



***Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program
Northcentral Regional Office***

***KDI Wyalusing Power, LLC
Wyalusing Energy Center Project
Plan Approval 08-00060A***

Comment and Response Document

October 9, 2025

Department of Environmental Protection

www.dep.state.pa.us

KDI Wyalusing Power, LLC (KDI) submitted a plan approval (08-00060A) application (Application) to the Pennsylvania Department of Environmental Protection (Department) for the proposed construction and operation of the Wyalusing Energy Center located in Wyalusing Township, Bradford County. The proposed Wyalusing Energy Center will consist of eight GE Model TM2500 self-contained combustion turbines. All turbines will operate in a simple-cycle mode, in which the thermal energy from fuel combustion is converted to mechanical energy that drives an integral compressor and an electric generator. The combustion turbines will generate up to 218 megawatts of electricity to power a data center. Emissions from the proposed Wyalusing Energy Center will be controlled through selective catalytic reduction for nitrogen oxides (NO_x) and by oxidation catalysts for carbon monoxide (CO) and volatile organic compounds (VOCs). An aqueous ammonia tank will be installed to support the selective catalytic reduction emission-control technology. The proposed Wyalusing Energy Center will also include a demineralized water treatment system to support turbine air emissions control, as well as a water intake pump powered by an electric generator. The only additional source of air emissions, apart from the natural gas turbines, will be a diesel-fired engine that powers an emergency water pump.

The potential emissions from the proposed Wyalusing Energy Center do not exceed the significant emission thresholds for any criteria pollutants or hazardous air pollutants under Title V standards. Therefore, the proposed Wyalusing Energy Center will be a minor facility with respect to air emissions and considered as a State Only facility. The proposed Wyalusing Energy Center is subject to the Best Available Technology (BAT) requirements of 25 Pa. Code §§ 127.1 and 127.12. The combustion turbines are also subject to the requirements of 40 CFR Part 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. The diesel-fired engine that powers the water pump is also subject to 40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

On July 12, 2025, the Department published in *The Pennsylvania Bulletin* its intent to issue Plan Approval 08-00060A to KDI for the Application's proposed Wyalusing Energy Center initiating a 30-day public comment period. During the public comment period, the Department received comments from 122 individuals from the public, KDI, and environmental advocacy groups. One hundred seventeen of the comments were submitted in the form of one of two template letters that were similar in content and, therefore, repetitive. The content of the letter templates mirrors the content of the comment document received from the Delaware Riverkeeper Network so that all the letter template comments will be collectively addressed below as "Delaware Riverkeeper Network."

This document summarizes the written comments received during the public comment period. The Department's responses to the comments are mainly focused on concerns directed at the proposed emissions and air emission sources, including the air emission control devices for the proposed Wyalusing Energy Center. The summaries of the comments are not intended to be a complete description of the individual's comments but rather provide the context for the Department's response. Each comment is available in its entirety at the Department's Northcentral Regional Office and may be accessed by any person wishing to review those comments by scheduling a file review with the Department.

List of Commentators

Commentor Number	Name	Affiliation
1	Debra Raggio	KDI Wyalusing Power, LLC
2	Delaware Riverkeeper	Delaware Riverkeeper
3	Jean MacFarlane	Private Citizen
4	Arthur Anderson	Private Citizen
5	Shannon Jacobs	Private Citizen
6	Barbara Sonies	Private Citizen
7	Catherine Folio	Private Citizen
8	William Haegele	Private Citizen
9	Yolanda Broad	Private Citizen
10	Thomas J. & Ann Marie Finn Cusick	Private Citizen
11	Jeanne Walton	Private Citizen
12	William Huber	Private Citizen
13	Robbie Cross	Private Citizen
14	Naomi Miller	Private Citizen
15	Richard Metz	Private Citizen
16	Ji Montgomery	Private Citizen
17	Daryl Ezzo	Private Citizen
18	Pamela Nelson	Private Citizen
19	Elizabeth Dale Harris	Private Citizen

