



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building
P.O. Box 8468
Harrisburg, PA 17105-8468
July 9, 2010

Bureau of Air Quality

717-787-9702

Mr. Larry L. Simmons, P.E.
Principal
Energy & Environmental Management, Inc.
P.O. Box 376
Harrison City, PA 15636-0376

Re: PADEP Comments on Air Quality Modeling Protocol
Erie Renewable Energy, LLC
Proposed Meadville Power Station, Greenwood Township, Crawford County

Dear Mr. Simmons:

The Pennsylvania Department of Environmental Protection (PADEP) received an air quality modeling protocol for the proposed Erie Renewable Energy, LLC (ERE) Meadville Power Station on June 25, 2010. According to the protocol, ERE proposes to construct a tire-derived fuel (TDF)-fired power generation facility in Greenwood Township, Crawford County. The project will be subject to the United States Environmental Protection Agency (USEPA) Prevention of Significant Deterioration (PSD) regulations promulgated in 40 CFR § 52.21. The PSD regulations are adopted by the PADEP in their entirety and incorporated by reference in 25 Pa. Code § 127.83. Consequently, the project requires an air quality analysis for carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter less than 10 micrometers (PM-10), particulate matter less than 2.5 micrometers (PM-2.5), and sulfur dioxide (SO₂).

The purpose of the modeling protocol is to establish methods and procedures for conducting the air quality analysis. The PADEP reviewed the modeling protocol to ensure consistency with the following: (1) the air quality analysis requirements of the USEPA PSD regulations; (2) the USEPA "Guideline on Air Quality Models" (Guideline), codified in Appendix W to 40 CFR Part 51; (3) associated USEPA modeling guidance and policy; and (4) PADEP recommendations. The PADEP's comments on the modeling protocol are enclosed.

The PADEP recommends that ERE provide a revised modeling protocol. If the PADEP determines that the revised protocol adequately address the enclosed comments, ERE will receive a protocol acceptance letter. As an alternative, the PADEP will accept a response to the comments that is incorporated into the final air quality analysis as part of the plan approval application, in order to help ERE expedite the submittal of the application.

On behalf of the PADEP, I look forward to working with you on the air quality analysis for this important project. If you have any questions or concerns, please contact me at 717-783-9243 or by email at afleck@state.pa.us.

Sincerely,

Andrew W. Fleck
Environmental Group Manager
Air Quality Modeling Section
Division of Air Resource Management

Enclosure

cc: Greg Rubino, ERE (email)
Joe Pezze, Hillcrest Group (email)
John Guth, Northwest Regional Office
Krishnan Ramamurthy, Division of Permits (email)
AQ Modeling Correspondence File