

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Southwest Regional Office

MEMO

TO: Air Quality File TV-65-00990

FROM: Nicholas J. Waryanka, P.E./NJW
Air Quality Engineer
Air Quality Program

THROUGH: Thomas J. Joseph, P.E./TJJ
Environmental Engineer Manager
Air Quality Program

Mark R. Gorog, P.E./MRG
Regional Manager
Air Quality Program

DATE: May 29, 2026

RE: Initial Title V Operating Permit TV-65-00990
Comment & Response Document
Tenaska Pennsylvania Partners, LLC
Tenaska Westmoreland Generating Station
South Huntingdon Township, Westmoreland County
APS #1117693 AUTH #1492008 PF #716802

On July 11, 2024, the Department received an initial application for Title V Operating Permit (TVOP) from Tenaska Pennsylvania Partners, LLC (Tenaska) for the Tenaska Westmoreland Generating Station (TWGS) located in South Huntingdon Township, Westmoreland County.

The TWGS is an electric power generating plant with a nominal rating of 1,065 megawatts (MW). The power plant is a single 2-on-1 combined cycle configuration consisting of two (2) Mitsubishi “J” class combined cycle combustion turbines (CCCTs). Each CCCT serves a single steam turbine generator and is equipped with heat recovery steam generators (HRSG) with supplemental 400 MMBtu/hr natural gas-fired duct burners. The two (2) HRSGs collectively serve the one steam turbine generator. The CCCT uses dry low NO_x burners to control emissions of NO_x. Emissions from the power block are controlled by selective catalytic reduction (SCR) and an oxidation catalyst.

Notice of the Department’s intent to issue the initial TVOP was published in the *PA Bulletin* on October 4, 2025, for a 30-day public comment period. Notice was also published by Tenaska in the *Westmoreland Tribune-Review* newspaper of general circulation in Westmoreland County, Pa. on October 1, 2, and 3, 2025, for a 30-day comment period in accordance with 25 Pa. Code §127.521. Therefore, the end of the 30-day public comment period was November 3, 2025.

On September 26, 2025, the proposed initial TVOP was sent to Tenaska for review. The Department received comments on the proposed initial TVOP from Tenaska on October 31, 2025. Those comments will be addressed below.

On September 26, 2025, the proposed initial TVOP was also sent to the United States Environmental Protection Agency (US EPA), the Maryland Department of the Environment (MDE), the Ohio Environmental Protection Agency (OEPA), and the West Virginia Department of Environmental Protection (WVDEP) for their review. The Department did not receive any formal comments from the US EPA, the MDE, the OEPA, or the WVDEP.

Various comments were received from non-governmental organizations (NGO's) and citizens throughout the public comment period. Those comments will be addressed below. Numerous NGO's and citizens submitted similar "General Comments" on the proposed TVOP for TWGS. These General Comments will be addressed first and individualized comments will follow.

GENERAL COMMENTS

General Comment 1: Commenters requested that the Department hold a public hearing prior to final issuance of an initial TVOP in order to express their concerns regarding how air pollution from the TWGS will impact residents' health, safety, and the environments, as well as whether or not the facility will comply with air pollution laws such as the Clean Air Act.

General Response 1: The Department held a public hearing at 5:00 pm on Wednesday, February 4, 2026, at The Huntingdon Place, 90 Supervisors Drive, West Newton, Pa. 15089, to take testimony regarding the proposed issuance of an initial TVOP for the TWGS. Following a presentation on the Air Quality Title V Operating Permitting process by the Department's Thomas Joseph, Environmental Engineer Manager, participants were allotted five (5) minutes to testify and convey their concerns on the public record. Mr. Joseph and other Department staff in attendance remained following the conclusion of the public hearing to speak with attendees in order to answer questions and address their concerns. It should be noted that a public hearing does not afford any additional weight or heightened consideration to comments submitted orally at the hearing as compared to comments submitted in writing during the established public comment period. All timely comments received by the Department are evaluated equally and considered as part of the administrative record, regardless of the method by which they are submitted. For this permitting action, the Department accepted public comments from October 1, 2025, through February 14, 2026, and all comments received during that period were reviewed and considered in accordance with applicable regulatory and administrative procedures. Any comments received after that time were evaluated for consistency with the below responses.

General Comment 2: Commenters suggested that the Draft Permit is deficient because it does not include sufficient monitoring to ensure compliance with the emission limits imposed in the permit.

General Response 2: On March 30, 2007, the United States Environmental Protection Agency (EPA) received a petition from Environmental Integrity Project, Refinery Reform Campaign, Citizens of Environmental Justice, and Suzie Canales (Petitioners) pursuant to section 505(b)(2) of the Clean Air Act (CAA or Act), 42 U.S.C. § 7661d(b)(2)¹. The petition requested that EPA object to the Title V operating permit issued by the Texas Commission on Environmental Quality (TCEQ) on February 2, 2007, to CITGO Refining and Chemicals L.P (CITGO) for the West Plant refinery operations in Corpus Christi, Nueces County, Texas.

¹ U.S. EPA Petition Number VI-2007-01, CITGO Refining and Chemicals Co. L.P. Permit No. O1420, <https://www.epa.gov/sites/default/files/2015-08/documents/citgo_corpuschristi_west_response2007.pdf>

One of the issues raised by petitioners was that the permit's monitoring requirements are not adequate to ensure compliance with all emission limitations and other substantive CAA requirements. In its response dated May 28, 2009, EPA asserted the following:

"The determination of whether the monitoring is adequate in a particular circumstance generally will be a context-specific determination. The monitoring analysis should begin by assessing whether the monitoring required in the applicable requirement is sufficient to assure compliance with permit terms and conditions. In many cases, such as with monitoring developed pursuant to the CAM rule, monitoring from the applicable requirement will be sufficient. Some factors that permitting authorities may consider in determining appropriate monitoring are (1) the variability of emissions from the unit in question; (2) the likelihood of a violation of the requirements; (3) whether add-on controls are being used for the unit to meet the emission limit; (4) the type of monitoring, process, maintenance, or control equipment data already available for the emission unit; and (5) the type and frequency of the monitoring requirements for similar emission units at other facilities. The preceding list of factors is only intended to provide the permitting authority with a starting point for their analysis of the adequacy of the monitoring. As stated above, such a determination generally will be made on a case-by-case basis and other site-specific factors may be considered."

Prior to the facility ever commencing operation, Tenaska was required by the Plan Approval to install, certify, maintain, and operate continuous emission monitoring systems (CEMS) for nitrogen oxides (NO_x), carbon monoxide (CO), and ammonia (NH₃) emissions on the exhaust of each combined-cycle power block (Sources 101 and 102) in accordance with all applicable requirements specified in 25 Pa. Code §139 and the Department's Continuous Source Monitoring Manual. Sources 101 and 102 are the largest sources of air pollution from the facility. The Department does have access to CEMS data as it is reported by Tenaska but there is no public digital reporting portal. However, the public can request CEMS data reports from the Department under the Pennsylvania Right to Know Law or by scheduling an informal file review.

In accordance with EPA's position on the establishment of adequate monitoring discussed above, the Department also believes in using a context-specific approach when inserting monitoring conditions in its plan approvals and operating permits. The use of CEMS is not technically or economically feasible for every air contamination source.

PM, PM₁₀, and PM_{2.5} emissions from the natural gas-fired combustion turbines are stable and there is a low likelihood of a violation of these limits. Tenaska is required to perform daily observations of the turbine stacks in order to look for excess opacity which would indicate a particulate matter issue. Tenaska must also maintain records of the manufacturer's maintenance schedule and any maintenance performed on the units to ensure proper operation. Copies of the current, valid purchase contract, tariff sheet, or transportation contract obtained from the natural gas supplier with the sulfur content of the natural gas must also be kept to ensure the facility is using only pipeline quality natural gas. In addition, use of CO CEMS ensures good combustion practices which minimizes the amount of particulate matter generated from unburned hydrocarbons in the fuel.

Likewise, SO₂ and sulfuric acid mist from natural gas combustion are stable and there is a low likelihood of a violation of these limits. Combustion of pipeline quality natural gas meets the SO₂ BAT and NSPS Subpart KKKK requirements. Tenaska has based the potential to emit SO₂ on an average sulfur content of 0.25 gr/100 scf which is lower than Texas Eastern's maximum FERC tariff

content of 5 gr/100 scf. Tenaska has provided supporting data showing the sulfur content is, on average, much lower than 0.25 gr/100 scf. To be conservative, emissions have been based upon the highest sulfur content out of the provided data. Monitoring the fuel sulfur content of the natural gas ensures that emissions of SO₂ and sulfuric acid mist are minimized.

VOC emissions from the combustion turbines are subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. The CAM requirements were inadvertently omitted from the draft TVOP but will be included in the final version of the operating permit. The VOC CAM plan for these units includes requirements for Tenaska to monitor catalyst inlet temperature, to perform catalyst inspections and sampling in accordance with Original Equipment Manufacturer (OEM) recommendations, and to perform VOC stack testing every two (2) years.

In addition, the Department has required Tenaska to develop a CO:VOC correlation factor using CO CEMS data in order to assure compliance with permitted VOC emissions rates. Because incomplete combustion in fuel burning sources results in increases of both VOC and CO emission levels, DEP has discussed the development of CO:VOC correlation factors with Tenaska during the public comment period in order to include Title V Operating Permit conditions which utilize this relationship together with the facility's CO CEMs in order to establish an improved continuous compliance method for VOC emissions. These conditions will closely approximate VOC emissions based on CO CEMs readings.

Emissions of GHG are monitored through the use of high efficiency turbines and good combustion practices. The TVOP restricts the turbines' duration of startups and shutdowns in order to minimize the number of events in which combustion is not optimal.

Using these different approaches to monitoring for various pollutants at the facility effectively assists the Department in ensuring that TWGS remains in compliance with its permitted emission limits.

General Comment 3: Commenters suggest that the draft TVOP fails to limit the duration of combustion tuning as stated in Section E, Group G001, Combined Cycle Combustion Turbines, Operation Hours Restriction(s), Condition #008, which states the following:

Startups, shutdowns, and combustion tuning:

- (a) The durations of startups and shutdowns shall be minimized to the maximum extent possible.*
- (b) Total startup and shutdown duration for each combined cycle combustion turbine shall not exceed 390 hours in any consecutive 12-month period.*
- (c) Each startup event shall not exceed one and one half-hour in duration.*
- (d) Each shutdown shall not exceed one half hour in duration.*

Commenters are concerned that the absence of a combustion tuning duration limit could lead to high emission releases.

General Response 3: Combustion tuning is required by the turbine manufacturer and is typically performed seasonally, to adjust the combustion dynamics to account for the emission effects of extreme ambient temperatures, and after outages during which the combustion system is inspected

and/or maintained, to ensure those activities do not *negatively* affect emissions. Combustion stability is also improved which helps to prevent protective runbacks from occurring.

Combustion tuning is performed incrementally at loads typically between 50%-100% of full load, with the turbine held at different load points while the tuning is performed to optimize combustion dynamics, then moved to the next load point. The combustion turbines must be operating during these events as the emission levels of NO_x and CO are monitored in real time via the CEMS to evaluate the change in emissions as the combustion system is tuned. Proper tuning of the combustion turbines is necessary to allow them to run with the lowest possible emission rate.

