

November 19, 2019

The Honorable Andrew Wheeler  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**Re: Supplement to Petition to Delist Stationary Combustion Turbines as a Source  
Category Subject to Section 112 of the Clean Air Act**

Dear Administrator Wheeler:

Please find enclosed a supplement to the August 28, 2019 petition to remove the Stationary Combustion Turbine source category from the list of categories of major sources subject to regulation under section 112 of the Clean Air Act (“Petition”). The Petition was filed on behalf of American Fuel & Petrochemical Manufacturers, the American Petroleum Institute, the American Public Power Association, the Gas Turbine Association, the Interstate Natural Gas Association of America, and the National Rural Electric Cooperative Association.

In this letter, I am providing additional reports addressing the public health and environmental risks from stationary combustion turbine emissions of hazardous air pollutants (“HAPs”). These reports, which were published in October 2019 after the Petition was submitted, further support delisting stationary combustion turbines from regulation under section 112 of the Clean Air Act. Specifically:

1. The Electric Power Research Institute (“EPRI”) reissued its May 2019 report, “Inhalation Human Health Risk Assessment for U.S. Stationary Combustion Turbines: 2014 Base Year Evaluation,” with a new addendum. This addendum updated EPRI’s analysis of human health risks from inhalation to reflect new information provided in public comments on EPA’s proposed risk and technology review (“RTR”) for combustion turbines, including correction of modeling input parameters and inclusion of additional combustion turbines. The results, provided in Appendix G of that report, continue to demonstrate that no source in the category emits HAPs in amounts which may cause a greater than 1-in-1 million lifetime risk of cancer or emits non-carcinogenic HAPs in amounts which exceed a level adequate to protect public health with an ample margin of safety.

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2. EPRI also reissued its May 2019 report, "Multi-Pathway Human Health Risk Assessment for U.S. Stationary Combustion Turbines: 2014 Base Year Evaluation and Refine TRIM," with a new addendum. This addendum updated EPRI's analysis of multi-pathway human health risks to reflect new information provided in public comments on EPA's proposed RTR for combustion turbines, including correction of modeling input parameters and inclusion of additional combustion turbines. The results, provided in Appendix B of that report, continue to demonstrate that no source in the category emits HAPs in amounts which may cause a greater than 1-in-1 million lifetime risk of cancer or emits non-carcinogenic HAPs in amounts which exceed a level adequate to protect public health with an ample margin of safety.
3. EPRI published a new report assessing the environmental (i.e., ecological) risks of HAP emissions from stationary combustion turbines, titled "Environmental Risk Screening Assessment for U.S. Combustion Turbines: 2014 Base Year Evaluation." This report follows EPA's risk assessment methodology for environmental risks and uses many of the same modeling inputs and assumptions used in EPA's proposed combustion turbine RTR, but includes refined modeling inputs and reflects new information provided in public comments on that proposal. The report demonstrates that no source in the category emits HAPs in amounts that will cause any adverse environmental effect.

Please contact me with any questions you may have.

Sincerely,



Makram B. Jaber

cc: Anne Idsal, Acting Administrator, EPA Office of Air and Radiation  
Matthew Z. Leopold, General Counsel, EPA  
Justin Schwab, Deputy General Counsel, EPA  
Peter Tsirigotis, Director, Office of Air Quality Planning and Standards, EPA  
Nick Hutson, Acting Group Leader, Energy Strategies Group, EPA

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Enclosures (3):

- EPRI, "Inhalation Human Health Risk Assessment for U.S. Stationary Combustion Turbines: 2014 Base Year Evaluation," Report No. 3002016528
- EPRI, "Multi-Pathway Human Health Risk Assessment for U.S. Stationary Combustion Turbines: 2014 Base Year Evaluation and Refined TRIM," Report No. 3002016745
- EPRI, "Environmental Risk Screening Assessment for U.S. Stationary Combustion Turbines: 2014 Base Year Evaluation," Report No. 3002017441