20	David Bressler		Private Citizen
21	Kathleen Peterson		Private Citizen
22	Thanice Petrak		Private Citizen
23	Lois Oleksa		Private Citizen
24	Luana Goodwin		Private Citizen
25	Chris King		Private Citizen
26	Karen Bedics		Private Citizen
27	Karen Elias		Private Citizen
28	Anita Nolan		Private Citizen
29	Andrew Thierry		Private Citizen
30	Norma Van Dyke		Private Citizen
31	Bernard Greenberg		Private Citizen
32	Ned Connelly		Private Citizen
33	Isaiah Guenther		Private Citizen
34	Nancy Bartley		Private Citizen
35	Kelly Davis		Private Citizen
36	Norman Starr		Private Citizen
37	Chris DiGiulio		Private Citizen
38	Walter Goodman		Private Citizen
39	Mary Ann Leitch		Private Citizen
40	Lisa Tull	Private Citizen	

41	Roberta Camp		Private Citizen
42	Janet Amber		Private Citizen
43	Bruce and Lorraine McMahon		Private Citizen
44	Leanne Morical		Private Citizen
45	Patricia Libbey		Private Citizen
46	Judy Turetsky		Private Citizen
47	Vincent Prudente		Private Citizen
48	Joan Farb		Private Citizen
49	Linda Granato		Private Citizen
50	Boris Dirnbach		Private Citizen
51	Janet Cavallo		Private Citizen
52	Diane Dilendik		Private Citizen
53	Jim Loveland		Private Citizen
54	Aggie Perilli		Private Citizen
55	Ryan Dodson		Private Citizen
56	Wanda Cole		Private Citizen
57	Rex Destiny Roskos		Private Citizen
58	Ann Albence		Private Citizen
59	Marie Carota		Private Citizen
60	Lauri Moon		Private Citizen
61	Gracey Moralis		Private Citizen

62	Diana G. Dakey		Private Citizen
63	Sara Matthews		Private Citizen
64	Josephine Gingerich		Private Citizen
65	Mary Mammarella		Private Citizen
66	Marcus Ferreira		Private Citizen
67	Erin Johnson RN, MSN, MPH		Private Citizen
68	Patricia Rossi		Private Citizen
69	René Sharpless Micheli		Private Citizen
70	Claudia Waits		Private Citizen
71	Mary More		Private Citizen
72	Joseph Marlin		Private Citizen
73	Mary Tiebout		Private Citizen
74	Miranda Johnston		Private Citizen
75	Lisa Geyer		Private Citizen
76	Martha Carbone		Private Citizen
77	Carol Carmon		Private Citizen
78	Marnie Wilson		Private Citizen
79	Karen Norvig Berry		Private Citizen
80	Laura Michaels		Private Citizen
81	Joe Wolfgang		Private Citizen

82	Beatrice Zovich		Private Citizen
83	Daniel J Shields		Private Citizen
84	Lisa Payne		Private Citizen
85	Sarah Thompson		Private Citizen
86	Amy Page		Private Citizen
87	Andy Switzer		Private Citizen
88	John Dulik		Private Citizen
89	Richard Slater		Private Citizen
90	Kalle Weeks		Private Citizen
91	Jessica Wilson		Private Citizen
92	Michael Zuckerman		Private Citizen
93	Margaret Morgan		Private Citizen
94	Dean Marshall		Private Citizen
95	Robert Morgan		Private Citizen
96	Robin Spurlino		Private Citizen
97	Paul & Bonnie Stoeckl		Private Citizen
98	Christopher Dunham		Private Citizen
99	Heather Nelson		Private Citizen
100	Mary Prosser		Private Citizen
101	Thomas Posey		Private Citizen
102	Peter Tran		Private Citizen

103	Matt Neumaier		Private Citizen
104	Lois Drumheller		Private Citizen
105	Julie Kaye		Private Citizen
106	Sandy Freid		Private Citizen
107	Chris Stanton		Private Citizen
108	Jill Hardina		Private Citizen
109	Rose Meixell Neith		Private Citizen
110	Sandra Folzer		Private Citizen
111	Adam Mahonske		Private Citizen
112	Dennis Yaz Yaz		Private Citizen
113	Ellen Blais		Private Citizen
114	Karen Feridun		Private Citizen
115	Amber Notaro		Private Citizen
116	Daniel Lidon		Private Citizen
117	Tina Shelton		Private Citizen
118	Gillian Graber		Private Citizen
119	Barbara Brandom		Private Citizen
120	Paul Carluccio		Private Citizen
121	Tamela Trussell		Private Citizen
122	Jonathan Naugle		Private Citizen

Comments/Responses:

Comment 1 (Delaware Riverkeeper Network)

The Department's application review memo dated June 30, 2025, states that KDI is an affiliate of New Fortress Energy Inc., but its status is not clear from documents that are publicly available. There is also concern over whether KDI is financially sound enough to construct the proposed Wyalusing Energy Center as permitted and whether it can carry out the terms of the air quality control plan.