While combustion tuning event durations can vary for several reasons, there is no incentive for the operator to extend tuning longer than necessary. In fact, due to the variable loads required for tuning, the operator is incentivized to tune as efficiently as possible to get to baseload operations to meet market demand.

For these reasons, the Department does not believe a tuning duration limitation is warranted. The language in the TVOP condition referred to by the commenters has been changed to include operating hours restrictions on Startups and Shutdowns only.

General Comment 4: Commenters contend that the draft TVOP does not require record keeping or reporting of all emissions data, and that Tenaska should be required to report to the Department all monitoring that is done to determine compliance with permit limits for each source.

General Response 4: The following is a summary of the conditions which are included in the draft TVOP which pertain directly to monitoring, record keeping, or reporting requirements in relation to determining compliance with emission limits:

- Section C., Condition #010: Requires Tenaska to conduct a daily facility-wide inspection for visible stack emissions, fugitive emissions, and objectionable odors. Also requires corrective action to be taken if needed and records of inspections be maintained.
- Section C., Condition #011: Requires Tenaska to maintain the following records:
 - (a) Facility-wide emissions on a 12-month rolling basis for NO_x, CO, SO_x, VOC, PM, PM₁₀, PM_{2.5}, H₂SO₄, NH₃, HAPs, HCHO, and CO_{2e}.
 - (b) Amount of fuel used by each combustion unit, engine, and turbine on a 12-month rolling basis.
 - (c) Hours of operation of each source on a 12-month rolling basis.
 - (d) Results of facility-wide inspections including the date, time, name, and title of the observer, along with any corrective action taken as a result.
 - (e) Copies of the manufacturer's recommended maintenance schedule for each air source and air cleaning device.
 - (f) All maintenance performed on each source and air cleaning device.
 - (g) Copies of the current, valid purchase contract, tariff sheet, or transportation contract obtained from the natural gas supplier with the sulfur content of the natural gas.
 - (h) Results of the annual natural gas sulfur content analyses.

- (i) Amount of sulfur hexafluoride (SF₆) dielectric fluid added to each circuit breaker unit on a monthly basis.
 - (j) The date and time that each alarm associated with the circuit breaker is activated, the corrective action taken to remedy the problem associated with each alarm, and the date the corrective action remedied the problem.
 - (k) Ammonia throughput on a monthly and 12-month rolling basis.
- Section C., Condition #012: Requires all logs and records be maintained on site or at an alternative location acceptable to the Department for a minimum of five years and be made available to the Department upon request.
 - Section C., Conditions #013 and #015: Specifies that the annual emission report include all emissions information for all previously reported sources and new sources which were first operated during the preceding calendar year. Emissions data for the following pollutants must be included: CO, NO_x, PM₁₀, PM_{2.5}, SO₂, VOC including HCHO, total HAPs, speciated individual HAP emissions, H₂SO₄, and greenhouse gases, expressed as CO_{2e}. The report must also contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.
 - Section C., Condition #014: Specifies the procedures for reporting malfunctions, emergencies, or incidents of excess emissions which occur at the facility. The condition requires more expedient reporting (within 1 hour of discovery) for malfunctions, emergencies, and incidents of excess emissions which pose an imminent danger to the public health, safety, welfare, or the environment, and requires Tenaska to notify both the Department and the County Emergency Management Agency.
 - Section D., Source 104, Condition #004: Tenaska must maintain records of the fuel certification reports for each delivery of fuel to verify compliance with the fuel restriction requirements.
 - Section D., Source #105, Condition #003: Tenaska must sample, analyze, and record the circulating water TDS content on a monthly basis.
 - Section D., Source #105, Condition #004: Tenaska must continuously monitor and record the circulating water and make up water flow rates on a 24-hour average.
 - Section D., Source #105, Condition #005: Tenaska must maintain the following comprehensive and accurate records:
 - (a) Monthly circulating water TDS content.
 - (b) Daily circulating water and make up water flow rates.
 - (c) PM, PM₁₀, and PM_{2.5} emissions on a 12-month rolling basis based upon the measured parameters.
 - Section D., Source #106, Condition #001: Tenaska must implement a sulfur hexafluoride (SF₆) leak detection program to minimize SF₆ leaks as follows:

(a) Circuit breakers are to be state-of-the-art sealed enclosed-pressure circuit breakers equipped with low-pressure alarms that are triggered when 10% of the SF₆ by weight has escaped.

(b) When alarms are triggered, the facility shall take corrective action as soon as practicable to fix the circuit breaker units to a like-new state to prevent the emission of SF₆ to the maximum extent possible.

- Section E., Group G001, Sources #101 and #102, Condition #012: Tenaska must install, operate, and maintain continuous nitrogen oxides monitoring systems and other monitoring systems to convert data to required reporting units in compliance with Chapter 139, Subchapter C (relating to requirements for continuous in-stack monitoring for stationary sources).
- Section E., Group G001, Sources #101 and #102, Condition #013: Tenaska must install, certify, maintain and operate continuous emission monitoring systems (CEMS) for nitrogen oxides, carbon monoxide, and ammonia emissions on the exhaust of each combined-cycle power block in accordance with all applicable requirements specified in 25 Pa. Code §139 and the Department's Continuous Source Monitoring Manual. The owner or operator of the source shall not be issued an operating permit until the CEMS has received Phase III approval, in writing from the Department.
- Section E., Group G001, Sources #101 and #102, Condition #014: Tenaska must continuously monitor the oxygen level in the stack effluent.
- Section E., Group G001, Sources #101 and #102, Condition #015: Tenaska must maintain the following comprehensive and accurate records:
 - (a) Actual heat input and power output on a 12-month rolling basis.
 - (b) The number of startups and shutdowns and the dates each occur.
 - (c) Duration of each startup and shutdown event.
 - (d) The type of each startup (i.e. cold, warm, or hot).
 - (e) Duct burner hours of operation on a 12-month rolling basis.
 - (f) Requirements established in 25 Pa. Code §139 Subchapter C, requirements for source monitoring for stationary sources.
 - (g) Requirements in the most recent version of the Department's Continuous Source Monitoring Manual.
- Section E., Group G002, Sources #101 and #102, Condition #007: Tenaska must submit reports of excess emissions and monitor downtime, in accordance with §60.7(c). Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.
- Section E., Group G003, Source #104, Condition #006: Tenaska must install a non-resettable hour meter prior to startup of the engine.

In addition, as mentioned above in Response 2, VOC emissions from the combustion turbines are subject to the CAM requirements of 40 CFR Part 64. The CAM requirements were inadvertently omitted from the draft TVOP but will be included in the final version of the permit. The VOC CAM plan for these units includes requirements for Tenaska to monitor catalyst inlet temperature, to

perform catalyst inspections and sampling in accordance with Original Equipment Manufacturer (OEM) recommendations, and to perform VOC stack testing every two (2) years. Tenaska has also developed a CO:VOC correlation factor using CO CEMS which utilize the relationship between CO and VOC emission rates in order to assure compliance with permitted VOC emissions rates. This will result in the establishment of an improved continuous compliance method for VOC emissions.

The Department believes that the monitoring, record keeping, and reporting conditions included in the draft TVOP, combined with the VOC CAM requirements and the CO:VOC correlation conditions which will be added to the final TVOP, will provide our staff with the ability to effectively determine whether or not the facility is operating in compliance with all applicable operating permit terms and requirements.

General Comment 5: This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

General Response 5: The first step for obtaining approval to construct a major air contamination source such as TWGS in the Commonwealth is to submit a Plan Approval application. A Plan Approval provides authorization to construct and temporarily operate an air contamination source(s) and/or air cleaning devices and must be obtained from DEP before construction may commence. The Plan Approval application must demonstrate that new sources shall control the emission of air pollutants to the maximum extent, consistent with the best available technology (BAT) as determined by the Department as of the date of issuance of the plan approval for the new source. This means that the Plan Approval is technology-forcing in that it establishes actual emission limits therein in accordance with the equipment, devices, methods, or techniques as determined by the Department which will prevent, reduce, or control emissions of air contaminants to the maximum degree possible at the time that the plan approval is issued. In addition to emission limitations, the Plan Approval also establishes monitoring, testing, record keeping, and reporting requirements as well as work practice standards.

Major new sources such as TWGS are also subject to federal regulatory programs including Prevention of Significant Deterioration (PSD), promulgated under 40 CFR Part 52 and Non-Attainment New Source Review (NANSR) adopted under 25 Pa. Code Chapter 127 Subchapter E. These regulations require the application of Best Available Control Technology (BACT) under PSD and Lowest Achievable Emission Rate (LAER) under NANSR for certain pollutants, as well as the acquisition of Emission Reduction Credits (ERCs) to offset the new facility's potential emissions of NO_x and VOC. Upon final issuance, these Plan Approvals included the implementation of BACT for PM, PM₁₀, PM_{2.5}, NO₂, CO, CO_{2e}, and H₂SO₄; the implementation of LAER technology for NO_x and VOC; and the acquisition of 357 tons of NO_x offsets and 256 tons of VOC offsets.

Furthermore, in accordance with 25 Pa. Code §127.205(5), Tenaska was required to conduct an analysis of alternative sites, sizes, production processes, and environmental control techniques for the proposed facility, which demonstrates that the benefits of the proposed facility significantly outweigh the environmental and social costs imposed within this Commonwealth as a result of its location, construction or modification. The Plan Approval applications included this analysis of alternative sites, sizes, production processes, and environmental control techniques as required, and the DEP determined that Tenaska's analysis required by §127.205(5) was acceptable.

Additionally, in order to receive the Plan Approvals for construction of the facility, the company was also required to concurrently perform an Air Quality source impact modeling analysis as part of the PSD analysis to prove that the allowable emission increases from the project would not cause or contribute to air pollution in violation of any National Ambient Air Quality Standards (NAAQS) in any air quality control region or any applicable maximum allowable increase over the baseline concentration in any area. The cumulative impact of emissions from the TWGS facility, in conjunction with baseline ambient emission levels and the impact from existing air contamination sources in the vicinity, were evaluated by this modeling. The NAAQS are health based standards established by US EPA and are considered to be conservatively protective of the most sensitive population.

According to Summary of Air Quality Analysis for Prevention of Significant Deterioration dated August 1, 2014, from the Department's Air Quality Modeling Section, "The DEP's technical review concludes that Tenaska's air quality analysis satisfies the requirements of the PSD rules and is consistent with the U.S. Environmental Protection Agency's (EPA) *Guideline on Air Quality Models* (40 CFR Part 51, Appendix W) and the EPA's air quality modeling policy and guidance. Furthermore, the Department's technical review concludes that Tenaska's air quality analysis demonstrates, pursuant to 40 CFR § 52.21(k), that Tenaska's proposed emissions will not cause or contribute to air pollution in violation of the National Ambient Air Quality Standards (NAAQS) for CO, NO₂, and PM-10, and the PSD increment standards for NO₂ and PM-10. In addition, the analysis demonstrates, pursuant to 40 CFR § 52.21(o), that Tenaska's proposed emissions, in conjunction with anticipated emissions due to general commercial, residential, industrial, and other growth associated with Tenaska's proposed facility, will not impair visibility, soils, and vegetation. Furthermore, the analysis demonstrates, pursuant to 40 CFR § 52.21(p), that Tenaska's proposed emissions will not adversely affect air quality related values (AQRV), including visibility, in federal Class I areas."

