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To: [Spriggle, Andrew R: \(Constellation Nuclear\)](#)
Cc: [Kieran Dempsey](#); [Pascucci, Vincent](#)
Subject: Constellation Energy Generation LLC PA 22-05062A - Technical Deficiency
Date: Wednesday, January 7, 2026 8:17:15 AM

Upon receipt of this e-mail, please send a brief reply to acknowledge receipt

Re: Technical Deficiency
Constellation Energy Generation LLC/Crane Clean Energy Center (Constellation)
PLAN APPROVAL NUMBER: 22-05062A
APS ID# 1149755, AUTH ID# 1547964
Londonderry Township, Dauphin County

Andrew,

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The Department has reviewed your application and has determined that the following significant deficiencies exist. This information is required by 25 Pa. Code § 127.12, Content of Applications, in order for the application to be technically complete.

1. Section 1. Executive Summary (page 3). The portion states “The Crane Facility is a nuclear power generating facility in Londonderry Township, Dauphin County, PA which was shutdown in 2019 primarily due to economic reasons.” It further states “The Crane Facility is submitting this plan approval application in order to bring this facility back online and reactivate these sources without modification.” Was a maintenance plan in accordance with 25 Pa Code §127.11a(a)(1) submitted to DEP within 1 year of the deactivation of the sources? DEP does not have a record of an approved maintenance plan. If the facility submitted a maintenance plan, as part of the reactivation of sources which have been out of operation or production for more than 5 years but less than 10 years and in accordance with 25 Pa Code §127.11a(b) (2), the owner or operator of the source is required that the emission of air contaminants from the source will be controlled to the maximum extent, consistent with the Best Available Technology (BAT) as determined by the Department as of the date of reactivation. However, if the facility did not submit a maintenance plan in accordance with 25 Pa Code §127.11a(a) (1), the equipment will be treated as new sources. Therefore, a BAT analysis is required whether or not a maintenance plan was approved by the Department. Please provide a Top Down BAT analysis for the sources listed in the plan approval application, including the respective cost effectiveness analysis for technically feasible control devices/methods.
2. Section 1.1. Facility Description (page 3).
 - a. Various ratings for the engines are different than those reported by the facility in past annual emission reports and operating permit renewal applications. The following engines have listed ratings different than those previously reported: FSP1, FSP3, Y1A, Y1B, Y4. Please confirm the correct horsepower of the engines.
 - b. The section mentions an exempt propane-fired emergency generator. Although it may qualify for exemption from plan approval requirements, please address its applicability to 40 CFR 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. Also, please confirm the manufacture and installation date of the unit.
3. Section 2.2.1. 40 CFR Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. Are the engines subject to the regulation constant speed engines?
4. Section 2.3.2. 40 CFR Part 63, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. The section indicates the two 168 mmBtu/hr boilers are subject to the federal subpart. Previous

permitting defined the boilers as “seasonal boilers” under the regulation. Will Constellation still maintain the boilers as “seasonal boilers” under the subpart?

5. Plan Approval Application:

a. Boilers

- i. Sections B.1 & B.3 (pages 14 & 15) indicate a fuel usage of 2,420 gal/hr for each boiler. Based on the boiler’s rated capacity of 168 mmBtu/hr and a fuel heat content of 137,000 Btu/gal, the hourly fuel usage for the boiler would be 1,226 gal/hr. Please confirm the hourly throughput.

b. Cooling Towers

- i. Section B.1 (page 33) indicates a capacity of 136,108,800 gal/hr. What is the basis of this value as the throughput used in the PTE calculations was 272,000 gal/min for each tower (16,320,000 gal/hr)?
- ii. Section B.6 (page 35) states “Cooling Tower B will be modified to match the process dimensions and flowrates of Cooling Tower A. As such, both boilers [sic] will have matching emissions specifications.” What specific modifications will be performed on the tower.

c. Emergency Engines

- i. Sections B.6 & E for each engine indicate the engine will not exceed 100 hours per year. Please confirm if it is the facility’s intent to limit the combined emergency and non-emergency use to 100 hours per year for each engine.

6. Appendix E. PTE Calculation

- a. Please provide the emission factors used to calculate the emissions from the diesel engines and boilers.
- b. Cooling Towers (page 235). Please provide the manufacturer’s guarantee for the drift rate. The design flow rate is claimed to be 272,000 gpm, combined; however, previous permitting indicated the flow rate was 215,000 gpm for each cooling tower. Additionally, the 2009 Request for Determination for the modification of Tower A indicated a flow rate for each tower at 272,000 gpm. Please address the discrepancy. Finally, please provide the basis/sampling results for the total dissolved solids (TDS) and the breakdown of PM10 and PM2.5.
- c. Boilers (pages 236 – 240). The calculations utilize a fuel usage of 242,000 gal/yr for each boiler. Based on the boiler’s rated capacity of 168 mmBtu/hr, a fuel heat content of 137,000 Btu/gal and operating 100 hr/yr, the annual fuel usage for each boiler would be 122,628 gal/yr. Please address the discrepancy.
- d. Emergency Engines (pages 236 – 240). The calculations use a 100 hours per year limit for each engine. Again, please confirm if it is the facility’s intent to limit the combined emergency and non-emergency use to 100 hours per year for each engine.

7. The previous operating permit for the facility listed various insignificant sources in Section H (i.e. portable generators, storage tanks, etc.). Will any of the same equipment be utilized/operated?

8. Regarding any changes made to your application based on the comments above, please provide updated emissions calculations, tables, and applicable application forms.

Confidential Information:

Per Section 13.2 of the APCA, information can generally qualify for confidential treatment if it is not emission data and if disclosure of the information would divulge production or sales figures or methods, or would divulge a unique process or production, or would otherwise adversely affect competitive position by revealing trade secrets. See the end of this letter for the exact text of Section 13.2 of the APCA.

In order to request confidential treatment for any part of your application, you must submit a redacted version of the original relevant document with the confidential information blacked out (and thus suitable for public disclosure), along with a letter of request containing a table identifying

the page and line number of each redaction, along with a justification for each redacted item as to why it should be deemed confidential under the specific criteria allowed under Section 13.2 of the APCA.

Please send your confidentiality request to me, as part of your response to this technical deficiency letter. DEP's final decision on the request will be sent to you in writing, along with a notice of appeal rights in the event the request is denied. Please be aware that if you do not provide adequate justification for each redacted item that it meets one of the specific criteria for confidential treatment under Section 13.2 of the APCA, your request may be denied.

Summary:

Please submit a response fully addressing each of the significant technical deficiencies set forth above within 30 days or DEP may deny the application, or, if this timeframe is insufficient, please promptly propose an alternative expeditious schedule for your response. Should you have any questions regarding the identified deficiencies, please contact me to discuss your concerns or to schedule a meeting. The meeting should be scheduled within the 30-day period allotted for your reply, unless otherwise extended by the Department.

If you believe the stated deficiencies are not significant, instead of submitting a response to those deficiencies, you have the option of asking the Department to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency you should explain and justify how your current submission satisfies the deficiency. Please keep in mind that if you fail to respond, your application may be denied.

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>. If you have any questions or concerns on this matter, please call me at 717.705.4875.

Regards,

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