Response 1

The Application states that KDI (Federal Tax ID 33-2410502) is an affiliate of New Fortress Energy Inc. (Federal Tax ID 83-1482060). The Department requires the permittee to provide a Compliance Review Form with the submittal of the Application, which details a compliance history of KDI. According to the Compliance Review Form, New Fortress Energy Inc. is the parent corporation of KDI. KDI will be required to construct and initially operate the proposed Wyalusing Energy Center in accordance with the approved plan approval and as specified in the Application and the supplemental materials.

Comment 2 (Delaware Riverkeeper Network)

The Application states that the owner and operator of the proposed Wyalusing Energy Center will be an unknown third party, but there is no disclosure concerning whether the third party will be connected to KDI or what the credentials and reliability of the third party are.

Response 2

The Application review concerns the construction of air contaminant sources and establishes requirements to ensure that these sources operate in compliance with all air quality rules and regulations. KDI proposes to construct eight turbines, an emergency generator, and associated controls. While the Application identifies that the turbines will be used to power a data center, the approval of the Application only authorizes the construction and initial operation of the air contamination sources and controls proposed by KDI for the facility they are proposing to operate.

Comment 3 (Delaware Riverkeeper Network, Dakey, and Slater)

These commenters questioned whether Wyalusing Township and Bradford County received the Act 14 notice. It is stated in the Department's application review memo dated June 30, 2025, that Wyalusing Township and Bradford County received the Act 14 municipal notifications in 2018. One commenter suggested the Act 14 notice also be sent to downwind counties.

Response 3

Act 14 requires that the applicant send notice to municipalities and counties where the permitted facility is located. The Application applies to the proposed Wyalusing Energy Center that will be located in Wyalusing Township and Bradford County. Both Wyalusing Township and Bradford County received the Act 14 municipal notifications on December 21, 2024. The date of the notices referenced in the application review memo were incorrect. Copies of the notices that the company provided were included in Appendix D of the application, which was posted on the Department's regional community website. The Department has corrected this typographical error in its addendum review memo.

Comment 4 (Delaware Riverkeeper Network)

The Application is being offered for comment separate from and before any other permits are proposed or made public for the proposed Wyalusing Energy Center. For instance, the size or make-up of the data center that would be served by the turbines is unknown; we cannot offer an informed opinion as to whether these eight turbines are going to produce enough electricity for the data center. This is important because if they do not supply the needed energy, the data center may end up connecting to the regional electric grid, reducing available power for the communities the grid now serves. It is well known that data centers require enormous amounts of consistent electricity. It is also well known that data centers consume large amounts of fresh water, yet it is not known how the water flows, volume, and quality of the directly adjacent Susquehanna River would be impacted.

Response 4

The Application review concerns the construction of air contaminant sources and establishes requirements to ensure that these sources operate in compliance with all air quality rules and regulations. KDI proposes to construct eight turbines, a diesel engine for emergencies, and associated controls. While the Application identifies that the turbines will be used to power a data center, the approval of the Application authorizes the construction and initial operation of the air contamination sources and controls proposed by KDI. The Department will subsequently issue an operating permit if KDI satisfactorily demonstrates compliance with the approved plan approval requirements.

The Department cannot speculate as to any additional power sources required for KDI's operations that do not require Department authorization, such as obtaining additional power from the regional electric grid.

The Department is aware that KDI will exceed the Susquehanna River Basin Commission's (SRBC) threshold for consumptive water use of 20,000 gallons per day or more over a 30-day average from a regulated water source. Therefore, KDI is required to obtain any necessary authorizations from the SRBC. In addition, KDI is required to obtain any necessary water obstruction and encroachment permits needed for a water withdrawal from the Department. KDI is also required to obtain all necessary permits from all applicable Department programs before commencing the regulated activities, as well as any zoning or building permits through the county or municipality.

