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VP-Bell Bend Project-Development

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May 20, 2011

Mr. Mark Wejksznier  
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**BELL BEND NUCLEAR POWER PLANT  
REQUEST FOR DETERMINATION  
BNP-2011-091      Docket No. 52-039**

PPL Bell Bend, LLC is submitting a request for determination (RFD) application for a project to construct four (4) emergency diesel generators, two (2) station blackout diesel generators, two (2) fire water pumps, two (2) Cooling Water System cooling towers, four (4) Emergency System Water Supply cooling towers, and a Sponge-Jet media blasting unit at the proposed PPL Bell Bend Nuclear Power Plant (BBNPP) to be located in Salem Township, Luzerne County, Pennsylvania. During the construction phase of the project there will be a concrete batch plant located at the facility which will be an additional source of air emissions.

The plant is proposed to be built on property adjacent to the existing Susquehanna Steam Electric Station (SSES), a two unit nuclear power plant that is an existing permitted facility under State Only Permit Number 40-00027, a synthetic minor operating permit.

Luzerne County is located in the Scranton Wilkes-Barre Air Basin which is part of the Northeast Pennsylvania-Upper Delaware Valley Intrastate Air Quality Control Region. Luzerne County is currently designated as attainment/unclassified for all criteria pollutants pursuant to 40 CFR §81.339. However, Pennsylvania is part of the Northeast Ozone Transport Region (OTR); therefore, the entire state is treated for New Source Review (NSR) permitting purposes as being nonattainment for ozone.

It is assumed that the existing SSES facility and the new BBNPP will be considered as a single stationary source for Prevention of Significant Deterioration (PSD) and Nonattainment NSR applicability purposes. The existing SSES is an electrical generation facility that uses nuclear power. Nuclear power plants are not fossil fuel units and are therefore not in one of the 28 listed source categories under the PSD and Nonattainment NSR regulations. The major source threshold under PSD is therefore 250 tons per year for each NSR-regulated pollutant and the major source threshold under Nonattainment NSR is 50 tons per year for VOC and 100 tons per year for NO<sub>x</sub> since this facility is located in a portion of the OTR that is designated as attainment for ozone. Additionally, under the Greenhouse Gas Tailoring Rule, the PSD major source threshold for the existing source is 100,000 tons per year CO<sub>2</sub>e.

As stated above, the existing SSES facility currently has a minor source operating permit issued by PA DEP. Two natural draft cooling towers and an emergency spray pond are currently in the process of being added to the permit and the application is pending with PA DEP (Permit Number 40-399-071). Emissions of all NSR-regulated pollutants from the existing source including the emissions from the two natural draft cooling towers and emergency spray pond are

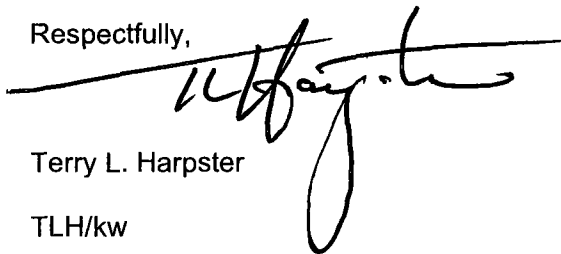
less than 250 tons per year, emissions of VOC are less than 50 tons per year, and emissions of NOx are less than 100 tons per year. Potential emissions of Greenhouse Gases (GHGs) from the existing source are less than 100,000 tons per year based on operating restrictions on the engines at the facility. Therefore, the existing source is a minor source under PSD and Nonattainment NSR.

BBNPP is proposing to limit the hours of operation of each of the emergency diesel generators, the station blackout diesel generators, and the fire water pumps to no more than 100 hours per year. Additionally, at the temporary concrete batch plant, particulate emissions from the pneumatic transfer of cement to the storage silos will be controlled by a 99% efficient baghouse and particulate emissions from sand and aggregate transfer activities will be controlled by watering. Fugitive particulate emissions from vehicle traffic on unpaved roadways associated with the concrete batch plant will be controlled by water spraying and graveling of the unpaved roads. These limitations and control measures will limit emissions of all NSR-regulated pollutants to less than 250 tons per year, VOC emissions to less than 50 tons per year, NOx emissions to less than 100 tons per year, and CO2e emissions to less than 100,000 tons per year. Therefore, this modification will not be a major source by itself and will not be subject to PSD or Nonattainment NSR requirements.

In order to receive a determination by the Department of whether the proposed changes are considered changes of minor significance, three (3) copies of the RFD application including the site location of the project indicating locations of the proposed emission sources (Attachment 1) and detailed emission calculations showing projected actual emissions from the modification (Attachment 2) are enclosed.

If you have any questions regarding this letter or the RFD application or need any further information, please contact Bradley Wise of my staff at (610) 774-6508 or [bawise@pplweb.com](mailto:bawise@pplweb.com).

Respectfully,



Terry L. Harpster

TLH/kw

Enclosure: 1) Request for Determination Application (Original and 2 copies)  
Attachment 1 – Site drawing showing locations of the proposed emission sources.  
Attachment 2 - Emission calculations showing projected actual emissions

cc: w/o Enclosure

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