



May 28, 2026

VIA EMAIL

Christopher Warren
AECOM
250 Apollo Drive
Chelmsford, MA 01824-3627

Re: DEP Acceptance of Air Dispersion Modeling Protocol
Air Quality Analyses for Prevention of Significant Deterioration
Montour CT Project LLC
Proposed Major Modification
Existing Montour Steam Electric Station Site
Derry Township, Montour County

Dear Christopher Warren:

The Pennsylvania Department of Environmental Protection (DEP) received an air dispersion modeling protocol¹ on May 26, 2026, for Montour CT Project LLC's (Montour CT) proposed installation and operation of two combined cycle combustion turbine trains (CCCT Project) at the existing Montour Steam Electric Station (Montour SES) site in Derry Township, Montour County.

According to the protocol, Montour CT will submit a plan approval application to the DEP for the proposed CCCT Project, which would be aggregated with the existing Montour SES site for Prevention of Significant Deterioration (PSD) applicability purposes. Montour CT's aggregated project at the Montour SES site would be a major modification to an existing major stationary source and therefore subject to the PSD regulations. The federal PSD regulations are codified in 40 CFR § 52.21 and are adopted and incorporated by reference in their entirety in 25 Pa. Code § 127.83 and the Commonwealth's State Implementation Plan (SIP) codified in 40 CFR § 52.2020. A written modeling protocol is intended to establish a common understanding of how the required PSD air quality analyses will be conducted and helps to keep misunderstandings and resource expenditures at a minimum.

The DEP reviewed Montour CT's protocol and determined that it adequately establishes modeling procedures and databases for conducting the required air quality analyses to be included with Montour CT's plan approval application. The DEP reviewed Montour CT's

¹ Air Dispersion Modeling Protocol. May 26, 2026. Prepared for: Montour CT Project LLC / Montour CCCT Project. Prepared by: AECOM, Chelmsford, MA.

protocol to ensure that the modeling procedures and databases are consistent with the PSD requirements for air quality analyses codified in paragraphs (k) through (p) of 40 CFR § 52.21, the U.S. Environmental Protection Agency's (EPA) "Guideline on Air Quality Models" (40 CFR Part 51, Appendix W), and the EPA's relevant air quality modeling policy and guidance.

The modeling procedures and databases established in Montour CT's protocol and the DEP's acceptance of Montour CT's protocol are not intended to supersede or conflict with the PSD requirements, the EPA's "Guideline on Air Quality Models," or the EPA's relevant air quality modeling policy and guidance. Additionally, the protocol is not intended to be a binding, formal legal document and changes in or deviations from the protocol are often necessary as the analyses progress; therefore, the DEP reserves the right to require the modeling procedures and databases set forth in Montour CT's protocol to be revised or modified in appropriate circumstances. Moreover, the DEP's acceptance of Montour CT's protocol does not preclude the DEP from issuing comments resulting from the technical review of Montour CT's air quality analyses.

If you have any questions relevant to conducting Montour CT's air quality analyses, you may contact me (droble@pa.gov, 717.705.7689) or Andrew Fleck (afleck@pa.gov, 717.783.9243), manager of the Air Quality Modeling and Risk Assessment Section.

Sincerely,



Daniel J. Roble
Air Quality Program Specialist
Air Quality Modeling and Risk Assessment Section
Division of Permits

cc: Thomas Weissinger, Talen Energy
Reese Doggett, Talen Energy
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