



Pennsylvania  
**Department of  
Environmental Protection**

AIR QUALITY PROGRAM

April 23, 2025

Ms. Debra Raggio  
Executive VP, Head of Regulatory Compliance  
KDI Wyalusing Power LLC  
111 W 19th Street, 8<sup>th</sup> Floor  
New York, NY 10011

Re: Tech Deficiency Letter: Need Additional Justification  
Plan Approval 08-00060A  
Wyalusing Township, Bradford County

Dear Ms. Raggio:

The Department has resumed its review of your application for the construction of the Wyalusing Energy Center to be located in Wyalusing Township, Bradford County. Based upon your response to our letter dated March 5, 2025, the Department is in needs of further information in order to continue the review of your application, we need additional information and/or clarification with respect to the following:

- a. The application requests emission limits based upon the “worst case scenario” regarding atmospheric conditions for all air contaminants from the combustion turbines (i.e. VOC 2.19 lb/hr). However, the potential emissions summarized in the table listed in Table E-5 of Appendix E of the application calculates the potential emissions from the turbines using the emission characteristics during the average atmospheric conditions of the facility’s location (i.e. VOC 1.31 lb/hr). The facility would be major for VOCs and CO by using the maximum allowable emission factors when taking into account startup and shutdown emissions. Assuming the turbines are operated for the maximum requested hours in any 12 consecutive month period (55,370 hours), the calculations show that VOC emission are in excess of 50 TPY and CO emissions are in excess of 100 TPY. consequently, the facility, as proposed, will become a major (Title V) facility.
- b. The plan approval will need a practically enforceable limit that restricts the emissions below major emissions thresholds. Please provide the Department with a proposal to limit the CO and VOC potential emissions below the major emissions thresholds.

KDI Wyalusing Power LLC  
08-00060A

April 23, 2025  
Information Request

Review of your application will continue upon receipt of the requested information. Please provide the requested information within 30 days of this letter. If you have any questions or concerns regarding this technical deficiency letter, please contact Joseph L. Piktel, Facilities Permitting Section, at 570-321-6559 or me at 570.974.2604.

Sincerely,



Brian K. Bailey P.E.  
Chief, Facilities Permitting Section  
Air Quality Program

cc: File OnBase KDI Wyalusing Power LLC