

December 22, 2022

Ms. Sheida Sahandy
Chief Sustainability Officer
Encina Fort Union, LLC
1095 Evergreen Circle, Suite 510
Woodlands, TX 77380

Re: Plan Approval Application 49-00069A
Point Township Circular Manufacturing Facility
Point Township, Northumberland County

Dear Ms. Sahandy:

The Department has commenced the technical review of the above captioned application. The application requests authorization to construct a plastics sorting operation which is Phase 1 of a two-phase project to be constructed at the proposed Point Township Circular Manufacturing Facility to be located in Point Township, Northumberland County. The Department of Environmental Protection has reviewed the above referenced Plan Approval application and has identified the following technical deficiencies. This information is required pursuant to 25 Pa. Code Chapter 127 Subchapters B, D, and E.

1. Section 4 of the Plan Approval application (“Major Source Applicability”) indicates that Phase 1 of the proposed project is not a major source on its own, and therefore not subject to the requirements of Prevention of Significant Deterioration (PSD) or Nonattainment New Source Review (NNSR) which are codified in 25 Pa. Code Chapter 127 Subchapters D and E, respectively. The plan approval application indicates an intent to reassess the applicability of these regulatory requirements when an application for Phase 2 of the proposed project is submitted to the Department.

If the PSD or NNSR requirements are determined to be applicable to the proposed project, they will apply equally to both Phase 1 and Phase 2 of the project. Without knowing the potential emission rates for the entire proposed project, the Department cannot reach a conclusion regarding the applicability of PSD or NNSR requirements to the proposed sources planned for construction under Phase 1 of the project. The Department requests that Encina Fort Union, LLC (Encina) submit potential emission rates for the entire project so that the PSD and NNSR applicability determinations can be completed. The Department understands that certain aspects of Phase 2 of the project have not yet been finalized, however, at a minimum, information indicating whether potential emissions will be above or below the applicable PSD/NNSR major source threshold for each type of air emissions projected to be emitted by the proposed project is required

2. If the potential emissions from the proposed project are anticipated to exceed any major source thresholds for NNSR or PSD, please provide a thorough analysis of the requirements of these regulations to the sources that are included in the Plan Approval application for Phase 1 of the proposed project. This includes an analysis of the Best Available Control Technology (BACT) and Lowest Achievable Emissions Rate (LAER) for the proposed sources, as applicable. Additionally, the applicability of the requirement to obtain Emission Reduction Credits (ERCs) for the proposed project should be addressed.
3. If the potential emissions from the proposed project are anticipated to exceed any major source thresholds for NNSR or PSD, please submit the fee specified in 25 Pa. Code § 127.702 for review of a Plan Approval application requiring approval under Subchapter D or E, as applicable.
4. As part of the determination of Best Available Technology (BAT) for minimizing emissions of fugitive dust from facility roadways, Encina proposes to, among other things, to post and enforce truck speed limits at the facility. The Department requests further detail regarding the proposed maximum truck speed.

Please provide a response fully addressing the technical deficiencies set forth above within 30 days. If you believe that a stated deficiency is not significant, instead of submitting a response to that deficiency, you have the option of asking the Department to make a decision based on the information that you have already made available with regard to that deficiency. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency.

If you have any questions or concerns about the above identified deficiencies, please contact Benjamin Hankins, Facilities Permitting Section, Air Quality Program at 570-327-3641 and refer to application 49-00069A to discuss your concerns. You may also follow your application through the review process via eFACTS on the Web at:
<http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,

Daniel C. Husted

Daniel C. Husted, P.E.
Chief, Facilities Permitting Section
Air Quality Program

cc: File
Central Office – AQ Permits