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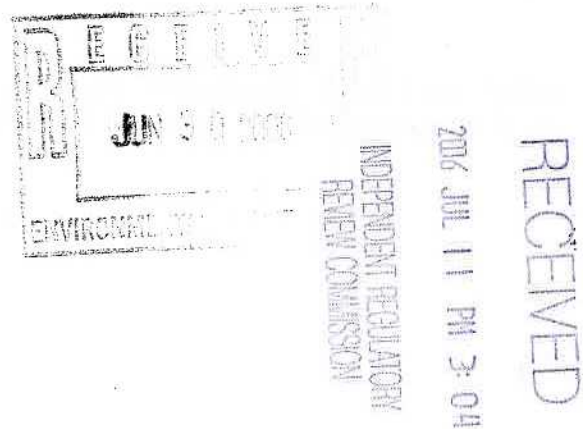
DAVID C. CANNON JR.
Vice President, Environment, Health & Safety

 **Allegheny Energy**
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June 28, 2006

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: Comments to Proposed Rulemaking
25 PA. Code Chapters 121 and 127
Nonattainment New Source Review
PA Bulletin, Doc. No. 06-071



Dear EQB:

Allegheny Energy generally agrees with the rule as proposed, with one exception. That exception centers on the "look back period" proposed in the rule. As currently written this look back period would be the consecutive 24-month period just prior to the permit application effort; or alternatively, 24 consecutive months from the previous 5 years of operation if it can be demonstrated that the immediate previous 24 months are not representative of normal operations. By adding this alternative PADEP is acknowledging that "normal" operations do not necessarily occur year after year.

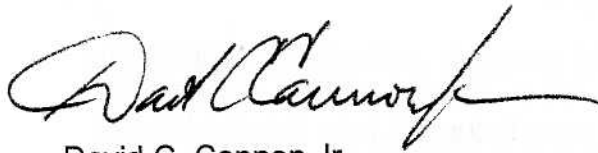
The very design and sheer size of industrial and EGU boilers lends to a host of potential impediments or failures (tube leaks, burner plugging, slagging, addition of control equipment, etc.) that could alter the operation of the boiler to a point where it does not operate at "normal levels." In addition, there are other external factors such as safety considerations or market pressures that may alter the operation of a boiler through intentional de-rates, and hence would not be representative of normal operation.

Since the proposed rule offers a different look back period from which to choose the 24 consecutive months of operation, it would seem that most applicants will try to make the case to use this longer 5-year period. These justifications will only add time and effort during the permitting process for both the applicant and the Department. Therefore, rather than protract the effort of determining which 24-month period to use, Allegheny Energy suggests the proposal offer a 10-year look back period as the standard. This would be consistent with federal regulations (EPA provides a 5 year look back period for EGU boilers and 10 years for non-EGU boilers [40 CFR 51]) and allow applicants the opportunity to select the most "representative" 24 month time period given their specific operational and business constraints.

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Allegheny Energy appreciates the opportunity to comment on these regulations. If we can be of further assistance please contact Mr. Randy Cain of my staff at 724-838-6004.

Sincerely,

A handwritten signature in black ink, appearing to read "David Cannon Jr.", with a stylized flourish extending to the right.

David C. Cannon Jr.
Vice President
Environment, Health & Safety