



Pennsylvania
**Department of
Environmental Protection**

MEMO

TO Justin Haley
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New Source Review Section
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Northwest Regional Office

FROM Daniel J. Roble *DJR*
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THROUGH Andrew W. Fleck *AWF*
Environmental Group Manager
Air Quality Modeling and Risk Assessment Section
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Bureau of Air Quality

DATE May 5, 2025

RE Determination of Administrative Completeness
PSD Air Quality Analyses
Homer City Generation, L.P.
Application for Plan Approval 32-00457A
Former Homer City Generating Station Site
Black Lick Township and Center Township, Indiana County

MESSAGE:

The Pennsylvania Department of Environmental Protection (DEP) received a plan approval application on April 4, 2025, from Homer City Generation, L.P. (Homer City) for a proposed major modification at the former Homer City Generating Station site in Black Lick Township and Center Township, Indiana County.¹ The plan approval application was prepared by AECOM, on behalf of Homer City. The purpose of this memorandum is to notify the DEP's Northwest Regional Office (NWRO) that the air quality analyses portion of Homer City's plan approval application has been determined to be administratively complete.

The DEP is required under 25 *Pa. Code* § 127.12d to “determine if an application for plan approval is administratively complete” and “provide written notice of the completeness

¹ Prevention of Significant Deterioration Permit Application. April 2025. Prepared for: Homer City Generation, L.P.
Prepared by: AECOM, Chelmsford, MA.

determination to the applicant within 30 days of receipt of an application.” Furthermore, this section of the *Pa. Code* states, “an application is administratively complete if it contains the necessary information, maps, fees and other documents requested in the plan approval application, regardless of whether the information, maps and documents would be sufficient to justify issuance of the plan approval.”

According to Homer City’s plan approval application, the proposed project would be a major modification² to an existing major stationary source³ and is therefore subject to the Prevention of Significant Deterioration (PSD) regulations codified in 40 CFR § 52.21. These federal PSD regulations are adopted and incorporated by reference in their entirety in 25 *Pa. Code* § 127.83 and the Commonwealth’s State Implementation Plan codified in 40 CFR § 52.2020. According to 40 CFR § 52.21(b)(22), “[c]omplete means, in reference to an application for a permit, that the application contains all of the information necessary for processing the application.” Relevant to 40 CFR § 52.21(k) through (p) of the PSD regulations, Homer City’s plan approval application includes the following air quality analyses:

- Source impact analyses of the net emissions increases of particulate matter less than or equal to 10 micrometers in diameter (PM-10) and particulate matter less than or equal to 2.5 micrometers in diameter (PM-2.5) due to Homer City’s project;
- Additional impact analyses of the impairment to visibility, soils, and vegetation due to Homer City’s project and associated growth; and
- Initial screening calculations to determine whether the net emissions increases due to Homer City’s project would have negligible impacts on air quality related values (AQRV) and visibility in nearby federal Class I areas.

This determination of administrative completeness for the PSD air quality analyses portion of Homer City’s plan approval application does not prohibit the DEP from requiring Homer City to submit additional information, if determined to be necessary, during the subsequent technical review.

If you have any questions regarding this administrative review, you may contact me (droble@pa.gov, 717.705.7689) or Andrew Fleck (afleck@pa.gov, 717.783.9243).

cc: Lori McNabb, NWRO/Air Quality
David Balog, NWRO/Air Quality/New Source Review
Nicholas Lazor, BAQ/Director
Viren Trivedi, BAQ/Permits
Sean Wenrich, BAQ/Permits/New Source Review

² *Code of Federal Regulations*. 40 CFR § 52.21(b)(2). Definition of “major modification.”

³ *Code of Federal Regulations*. 40 CFR § 52.21(b)(1). Definition of “major stationary source.”