



Pennsylvania
**Department of
Environmental Protection**

AIR QUALITY PROGRAM

March 7, 2025

Ms. Debra Raggio
Executive VP, Head of Regulatory Compliance
KDI Wyalusing Power LLC
111 W 19th Street, 8th 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 initiated its review of your application for the construction of the Wyalusing Energy Center to be located in Wyalusing Township, Bradford County. In order to continue the review of your application, we need further information and/or clarification with respect to the following:

1. The application requests emission limits based upon the “worst case scenario” regarding atmospheric conditions for all air contaminants from the combustion turbines (i.e. NO_x 2.85 lb/hr). However, the potential emissions listed in the table based upon the total requested operating time seem to be based on the average atmospheric conditions of the facility’s location (i.e. NO_x 2.40 lb/hr). Please explain the discrepancy.
2. KDI is proposing the construction of eight (8) simple cycle turbines with a total combined output of approximately 248 MW. Simple cycle turbines are much less efficient than those in combined cycle with a heat recovery steam generator. It would seem that less turbines would be required to produce 248 MW, under a combined cycle scenario and would be 10 – 20 percent more efficient. Please provide detailed justification as to why combined cycle could not be used for this project.
3. The plan approval application indicates 365 startup/shut down events. It is not clear whether these 365 total events are between all the turbines for a year. Please clarify.
4. KDI included emission factors for the start-up events of the turbines, however the shutdown events do not have an emission factor listed in the application. Please explain.

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5. Table E-5 implies that there are 6 combustion turbines that will be ran simultaneously for 6,000 hours a year, 7 for 2,710 hours per year, and 8 for 50 hours per year. It does not indicate if these are the same combustion turbines being operated over the year timeframe, where 6 of the combustion turbines would then be operated a total of 6,760 hours, 1 additional combustion turbine for 2,710 hours, and another for 50 hours. Please confirm that you are proposing a limit of 55,370 hours per year for all 8 turbines combined.

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.

If you have any questions, please call 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