

Extended CRE Response 23

From: <Andrea_Stacy@nps.gov>
To: "John Notar" <john_notar@nps.gov>
Cc: <grubino@lpassport.com>; <jpezz@zoominternet.net>; <jguth@state.pa.us>;
<afleck@state.pa.us>; <elhuffman@fs.fed.us>; <John_Bunyak@nps.gov>
Sent: Wednesday, May 05, 2010 12:54 PM
Subject: Fw: Class I Determination

Larry,

Thank you for sending the following information regarding the Erie Renewable Energy, LLC Meadville Power station, to be located in Crawford County, PA, greater than 300 km northwest of Shenandoah National Park (SHEN). Based upon the proposed emission rates and distance from SHEN, as described in your May 4, 2010 letter, the NPS does not anticipate that modeling would show any significant additional impacts to air quality related values (AQRV) in SHEN. Therefore, we are not requesting that a Class I AQRV analyses be included in the PSD permit application, nor do we anticipate the need for further NPS review of the project. However, please contact us if the emissions or nature of the project change significantly, so that we might re-evaluate the project.

Please note that our determination regarding the need for a Class I AQRV analysis does not indicate our agreement with any Class I modeling protocols, results or conclusions that applicants might make independent of Federal Land Manager review.

Finally, we are only addressing the need for an AQRV analysis in SHEN. The state and/or EPA may have a different opinion regarding the need for a Class I increment analysis. Additionally, independent determinations will need to be made for Class I areas managed by other federal agencies (i.e. FWS, USFS). Accordingly, I have copied Tedd Huffman with the USFS on this email; Tedd is the contact for the WV Class I areas.

Thank you for keeping us informed and involving the NPS in this project review, please feel free to contact me if you have any questions.

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----- Forwarded by Andrea Stacy/DENVER/NPS on 05/05/2010 10:43 AM

Larry Simmons

From: Edward L Huffman [elhuffman@fs.fed.us]
Sent: Tuesday, August 10, 2010 8:03 AM
To: Andrew Fleck
Cc: Larry Simmons; Andrea Stacy
Subject: Re: Request for Determination
Attachments: 610_C642.pdf, 623_C642.pdf

Mr. Fleck,

The US Forest Service, Federal Land Manager for Dolly Sods and Otter Creek Class I Wilderness areas has received the letter dated August 8, 2010 for the proposed Meadville Power Station (Crawford Renewable Energy LLC) in Crawford County, Pennsylvania from Larry Simmons of Energy and Environmental Management, Inc.. Based on the emission rates in the attached request for determination and distances to the Class I areas we anticipate that modeling would not show any significant additional impacts to air quality related values (AQRV) at the Class I areas administered by the US Forest Service. Therefore, we are not requesting that a Class I AQRV analysis be included in the PSD permit application. We understand that the Pennsylvania Department of Environmental Protection and/or US EPA may have a different opinion regarding the need for a Class I increment analysis.

Class I Area	Distance from Facility in kilometers	Annual PTE in tpy
Dolly Sods	275	498
Otter Creek	285	

1/ Based on 24-hour maximum allowable emissions of sulfur dioxide, nitrogen oxides, total fine particulate matter and sulfuric acid mist from all proposed new sources at the facility.

Our waiver of this analysis does not indicate agreement with any AQRV analysis protocols or conclusions applicants may make independent of Federal Land Manager review. Please note that we are specifically addressing the need for an AQRV analysis for Class I areas managed by the US Forest Service. Should the emissions or the nature of the project change significantly from that presented in this letter dated 8 August 2010, please contact me so that we may re-evaluate the project proposal.

Thank you for keeping us informed and involving the USDA Forest Service in the project review. Even though we do not need to continue to be involved in the permitting process for this facility we would like to receive the final permit when issued (an electronic version is preferred). Please include the Forest Service in Class I area analysis determinations early in the process to avoid time lags in replies from Federal Land Managers. I received a copy of the NPS determination from Andrea Stacy in May 2010 but I did not have the necessary information to provide an informed determination until yesterday. Hopefully, the time lag did not impact your planning and permit process.

Sincerely,

Edward (Tedd) Huffman
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