



# Renovo Energy Center

12011 Sunset Hills Rd Ste 110, Reston, VA 20190

June 28, 2022

**VIA ELECTRONIC MAIL**

Mr. Muhammad Q. Zaman  
Environmental Program Manager  
Pennsylvania Department of Environmental Protection  
North Central Regional Office  
208 West Third Street, Suite 101  
Williamsport, PA 17701

Re: Plan Approval 18-00033B Extension Request  
Renovo Energy Center LLC  
Renovo Generation Station  
Renovo Borough, Clinton County

Dear Mr. Zaman:

The Pennsylvania Department of Environmental Protection ("Department") issued Plan Approval 18-00033B for the Renovo Energy Center ("REC") on April 29, 2021. The Plan Approval has an expiration date of October 28, 2022, by which date REC is to commence construction. As the Department is aware, Plan Approval 18-00033B was appealed to the Environmental Hearing Board on May 26, 2021, and that appeal is ongoing. This appeal has negatively impacted the project's ability to commence construction. Given the current schedule for the appeal, it is unlikely that REC will be able to commence construction prior to October 28, 2022. Thus, REC is submitting this request as provided for under 25 Pa. Code §127.13(b).

For the reasons stated above, REC requests an 18-month extension to the expiration date of Plan Approval 18-00033B for the Renovo Energy Center. Based on the attached Air Quality Fee schedule, a check in the amount of \$750 is enclosed.

Thank you for your consideration, and if you have any questions or need additional information in support of our request, please do not hesitate to contact me at 571-392-6383 or [rfranzes@bechtel.com](mailto:rfranzes@bechtel.com).

Sincerely,

**Renovo Energy Center**

  
Rick Franzese  
REC Consultant



## PLAN APPROVAL EXTENSION FORM

Current Plan Approval Information				
Plan Approval No.: 18-00033B		Owner Name: Renovo Energy Center LLC		
Original Issued Date: April 29, 2021		Plant Name: Renovo Energy Center LLC/Renovo Plant		
Current Expiration Date: October 28, 2022		Contact Name: Ron Tobler		
Project Commenced Date: TBD		Contact Title: Project Manager		
Contact Telephone: 571-392-3336		Contact Email: rtobler@bechtel.com		
Municipality: Renovo		Mailing Address: 12011 Sunset Hills Road, Suite 110		
County: Clinton		City: Reston	State: VA	Zip Code: 20190-5919
List of Source(s) and/or Air Cleaning Devices Specified in the Plan Approval (attach additional pages as needed)				
Source ID	Source Name	Air Cleaning Device	Date of Completion	Operational Commencement Date
031	Auxiliary Boilers		TBD	TBD
032	Water Bath Heater		TBD	TBD
033	Dew Point Heater		TBD	TBD
P101	Combustion Turbine #1	Selective Catalytic Reduction and Oxidation Catalyst	TBD	TBD
P102	Combustion Turbine #2	Selective Catalytic Reduction and Oxidation Catalyst	TBD	TBD
P103	Emergency Generator Engine		TBD	TBD
P104	Fire Pump Engine		TBD	TBD
P105	Storage Tanks		TBD	TBD
Z001	Fugitive Emissions		TBD	TBD
Reason for Extension (See Instructions)				
<input type="checkbox"/>	(A) Plan Approval Extension to continue construction, modification, reactivation of the source(s) or installation of air cleaning device(s) in accordance with 25 Pa. Code §127.13(a).			
<input type="checkbox"/>	(B) Plan Approval Extension to extend temporary operation to facilitate the shake-down of sources and air cleaning devices, to permit operation pending issuance of a permit under Subchapter F (relating to operating permit requirements) or Subchapter G (relating to Title V operating permits) or to allow the evaluation of the source(s) for compliance with applicable regulations and requirements in accordance with 25 Pa. Code §127.12b(d).			
<input checked="" type="checkbox"/>	(C) Other (including the extension of the 18-month period specified in 25 Pa. Code §127.13(b).			



### Checklist

- ☒ **Enclosed Air Quality Fees Schedule**
- ☐ **Fees are not required in accordance with 25 Pa. Code § 127.702(i)(3)**
- ☒ **Enclosed justification for the extension request**
- ☒ **Enclosed Compliance Review Form or Compliance Review Supplemental Form if one has not been submitted within 6 months from the date of this application**
- ☒ **Compliance Review and Plan Approval Extension forms signed by a responsible official**

### Certification of Truth, Accuracy and Completeness

I certify that, subject to the penalties of Title 18 Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the design and operation of the facilities to which this application applies and that the information provided in this application is true, accurate, and complete to the best of my knowledge, information, and belief formed after reasonable inquiry.

