

March 17, 2025

VIA EMAIL

Jeff Connors AECOM 250 Apollo Drive Chelmsford, MA 01824-3627

Re: DEP Acceptance of Air Dispersion Modeling Protocol Air Quality Analyses for Prevention of Significant Deterioration Homer City Generation, L.P. Proposed Major Modification Former Homer City Generating Station Site Black Lick Township and Center Township, Indiana County

Dear Jeff Connors:

The Pennsylvania Department of Environmental Protection (DEP) received an air dispersion modeling protocol¹ on March 10, 2025, for Homer City Generation, L.P. (Homer City) proposed major modification at the former Homer City Generating Station site in Black Lick Township and Center Township, Indiana County.

According to the protocol, Homer City will submit a plan approval application to the DEP for a proposed project that would be a major modification to an existing major stationary source and therefore subject to the Prevention of Significant Deterioration (PSD) regulations. The federal PSD regulations are codified in 40 CFR § 52.21 and are adopted and incorporated by reference in their entirety in 25 *Pa. Code* § 127.83 and the Commonwealth's State Implementation Plan (SIP) codified in 40 CFR § 52.2020. A written modeling protocol is intended to establish a common understanding of how the required PSD air quality analyses will be conducted and helps to keep misunderstandings and resource expenditures at a minimum.

The DEP reviewed Homer City's protocol and determined that it adequately establishes modeling procedures and databases for conducting the required air quality analyses to be included with Homer City's plan approval application. The DEP reviewed Homer City's protocol to ensure that the modeling procedures and databases are consistent with the PSD requirements for air quality analyses codified in paragraphs (k) through (p) of 40 CFR § 52.21,

¹ Air Dispersion Modeling Protocol. March 4, 2025. Prepared for: Homer City Generation, L.P. Prepared by: AECOM, Chelmsford, MA.

the U.S. Environmental Protection Agency's (EPA) "Guideline on Air Quality Models" (40 CFR Part 51, Appendix W), and the EPA's relevant air quality modeling policy and guidance.

The modeling procedures and databases established in Homer City's protocol and the DEP's acceptance of Homer City's protocol are not intended to supersede or conflict with the PSD requirements, the EPA's "Guideline on Air Quality Models," or the EPA's relevant air quality modeling policy and guidance. Additionally, the protocol is not intended to be a binding, formal legal document and changes in or deviations from the protocol are often necessary as the analyses progress; therefore, the DEP reserves the right to require the modeling procedures and databases set forth in Homer City's protocol to be revised or modified in appropriate circumstances. Moreover, the DEP's acceptance of Homer City's protocol does not preclude the DEP from issuing comments resulting from the technical review of Homer City's air quality analyses.

If you have any questions relevant to conducting Homer City's air quality analyses, you may contact me (<u>droble@pa.gov</u>, 717.705.7689) or Andrew Fleck (<u>afleck@pa.gov</u>, 717.783.9243), manager of the Air Quality Modeling and Risk Assessment Section.

Sincerely,

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Daniel J. Roble Air Quality Program Specialist Air Quality Modeling and Risk Assessment Section Division of Permits

cc: Gary Cline, Homer City Mark Wroten, Homer City Joel Heiser, Homer City Christopher Warren, AECOM Lori McNabb, DEP/NWRO/Air Quality David Balog, DEP/NWRO/Air Quality/New Source Review Jacob Chemsak, DEP/NWRO/Air Quality/New Source Review Nicholas Lazor, DEP/BAQ/Director Viren Trivedi, DEP/BAQ/Permits Sean Wenrich, DEP/BAQ/Permits/New Source Review Andrew Fleck, DEP/BAQ/Permits/Air Quality Modeling and Risk Assessment