

Limitations subject to the request

- General requirement to use a PM CEMS or HAP metals CEMS
- Prohibition of using the LEE option for filterable PM or non-mercury HAP metals.

Facility and Affected Sources

Requesting Facility: Schuylkill Energy Resources, Inc.'s St. Nicholas Cogeneration Project, PFID: 467540; ORIS ID: 54634

Affected Sources: CU 031, CFB Boiler

Length of compliance period being requested: Delayed compliance until July 6, 2029

Background of SER

SER is a 100-megawatt (net 80-megawatt) anthracite waste coal-fired Independent Power Production (IPP) facility located in Mahanoy Township, Schuylkill County. SER uses anthracite waste coal, known as culm, from existing abandoned waste coal banks to generate energy. SER is a base-load power generation facility.

SER is part of the small waste coal to energy power generation industry. SER converts culm into reliable source of electricity, while simultaneously improving land, air, and water quality by remediating waste coal banks, thereby reducing acid mine drainage as well as GHG and pollutant emissions, fugitive dust, and physical hazards. SER works in close conjunction with the Pennsylvania Department of Environmental Protection ("PADEP") in its reclamation efforts and uses PADEP-certified Beneficial-Use ash to restore many acres of abandoned mine lands, and ultimately revegetating them and further supporting regional air and water quality.

SER's Facility is unlike most other solid fuel fired generators in that it consumes an anthracite waste coal material, also referred to as culm, of a low Btu value and high ash content; up to 80% by weight. Other than being used as fuel for the Facility and similar facilities in the waste coal to energy industry, these culm banks have little to no value and/or use. SER successfully complied with the limitations originally enforceable under the MATS rule, but not without a great deal of effort, cost, and time. SER currently maintains PM Low Emitting EGU (LEE) status, despite a flue gas that is laden with six-to-ten times the particulate load of a traditional solid fuel unit. To further reduce the MATS Rule limitations by 66% would be unreasonable and not technically or financially feasible. Further, beyond being technically impractical, it would likely be impossible to achieve this dramatic reduction in such a short timeframe, as would be simultaneously commissioning a PM CEMS at this new, likely unachievable, lower PM level.