Comment 5 (Delaware Riverkeeper Network)

Several of these air pollutants are approaching the threshold that requires a Title V air permit. For instance, the combined particulate matter (PM10 and PM2.5) is 91.63 tons and the threshold is 100 tons. Why is this permissible?

Response 5

The Department reviewed the information in the Application, including all responses to technical deficiencies, and supplemental information to determine potential emissions. The emissions restrictions established in the approved plan approval and specified in the Application and supplemental materials are enforceable and require the operation of the proposed Wyalusing Energy Center to remain below Title V emission levels. The approved plan approval includes substantial monitoring, record-keeping, and reporting measures to ensure the sources are operated within these enforceable limitations. Each simple-cycle combustion turbine will be equipped with a Department-certified continuous emission monitoring system that continuously and accurately monitors CO and NOx emissions to ensure each source is operating within the permitted limits. Furthermore, monthly calculations using emission factors derived from test results and vendor data are required to verify compliance with emission limits for

pollutants that will not be continuously monitored by a continuous emission monitoring system, including PM10 and PM2.5. Periodic emissions testing is also required to verify the emission rates.

Comment 6 (Delaware Riverkeeper Network)

The proposed Wyalusing Energy Center will release criteria air pollutants that negatively impact air quality, the environment, and human health. These pollutants include NO_x, CO, VOCs, PM, SO_x, formaldehyde, Sulfuric Acid (H₂SO₄) mist, and Greenhouse Gas Emissions (GHGs). These emissions are significant and will have substantial impact on air quality, public health, and the health of the Susquehanna River and the environment, locally, regionally, and on a wider scale. The burning of the fuel will also create Hazardous Air Pollutants (HAPs) to be released, including 1,3 butadiene, acetaldehyde, acrolein, benzene, ethylbenzene, formaldehyde, naphthalene, polyaromatic hydrocarbons (PAHs), propylene oxide, toluene, and xylenes.

Response 6

BAT considers the technical and economic feasibility for all air contaminants, including all the criteria pollutants and the HAPs noted within comment 6. The proposed simple-cycle combustion turbines are equipped with selective catalytic reduction to minimize NO_x emissions and oxidation catalysts for control of CO, VOCs, and HAPs, including formaldehyde emissions. The water spray into the simple cycle combustion turbines helps reduce the flame temperature, which reduces thermal NO_x. These control technologies are BAT and satisfy the requirements specified in 25 Pa. Code §§ 127.1 and 127.12. The proposed construction and operation of the simple-cycle combustion turbines and emergency generator meets or exceeds all applicable state and federal air quality regulatory requirements for these sources, including those requirements associated with maintaining the National Ambient Air Quality Standards, which the US EPA has set for impacts to human health and the environment.

Comment 7 (Naugle)

This commenter expressed concern that the proposed Wyalusing Energy Center will release criteria air pollutants, including NO_x and PM, that could become trapped in a narrow valley due to wind patterns or a temperature inversion. A Wyalusing area school, its playing fields, and a day care facility are located approximately one mile away. The expressed concern is that the proposed Wyalusing Energy Center may increase pollutant concentrations near ground level, thereby adversely affecting children during outdoor activities.

Response 7

See response to comment number 6. Additionally, while the Department cannot predict extreme weather conditions, the potential emissions are still not expected to exceed National Ambient Air Quality Standards.

Comment 8 (Delaware Riverkeeper Network)

Why is the Department allowing construction of an emergency engine run on diesel and not requiring it be fired on natural gas? Additionally, the purpose of the engine is not clear.

Response 8

KDI has proposed constructing a small diesel-fired engine rated at 125 horsepower to operate a fire pump in the event of a fire at the proposed Wyalusing Energy Center. Natural gas may not be available during an emergency. The emergency engine is limited to only 500 hours of operation in any 12 consecutive month period. Potential emissions from the engine are minimal and considered as *de minimis* emissions. Additionally, the engine is EPA-certified, satisfies the Department's BAT

requirements, and complies with a fuel sulfur content of 15 ppmv requirement as specified in 40 CFR Part 60 Subpart IIII.