As demonstrated by the above discussion regarding the Plan Approval process, the cumulative air quality impact analyses required for a project of this scope all take place prior to final issuance of a Plan Approval. Issuance of a TVOP does not trigger any new requirements for the permittee to reevaluate emission limits or perform additional control technology analysis; additional alternative sites, sizes, production processes, environmental control techniques analyses; or additional air quality source impact modeling analyses. The TVOP compiles all existing requirements into one legally enforceable document so that they are clear to the permittee as well as to the public. The Department is bound to issue a TVOP if the permittee is determined to be operating in compliance with its terms and conditions.

The Department operates three (3) Ambient Air Monitoring sites, each located within twenty miles of the TWGS facility. These sites are used to continuously collect ambient emission concentrations for specific pollutants to ensure compliance with the NAAQS. The Charleroi site in Washington County monitors ozone, NO₂, PM_{2.5}, and SO₂. The Greensburg site in Westmoreland County monitors ozone and PM_{2.5}. The Uniontown site in Fayette County monitors ozone, NO₂, and PM_{2.5}. All three sites show that the area is in attainment with the NAAQS for the pollutants being monitored. The Department's air monitoring stations provide continuous, objective measurements of ambient pollutant levels, which account for the cumulative effects of emissions from multiple sources. The data enables the Department to detect elevated pollutant levels, assess trends, and determine whether cumulative impacts warrant further investigation or regulatory action.

Plan Approval PA-65-00990C was issued final by the Department on April 1, 2015. In accordance with state and federal air quality regulations, Tenaska was required to install state-of-the-art equipment and air pollution control technology which was available at the time of plan approval issuance in order to comply with federal Lowest Achievable Emission Rate (LAER), federal Best Available Control Technology (BACT), and state Best Available Technology (BAT) programs. The emission limits, control technologies, and monitoring systems were reviewed and approved by both the Department's New Source Review staff as well as the United States Environmental Protection Agency (EPA). The issuance of an initial TVOP does not obligate Tenaska to implement new air pollution control technology or monitoring systems in place of what was approved as meeting LAER, BACT, and BAT requirements in April 2015.

General Comment 6: Numerous citizens commented to inquire why Tenaska was permitted to operate under a construction permit for 9 years.

General Response 6: Prior to the construction of a new source or facility such as Tenaska, or the modification of an existing source, permittees must obtain a plan approval from the Department. A plan approval authorizes both the construction and temporary operation of a project. By regulation the temporary operation period must be evaluated, and extended, every 180 days. There are no regulatory limitations on the number of temporary operation periods that can be authorized however authorization under temporary operating must be kept active until the plan approval is incorporated into an operating permit. During the plan approval phase, a permittee must prove that the emission controls and emission rates proposed therein are state-of-the-art and in compliance with applicable state and federal regulations. Upon completion of construction of the facility, the plan approval is extended to provide a "shakedown" period which allows the permittee time to get all of the sources and air pollution control devices up and running. In Tenaska's case, the facility did not commence operation until March 20, 2018, and several changes from the original plan approval required the submission, review, and approval of plan approval modifications which delayed the submission of an application for TVOP. Nevertheless, operation under a plan approval instead of a TVOP does not afford the permittee any liberties. Compliance with all applicable state and federal rules, regulations, and permit conditions is required under a plan approval the same as it is required under a TVOP. The purpose of a TVOP is not to introduce stricter emission limits or additional control technologies, but to incorporate the existing requirements into one federally enforceable document.

General Comment 7: Numerous citizens commented to inquire why Tenaska was permitted to operate in a state of noncompliance with high priority violations for the previous 12 quarters.

General Response 7: The TWGS was not out of continuous compliance for 12 consecutive quarters. The Department issued several Notices of Violation (NOV) to Tenaska for the noted violations and executed two (2) Consent Assessments of Civil Penalties (CACP) for these violations. The violations referred to by the commenters were addressed and closed by Department staff, however those same violations were not closed out by the US EPA in its public facing databases.

The Integrated Compliance Information System for Air (ICIS-Air) is a computer based repository that contains both emissions and detailed compliance, permit, and enforcement records for stationary sources of air pollution regulated under the Clean Air Act by the US EPA and/or state and local air regulatory agencies. Enforcement and Compliance History Online (ECHO) is EPA's public-facing platform that presents compliance and enforcement information for states, regulated entities, and the

public. It integrates data from multiple EPA systems, including ICIS-Air, to provide searchable, downloadable, and dashboard views of environmental compliance. ICIS-Air is the system that stores and manages the compliance data; ECHO is the interface that makes the data accessible to the public and other stakeholders. Because ICIS-Air was not updated to reflect resolution of the violations at TWGS, the compliance data available to public was not accurate. Upon the Department's realization of this issue, steps were taken to have ICIS-Air updated to reflect that the violations at TWGS have been addressed.

On September 22, 2022, the Department and Tenaska entered into a CACP in the amount of \$14,997 to settle the following violations at TWGS:

12/15/18 – Exceeded CO ppm limit for Unit 1 over four consecutive 3-hour averages.
12/15/18 – Exceeded CO lbs/hr limit for Unit 1 over two 1-hour averages.
12/23/18 – Exceeded CO lbs/hr limit for Unit 1 over one 1-hour average.
12/29/18 – Exceeded CO ppm limit for Unit 1 over five consecutive 3-hour averages.
12/29/18 – Exceeded lbs/hr limit for Unit 1 over four consecutive 1-hour averages.
01/13/19 – Exceeded NO_x ppm limit for Unit 1 over five consecutive 3-hour averages.
01/13/19 – Failure to report malfunction of ammonia delivery system.
01/13/19 – Exceeded NO_x lbs/hr limit for Unit 1 over four consecutive 1-hour averages.
01/13/19 – Exceeded NO_x ppm limit for Unit 2 over five consecutive 3-hour averages.
01/13/19 – Exceeded NO_x lbs/hr limit for Unit 2 over four consecutive 1-hour averages.
02/21/19 – Exceeded CO ppm limit for Unit 1 over two 3-hour averages.
02/21/19 – Exceeded CO lbs/hr limit for Unit 1 over one 1-hour average.
03/04/19 – Exceeded CO ppm limit for Unit 1 over one 3-hour average.
04/26/19 – Underreporting 2018 VOC emissions for Units 1 and 2.
10/04/19 – Exceeded of one hour startup mode duration by nine minutes.
11/08/19 – Exceeded NO_x ppm limit for Unit 1 over one 3-hour average.
03/18/20 – Exceeded NO_x ppm limit for Unit 2 over two 3-hour averages.
01/18/22 – Exceeded CO lbs/hr limit for Unit 1 over one 1-hour average.

On October 14, 2025, the Department and Tenaska entered into a CACP in the amount of \$5,028 to settle the following violations at TWGS:

05/10/22 – Exceeded CO ppm limit for Unit 1 over two consecutive 3-hour averages.
12/23/22 – Exceeded CO ppm limit for Unit 2 over two consecutive 3-hour averages.
12/23/22 – Exceeded CO lbs/hr limit for Unit 2 over one 1-hour average.
04/28/23 – Exceeded CO ppm limit for Unit 2 over two consecutive 3-hour averages.
04/28/23 – Exceeded CO lbs/hr limit for Unit 2 over one 1-hour average.
05/21/23 – Exceeded CO ppm limit for Unit 1 over one 3-hour average.
05/22/23 – Exceeded CO lbs/hr limit for Unit 1 over one 1-hour average.
06/07/23 – Exceeded CO lbs/hr limit for Unit 1 over one 1-hour average.
09/04/24 – Exceeded CO ppm limit for Unit 1 over one 3-hour average.
09/04/24 – Exceeded CO lbs/hr limit for Unit 1 over one 1-hour average.
09/04/24 – Exceeded CO lbs/hr limit for Unit 2 over one 1-hour average.
04/08/25 – Exceeded CO lbs/hr limit for Unit 2 over one 1-hour average.

This list of violations covers nearly a seven-year period of operation at TWGS. As the list shows, the majority of violations occurred over a matter of hours and not days, weeks, or months. This demonstrates that the periods of noncompliance at TWGS have been very intermittent and not continuous for 12 quarters as alleged by commenters. Therefore, the TWGS is not currently operating out of compliance and no compliance schedule is needed in order to issue an initial Title V Operating Permit for the facility.

INDIVIDUALIZED COMMENTS

1. Avolio Law Group, LLC – Solicitor for South Huntingdon Township Board of Supervisors June 23, 2025

Comment 1: On behalf of the South Huntingdon Board of Supervisors, commenter requests that the Department establish a stakeholder group which would hold scheduled meetings with Department staff to better understand the processes that will unfold regarding the current and future permits for the Tenaska Facility.

Response 1: Please refer to General Response 1 to General Comment 1, above. The public process for any potential future authorizations at this facility will be evaluated on a case-by-case basis at the time of receipt.

2. Terrie & Kathy Balko – Citizens October 30, 2025 (hard copy)

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

Comment 6: Why was this plan still operating on a construction permit for 9 years!

Response 6: Please refer to General Response 6 to General Comment 6, above.

Comment 7: I live near the Tenaska gas power plant and I have concerns about the plant's current permit and the major operating permit they've applied for at your office. I am writing to request that you convene a series of community meetings, similar to the ones you held in Beaver County for folks living near the Shell ethane cracker plant. These meetings would be in addition to the public hearing that will be required as the plant seeks its Title V operating permit.

Response 7: : Please refer to General Response 1 to General Comment 1, above.

3. Dennis Cain – Citizen July 26, 2025 (email)

Comment 1: I live near the Tenaska gas power plant and I have concerns about the plant's current permit and the major operating permit they've applied for at your office. I am writing to request that you convene a series of community meetings, similar to the ones you held in Beaver County for folks

living near the Shell ethane cracker plant. These meetings would be in addition to the public hearing that will be required as the plant seeks its Title V operating permit.

Response 1: Please refer to General Response 1 to General Comment 1, above.

***4. Dr. Teagan Goforth – Citizen
February 17, 2026 (email)***

Comment 1: I am writing today to urge DEP to add additional protective measures against the Tenaska facility beyond title V measures, like more limits on pollution and monitoring to keep Tenaska accountable and protect our communities.

As someone who lives in the county and has severe asthma, I take the air pollution here very seriously. I purposely limit my time outside when the AQI is over 40, which is quite often in Allegheny county. Our communities have the right to clean air and to not expose themselves to unnecessary harm. I would love to freely enjoy a nice day outside without knowingly damaging my health and life expectancy.

Beyond my personal experience, I have extensive research experience on air pollution and its effect on human health. Air pollution is known to cause developmental issues in children, lung and heart diseases, and premature deaths. It's estimated that the air quality here causes hundreds of deaths per year. Our communities deserve protection from these harms.

Again, I urge you to please take more protective measures against Tenaska to make our communities and environment safer and better for everyone.

Response 1: Please refer to General Responses 2, 4, and 5 to General Comments 2, 4, and 5, above.

