



Stephen Hoffman

From: ecomment@pa.gov
Sent: Tuesday, October 12, 2021 2:01 PM
To: Environment-Committee@pasenate.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; Troutman, Nick; gking; lversen, Sarah A.; Emily.Eyster; IRRC
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Additional RACT Requirements for Major Sources of NOx and VOCs for the 2015 Ozone NAAQS (#7-561)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Additional RACT Requirements for Major Sources of NOx and VOCs for the 2015 Ozone NAAQS (#7-561).

Commenter Information:

Joseph Walsh
 Covanta (jwalsh@covanta.com)
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Comments entered:

Please see the following comments on the above-referenced draft rule proposal.

Covanta owns and/or operates five municipal waste combustors in the Commonwealth that provide clean, renewable energy to the clients and communities that we serve in addition to being a net greenhouse gas reducer compared to landfill disposal. We recognize the role that our facilities play in ensuring that the Commonwealth is successful in attaining the 2015 Ozone National Ambient Air Quality Standard (NAAQS), specifically as it relates to NOx emissions as a precursor to ozone formation. In that regard, our PA facilities publish continuous emission monitoring system data on a daily basis, including NOx emissions, through the Covanta.com website so that the public can readily review our environmental performance.

We have reviewed the draft RACT III rule proposal as published in the August 7, 2021 PA Bulletin and offer the following comments for consideration:

1. Proposed PA Code 25 Sec 129.112 contains a presumptive RACT limit of 150ppmvd@7%O2 for municipal waste combustors (MWCs). This revised limit was based, in part, on emissions data summarized in the Technical Support Document presented during the May 19, 2021 meeting of the Environmental Quality Board. That document contains NOx emissions data (Appendix 6) for

Covanta MWC facilities in York County, Montgomery County, Delaware County (3 of 6 units), Lancaster County and Dauphin County for the years 2018 and 2019. Referencing this data set, the Department concluded that achieving a proposed NOx emissions limit of 150ppmvd@7%O2 was readily achievable for each of these facilities. With the exception of the facilities in Delaware and York Counties, the remaining Covanta MWCs employ Selective Non-Catalytic Reduction (SNCR) technology for the control of NOx emissions, which is considered Best Available Control Technology (BACT) for the combustion technologies in use by these facilities. When optimized, SNCR is capable of achieving the proposed RACT NOx limit at these facilities. However, SNCR has not been demonstrated as being technically feasible for the mass burn rotary combustor technology employed at the Delaware and York County MWCs. In addition, for RACT purposes, the Department has concluded that a SNCR retrofit for certain existing MWCs is economically infeasible. Despite these limitations, Covanta has proposed to voluntarily field test SNCR technology on one unit at the Delaware County MWC through Request for Determination submitted to the Department (which has been approved). The results of that field test will not be available prior to the estimated finalization of the RACT III rule. As such, SNCR technology cannot be relied on for NOx control at this time at these two facilities.

2. Proposed Section 129.133 (Facility-wide or System-wide NOx emissions averaging plan general requirements) specifies that a source or sources may average NOx emissions by demonstrating that aggregate emissions emitted by the source(s) do not exceed the applicable NOx limit on a source specific basis. For RACT sources subject to a concentration-based NOx limit (i.e., parts per million), does the term 'aggregation' apply to that standard? For example, if a facility has two sources subject to a RACT NOx limit of 150ppmvd as a daily average, would aggregation allow, for example, one unit to operate at 100ppmvd and the second unit to operate at or below 200ppmvd for the combined daily average of = 150ppmvd?

3. The Technical Support Document also evaluates Selective Catalytic Reduction (SCR) as a potential control technology for MWCs. The Document concludes that SCR is technically infeasible for MWCs. We concur with the conclusion as no existing MWC has been retrofitted with SCR technology due to technical, logistical and economic limitations. The conclusion that SCR is not RACT for NOx control at existing MWCs is supported by NOx RACT determinations for the 2015 Ozone NAAQS in both Virginia and Maryland.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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