Comment 9 (Delaware Riverkeeper Network)

KDI is avoiding certain regulations that control pollution by not being labeled as a “utility”. This allows KDI to avoid greenhouse gas emission standards that apply to electric generating facilities. How greenhouse gas emissions standards are avoided is explained in the Department’s application review memo in the discussion of 4.1.1.2 40 CFR Part 60, Subpart TTTT – Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units.

Response 9

40 CFR Part 60 Section 60.2 defines utility as any steam electric generating unit that is constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 megawatts electrical output to any utility power distribution system for sale. KDI is not proposing to provide power directly to the regional electric grid. Instead, KDI’s Application indicates that the required power load for the planned data center can be met by six of the eight proposed simple-cycle combustion turbines. As such, the proposed Wyalusing Energy Center does not meet the definition of a utility and is not subject to the requirements of Subpart TTTT. Additionally, the sources are subject to the BAT requirements that minimize GHG emissions to the maximum extent possible.

Comment 10 (Delaware Riverkeeper Network)

KDI states on the Klondike website that the Wyalusing site has: “access to power transmission” and “1,000+ MW existing electrical interconnect with existing local and long-haul fiber routes.” Why would New Fortress Energy Inc. and KDI advertise that the proposed Wyalusing Energy Center has access to the grid’s electrical interconnect if they cannot use it, as restricted by the proposed air quality control plan? Is the plan to eventually connect to the grid?

Response 10

The Department has reviewed the proposal submitted by KDI in its Application. Although KDI has indicated that it has access to the local electrical interconnection, it has not proposed to use it. KDI has not expressed any interest to the Department in providing any power to or taking any power from the grid. KDI’s Application includes eight simple-cycle combustion turbines to provide power within the proposed Wyalusing Energy Center. The Department cannot speculate as to any additional power sources required for KDI’s operations that do not require Department authorization, such as obtaining additional power from the regional electric grid.

Comment 11 (Delaware Riverkeeper Network)

Why is the Department permitting such an inefficient and polluting energy system (simple-cycle combustion turbines) instead of combined-cycle combustion turbines despite the negative environmental and public health impacts?

Response 11

Combined-cycle combustion turbines are suitable for large electric generating stations providing power directly to the regional electric grid. KDI is not proposing to provide power directly to the regional electric grid. Instead, KDI’s Application indicates that the required power load for the planned data center can be met by six of the eight simple-cycle combustion turbines for the majority of ambient conditions and load requirements. In the event of increased demand or due to ambient conditions (e.g., efficiency of simple-cycle combustion turbines decreases during hot and humid conditions), a seventh and, in extreme cases, an eighth simple-cycle combustion turbine will provide supplemental power as

needed. If an upset or malfunction occurs for one of the six simple-cycle combustion turbines, a backup simple-cycle combustion turbine would be brought online as a replacement to fulfill the power demands for the data center. The proposed Wyalusing Energy Center's design and engineering configuration are best suited to the use of simple-cycle combustion turbines, employing these units to provide constant and reliable power to the proposed data center.

Simple-cycle combustion turbines are more responsive, with faster startup times, compared to combined-cycle combustion turbines. If more power is needed due to increased demand, the more responsive and faster startup times of the simple-cycle combustion turbines will provide any necessary power more quickly and efficiently. The more responsive and faster startup times also make the simple-cycle combustion turbines more effective as a backup in the event of upset conditions or a malfunction. A combined-cycle combustion turbine constructed as a backup would require its own individual maintenance and readiness testing program. This would significantly increase the potential emissions profile of the proposed Wyalusing Energy Center.

Comment 12 (Delaware Riverkeeper Network)

Due to the use of selective catalytic reduction technology to control emissions, water will need to be utilized at the proposed Wyalusing Energy Center. There is no mention of a water permit or wastewater discharge permit for the water used. This must be corrected by the Department in order to provide full information on water use for the selective catalytic reduction system and the wastewater discharge from the selective catalytic reduction system. The water source and wastewater discharge information must be made available for public comment as these aspects of the project are significant, especially because the proposed Wyalusing Energy Center is located directly adjacent to the Susquehanna River, which may be the water source and could possibly receive the waste discharge. The correction of this missing information for the water and wastewater permitting for the proposed Wyalusing Energy Center must be considered at the same time as the air quality control plan to provide a fair and full analysis to the public of the proposed Wyalusing Energy Center.