***5. Jeff and Joanne Hall – Citizens
October 30, 2025 (hard copy); November 2, 2025 (email); and February 4, 2026 (public hearing)***

As listed above, the commenter submitted comments to the Department on the proposed TVOP for the TWGS on three (3) separate dates. The majority of the comments from the three submissions are very similar to the six (6) General Comments discussed above. Comments that are outside the scope of the six General Comments are addressed individually below.

Comments 1-6: Please refer to General Comments 1-6, above.

Responses 1-6: Please refer to General Responses 1-6 to General Comments 1-6, above.

Comment 7: Pollution limits exceed standards set by the Clean Air Act in many cases and need to be corrected... the draft permit must be amended to be in compliance with the Clean Air Act.

Response 7: The Department disagrees with the statement that “pollution limits exceed standards set by the Clean Air Act in many cases and need to be corrected...” As discussed above in General Response 5, the emissions limits in the draft permit were originally established in plan approval PA-65-00990C and were approved by both the US EPA and the Department as complying with all

applicable federal LAER, BACT, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants requirements, as well as Pennsylvania BAT and other Title 25 Pa. Code requirements.

Comment 8: It has been 9 years that you (the Department) have not done your job and made a big mistake by letting this go on for so long. Shame on you for not wanting us to be heard.

Response 8: Please refer to General Responses 1 and 6, above.

Comment 9: The permit should require monitoring of total dissolve solids from the cooling tower water more frequently than monthly.

Response 9: The results of monthly total dissolved solids (TDS) sampling have shown to be consistently less than the operating permit limit of 2,000 parts per million (ppm). On August 14, 2025, a full compliance evaluation (FCE) inspection of the TWGS was conducted by Department Air Quality Specialists Cody Frick and Joey Engelmeier. Mr. Frick noted in his inspection report that the highest value noted was 1,363.2 ppm in November of 2024. Mr. Frick also noted that although the operating permit requires monthly monitoring of the TDS content, Tenaska has records that the monitoring is actually being done more frequently on both a daily and monthly basis.

Comment 10: The Draft Permit sets limit on 7 pollutants from the auxiliary boiler and the emergency fire pump engine but does not state the method or frequency required to monitor any of them.

Response 10: Please refer to General Responses 2 and 4, above. Also, direct measurement of emissions from emergency and auxiliary sources is very difficult due to the very nature of the intended usage of these sources and the uncertainty of when they will be in operation. For this reason, the Department uses alternative methods of determining compliance such as reviewing fuel usage records, monitoring hours of operation for the emergency fire pump engine, preventative maintenance records, and reviewing fuel supply certification analyses.

Comment 11: I live in the Environment Justice Community of West Newton and directly impacted by the air pollution from this facility. Air modeling proves this (See Attached).

Response 11: The air modeling performed by the Environmental Health Project and provided by the commenter shows only the locations of the areas predicted to be impacted as a “percentage of highest receptor” by the emissions “of primary air pollutants” produced by the TWGS. It does not quantify the numerical concentrations of specific air pollutants, nor does it provide any evidence of violations of the NAAQS occurring in these areas resulting from those emissions.

6. Lisa Riley – Citizen

October 30, 2025 (hard copy) and February 4, 2026 (public hearing)

As listed above, the commenter submitted comments to the Department on the proposed TVOP for the TWGS on three (3) separate dates. The majority of the comments from the three submissions are very similar to the six (6) General Comments discussed above. Comments that are outside the scope of the six General Comments are addressed individually below.

Comments 1-7: Please refer to General Comments 1-7, above.

Responses 1-7: Please refer to General Responses 1-7 to General Comments 1-7, above.

Comment 8: The draft permit must include a compliance schedule since an operating permit in Pennsylvania cannot be issued to a facility that is out of compliance with the Air Pollution Control Act, the Clean Air Act, and other regulations unless the operating permit contains “an enforceable schedule requiring the source to attain compliance as soon as possible”.

Response 8: As explained in General Response 7 above, the CEMS violations which occurred at TWGS were intermittent deviations lasting for a matter of hour(s). Those violations have been addressed by the Department through the execution of two (2) CACP’s which included the assessment and payment of penalties. Therefore, the TWGS is not operating out of compliance and no compliance schedule is needed in order to issue an initial Title V Operating Permit for the facility.

7. Catherine Anderson – Citizen

October 30, 2025 (hard copy) and February 4, 2026 (public hearing)

Comments 1-7: Please refer to General Comments 1-7, above.

Responses 1-7: Please refer to General Responses 1-7 to General Comments 1-7, above.

8. David Holliday – Citizen

October 30, 2025 (hard copy) and February 4, 2026 (public hearing)

Comments 1-7: Please refer to General Comments 1-7, above.

Responses 1-7: Please refer to General Responses 1-7 to General Comments 1-7, above.

Comment 8: I respectfully request that DEP conduct a cumulative impact assessment that considers existing pollution sources and health burdens in our community.

Response 8: As explained above in General Response 5, a Title V Operating Permit is not the vehicle to conduct a cumulative impact assessment. The impact of potential emissions from TWGS along with emissions of existing sources of air pollution in the vicinity were addressed during the Plan Approval phase of this project. In accordance with 25 Pa. Code §127.205(5), Tenaska was required to conduct an analysis of alternative sites, sizes, production processes, and environmental control techniques for the proposed facility, which demonstrates that the benefits of the proposed facility significantly outweigh the environmental and social costs imposed within this Commonwealth as a result of its location, construction or modification. The Plan Approval applications included this analysis of alternative sites, sizes, production processes, and environmental control techniques as required, and the DEP determined that Tenaska’s analysis required by §127.205(5) was acceptable.

Additionally, in order to receive the Plan Approvals for construction of the facility, the company was also required to concurrently perform an Air Quality source impact modeling analysis to prove that the allowable emission increases from the project would not cause or contribute to air pollution in

violation of any National Ambient Air Quality Standards (NAAQS) in any air quality control region or any applicable maximum allowable increase over the baseline concentration in any area. The cumulative impact of emissions from the TWGS facility, in conjunction with baseline ambient emission levels and the impact from existing air contamination sources in the vicinity, were evaluated by this modeling. The Department's Air Quality Modeling Section concluded that Tenaska's air quality analysis demonstrated that the proposed emissions from TWGS will not cause or contribute to air pollution in violation of the National Ambient Air Quality Standards (NAAQS) for CO, NO₂, and PM-10, and the PSD increment standards for NO₂ and PM-10. Please also see the response to Comment 5 which notes that DEP's ambient monitoring network provides continuous, objective measurements of actual air quality conditions and inherently reflects the combined contribution of emissions from numerous stationary, mobile, and area sources throughout the region. Based on the available monitoring data at stations in the vicinity of TWGS, the Department has not identified ambient pollutant concentrations indicating a cumulative air quality impact that would interfere with continued attainment of the NAAQS.

***9. Kaleigh and Zachary Shuster – Citizens
October 30, 2025 (hard copy) and February 4, 2026 (public hearing)***

Comments 1-7: Please refer to General Comments 1-7, above.

Responses 1-7: Please refer to General Responses 1-7 to General Comments 1-7, above.

***10. Nancy Ivan – Citizen
February 4, 2026 (public hearing)***

Comment 1: Tenaska has been operating on a 'temporary' basis for nine years. Their initial Plan Approval was issued April 2015. This 'shakedown' period has been extended repeatedly, allowing a major source to avoid the permanent, federal oversight that a Title V permit requires.

Response 1: Please refer to General Response 6, above.

Comment 2: This facility is a chronic violator. According to EPA Registry ID 110064115598, Tenaska has been in a state of non-compliance for the last 12 consecutive quarters. For three straight years, this plant has failed to meet Clean Air Act Standards. The DEP cannot legally issue this permit without a binding, enforceable Compliance Schedule to remediate these violations.

Response 2: Please refer to General Response 7, above.

Comment 3: The draft permit is a 'hollow' document. Section 504(c) of the Clean Air Act requires permits to include monitoring that 'assures compliance'. Yet, this draft lacks Continuous Emissions Monitoring Systems (CEMs) for all key pollutants and contains no site-specific monitoring in the West Newton valley. This is especially dangerous because of our topography. Air modeling shows that the West Newton valley acts as a basin that accumulates direct particulate matter. Your own draft permit allows for 92.2 tons of particulate matter and 222.2 tons of Nitrogen Oxides per day. In a valley like ours, these aren't just numbers-they are health risks trapped at the street level where our children play and senior citizens live.

I demand that the DEP deny this permit until it includes:

1. Site-specific, real time monitoring in the West Newton valley and neighboring communities of Wyano, Smithton, Yukon, Ruffsedale and Buena Vista in Allegheny County.
2. Continuous Emissions Monitoring with a public, digital reporting portal.
3. A strict compliance schedule to address the 12 quarters of violations.

Response 3: As discussed above in General Response 2, the two (2) power blocks, Sources 101 and 102, are equipped with CEMS for NO_x, CO, and NH₃ (ammonia) emissions. NO_x, CO, and NH₃ are the three highest pollutants potentially emitted from TWGS besides VOC emissions. However, CO and VOC emissions are closely correlated and Tenaska has been required to use readings from the CO CEMS to determine compliance with VOC emissions limits from Sources 101 and 102.

The emission limits in the draft permit are specified in tons per year (tpy), not tons per day as the commenter states. The actual emission limits from the draft permit for NO_x, PM₁₀ (particulate matter less than 10 microns), and VOC are 303.1 tpy of NO_x, 92.2 tpy of PM₁₀, and 222.2 tpy of VOC. It's important to remember that these are potential emission limits, on a worst case scenario, not the quantity of emissions that are actually being emitted.

The Department does have access to CEMS data as it is reported by Tenaska but there is no public digital reporting portal. However, the public can request CEMS data reports from the Department under the Pennsylvania Right to Know Law or by scheduling an informal file review.

As discussed above in General Response 5, the Department operates an Ambient Air Monitoring site in Charleroi, Washington County, which monitors ozone, NO₂, PM_{2.5}, and SO₂. The Charleroi monitoring site is approximately eight miles (straight line distance) from West Newton. The site monitors air pollution in the area to ensure attainment with the NAAQS for the pollutants being monitored. DEP's air monitoring stations provide continuous, objective measurements of ambient pollutant levels, which account for the combined effects of emissions from multiple sources. The data enables DEP to detect elevated pollutant levels, assess trends, and determine whether cumulative impacts warrant further investigation or regulatory action.

As explained in General Response 7 above, the CEMS violations which occurred at TWGS were intermittent deviations lasting for a matter of hour(s). Those violations have been addressed by the Department through the execution of two (2) CACP's which included the assessment and payment of penalties. Therefore, the TWGS is not operating out of compliance and no compliance schedule is needed in order to issue an initial Title V Operating Permit for the facility

Please also refer to General Responses 2 and 7, above.

11. Wanda Greenawalt – Citizen
October 30, 2025 (hard copy)

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***12. Dianne Walters – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***13. Mary Lou Mills – Citizen
October 30, 2025 (hard copy)***

Comments 1-6: Please refer to General Comments 1-6, above.

Responses 1-6: Please refer to General Responses 1-6 to General Comments 1-6, above.

