



Stephen Hoffman

From: ecomment@pa.gov
Sent: Tuesday, October 12, 2021 4:34 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:

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Comments entered:

#1 - Daily Average Limits

When RACT limits are on a daily average basis, allowances or exemptions should be made for startup and shutdown conditions, as well as partial day operations. Having only 24 hours of emissions in an average for compliance demonstration provides very little buffer for variable operations (30-day averages, as in the RACT 2 rule, should be sufficient). Startup and shutdown emissions are known to be higher than those during normal, baseline operations. Those emissions will skew the average rate higher, potentially above any limit, even when emissions are controlled during those events in accordance with good engineering practices and manufacturing specifications. It will be worse, if there are not a significant number of normal operating hours included in the daily average, like when operations start late in the day or end early in the day.

#2 Facility-wide Averages

The proposed regulation appears to only allow averaging of emissions across all sources at a facility when the sources are subject to presumptive limits. Averaging across a facility should be allowed in all cases, including when an alternative RACT proposal is made and adopted for a source. The RACT rule is limiting emissions for the purposes of impacting ozone formation significantly down-wind of an area. If emissions are slightly higher from one source on a site,

they should be able to be offset by lower emissions from other sources on the site. The net effect downwind from the facility will be the same as if all sources met their respective limits. This is especially important when compliance is measured on a daily basis, as emissions are typically variable over shorter time periods.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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