Name (Type): Rondal D. Tobler

Title: Project Manager

Name (Signed):

Date: 6/28/2022

## PLAN APPROVAL EXTENSION FORM INSTRUCTIONS

A plan approval is issued with a term that provides a sufficient and reasonable amount of time to complete the project as described within the plan approval application. Plan Approvals granted by the Department will be valid for a limited time, as specified by the Department in the approval. Except as provided in 25 Pa. Code § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

*(A) Plan Approval Extension to continue construction, modification, reactivation of the source(s) or installation of air cleaning device(s) in accordance with 25 Pa. Code §127.13(a).*

If construction has commenced but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include a justification for the extension, the specific sources for which the extension of construction or modification is needed and a schedule for the completion of the construction.

*(B) Plan Approval Extension to extend temporary operation to facilitate the shake-down of sources and air cleaning devices, to permit operation pending issuance of a permit under Subchapter F (relating to operating permit requirements) or Subchapter G (relating to Title V operating permits) or to allow the evaluation of the source(s) for compliance with applicable regulations and requirements in accordance with 25 Pa. Code §127.12b(d).*

Pursuant to 25 Pa. Code § 127.12b(d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide the specific source(s) for which the extension of temporary operation authorization is needed, a description of the compliance status of the source(s), a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.



(C) *Other (including the extension of the 18-month period specified in 25 Pa. Code §127.13(b)).*

If the construction, modification or installation is not commenced within 18 months of the issuance of the plan approval or if there is more than an 18-month lapse in construction, modification, or installation, a new plan approval application that meets the requirements of Subchapters B, D and E (relating to plan approval requirements; prevention of significant deterioration of air quality; and new source review) shall be submitted unless it is extended. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

Except for the 18-month extension, the Department will publish a notice of its action in the *Pennsylvania Bulletin*. The 18-month extension, if approved, will require the applicant to publish the newspaper notices in accordance with 25 Pa. Code §127.44 (relating to public notice).

To request a plan approval extension, the applicant shall complete all information as requested in the plan approval extension form and have it signed by a "responsible official" as defined in 25 Pa. Code § 121.1 (relating to definitions). A submission checklist is provided to ensure all required items are included in submitting the plan approval extension form.

The Department will waive the fee in accordance with 25 Pa. Code § 127.702 (i)(3) if through no fault of the applicant, an extension is required. For example, the applicant is waiting for the Department's review of stack test reports, CEM certification, Department's initial inspection, or pending litigation. Please include an explanation of why fees are not applicable along with your justification for the extension, which includes, but is not limited to, any relevant submittal dates of reports or applications sent to the Department.

## AIR QUALITY FEES SCHEDULE

There are four different Fees Schedules.

1. Fees Schedule for New Plan Approval
2. Fees Schedule for Pending or Issued Plan Approval
3. Fees Schedule for State-Only Operating Permit
4. Fees Schedule for Title V Operating Permit

If the company is submitting a new plan approval application, the fees schedule for a "New Plan Approval" should be used. In this form, the company should check the appropriate boxes depending on the types of review requested and pay accordingly.

Similarly, if the company is submitting an Operating Permit application, the company should use the respective fees schedule for an Operating Permit, check all the appropriate boxes, and pay the fees required.

Please make the check payable to the "Commonwealth of Pennsylvania Clean Air Fund." Submit this fees schedule and the check with the application package to the appropriate regional office.



## AIR QUALITY FEES FOR PENDING\* OR ISSUED\*\* PLAN APPROVAL

Company Information				
Federal Tax ID: 47-218250		Firm Name: Renovo Energy Center LLC		
Permit # (If any): 18-00033B		Facility Name: Renovo Energy Center LLC/Renovo Plant		
Municipality: Renovo		County: Clinton		
Contact Person Name: Ron Tobler		Telephone Number: 517-392-3336		
E-mail: rtobler@bechtel.com				
Pending or Issued Plan Approval ***				
Line #	Check the appropriate boxes below	Type of Authorization	Fee 2021 - 2025	Total Fees
1	<input type="checkbox"/>	Minor Modification	\$1,500	
2	<input checked="" type="checkbox"/>	Extension	\$750	\$750
3	<input type="checkbox"/>	Transfer of Ownership	\$750	
4	<input type="checkbox"/>	Significant Modification, Ambient Impact Analysis	\$9,000	
5	<input type="checkbox"/>	Significant Modification, Reassessment of Control Technology	\$2,500	

\* Pending plan approval is such that the Department has completed the technical review and published a notice in the *Pennsylvania Bulletin*. This is applicable only to Lines 4 and 5.

\*\* Issued plan approval is such that the conditions of the plan approval have not been incorporated into an operating permit.

