

**TO** Air Quality Permit File SOOP # 11-00516  
Gamesa Wind US, LLC / Ebensburg Plant

**FROM** Sheila A. Shaffer *SAS*  
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**THROUGH** Thomas J. Joseph, P.E. *TJJ* Mark R. Gorog, P.E. *MRG*  
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**DATE** October 3, 2016

**RE** Comment and Response Document  
Cambria Township, Cambria County  
APS# 877482; AUTH # 1084849; PF# 668366

On July 30, 2015, the Department received a State Only Operating Permit (SOOP) renewal application for Gamesa Wind US, LLC /Ebensburg Plant located in Cambria Township, Cambria County. Gamesa is a subsidiary of Gamesa Technology Corporation, Inc. and formerly did business under the name of Fiberblade, LLC. Although the facility has decided to perform operations under the subsidiary name, the tax identification number remains the same (20-2162951-1). Gamesa owns and operates the wind turbine component manufacturing and repair facility. Gamesa has complied with the municipal notification requirements contained in 25 Pa. Code §127.413 and the application fee requirements contained in 25 Pa. Code §127.703(b)(3). Gamesa is currently authorized to operate under SOOP 11-00516 issued on March 29, 2011, and expires on March 29, 2016.

On April 15, 2011, a full compliance evaluation (FCE) was performed by Phil Sapala, Air Quality Specialist. Mr. Sapala did not note any violations at the time of the inspection. The facility was out of operation for most of 2014 and all of 2015; therefore no FCE was performed during these time frames.

On January 9, 2016, the Notice of Intent to Issue was published in the PA Bulletin for a 30-day public comment period. The proposed operating permit was submitted to Gamesa for their review as well as the Air Quality inspector and District Supervisor for this facility. On February 15, 2016, the Department received comments from Joe Osborne, Legal Director of Group Against Smog & Pollution (GASP). On February 19, 2016, the Department also received comments from Georgette Galbreth, Facilities Manager of Gamesa. Please see Addendum A for all comments received and the Department's response.

On March 1, 2016, the Department received a revision to the State Only Operating Permit Application (page 1 and 2) and an updated Compliance Review Form to request the change of the Responsible Official to Francis Fuselier, General Counsel. This request has been updated in the issued operating permit renewal.

On April 8, 2016, Gamesa updated the potential emissions from the finishing operations (blade repairs), Source 102. Emissions were calculated based on the materials used during the repairs with the highest VOC and HAP contents. At 60.76 tons of repair material used and

80% VOC content, Gamesa would emit 48.61 tpy VOC from the finishing operations. In addition, at 8.91 tons of repair material used and 100% HAP content, Gamesa would emit 8.91 tpy HAP from the finishing operations. The Department has approved these calculations and incorporated the following conditions into the issued operating permit renewal:

Section C, Condition #008: *“The owner or operator shall not use more than 8.91 tons of any and all HAP containing repair materials in any consecutive 12-month period.”*

Section C, Condition #009: *“The owner or operator shall not use more than 60.76 tons of any and all VOC containing repair materials in any consecutive 12-month period.”*

In addition, the Department updated Section C, Condition #015 (previously Condition #013 in the proposed operating permit) to include, *“VOC and HAP emissions for the preceding consecutive 12-month period shall also be determined each month, and kept for a period of five years. These records shall be used to determine compliance with emission limits for the facility.”*

Table 1-Projected Emissions (provided in the Review Memo dated January 20, 2016) has been updated to reflect the additional conditions incorporated into the issued operating permit renewal mentioned above.

Table 1-Projected Emissions

Sources:	Tons Per Year					
	NOx	CO	SOx	VOC	PM	HAPS
102- Finishing Operations	0.000	0.000	0.000	48.61	4.42	8.91
104- Emergency Generator	6.110	0.450	0.080	0.130	0.067	0.002
105- Misc. Natural Gas Units	4.700	3.950	0.030	0.260	0.360	0.004
<b>TOTALS:</b>	<b>10.81</b>	<b>4.40</b>	<b>0.11</b>	<b>49.00</b>	<b>4.84</b>	<b>8.92</b>

It is my recommendation that the State Only Operating Permit renewal for Gamesa Wind US, LLC / Ebensburg Plant, SOOP 11-00516, be issued.