Response 12

KDI will be required to obtain from the Department any necessary water obstruction and encroachment permits needed for a water withdrawal and any required authorizations from the SRBC. The issues raised in this comment will be addressed by those additional authorizations and be subject to public comment. KDI is required to comply with the construction and operational conditions of the approved plan approval, as well as the specifications in the Application and must obtain any necessary additional authorizations to ensure that the proposed Wyalusing Energy Center complies with all applicable local, state, and federal regulatory requirements.

Comment 13 (Delaware Riverkeeper Network)

The people of Pennsylvania, pursuant to Article 1, Section 27 (Environmental Rights Amendment), have a constitutional right to clean air, pure water, and a healthy environment. The Department has a duty to uphold these rights and a duty to serve as trustee protecting the natural resources of the Commonwealth for the benefit of current and future generations of Pennsylvanians. Without securing, releasing, and assessing full information on the air pollution, water impacts, noise and light pollution, as well as the environmental and community harms associated with this project, the Department is unable to fulfill its constitutional obligation to protect the people's environmental rights under Article 1, Section 27. The Department is not adhering to its duty as a trustee under Article 1, Section 27 by attempting to approve the proposed Wyalusing Energy Center in segments without a full analysis of the project as a whole.

Response 13

The Department's mission includes conserving and maintaining Pennsylvania's clean air, pure water, and to preserve the natural values of the environment while ensuring the health and safety of all residents and visitors to Pennsylvania. In implementing its responsibility as a trustee while reviewing the Application, the Department took into consideration the public's right to protection of public natural resources, including clean air. This is consistent with the Air Pollution Control Act, Act of January 8, 1960, P.L. 2119, as amended, 35 P.S. §§ 4001-4015 (Air Act), which provides, in part, that the Commonwealth's policy is to regulate activities that impact the quality of air resources for the protection of public health, safety, and the well-being of its citizens, while allowing reasonable development, attraction, and expansion of industry and commerce. 35 P.S. § 4002(a). The Department must conserve and maintain clean air in Pennsylvania, which belongs to all people, including future generations. This is accomplished largely through the implementation of requirements in the Air Act and the air quality regulations developed under the Air Act, which are designed to prevent the degradation, diminution, and depletion of clean air.

At the pre-application meeting, the Department did inform KDI that it will need to obtain several other permits and authorizations from other programs, including permits concerning water usage at the site. KDI will be required to operate in accordance with the terms of those permits and authorizations, as well as all federal, state, and local statutes, regulations, and ordinances. This would include complying with local noise ordinances, local land use ordinances, and zoning laws. Additionally, both Bradford County Officials and Wyalusing Township Officials were notified of the Application, and the Department published its intent to issue the proposed plan approval in *The Pennsylvania Bulletin*. The Department did not receive any comments from either of those officials.

The Department thoroughly reviewed the Application and determined that the Application satisfies all applicable state and federal statutory and regulatory requirements, including the utilization of BAT requirements under 35 P.S. § 4006.6 and 25 Pa. Code § 127.1. Further, the Department incorporated all appropriate and applicable monitoring, recordkeeping, and reporting requirements in the approved plan approval. As part of BAT, the Department reviewed and approved controls, including selective catalytic reduction for NOx and oxidation catalysts for CO and VOCs.

Comment 14 (Delaware Riverkeeper Network)

The Klondike website advertises that they can generate 500+ MW of electricity; yet, the application only allows for 218 MW. Why is there this discrepancy?

Response 14

The Department has reviewed what was proposed by KDI in the Application. KDI will be restricted to operate the proposed Wyalusing Energy Center as it was described in the Application. KDI shall demonstrate compliance with all the terms and conditions in accordance with the approved plan approval, as well as specifications in the Application and the supplemental materials.

Comment 15 (Delaware Riverkeeper Network)

Is the undisclosed plan to come back in the future to ask for more turbines and other expansions after the proposed Wyalusing Energy Center is built and is a *fait accompli*?

Response 15

The proposed Wyalusing Energy Center is a minor facility and KDI has not indicated in the application any future plans to expand the proposed Wyalusing Energy Center. Any expansion of the proposed

Wyalusing Energy Center would likely exceed major source thresholds and subject it to more rigorous permitting requirements, including Title V, New Source Review, Prevention of Significant Deterioration, and Emission Reduction Credit requirements. KDI will be required to meet or exceed all applicable requirements in the event expansion is proposed.