\*\*\* Pay maximum amount of fee when one or more authorizations are requested. For example, when a minor modification of a plan approval and a transfer of ownership are needed, please pay only the highest amount of fee (\$1,500).



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

## AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

**Type of Compliance Review Form Submittal (check all that apply)**

☒ Original Filing  
☐ Amended Filing

Date of Last Compliance Review Form Filing: \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

**Type of Submittal**

☐ New Plan Approval      ☐ New Operating Permit      ☐ Renewal of Operating Permit  
☒ Extension of Plan Approval      ☐ Change of Ownership      ☐ Periodic Submission (@ 6 mos)  
☐ Other: \_\_\_\_\_

### SECTION A. GENERAL APPLICATION INFORMATION

**Name of Applicant/Permittee/("applicant")**  
(non-corporations-attach documentation of legal name)

Renovo Energy Center LLC

**Address**      12011 Sunset Hill Road, Suite 110  
Reston, VA 20190-5919

**Telephone**      571-392-3336      **Taxpayer ID#**      47-2181250

**Permit, Plan Approval or Application ID#**      18-00033B

**Identify the form of management under which the applicant conducts its business (check appropriate box)**

☐ Individual      ☐ Syndicate      ☐ Government Agency  
☐ Municipality      ☐ Municipal Authority      ☐ Joint Venture  
☐ Proprietorship      ☐ Fictitious Name      ☐ Association  
☐ Public Corporation      ☐ Partnership      ☒ Other Type of Business, specify below:  
☐ Private Corporation      ☐ Limited Partnership      LLC

**Describe below the type(s) of business activities performed.**

Renovo Energy Center, LLC (REC) proposes to construct a nominally rated 1,240 MW (net) dual fuel-fired (natural gas and ultra-low sulfur diesel (ULSD)) combined cycle electric generating plant in Renovo, Pennsylvania. The proposed REC facility will consist of two 1-on-1 power blocks that include a Combustion Turbine Generator (CTG), Heat Recovery Steam Generator (HRSG), and a Steam Turbine (STG) in line to produce electricity for distribution into the transmission grid system. Each combined cycle system is intended to be fired on natural gas unless there is an interruption in supply. Additionally, each HRSG is equipped with a natural gas-fired Duct Burner (DB) for supplemental steam production, and the steam from the HRSGs is routed through the condensing STG. REC will utilize Air Cooled Condensers (ACCs) for condensing the exhaust steam, which is an environmentally preferred method when compared to a traditional wet cooling tower.

**SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"**

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
BDC Power Holdings, LLC	Virginia	Delaware	47-5241008	Parent of Applicant
Bechtel Development Company, Inc.	Virginia	Delaware	94-3288883	Parent of BDC Power Holdings, LLC
Bechtel Enterprises, Inc.	Virginia	Delaware	94-3071990	Parent of Bechtel Development Company, Inc.
Bechtel Global Infrastructure, Inc.	Virginia	Delaware	90-0917499	Parent of Bechtel Enterprises, Inc.
Bechtel Global Infrastructure & Minerals, Inc.	Virginia	Delaware	46-1528070	Parent of Bechtel Global Infrastructure, Inc.
Bechtel Corporation	Virginia	Delaware	94-2681914	Parent of Bechtel Global Infrastructure & Minerals, Inc.
Bechtel Group, Inc.	Virginia	Delaware	94-2681915	Parent of Bechtel Corporation
J Renovo Holdings, LLC	New York	Delaware	81-1254249	Parent of Applicant
GE Energy, LLC	Georgia	Delaware	26-3820956	Parent of J Renovo Holdings, LLC
See Attachment for	Additional	Information		

**SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"**

**Pennsylvania Facilities.** List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant

Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.



Name	Business Address

List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).

Name	Business Address

**Plan Approvals or Operating Permits.** List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
Renovo Energy Center LLC/Renovo Plant	18-00033A	Renovo, PA	January 26, 2018	January 25, 2021

**Compliance Background.** (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date

**CONTINUING OBLIGATION.** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

**VERIFICATION STATEMENT**

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.



6/28/2022

Signature

Date

Rondal D. Tobler

Name (Print or Type)

Project Manager

Title

## AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM

Supplemental Information to SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"

<b>Unit Name</b>	<b>Principal Places of Business</b>	<b>State of Incorporation</b>	<b>Taxpayer ID</b>	<b>Relationship to Applicant</b>
BHA Group, Inc.	New York	Delaware	22-2968559	Parent of GE Energy, LLC
General Electric Company	Massachusetts	New York	14-0689340	Parent of BHA Group, Inc.
JERA Americas Inc.	Texas	Delaware	74-3128147	Parent of J Renovo Holdings, LLC
JERA Co. Inc.	Japan	Japan	N/A	Parent of JERA Americas Inc.