***14. Dennis McAndrew – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***15. Keith and Lori Hughes – Citizens
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***16. John and Sandra Momyer – Citizens
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***17. Jocelyn McCann – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***18. Richard and Nancy Neel – Citizens
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***19. Terri Sims – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***20. James Sims – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***21. Linda Pocratski – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***22. Joan Kodrin – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***23. Deborah Franzetta – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***24. Alessandro Cerreti – Citizen
October 30, 2025 (hard copy)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***25. Janet Roslund – Citizen
October 30, 2025 (hard copy) and February 4, 2026 (public hearing)***

Comments 1-5: Please refer to General Comments 1-5, above.

Responses 1-5: Please refer to General Responses 1-5 to General Comments 1-5, above.

***26. Unitarian Universalist Congregation of Smithton – Local Religious Organization
October 30, 2025 (hard copy) and February 4, 2026 (public hearing)***

Comment 1: Our congregation fully supports a decision where individuals are provided the opportunity for a public hearing where residents and stakeholders would be allowed to gather and voice their concerns.

Response 1: Please refer to General Response 1, above.

Comment 2: The Draft Permit does not include monitoring provisions sufficient to determine compliance with emission limits, which is required by the Clean Air Act.

Response 2: Please refer to General Response 2, above.

Comment 3: The Permit fails to limit the duration of combustion tuning, which could lead to high emissions releases.

Response 3: Please refer to General Response 3, above.

Comment 4: Tenaska must be required to report to DEP all emissions monitoring it does to determine compliance with permit limits.

Response 4: Please refer to General Response 4, above.

Comment 5: The Draft Permit impermissibly fails to include a schedule for coming into compliance with the Clean Air Act.

Response 5: As explained in General Response 7 above, the CEMS violations which occurred at TWGS were intermittent deviations lasting for a matter of hour(s). Those violations have been addressed by the Department through the execution of two (2) CACP's which included the assessment and payment of penalties. Therefore, the TWGS is not operating out of compliance and no compliance schedule is needed in order to issue an initial Title V Operating Permit for the facility.

***27. Borough of West Newton – Local Municipality
October 30, 2025 (hard copy)***

Comment 1: As one of the neighboring communities impacted by emissions from this facility, West Newton Borough respectfully requests that the PA DEP hold a public hearing on Draft Title V Operating Permit No. 65-00990 for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

Response 1: Please refer to General Response 1, above.

28. Kenneth Ball – Citizen
February 4, 2026 (public hearing)

Comment 1: The draft permit lists emissions from the plant: 222 tons per year of nitrogen oxides, 92 tpy of particulate matter, 193 tons of ammonia, sulfuric acid mist, carbon monoxide, and almost 4 million tons of carbon dioxide annually. I also want to respectfully highlight the map modeled by Environmental Health Project, showing impacts along the Youghiogheny River, affecting areas like Sutersville, West Newton, and Buena Vista. Our farm is in an area of greatest impact so as these pollutants travel, they will affect our air, land, water... our health, our cattle and our customers' confidence in the product we provide. This is potentially a risk to life and livelihood. This is personal.

Response 1: The air modeling performed by the Environmental Health Project and provided by the commenter shows only the locations of the areas predicted to be impacted as a “percentage of highest receptor” by the emissions “of primary air pollutants” produced by the TWGS. It does not quantify the numerical concentrations of specific air pollutants, nor does it provide any evidence of violations of the NAAQS occurring in these areas resulting from those emissions.

Comment 2: According to EPA’s “Enforcement and Compliance History Online” over the past 12 quarters, Tenaska has been in noncompliance with its permit for all 12 of the last 12 quarters, and the compliance status is marked in red and labeled “High Priority Violation”. Despite this, there has only been 1 enforcement action in the last 5 years (dated September 16, 2022) with a penalty under \$15,000.

Response 2: Please refer to General Response 7, above.

Comment 3: These are my concerns: The draft permit lacks sufficient monitoring, lacks a compliance schedule, doesn’t restrict the duration of combustion tuning, and doesn’t require Tenaska to report to DEP all emissions monitoring it does to determine compliance with permit limits. It’s bad enough that you are asking the fox to monitor the hen house, but you don’t even get the camera feed?

Response 3: Please refer to General Responses 2, 3, 4, and 7 above.

Comment 4: With Title V, I respectfully urge DEP to enforce clear, strong limits under the Clean Air Act, to protect our farm, our community, and our environment. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility. The ownership, Tenaska Pennsylvania Partners include affiliates of Nebraska based Tenaska and two Japanese firms – a Mitsubishi subsidiary and a Tokyo-based power plant developer. Come on... they can do better.

Response 4: Please refer to General Responses 2, 4, and 5, above.

29. Benjamin Chiszar – Citizen
February 4, 2026 (public hearing)

Comment 1: Commenter states that “Our State Constitution prohibits this permit” and asks that the Department deny this TVOP based upon the following paraphrased reasons: the facility’s

contributions to greenhouse gas emissions and localized air and water pollution, greenhouse gas emissions impact on climate change and an increase in natural disasters, the wasteful nature of public investment in new gas-fired power plants and how it diverts resources from renewables and energy efficiency measures, and the belief that gas-fired power plants are often sited near low-income, rural communities, and communities of color which are disproportionately affected by air and water pollution and associated health risks.

Response 1: As discussed above in General Response 5, the cumulative impact of a new project such as the TWGS on emissions, the NAAQS, and the local community in which it is located are all evaluated prior to final issuance of a Plan Approval. Issuance of a TVOP does not trigger any new requirements for the permittee to reevaluate emission limits or perform additional control technology analysis; additional alternative sites, sizes, production processes, or environmental control techniques analyses; or additional air quality source impact modeling analyses. The TVOP compiles all existing requirements into one legally enforceable document so that they are clear to the permittee as well as to the public. The DEP is bound to issue a TVOP if the permittee is determined to be operating in compliance with its terms and conditions. Furthermore, the commenter's stated objections to issuance of a final TVOP for the TWGS are anecdotal in nature and do not offer specific evidence of reasons to deny the operating permit.

Comment 2: I am concerned about the insufficient monitoring and record keeping by Tenaska and the DEP, no limits on combustion tuning, and no compliance schedule for the Clean Air Act which they have failed for 12 straight quarters. They are one of the newest yet dirtiest facilities in the Commonwealth. Why? How?

Response 2: Please refer to General Responses 2, 3, 4, and 7, above.

***30. Larisa Mednis – Clean Air Council
February 4, 2026 (public hearing)***

Comment 1: I call upon the DEP to utilize the full extent of your power to protect local residents, including creating a public website where Tenaska must post their emissions reading daily. Currently, publicly available information about the Tenaska plant is notably lacking on the DEP's website. Tenaska's permits have not been updated since 2015, and zero Notices of Violation have been published despite this facility's consistent violations of the Clean Air Act. It is misleading for the DEP to maintain a website without publishing updated permits and information about public hearings on the site. In comparison, the DEP's webpage for Shell Chemicals Appalachia lists every NOV and every permit approval draft and document through 2025.

Response 1: Publication of operating permits and other information on the Department's website is done as a courtesy and is not a requirement. The Department has met all of its publication requirements under Pa. Code Title 25, Chapter 127. The public can request operating permits, emissions reports, Notices of Violations, inspections reports, and other information from the Department under the Pennsylvania Right to Know Law or by scheduling an informal file review.

Comment 2: As a representative of Clean Air Council and its members, I am concerned about the ongoing exposure to VOCs and PM2.5 air pollutants in the region. Air and water pollution from these facilities frequently impacts surrounding areas. The DEP must consider the cumulative

pollution burdens that we face. The Tenaska facility is located within an Environmental Justice area in the 80-89.9th percentile, and is less than 2 miles from an Environmental Justice area with pollution exposure in the 98th percentile.

Response 2: Please refer to General Response 5, above for discussion of the Department's consideration of cumulative air pollution impact analyses.

Comment 3: The Tenaska facility has been out of compliance with the Clean Air Act for all 12 out of the last 12 quarters. Frankly, a facility that has demonstrated incompetence and inability to comply with pollution limits should not be granted a Title V permit. A facility's ability to comply with permit requirements is a vital factor to consider according to the Air Pollution Control Act and the Clean Air Act, which were created to protect people from the most harmful effects of air pollution. A plan for coming into compliance must be developed before the Tenaska plant receives this permit.

Response 3: Please refer to General Response 7, above.

Comment 4: In the event the Title V permit is granted, I recommend several changes that would better protect those living around the Tenaska facility. First of all, I recommend that the DEP implement more frequent monitoring and stack testing at the plant. Secondly, I recommend that the monitoring of dissolved solids from the cooling tower take place daily instead of monthly, to ensure that pollutants such as particulate matter are accounted for. Particulate matter, a known carcinogen, must remain within permit limits with frequent monitoring to ensure that the impact on public health is minimal. I recommend that the DEP create much more stringent guidelines than the 3.7 million tons of annual greenhouse gas emissions allowed under the current draft permit.

Response 4: In addition to the monitoring and stack testing requirements discussed above in General Responses 2 and 4, VOC emissions from the combustion turbines are subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. The CAM requirements were inadvertently omitted from the draft TVOP but will be added to the final version of the operating permit. The VOC CAM plan for these units includes requirements for Tenaska to monitor catalyst inlet temperature, to perform catalyst inspections and sampling in accordance with Original Equipment Manufacturer (OEM) recommendations, and to perform VOC stack testing every two (2) years.

Furthermore, the Department has required Tenaska to develop a CO:VOC correlation factor using CO CEMS data in order to assure compliance with permitted VOC emissions rates. Because incomplete combustion in fuel burning sources results in increases of both VOC and CO emission levels, DEP has discussed the development of CO:VOC correlation factors with Tenaska during the public comment period in order to include Title V Operating Permit conditions which utilize this relationship together with the facility's CO CEMs in order to establish an improved continuous compliance method for VOC emissions. These conditions will closely approximate VOC emissions based on CO CEMs readings.

The results of monthly total dissolved solids (TDS) sampling have shown to be consistently less than the operating permit limit of 2,000 parts per million (ppm). On August 14, 2025, a full compliance evaluation (FCE) inspection of the TWGS was conducted by Department Air Quality Specialists

Cody Frick and Joey Engelmeier. Mr. Frick noted in his inspection report that the highest value noted was 1,363.2 ppm in November of 2024. Mr. Frick also noted that although the operating permit requires only monthly monitoring of the TDS content, Tenaska has records that the monitoring is actually being done on both a daily and monthly basis.

Regarding revision of the facility-wide greenhouse gas emission limit to something “much more stringent than the 3.7 million (annual) tons”, doing so would result in limiting the TWGS’s potential electric power generating capacity below its designed maximum level of production. Although the facility has yet to approach this 3.7 million tons of CO₂e annual limit of greenhouse gases, this emission limitation was approved by both the US EPA and the Department during the Plan Approval phase of the project. Issuance of a Title V Operating Permit alone is not justification for reducing the facility’s emission limitation on greenhouse gases.