Comment 16 (Delaware Riverkeeper Network)

The Delaware Riverkeeper Network requested a public hearing and to extend the public comment period an additional 60 days.

Response 16

The Department thoroughly reviewed the Application for the construction of a minor facility. The Department published the notice of intent to issue a plan approval in *The Pennsylvania Bulletin* on July 12, 2025. There was a 30-day comment period pursuant to 25 Pa. Code § 127.44(f) to solicit comments from the public. There were only a few air quality-related comments from citizens that live in close proximity to the proposed Wyalusing Energy Center. The vast majority of the comments received requesting a public hearing came from those residing over 100 miles away from the proposed Wyalusing Energy Center. Most of the comments submitted raised similar issues that were general in nature and did not provide specific technical deficiencies regarding the proposed plan approval and the Application for the proposed Wyalusing Energy Center. Local interest in the proposed Wyalusing Energy Center is one of the factors considered in the decision to hold a public hearing. The Department believes that the responses contained within this document regarding the proposed Wyalusing Energy Center are sufficient to address the concerns which were raised, and a public hearing for this Application approval is not warranted. Since the Department posted the entire Application, including all the information pertaining to the proposed Wyalusing Energy Center and the technical deficiencies, months before the publication of the notice of intent to issue in *The Pennsylvania Bulletin*, the Department believes extending the public comment period any further does not serve any purpose and is not necessary. Additionally, the Department followed the 30-day comment period requirement as specified in 25 Pa. Code § 127.44.

Comment 17 (Nolan)

One commenter emphasized the need for more reliable electricity generation and urged approval of the proposed Wyalusing Energy Center.

Response 17

The Department acknowledges the commenter's support of the reliable electricity generation. However, the Department's decision is not predicated on non-air quality issues such as land values, job creation, electricity generation, economic benefit, energy independence, visual impact, grant eligibility, etc., regardless of the impacts of those factors.

Additionally, the applicant has provided the following comments during the 30-day comment period for the proposed Wyalusing Energy Center. The Department's responses are as follows:

Comment 18 (KDI)

The phone number, (703) 778-0842, for Debra L. Raggio, the Responsible Official and Plan Approval Contact Person, is incorrectly listed.

Response 18

As requested, the phone number for Debra Raggio has been corrected to (703) 778-0841.

Comment 19 (KDI)

KDI is requesting that the Department add clarifying language to each condition to specify that the simple-cycle combustion turbine megawatt rating is a “nominal rating” that is dependent on situational operating and ambient conditions.

Response 19

The Department has revised the description of the source to indicate that each simple-cycle combustion turbine’s megawatt rating is a nominal value. Actual output in megawatts is dependent on atmospheric conditions at the time of operation.

Comment 20 (KDI)

KDI requests to remove the initial CO stack testing for the simple-cycle combustion turbines since a Department-certified continuous emission monitoring system will be installed on the units.

Response 20

The Department has determined that initial CO testing is required to verify compliance with the established CO emission limits. This condition is revised to remove subsequent biennial CO stack testing, since CO emissions will be monitored continuously through the continuous emission monitoring system, which will also require Relative Accuracy Test Audit testing.

Because a Department-certified continuous emission monitoring system will be installed, maintained, and certified, additional CO stack testing will be conducted during the Relative Accuracy Test Audit process as part of the continuous emission monitoring system calibration. Relative Accuracy Test Audit testing is required under the Department’s Continuous Emission Monitoring System Manual and must be performed to maintain certification of the continuous emission monitoring system.

Comment 21 (KDI) Condition #006 of Section C incorrectly cites the wrong citation number referencing sulfur testing for the simple-cycle combustion turbines.

Response 21

The Department has corrected the erroneous citation and revised the citation to refer to 40 CFR Part 60 Subpart KKKK Section 60.4415. KDI has elected to comply with this requirement using subsection (c) of Section 60.4415. Therefore, the requirement has been revised as follows:

“SO₂ compliance shall be demonstrated in accordance with the provisions of 40 CFR Part 60 Subpart KKKK Section 60.4415 for all eight turbines. The Facility may use a current, valid purchase contract, tariff sheet, or transportation contract for the fuel specifying the maximum total sulfur content. Alternatively, the permittee may use any other method specified in 40 CFR Part 60 Section 60.4415.”

