerns about the above identified deficiencies, please contact Benjamin Hankins, Facilities Permitting Section, Air Quality Program at 570-327-3641 and refer to application 49-00069A to discuss your concerns. You may also follow your application through the review process via eFACTS on the Web at:
<http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,

Daniel C. Husted

Daniel C. Husted, P.E.
Chief, Facilities Permitting Section
Air Quality Program

cc: File: Encina Fort Union LLC, Permits, NMOP, 49-00069
Central Office – AQ Permits