



Pennsylvania
**Department of
Environmental Protection**

MEMO

TO Benjamin Hankins
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FROM Daniel J. Roble *DJR*
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THROUGH Andrew W. Fleck *AWF*
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DATE July 1, 2026

RE Administrative Review – Determination of Completeness
Air Quality Analyses for Prevention of Significant Deterioration
Montour CT Project LLC
Application for Plan Approval 47-00016A
Proposed Major Modification of Montour Steam Electric Station
Derry Township, Montour County

MESSAGE:

The Pennsylvania Department of Environmental Protection (DEP) received a plan approval application on June 10, 2026, from Montour CT Project LLC (Montour CT) for a proposed major modification at the existing Montour Steam Electric Station site in Derry Township, Montour County.¹ The plan approval application was prepared by Trinity Consultants and AECOM, on behalf of Montour CT. The purpose of this memorandum is to notify the DEP's Northcentral Regional Office (NCRO) that the air quality analyses portion of Montour CT's plan approval application has been determined to be administratively complete.

The DEP is required under 25 Pa. Code § 127.12d to “determine if an application for plan approval is administratively complete” and “provide written notice of the completeness

¹ PSD Air Permit Application. June 10, 2026. Prepared for: Montour CT Project LLC. Prepared by: Trinity Consultants, Exton, PA and AECOM, Chelmsford, MA.

determination to the applicant within 30 days of receipt of an application.” Furthermore, this section of the Pa. Code states, “an application is administratively complete if it contains the necessary information, maps, fees and other documents requested in the plan approval application, regardless of whether the information, maps and documents would be sufficient to justify issuance of the plan approval.”

According to Montour CT’s plan approval application, the proposed project would be a major modification² to an existing major stationary source³ and is therefore subject to the Prevention of Significant Deterioration (PSD) regulations codified in 40 CFR § 52.21. These federal PSD regulations are adopted and incorporated by reference in their entirety in 25 Pa. Code § 127.83 and the Commonwealth’s State Implementation Plan codified in 40 CFR § 52.2020. According to 40 CFR § 52.21(b)(22), “[c]omplete means, in reference to an application for a permit, that the application contains all of the information necessary for processing the application.” Relevant to 40 CFR § 52.21(k) through (p) of the PSD regulations, Montour CT’s plan approval application includes the following air quality analyses:

- Source impact analyses of the net emissions increases of carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter less than or equal to 10 micrometers in diameter (PM-10), and particulate matter less than or equal to 2.5 micrometers in diameter (PM-2.5) due to Montour CT’s project;
- Additional impact analyses of the impairment to visibility, soils, and vegetation due to Montour CT’s project and associated growth; and
- Initial screening calculations to determine whether the net emissions increases due to Montour CT’s project would have negligible impacts on air quality related values (AQRV) and visibility in nearby federal Class I areas.

This determination of administrative completeness for the PSD air quality analyses portion of Montour CT’s plan approval application does not prohibit the DEP from requiring Montour CT to submit additional information, if determined to be necessary, during the subsequent technical review.

If you have any questions regarding this administrative review, you may contact me (droble@pa.gov, 717.705.7689) or Andrew Fleck (afleck@pa.gov, 717.783.9243).

cc: Muhammad Zaman, NCRO/Air Quality
Brian Bailey, NCRO/Air Quality/Facilities Permitting
Nicholas Lazor, BAQ/Director
Viren Trivedi, BAQ/Permits
Sean Wenrich, BAQ/Permits/New Source Review

² *Code of Federal Regulations*. 40 CFR § 52.21(b)(2). Definition of “major modification.”

³ *Code of Federal Regulations*. 40 CFR § 52.21(b)(1). Definition of “major stationary source.”