## Addendum A:

### I. Group Against Smog & Pollution (GASP):

Comment #1: The draft permit must be amended to include enforceable limits on potential to emit.

Response #1: Gamesa has elected to accept emission limitations based upon usage of repair materials with the highest VOC and HAP content. These restrictions can be found in Section C, Condition #009 and #010 of the issued operating permit SOOP-11-00516.

Comment #2: Gamesa must submit additional application information prior to issuance of the operating permit renewal.

Response #2: Gamesa has provided additional information to support potential emissions for the State-Only Permit renewal application. Please see Response #1 for additional information.

Comment #3: The operational assumptions the Department used to calculate projected facility emissions are inconsistent with the facility operating conditions listed in the draft operating permit. If converted into enforceable permit conditions, some of these assumptions may provide a means to effectively limit facility-wide PTE to below applicable major source thresholds.

Response #3: Page 3 and 4 of the Department's Review Memo for Review of State Only Operating Permit Renewal Application for Gamesa/ Ebensburg Plant dated January 20, 2016, contains a typographical error. The correct limitation is 0.04 grains PM/dscf as stated in the proposed operating permit renewal 11-00516, page 18, Section D, Source ID 102 Finishing, Condition #001. The projected emission for Source ID 102 in Table 1 should be 4.42 tpy PM based on the limit of 0.04 gr/dscf and 8,760 hours per year. For all pollutants (NO<sub>x</sub>, PM, CO, SO<sub>x</sub>), other than VOC and HAPs, the facility does not have the potential to reach major thresholds and, therefore, is a natural minor source of air contaminants. Please see Response #1 for additional information on VOC and HAP emission limitations.

### II. Gamesa:

Comment #1: The request to change wording to be consistent with 40 CFR 63.6603, 63.6595, 63.6605, and 63.6640 in Section D, Source 104, Conditions #003, #007 (now #009), #008 (now #010), and #010 (now #012) was not granted.

Response #1: The Department has updated the language pertaining to 40 CFR Part 60 Subpart ZZZZ as applicable. The citation headings for Condition #003 and #012 are locked by our system that is used for creating permit conditions. However, this inconsistency with the Federal Regulation language does not create a conflict of demonstrating compliance with the applicable requirements. The Department is aware of the typographical error and has routed the concern to our Central Office.

Comment #2: There are five (5) Section C. Site Level requirements related to the site-wide VOC and HAP caps that we did not specifically address in our renewal, but are consistent with the previous SOOP.

Response #2: The Department appreciates Gamesa comment and their acknowledgment that they are in compliance with the proposed operating permit.

Comment #3: The overall VOC and HAP “caps” were removed from Section C Site Level Requirements and moved to Section G. Miscellaneous.

Response #3: The Department has inserted the VOC and HAP limitations in Section C Site Level, Condition # 008 as well as the material usage limitations in Section C Site Level, Conditions #009 and #010.

Comment #4: There are two (2) Section D. Source ID 102 Requirements (Condition #002, related to maintenance records and #003, related to the requirement for install and maintain a magnehelic gauge to indicate pressure drop across each baghouse) that we did not specifically address in our renewal, but are consistent with the previous SOOP.

Response #4: The Department appreciates Gamesa comment and their acknowledgment that they are in compliance with the proposed operating permit.

Comment #5: There is one (1) Section D. Source ID 104 Requirement (Condition #004) regarding the limit on hours (500 hours) that we did not specifically address in our renewal, but is consistent with the previous SOOP.

Response #5: The Department appreciates Gamesa comment and their acknowledgment that they are in compliance with the proposed operating permit.

Comment #6: There are four (4) 10.8 kW portable genie diesel-fired flood light towers mentioned in Section G. Miscellaneous that are not subject to any additional restrictions, monitoring, testing, or recordkeeping requirements that we did not specifically address in our renewal, but are consistent with the previous SOOP.

Response #6: The Department appreciates Gamesa comment and their acknowledgment that they are in compliance with the proposed operating permit.

No further comments have been received at this time.