Comment 22 (KDI)

KDI requests removal of the requirement to install a volumetric flow due to the proposed installation of a certified fuel flow meter at the proposed Wyalusing Energy Center which then allows determination of compliance with all emission limits without the need for a volumetric flow meter.

Response 22

The Department has established a natural gas usage limitation to ensure that the proposed Wyalusing Energy Center is designated as a minor facility. Since the fuel usage will be continuously monitored

with the certified fuel flow meter, the Department has removed the requirement for the volumetric flow system to be installed on the exhaust of the simple-cycle combustion turbines.

Comment 23 (KDI)

KDI requests the removal of the requirement that requires records be kept of the number of startups and shutdowns for each simple-cycle combustion turbine.

Response 23

Emissions from the proposed sources differ during startup and shutdown operations. Maintaining records of startup and shutdown of units is necessary. The Department considers these records to be useful to ensure the emissions from the proposed Wyalusing Energy Center remain classified as a minor facility.

Comment 24 (KDI)

The VOC emissions (measured as propane) at 15% O₂ is listed as 3.43 ppmvd in Table E-1 as part of the December 26, 2024, submittal. KDI requests the discrepancy of 1.32 ppmv value be updated to 3.43 ppmv to accurately account for the post-control emissions rate, corresponding to the 2.19 lb/hr.

Response 24

The Department has reviewed the emissions table and has corrected the error. The VOC emission rate in the approved plan approval has been revised to 3.43 ppmv.

Comment 25 (KDI)

The 26,280-hour operational limit for the catalyst is based on three years of simple-cycle combustion turbine operation, which is an estimate of the catalyst's operational life. KDI requests that this be revised in accordance with manufacturer's recommendations.

Response 25

The 26,280 hours operation value was based on three years of operational usage. The Department agrees that as long as the oxidation catalyst is able to achieve compliance with the CO, VOC, and formaldehyde emission limits, the need to replace the catalyst based solely on hours of operation is not appropriate. Each simple-cycle combustion turbine will be equipped with a Department-certified continuous emission monitoring system so that it will be apparent when the catalyst approaches the end of its useful life. The Department is revising the condition as follows:

“Pursuant to the best available technology requirements of 25 Pa. Code Sections 127.1 and 127.12, each catalytic oxidizer associated with the turbines shall be changed out in accordance with manufacturer's and/or vendor's recommendations based on testing of remaining catalyst activation level.”

Comment 26 (KDI)

KDI requests that the condition limiting the total number of startups and shutdowns be removed from the Application.

Response 26

Emission calculations were conducted based on the maximum number of startups and shutdowns of the simple-cycle combustion turbines. Therefore, limits on the number of startups and shutdowns will remain in the approved plan approval, as specified in the Application and the supplemental materials.

FINAL DETERMINATION

Pursuant to 25 Pa. Code Chapter 127, the comments submitted during the public comment period have been reviewed and are appropriately addressed in this document. The Department appreciates the many thoughtful comments, which covered a wide variety of topics related to KDI's proposed Wyalusing Energy Center for the data center and the proposed new equipment. The Department hopes the above information addresses the commenters' concerns. The Department appreciates the commenters' efforts in preserving and protecting our environment and the residents of our Commonwealth. It is the Department's determination that, after consideration of all comments received concerning the Application and the proposed plan approval, the available information indicates that KDI's proposed construction will meet the emission limitations and the conditions set forth in the plan approval, and will comply with all applicable state and federal air quality regulatory requirements, including the BAT requirements of 25 Pa. Code §§ 127.1 and 127.12. Therefore, the Department decided to issue the plan approval (No. 08-00060A) for the Application to KDI Wyalusing Power LLC on October 9, 2025. The expiration date of the plan approval is April 8, 2027. KDI is required to demonstrate to the Department's satisfaction that emissions from the sources comply with all applicable Department rules and regulations and conform to the approved plan approval conditions and operational information stated in the Application. Upon satisfactory demonstration of compliance with the requirements of the approved plan approval and specifications of the Application, the Department will subsequently issue an operating permit.

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