Comment 5: As we catapult increasingly towards catastrophic levels of human-induced climate change, it is more important than ever that the DEP use their regulatory powers to keep polluters in check. We have the science, research, and technology in our arsenal to demonstrate that fossil fuel extraction endangers human and environmental health. We deserve a better future for ourselves and for generations to come. We should be decarbonizing, including transitioning to renewable energy and reducing our reliance on plastics. Pennsylvania is ranked 49th out of 50 states for renewable energy growth, and is far behind other large energy-producing states such as Texas, which is leading the nation in installing renewable energy capacity. Wind and solar farms account for about 30% of Texas’ energy generation, while only about 4% of our energy in Pennsylvania is renewable. DEP must execute its statutory duties to protect Pennsylvanians and to hold polluting facilities accountable that repeatedly violate the law. Thank you for providing the opportunity to speak this evening.

Response 5: The Department acknowledges the commenter’s views on increasing growth of renewable energy within the Commonwealth, however this Comment and Response document regarding the issuance of an initial TVOP for the TWGS is not the proper forum to address this issue.

31. Natalie Davidson – PennFuture
February 4, 2026 (public hearing)

Comment 1: The Tenaska Plant has spent close to a decade operating without the necessary permit which makes it even more critical that DEP should ensure that this permit meets all standards.

Response 1: Please refer to General Response 6, above.

Comment 2: The current permit is lacking in monitoring requirements that would ensure the plant is in compliance with federal and state clean air standards. Also, there are not proper monitoring requirements to protect the community against the emissions of several pollutants [sulfuric acid mist (H₂SO₄), PM_{2.5}, PM₁₀, sulfur oxides, and greenhouse gases) as outlined in the Clean Air Act requirements for Title V Operating Permits. This raises concerns for the health and safety of residents as it would mean that proper measures cannot be taken to protect the public or monitor compliance sufficiently. As it appears in the draft permit the plant is only responsible for continuous emission monitoring systems for three pollutants (NO_x, CO, and ammonia) with limits while still lacking a set of monitoring methods, calculations, and frequencies for the other seven pollutants identified above. Since the permit fails to set specific monitoring requirements to assure compliance

with limits for seven pollutants it is failing to comply with the Clean Air Act and PA Pollution Control Act. We ask that the permit be redrafted to include the proper amount of monitoring for compliance.

Response 2: Please refer to General Responses 2 and 4, above.

Comment 3: The draft permit should also include requirements for record keeping or reporting of all emissions data and any data used to determine compliance with permit limits for each source should be reported to DEP. It would be insufficient to excluded this data and result in limitation to DEP and the public's ability to ensure that the Tenaska Plant would be in full compliance with their emission limits per the EPA and PA Title V regulation. Therefore, the permit must be revised to ensure all emissions restrictions have sufficient monitoring and record keeping requirements.

Response 3: Please refer to General Response 4, above.

Comment 4: The draft permit fails to meet requirements to include plans for coming into compliance with the Clean Air Act. Tenaska has been out of compliance for 12 of the last 12 quarters according to the EPA's Enforcement and Compliance History Online Database. It is required to include a schedule for when and how they plan to comply with regulation. The compliance plan for outstanding violations must be included in the permit for an Operating permit to be issued. The residents that are impacted by the operation of the plant should be able to live with faith that this plant is operating in accordance with all legal requirements but that is not true for the past 12 of 12 quarters so it is imperative that DEP ask for a revision of this permit with a compliance plant.

Response 4: Please refer to General Response 7, above.

***32. Santosh Muralidaran – Environmental Health Project
February 13, 2026 (email)***

Comment 1: Environmental Health Project (EHP) recommends that DEP amend the draft TVOP to increase the frequency of the current mandated stack testing for VOCs and PM to at least annually from the current mandated frequency of once every two years.

Response 1: VOC emissions from the two (2) power blocks are monitored in accordance with the facility's Compliance Assurance Monitoring (CAM) plan as discussed above in General Response 2. VOC emissions will also be monitored closely through correlation with CO emissions through CO CEMs data in accordance with the correlation factor which will be established in the final TVOP. Regarding PM emissions, it should be noted that potential PM emissions from the entire facility including the power blocks are below the major source threshold (100 tons per year). PM emissions will be monitored through the use of burning pipeline quality natural gas, visible stack emission observations, periodic tunings, preventative maintenance, record keeping of fuel usage and operating hours, and operating the units in accordance with manufacturer's specifications and good air pollution control operating procedures. The Department believes that stack testing for VOC and PM on a frequency of once every two years is sufficient to determine compliance with operating permit limits.

Comment 2: EHP recommends that DEP amend the draft TVOP to establish a VOC to CO correlation during VOC stack testing to ensure continuous monitoring of VOC emissions using CO as a surrogate.

Response 2: As discussed above in General Response 2, the Department has instructed Tenaska to develop a CO to VOC correlation factor which will be included in the final TVOP to provide continuous monitoring of VOC emissions and to demonstrate compliance with VOC operating permit limits.

Comment 3: EHP recommends that DEP amend the draft TVOP to implement Selective Catalytic Reduction for NO_x emissions to reduce environmental impact.

Response 3: The combustion turbines, Source IDs 101 and 102, have been equipped with Selective Catalytic Reduction systems to reduce NO_x emissions from the time the plan approval application was submitted to construct the facility. This was mentioned on page 2 of the Technical Review Memorandum dated September 23, 2025, for the initial TVOP as follows:

“Emissions resulting from the combustion of natural gas in the CCCTs consist of air pollutants NO_x, CO, VOC, sulfur dioxide (SO₂), particulate matter (PM), GHG, and hazardous air pollutants (HAPs). Emissions from each combustion turbine (CT) and HRSG duct burner unit are passed through a selective catalytic reduction (SCR) unit and an oxidation catalyst to reduce NO_x, CO, VOC, and HAPs before being released to the atmosphere through a common stack. There is no bypass stack for the CT exhaust; therefore, emissions are controlled at all possible times. The SCR unit employs ammonia as a reducing agent for the control of NO_x emissions.”

Comment 4: EHP recommends that DEP amend the draft TVOP to specify all monitoring systems for PM₁₀, PM_{2.5}, H₂SO₄, sulfur oxides, and greenhouse gases, as well as a regular schedule and format for the reporting of monitoring data, and required Tenaska to report all monitoring data to the DEP.

Response 4: Please refer to General Responses 2 and 4, above.

Comment 5: EHP recommends that DEP amend the draft TVOP to create a schedule to ensure compliance with Clean Air Act as soon as possible.

Response 5: Please refer to General Response 5, above.

33. Lane & Geri Rupert – Citizens
February 2, 2026 (email)

Comment 1: The commenters state that Tenaska’s power plant cooling tower plume has been raining down on their household and property for years. Commenters also complain of “smells of hydrocarbons, fuels, fumes, and other foul smells that roll down the hillside into our house” as well as increase noise levels. Commenters request that Tenaska maintain a log of all chemicals used on site, the quantities, and all emissions sources, including safety valves, diesel tank vents, diesel fuel oil fumes, and the number and types of vehicles on site for outages. Commenters request that a

TVOP not be issued unless Tenaska agrees to replace the existing cooling tower with newer “air-cooling-condensers” that would not use clean Youghiogheny River water as a cooling agent. Commenters also request that Tenaska fund an independent health fund to help any community member that contracts any respiratory ailment or cancer.

Response 1: The Department recognizes the seriousness of the issues you have raised and appreciates the opportunity to clarify the scope of our review and the regulatory framework under which this facility operates. The Department does not dismiss these concerns, and we understand how persistent operational impacts from a nearby facility may affect quality of life. Complaints related to odors, fallout, and noise are taken seriously and are evaluated under the appropriate regulatory programs when received. In plain terms, a Title V permit does not approve new construction, require equipment upgrades, or mandate the installation of newer or alternative pollution control technologies. It is important, however, to clearly explain the purpose and limits of the Title V Operating Permit program, particularly as it relates to technology and facility design.

The Title V program collects, consolidates, and restates existing air quality requirements that already apply to a facility under federal and state law. These requirements are established through prior permits (such as plan approvals), applicable federal standards, and state regulations. A Title V permit does not reopen or re-evaluate past decisions regarding plant design, cooling technology, or pollution control equipment that were previously authorized.

Concerns regarding best available technology, alternative cooling methods, or redesign of facility systems are evaluated, when applicable, during new source permitting or major modification reviews, not during Title V renewals. The Tenaska facility is not currently undergoing such a review as part of the Title V action.

With respect to visible plumes from cooling towers and stacks, it is also important to clarify that visible water vapor plumes are not, by themselves, an indication of noncompliance or harmful emissions. Cooling tower plumes primarily consist of water vapor, and their behavior can be influenced by local meteorology and terrain. That said, the Department does require compliance with applicable particulate matter limits and odor regulations, and we investigate credible complaints that suggest those requirements may not be met.

The Department has conducted several inspections and visible emission, fugitive emission, and malodor observations as part of its complaint investigation. An offsite odor observation was performed on February 5, 2026, with no odors noted. A subsequent offsite odor observation was performed on February 20, 2026, with no odors noted. Another offsite odor observation was performed on March 2, 2026, with no odors noted. On March 5, 2026, Department staff visited the TWGS and conducted visible emissions observations of both combustion turbines, Sources 101 and 102, and also reviewed records of the company’s daily observations. Although a few instances of 5% opacity were observed for both Sources 101 and 102, neither source exceeded the plan approval regulatory limit, and no odors or fugitive emissions were observed. On March 9, 2026, Department staff conducted visible emissions observations of the cooling tower, Source 105. No onsite violations were noted. On March 20, 2026, an update on the status of the complaint and the Department’s findings was provided to complainants. Copies of the Department’s inspection reports and complaint investigations are attached to this Comment and Response document. Please

also refer to General Response 2, above which discusses TDS content monitoring requirements for the cooling tower.

Questions regarding public health impacts, cancer incidence, or epidemiological studies fall primarily under the jurisdiction of health agencies rather than the Air Quality Program. While DEP coordinates with other agencies as appropriate, the Department does not have the authority to make health determinations or require medical studies through an air operating permit. It should be noted that TWGS is a non-major facility for hazardous air pollutants (HAPs). The TVOP limits total HAP emissions from the facility to 22.07 tons per rolling 12-month period and formaldehyde emissions to 8.67 tons per rolling 12-month period.

Please be assured that DEP will continue to oversee the facility's compliance with all applicable air quality requirements and will take appropriate action if violations are identified. We encourage residents to continue reporting specific, time-bound odor, fallout, or noise complaints so they can be evaluated under the relevant regulatory authorities. We appreciate your engagement in the permitting process and your interest in understanding how these programs function. Public input is an important part of environmental oversight, and we are committed to transparency within the limits of our statutory authority.

Comment 2: It is appalling that Tenaska could actually continue to operate a power plant and not be responsible. We have lived in this area over 30 years, and not until Tenaska have we been sick. By default, we will fight all the sloppy compliance and less-than-state-of-the-art emissions technology. The fight will be short if they continue polluting us all so they can make private corporate profits at our expense. Only Tenaska benefits when they do not have to track and trace all forms of pollutants, emissions, and contaminants. But why would they want to get track of this, not doing so makes it impossible for the little people to fight them and that is exactly why they chose to build in South Huntingdon, Township, as we were told years ago.

Response 2: Please refer to General Responses 2, 4, 5, and 7, above.

