

US EPA ARCHIVE DOCUMENT



Chrissy Camacho Borskey
Government Affairs and Policy
GE Aeroderivatives and
Gas Engines

1122 Colorado, Suite 106
Austin, TX 78701

T 512 461 6932
Chrissy.Borskey@ge.com

September 27, 2012

Mike Gordon, 3AP10
U.S. Environmental Protection Agency – Region III
1650 Arch Street
Philadelphia, PA 19103
VIA EMAIL: gordon.mike@epa.gov

Comments on Proposed: Plantwide Applicability Limit (PAL) permit to construct and operate a cogeneration plant for the U.S. Capitol Power Plant (CPP) by the Architect of the Capitol

Dear Mike:

The General Electric Company (GE) appreciates the opportunity to comment on the proposed Plantwide Applicability Limit (PAL) permit to construct and operate a cogeneration plant for the U.S. Capitol Power Plant (CPP) by the Architect of the Capitol (AOC). We look forward to working with the Agency as it moves toward issuance of a final permit.

For over a half century, GE's Gas Engine business has led in the development and production of gas-fueled reciprocating engines, packaged generator sets, and cogeneration units for the efficient generation of power and heat. GE's gas engines are designed for stationary, continuous duty operation. Known for their high efficiencies, low emissions, durability, and high reliability, our engines run on natural gas or a variety of other gases including biogas, landfill gas, coal mine gas, sewage gas, combustible industrial waste gases.

GE Gas Engines is a business under GE Power & Water, which provides customers with a broad array of power generation, energy delivery and water process technologies to solve their challenges locally. GE Power & Water works in all areas of the energy industry including renewable resources such as wind and solar; biogas and alternative fuels; and coal, oil, natural gas and nuclear energy. The business also develops advanced technologies to help solve the world's most complex challenges related to water availability and quality. Numerous products are qualified under ecomagination, GE's commitment to providing innovative solutions that maximize

resources, drive efficiencies and help make the world work better. GE Power & Water's seven business units include Aeroderivative Gas Turbines; Gas Engines; Nuclear Energy; Power Generation Services; Renewable Energy; Thermal Products and Water & Process Technologies. Headquartered in Schenectady, N.Y., Power & Water is GE's largest industrial business.

GE Gas Engines has installed over 600 engines in the United States and tens of thousands globally. Nearly one quarter of all installations have been natural gas-fired cogeneration projects. Most recently, GE Gas Engines commissioned the first of three engines installed at a greenhouse in California. Not only did the engines generate electricity through the combustion of natural gas and utilize the thermal by products of the combustion engine to heat the greenhouse and its ancillary buildings, but this site also employed the use of a world class exhaust treatment system. The exhaust stream is so pure after treatment that the flow can (and is) directed into the enclosed greenhouse as a form of CO2 fertilization. The waste our reciprocating engines create during the production of electricity is used to make plants grow faster and healthier. We cannot think of a better way to demonstrate the capabilities that gas engines have than to point at our newest units at this greenhouse in California.

As a manufacturer of gas engines used in cogeneration projects across the globe and our commitment to sustainability and environmentalism, we are interested in the success of the CPP project. We ardently agree with the aggressive consideration that is given to the emissions profile of this future plant. We support the EPA approving the PAL permit for the CPP.

However, we do take exception to the language in **Section 2: Project Description** which outlines the CPP. We respectfully request that the forthcoming language requesting proposals for the CPP be technology agnostic in its project description. Our extensive experience in cogeneration has taught us that there are countless configurations that will lead to an impressive overall efficiency. We are concerned that the current language does not allow the AOC to fully explore the amazing number of possibilities that exist to provide heat and power to our Nation's Capital.

We appreciate the opportunity to comment on this the draft permit and welcome any questions you may have.

Sincerely,


Chrissy Camacho Borskey