



December 11, 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: Plan Approval 08-00060A  
KDI Wyalusing Power LLC  
Wyalusing Energy Center  
Wyalusing Township, Bradford County

Dear Ms. Raggio:

Thank you for your email and for summarizing your understanding of the discussions that have taken place regarding the CO source testing condition in the Plan Approval. You are correct that the Department previously acknowledged, in the Comment Response document addressing KDI's comments, that the biennial CO testing requirement would no longer be necessary due to the installation and operation of CO CEMS. The retention of that condition in the issued Plan Approval was inadvertent. As discussed with Mr. Slade, the Department continues to agree that the two-year CO performance testing requirement will not be carried forward.

The Department does not intend to revise the issued Plan Approval at this time. Instead, the CO testing requirement will be removed at the time of issuance of the Operating Permit. The Operating Permit will reflect the Department's determination that continuous CO monitoring through the CEMS provides sufficient assurance of compliance and eliminates the need for periodic CO testing. Please note that performance testing associated with the installation, operation, certification, and calibration of the CO CEMS will still be required. The Department intends to treat that testing, conducted as part of the CEMS certification process, as meeting the CO performance testing requirement for the units.

The Department hopes this letter clarifies and satisfies your concerns. If you have any questions or need further clarification, please contact Brian Bailey, PE, Chief, Facilities Permitting Section, Air Quality Program, at 570.974.2604.

Sincerely,

*Muhammad Q. Zaman*

Muhammad Q. Zaman  
Environmental Program Manager  
Air Quality Program

cc: File OnBASE KDI Wyalusing Power LLC FAC/FAC OP  
John Slade, All 4 Consulting

**From:** Debra Raggio <[draggio@newfortressenergy.com](mailto:draggio@newfortressenergy.com)>

**Sent:** Wednesday, November 19, 2025 8:12 AM

**To:** Zaman, Muhammad ([mzaman@pa.gov](mailto:mzaman@pa.gov)) <[mzaman@pa.gov](mailto:mzaman@pa.gov)>

**Cc:** Debra Raggio <[draggio@newfortressenergy.com](mailto:draggio@newfortressenergy.com)>; Jordan Truitt <[jtruitt@newfortressenergy.com](mailto:jtruitt@newfortressenergy.com)>; Alex Bowman <[abowman@newfortressenergy.com](mailto:abowman@newfortressenergy.com)>

**Subject:** Issued Plan Approval 08-00060A KDI Wyalusing Power LLC/New Fortress Energy Site--  
Correction to CO Testing Requirement

Mr. Zaman,

On October 30, 2025, John Slade informed me that he had a conversation with you regarding an email he had previously sent to you. The email discussed the Plan Approval condition that requires source testing for CO for 2 years after the initial testing, and every 2 years thereafter. PADEP had agreed in its Comment Response document, addressing KDI's comment, to remove that requirement because the units will have CO CEMS. According to Mr. Slade, you had agreed that it was an error on PADEP's part to retain that condition.

Mr. Slade informed me that you continue to agree with the determination of not requiring the 2 year testing for CO but did not want to issue a new Plan Approval. Accordingly, after the 30-day appeal period we understood that you would be willing to send an email to address this error and the manner in which it would be resolved. My understanding from Mr. Slade is that you would propose not to make a change in the Plan Approval, but, rather, eliminate the condition once an Operating Permit is issued.

Given that the 30-day appeal of the Plan Approval has passed, I am requesting an email or written document that confirms your intent to remove this CO testing condition for the final operating permit.

I'm also happy to discuss on the phone if needed. My contact information is below.

Thank you for your time. Please do not hesitate to contact me if you have any questions or I have misstated something above.

Debra

Debra L. Raggio  
Executive Vice President, Head of Regulatory



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**From:** John Slade <[jslade@all4inc.com](mailto:jslade@all4inc.com)>

**Sent:** Wednesday, October 29, 2025 11:41 AM

**To:** Zaman, Muhammad <[mzaman@pa.gov](mailto:mzaman@pa.gov)>

**Cc:** Debra Raggio <[draggio@newfortressenergy.com](mailto:draggio@newfortressenergy.com)>; Merritt McGlynn <[mmcglynn@all4inc.com](mailto:mmcglynn@all4inc.com)>; Colleen Nagel <[cnagel@all4inc.com](mailto:cnagel@all4inc.com)>

**Subject:** [External] KDI Plan Approval

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Muhammad –

As per my phone message to you, there is an error in the recently issued Plan Approval to KDI. In PADEP's Comment Response document it was stated that PADEP was going to remove "the every 2-year testing for carbon monoxide" since the facility is installing CO CEMS. However, in the issued Plan Approval CO was not removed as shown below in yellow highlight. We are asking for the Plan Approval to be reissued to correct that mistake on page 13 for the condition below.

**# 006**

**[25 Pa. Code §127.12b]**

**Plan approval terms and conditions.**

[Additional authority for this plan approval condition is derived from 40 CFR Part 60 Subpart KKKK Section 60.4400]

(a) The permittee shall conduct initial EPA reference method testing on each of the turbines (Source IDs P101 - P108) within 180 days of the startup of the facility and subsequent testing every two years from the previous tests for carbon monoxide, ammonia slip, volatile organic compounds (including formaldehyde), and total (filterable and condensable) particulate matter. The permittee shall follow the Notification and Reporting requirements specified in Section C of this plan.....

If you have any questions, please give me a call.

Thanks - John

John F. Slade

Senior Consultant

[jslade@all4inc.com](mailto:jslade@all4inc.com) / 610.422.1136

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