***34. Lisa Graves Marcucci – Environmental Integrity Project
February 4, 2026 (public hearing)***

Comment 0: Although we are grateful the DEP is working to finalize a Title V permit for this facility, it is unconscionable that it has taken nine years, particularly since this facility has been out of compliance for the past 12 quarters for carbon monoxide, nitrogen oxide and volatile organic compounds. The US EPA's ECHO database labeled these events as "High Priority Violations." No facility should be allowed to operate without its federally required Title V permit, particularly one that is non-compliant. I do hope the PA DEP will be instituting internal fact checking to ensure this never happens again.

Response 0: Please refer to General Response 6 and 7, above.

Comment 1: 1. The Draft Permit does not require record keeping or reporting of all emissions data, and all monitoring conducted by Tenaska to determine compliance with permit limits for each source to be reported to DEP.

- Tenaska must be required to report to PA DEP ALL emissions monitoring it does to determine if the facility is in compliance with their permit limits.
- And that data must be accessible to the public through Right to Know requests.

Response 1: Please refer to General Responses 2 and 4, above. The public may request data from the Department under the Pennsylvania Right to Know Law or by scheduling an informal file review.

Comment 2: The Draft Permit Does Not Include Monitoring Provisions Sufficient to Determine Compliance with Emissions Limits, which is Required by the Clean Air Act.

- The Draft Permit is deficient because it does not include monitoring requirements that are sufficient to ensure compliance with the limits in the permit. The Clean Air Act requires that a Title V Operating Permit must include in the permit itself monitoring requirements that are specific and frequent enough to show if the facility is complying with or violating the permit limits. This permit fails to include this required monitoring.
- The Draft Permit sets limits on emissions of seven pollutants (VOCs, total PM, PM10, PM2.5, sulfuric acid mist (H2SO4), sulfur oxides, or greenhouse gases) from the two combustion turbines (see p.37) but does not include sufficient monitoring requirements to assure compliance with the limits.
- The Draft Permit must require additional monitoring and maintenance to ensure compliance with NOx, VOC, and CO emission limits.

Response 2: Please refer to General Responses 2 and 4, above.

Comment 3: The Permit Fails to Limit the Duration of Combustion Tuning, Which Could Lead to High Emissions Releases.

- The Draft Permit's section restricting operating hours for "Startups, shutdowns, and combustion tuning" for the combustion turbines (page 39) are actually only limits durations of startups and shutdowns but not combustion tuning. The permit must be changed to limit duration for combustion tuning as well.

Response 3: Please refer to General Response 3, above.

Comment 4: The Draft Permit Impermissibly Fails to Include a Schedule for Coming Into Compliance with the Clean Air Act.

- The Tenaska Westmoreland facility has been in non-compliance with the Clean Air Act for all 12 of the last 12 quarters, but the Draft Permit fails to include a schedule for when and how they will comply.
- A compliance schedule must be included in the permit.

Response 4: Please refer to General Response 7, above.

Comment 5: This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

Response 5: Please refer to General Response 5, above.

35. Lisa Hallowell – Environmental Integrity Project
November 3, 2025 (hard copy) and February 4, 2026 (public hearing)

Also signatory on these comments:

Lisa Graves Marcucci – Environmental Integrity Project
Emilee Hough – Mountain Watershed Association
Ashley Funk – Mountain Watershed Association
Melissa Marshall – Mountain Watershed Association
Lawrence Hafetz – Clean Air Council
Yough Communities CARE
Alison Steele – Environmental Health Project
Gillian Graber – Protect PT
Hilary Starcher O’Toole – Beaver County Marcellus Awareness Community
Vanessa Lynch – Moms Clean Air Force – PA Chapter
Archbishop Dr. Marcia Dinkins – Black Appalachian Coalition
Rev. B. De Neice Welch – Pennsylvania Interfaith Impact Network
Matthew Mehalik – Breathe Project
Catherine Anderson – Citizen
Kenneth & April Ball – Citizens
Martha Evans – Citizen
Joanne Hall – Citizen
David Holliday – Citizen
Nancy Ivan – Citizen
Dennis McAndrew – Citizen
Mary Lou Mills – Citizen
Janet Roslund – Citizen
Lisa Riley – Citizen
Diana Steck – Citizen

Comment II.a.: The Draft Permit Does Not Require Sufficient Monitoring to Assure Compliance with Applicable Limits for VOCs, Total PM, PM10, PM2.5, Sulfuric Acid Mist, Sulfur Oxides, or Greenhouse Gases from the Combustion Turbines.

Response II.a.: Please refer to General Response 2, above.

Comment II.a.i.: The Draft Permit Should Require Stack Testing At Least Annually of the Seven Pollutants for Which CEMS is Not Required.

Response II.a.i.: Please refer to General Responses 2 and 4, above.

Comment II.a.ii.: The Draft Permit Fails to Specify Monitoring Requirements for VOCs or Formaldehyde from the Combustion Turbines and DEP Should Establish a VOC to CO Ratio to Continuously Measure VOCs Using CO as a Surrogate.

Response II.a.ii.: As explained in General Response 2, above, VOC emissions from the combustion turbines are subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. The CAM requirements were inadvertently omitted from the draft TVOP but will be included in the final version of the permit. The VOC CAM plan for these units includes requirements for Tenaska to monitor catalyst outlet temperature, to perform catalyst inspections and sampling in accordance with Original Equipment Manufacturer (OEM) recommendations, and to perform VOC stack testing every two (2) years.

Regarding the establishment of a VOC to CO ratio, the Department has required Tenaska to develop CO/VOC correlation factors using CO CEMS data in order to assure compliance with permitted VOC emissions rates. Because incomplete combustion in fuel burning sources results in increases of both VOC and CO emission levels, DEP has discussed the development of CO/VOC correlation factors with Tenaska during the public comment period in order to include Title V Operating Permit conditions which utilize this relationship together with the facility's CO CEMs in order to establish an improved continuous compliance method for VOC emissions. These conditions will closely approximate VOC emissions based on CO CEMs readings.

Formaldehyde is a VOC, therefore the monitoring methods for VOC emissions, such as the CAM requirements and CO/VOC correlation factors discussed earlier, can also be used for formaldehyde. It should be noted that the TWGS is considered a minor source of formaldehyde emissions (less than 10 tons per rolling 12-month period).

Please also refer to General Response 2, above.

Comment II.b.: The Draft Permit Must Require Additional Monitoring and Maintenance To Assure Compliance with NOx Emissions from the Power Blocks, Sources 101 and 102 (Combustion Turbines).

The Draft Permit does not include monitoring and maintenance requirements for NOx emissions sufficient to assure compliance with applicable limits. Specifically, the DEP's Review Memo says that DEP's BACT determination for control of NOx was good combustion practices and installation of Selective Catalytic Reduction ("SCR"), and states that "Tenaska is required to":

- 1) continuously measure and record the SCR pressure differential;
- 2) continuously monitor and record the inlet and outlet temperatures;
- 3) continuously monitor and record the ammonia injection rate of the SCR;
- 4) conduct maintenance per the manufacturer's specifications; and
- 5) visually inspect the catalyst during planned outages and clean/replace as needed.

However, the Draft Permit fails to include any of these requirements.

Response II.b.: The requirements to continuously measure and record the SCR pressure differential and monitor and record the inlet and outlet temperatures were originally required in the draft version of Plan Approval PA-65-00990C. During the public comment period for the plan approval, Tenaska

commented and requested that the Department remove the pressure differential and temperature monitoring requirements for the turbine control devices. In the Comment and Response Document for the plan approval dated April 1, 2015, the Department responded as follows:

“Response: The requirement to monitor these parameters will be removed from the final plan approval. In instances where control devices (i.e. catalysts) are required but CEMS is not, monitoring physical parameters across the catalyst is used as a method to determine the operational effectiveness of the device. For the proposed project, the applicant is required to install CEMS for NO_x and CO (as well as ammonia). Operation of the CEMS for these pollutants indicates the SCR and oxidation catalyst effectiveness. CEMS monitoring for CO is representative of overall oxidation catalyst effectiveness and is therefore also a good indicator of VOC control.

Furthermore, since VOC emissions exceed the major source threshold, the permittee will be required to submit a complete Compliance Assurance Monitoring (CAM) plan for the oxidation catalysts pursuant to 40 CFR Sections 64.1 through 64.10 with the Part 70 (Title V) operating permit application. If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this plan approval may be in excess of the limitations specified in, or established pursuant to this plan approval, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.”

Therefore, the requirements to monitor and record SCR pressure differential, inlet temperature, and outlet temperature were never included in the final plan approval. These monitoring requirements were mistakenly included in the draft TVOP.

Section C, Condition #011, of the draft TVOP requires Tenaska to maintain comprehensive and accurate records of the manufacturer’s recommended maintenance schedule for each air contamination source and air cleaning device, to maintain records of all maintenance performed on each air contamination source and air cleaning device, and to record the ammonia throughput on a monthly and 12-month rolling basis. Failure to inject the proper amount of ammonia into the power block exhaust would certainly result in NO_x CEMS violations. The NO_x CEMS is a better indicator of compliance than the ammonia injection rate.

Comment II.c.: The Draft Permit Must Require Additional Monitoring and Maintenance To Assure Compliance with CO and VOC Emissions from the Power Blocks, Sources 101 and 102 (Combustion Turbines).

Response II.c. Please refer to General Response 2, Response II.a.ii., and Response II.b., above.

Comment II.d.: The Draft Permit Should Specify Exactly How Cooling Tower PM Emissions Must Be Calculated and Should Require Daily Monitoring of Total Dissolved Solids from the Cooling Tower Water Instead of Monthly Monitoring.

Response II.d.: Tenaska's PM calculation method for the cooling tower is presented in the TVOP application on page 114. The Department does not believe that this method must be specified in the TVOP as an operating permit condition. Tenaska is already performing daily monitoring of total dissolved solids from the cooling tower water as discussed above in Response 9 to Commenter 5.

Comment II.e.: The Draft Permit Sets Limits on Eight Pollutants from the Auxiliary Boiler But Does Not State the Method or Frequency Required to Monitor Any of Them, So the Draft Permit Does Not Assure Compliance With Limits As Required by the Clean Air Act.

Response II.e.: Please refer to General Responses 2 and 4, above.

Comment II.f.: The Draft Permit Sets Limits on Seven Pollutants from the Emergency Fire Pump Engine But Does Not State the Method or Frequency Required to Monitor Any of Them.

Response II.f.: Please refer to General Responses 2 and 4, above.

Comment III.: The Draft Permit Fails to Limit the Duration of Combustion Tuning, Which Could Lead to High Emissions Releases.

Response III.: Please refer to General Response 3, above.

Comment IV.: Tenaska Must Be Required to Report to DEP All Emissions Monitoring It Does to Determine Compliance with Permit Limits.

Response IV.: Please refer to General Responses 2 and 4, above.

Comment V: The Draft Permit Violates Pennsylvania Regulations Because It Fails to Contain a Compliance Schedule that Is Required Since the Tenaska Westmoreland Facility Has Been in Non-Compliance With the Clean Air Act for All 12 of the Last 12 Quarters.

Response V: Please refer to General Response 7, above.

