

TO Air Quality Permit File: OP-32-00059
GenOn Northeast Management Company/Conemaugh Station

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DATE October 19, 2015

SUBJECT Comments and Response Document for Renewed Title V Operating Permit
Comments and Response Document for Acid Rain Permit
GenOn Northeast Management Company/Conemaugh Station
West Wheatfield Township, Indiana County
APS#792337; AUTH #944768; PF#559131

Background:

The main sources at the Conemaugh Station are two pulverized coal-fired (PC) boilers (Source IDs 031 and 032), each with nominal maximum heat inputs of 8,060 MMBtu/hour. Each boiler powers an electrical generator with a nameplate capacity of 856-MW, for a combined capacity of 1,711-MW. Emissions from the PC boilers are controlled by low NO_x burners and discretionary selective catalytic reduction systems (SCR) (Control IDs C07 and C08) to control NO_x emissions, electrostatic precipitators (ESP) with ammonia flue gas conditioning (Control IDs C01 and C02) to control PM emissions and wet limestone scrubbers (Control IDs C03 and C04) to control sulfur dioxide (SO₂) emissions. On March 30, 2012, installation of sorbent injection systems (Control IDs C101 and C102) was authorized by PA-32-00059E.

Supporting equipment at this site includes two, 211.5 and 212.5 MMBtu/hr, natural gas/oil-fired auxiliary boilers, four 3,600-BHP, peaking diesel electrical generators, two emergency diesel generators (Each rated at 1,662-bhp.), two non-emergency fire pumps (283-bhp and 380-bhp), coal storage piles, and plant roads.

The application for the renewed Title V Operating Permit (TVOP) for the Conemaugh Station was received on September 28, 2012. Notice of the Department's intent to issue the proposed TVOP for the Conemaugh Station was published in the Pa. Bulletin on May 30, 2015 and in the Indiana Gazette, Indiana, PA, on June 6, 7, and 8, 2015. The 30-day public comment period closed on July 8, 2015. Copies of the proposed TVOP and the associated Technical Review Memo were sent to EPA on May 29, 2015. Their 45-day comment period closed on July 13, 2015.

A change to the proposed TVOP was made by the Department due to its authorization on May 22, 2015, that the owners/operators of the Conemaugh Station have a 1-one year exemption, until April 16, 2016, from the requirements of § 63.10020(e). This paragraph relates to monitoring and reporting requirements for startup and shutdown under 40 CFR Part 63, Subpart UUUUU - Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units for Main Boilers #1 and #2 at Conemaugh. EPA has proposed changes to this paragraph. However, at the time of renewal of the TVOP, these changes have not been finalized. Also, the posted, proposed permit contained a condition for Compliance Assurance Monitoring (CAM) carried forward from the existing permit. Optional testing requirements for 40 CFR Part 63, Subpart UUUUU, which are required in the proposed permit, supersede these requirements for CAM. Therefore, this CAM requirement was deleted from the proposed permit. Finally, wording was added to the condition in the proposed permit requiring Subpart UUUUU, as a result of its remand by the Supreme Court of the United States (SCOTUS), on June 29, 2015. *Michigan v. EPA*, 135 S. Ct. 2699.

During the comment period, one comment was received. This comment was a letter, addressing several items in the proposed permit, sent by Zachary M. Fabish, Staff Attorney for the Sierra Club. Comments and the Department's responses are contained in ATTACHMENT 1. A list of all changes that have been made to the TVOP since the draft was sent to EPA on May 29, 2015 is contained in ATTACHMENT 2. A list of commenters is included as ATTACHMENT 3.

After thorough review and careful consideration of the comments received during the comment period, the TVOP has been revised where indicated in the Comments and Response Document. I recommend that both the TVOP renewal and Acid Rain Permit be issued with five year terms.