Comment VI.: The Permit Contains Additional Errors. The Draft Permit contains additional errors that must be addressed in the final permit. In particular, Commenters note that the lettered subparts of Section E.1. #001 are out of order, with subsection "(c)" appearing between "(h)" and "(i)" rather than between "(b)" and "(d)." This, and any other errors, must be corrected in the final permit.

Response VI.: This error has been corrected in the final permit.

Comment VII.: Commenters Request A Public Hearing Before A Final Permit Issued Given the Numerous Substantive Deficiencies in This Draft Permit.

Response VII: Please refer to General Response 1, above.

36. Walt Vinoski – Citizen and Representative Eric Davanzo, submitted on behalf of the local community

November 2, 2025 (email)

Plan Approval PA-65-00990C Technical Review Memo Comments

Response to Comments on pages 2 – 33 of 58: It appears that this group of comments were made on the technical review memo dated December 16, 2014, for the original plan approval, PA-65-00990C. This document contains 58 pages (including special conditions) while the technical review memo for the TVOP contains only 29 pages. Nonetheless, the Department considers technical review memos to be final documents and not subject to revision.

Plan Approval PA-65-00990C Special Conditions Comments

Comment on page 34 of 58. Section 7.: Where are the cooling tower PM, PM₁₀, and PM_{2.5} limits?

Response: Section 7 contained facility-wide emission limits. Cooling tower PM, PM₁₀, and PM_{2.5} limits were included in Section 69 of this document as follows:

69. The emissions from the cooling tower shall not exceed the following [25 Pa. Code §127.12b]:

- (a) Total PM: 1.5 lb/hr or 6.57 tpy on a 12-month rolling basis.
- (b) Total PM₁₀: 0.75 lb/hr or 3.29 tpy on a 12-month rolling basis.
- (c) Total PM_{2.5}: 0.002 lb/hr or 0.009 tpy on a 12-month rolling basis.

These same emission limits were included for Source 105, Cooling Tower, on page 32 of draft Title V Operating Permit TV-65-00990 in Section D. Source Level Requirements, I. Restrictions, Condition #001.

Comment on page 37 of 58. Section 15.: Needs to include ammonia and ammonia slip.

Response: Section 15 is included in the draft TVOP ` under Section C. Site Level Requirements, V. Reporting Requirements, Condition #013. The condition states that “Emissions data including, but not limited to the following, shall be reported:...”, therefore ammonia is included as a pollutant that must be reported by Tenaska. Nevertheless, the condition has been revised to specifically include ammonia. It is worth noting that Tenaska has been reporting ammonia emissions and reported a facility-wide total of 15 tons of ammonia emitted for calendar year 2025 according to the Department’s records.

Comment on page 37 of 58. Section 16(b).: The malfunction notice needs to include all local emergency response agencies, including fire and ambulance companies, and to the community as immediately as possible, to reduce contamination, poisoning, health, safety, and to avoid death. Such a plan shall be made available to the surrounding communities.

Response: Section 16(b), as the commenter refers to it, is the malfunction reporting condition from Plan Approval PA-65-00990C. The malfunction condition in draft Title V Operating Permit TV-65-

00990 is included in Section C. Site Level Requirements, V. Reporting Requirements, Condition #014, and states the following:

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency, or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies, or incidents of excess emissions to the Department within three (3) business days of the telephone report.

The County agency would have the responsibility to notify local emergency response agencies, including fire and ambulance companies, as well as the community.

Comment on page 39 of 58: This plan approval is to allow construction and temporary operation of a combined-cycle, so this section must be updated. Why did it take Tenaska 8 years after the power plant was built to submit this application? In a real-life emergency situation, like the rupture of the ammonia storage tank, the community cannot trust Tenaska with their safety and long-term health.

Response: Please refer to General Response 6, above.

Comment on page 42 of 58. Section 42.: What are the results of these stack tests? Please provide them to Rep. Davanzo.

Response: Results of these stack tests are attached to this Comments and Response document in the form of Source Test Audit Review Memos (Memos) from the Department's Division of Source Testing and Monitoring (Source Testing) located in Harrisburg, Pa.

Please note that the original Memo dated November 1, 2019, shows that the testing performed in January 2019 on both Sources 101 and 102 showed the units exceeding the mass emission limit in pounds per hour for formaldehyde (HCHO). However, Tenaska challenged the results of the formaldehyde testing as invalid due to "errors in the sampling, sampling approach, and/or instrumentation during the initial stack test". Source 102 was retested for formaldehyde, as well as VOC, on March 20, 2019, and this test showed compliance with formaldehyde and VOC limits. The results of the Source 102 retest were deemed to be acceptable by Source Testing in a Memo dated September 28, 2023. Source 101 was retested for formaldehyde, as well as VOC, on May 23, 2019, and this test also showed compliance with formaldehyde and VOC limits. The results of the Source 101 retest were deemed to be acceptable by Source Testing in a Memo also dated September 28, 2023. Copies of all three (3) Memos are attached to this Comments and Response document.

Comment on page 42 of 58. Section 44.: Since a CEMS is required, and it measures CO2. Is this section should strongly state that it is referring to an independent third-party certification testing at every 25,000 hours of operation? Wouldn't it be more representative to require a third-party CO2 and other emissions testing prior to each combustor and hot gas path shutdown, as well as immediately after the combustor and hot gas path rebuild, to ensure true compliance? Such testing would help determine how much superalloy materials degraded and were emitted out through the turbine exhaust stacks.

Response: Tenaska is required to operate and maintain a CEMS for carbon monoxide (CO), not for carbon dioxide (CO₂), which is why the Department requires Tenaska to perform independent, third party stack testing for CO₂ every 25,000 hours of operation. This condition is included in the draft TVOP under Section E. Group Level Requirements, Group G001 Combined Cycle Combustion Turbines, II. Testing Requirements, Condition #011. The condition requires only testing for CO₂ and not for superalloy materials.

Comment on page 42 of 58. Section 45.: This section must be rewritten to cover ALL of the pollutants and not just three.

Response: Plan Approval PA-65-00990C required CEMS for nitrogen oxides, carbon monoxide, and ammonia emissions only. As explained in General Response 2 above, decisions on requiring CEMS for specific pollutants are typically made during the Plan Approval phase of facility planning before construction commences. The decision to require CEMS for nitrogen oxides, carbon monoxide, and ammonia was made after careful consideration, review, and approval by both the Department's New Source Review staff and the US EPA. The monitoring regime for non-CEM pollutants at TWGS is consistent with other sources in this class or category.

Comment on page 46 of 58. Section 69 through 74 on Page 47.: What type of continuous measuring and monitoring system will be used to measure the cooling tower evaporation, emissions, and blow-down pollutants? These Sections need to define online continuous measurement instruments, such as conductivity probes, sampling rates of phosphorous, zinc, copper, etc. pH, temperatures, biocide feed rates and duty cycle monitoring, validation of drift carryover, biological aerosol measuring (Legionella) and TDS.

Response: According to the technical review memo for Plan Approval PA-65-00990C, Tenaska proposed to utilize advanced drift eliminators for the mechanical cooling tower particulate matter as PM₁₀ Best Available Control Technology as well as limits of 1.5 lbs of PM per hr, 0.75 lbs of PM₁₀ per hr, and 0.002 lbs of PM_{2.5} per hr, respectively. These rates were based upon a 0.0005% drift rate and a maximum total dissolved solids concentration of 2,000 ppm based upon the National Pollutant Discharge Elimination System (NPDES) permit limit. Tenaska monitors and minimizes circulating water TDS to reduce potential particulate emissions and ensure continued compliance with the emission rates. This determination for the cooling tower was consistent with or more stringent than other plan approvals and sources identified in the RACT/BACT/LAER Clearinghouse at the time of plan approval issuance on April 1, 2015.

Comment on page 48 of 58. Section 78(a).: This section needs to be deleted so that only 78(b)(1) exists, and 78(b)(2) needs to be deleted.

Response: Part (a) of this condition needs to be retained in the permit so that it is clear what the alternative presented in part (b) of the condition is referring to, therefore this condition shall remain as written.

Comment on page 48 of 58. Section 79.: The first sentence needs to be restated: "These are the minimum requirements for the CEMS that will be used."

Response: This language was taken verbatim from 40 CFR Part 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines, Section 60.4345 and shall remain as written.

37. Austin Zigler – Manager, Environmental Programs for Tenaska Pa. Partners, LLC
October 31, 2025 (email)

Comments on Draft TV-65-00990

Comment 1: Section A, Site Inventory List, Source ID 104 (Emergency Fire Pump Engine)
Tenaska requests the throughput be revised to “19 gal/hr” to reflect the design fuel usage rate.

Response 1: This change has been made as requested.

Comment 2: Section A, Site Inventory List, Source ID 109 (Aqueous Ammonia Storage Tank)
Tenaska requests the throughput be revised to “228 gal/hr” to reflect the design pump rate.

Response 2: This change has been made as requested.

Comment 3: Section A, Site Inventory List, Source ID 110 (Circuit Breakers)
Tenaska requests the capacity be revised to “5598 lbs” to reflect the total SF6 capacity of the circuit breakers. A throughput rate is not applicable to these units.

Response 3: Due to the limitations of the Department’s permit generating system, it is not possible to list a capacity in Section A. without displaying it as a throughput rate. Therefore, the Capacity/Throughput rate will still display as “5,598.000 Lbs/HR”. However, a note has been added to the “Fuel/Material” column to state that this value is the “TOTAL SF6 CAPACITY”.

Comment 4: Section B, Condition #028

Tenaska requests Condition #028 be removed, and Source ID 109 be moved to the Trivial Activities List in Section H, as the facility is not subject to Risk Management Plan (RMP) requirements. Per 40 CFR §68.10(a), a stationary source is subject to Chemical Accident Prevention Provisions if more than the threshold quantity of a regulated substance is used in a process, as determined by 40 CFR §68.115, which goes on to reference the threshold quantities listed in 40 CFR §68.130. Further, 40 CFR §68.130 only includes a threshold quantity for aqueous ammonia with a concentration of 20% or more.

The aqueous ammonia used at TWGS has a concentration of less than 20% and is therefore not a regulated substance per 40 CFR §68.130 and as such, is not subject to Chemical Accident Prevention Provisions. Tenaska does not store or use anhydrous ammonia at the TWGS.

Response 4: Section B conditions are General Title V Requirements that are automatically generated by the Department’s permit system and cannot be removed or revised by regional permitting staff. The Department concurs that as an air contamination source which uses aqueous ammonia at a concentration of less than 20%, Source 109 is not subject to 40 CFR §68.10(a) or §68.115 or Risk Management Plan requirements. However, Source 109 will remain in the source inventory list.

Comment 5: Section C, Condition #015

Tenaska requests this condition be removed as it appears to be duplicative of Section C, Condition #031.

Response 5: Section C, Condition #015, is duplicative of Section B, Condition #031, and has therefore been removed from the initial TVOP as requested.

Comment 6: Section D, Source ID 104 (Emergency Fire Pump Engine)

Per TVOP Comment #1, Tenaska requests the throughout be revised to “19 gal/hr.”

Response 6: This change has been made as requested.

Comment 7: Section D, Source ID 109 (Aqueous Ammonia Storage Tank)

Per TVOP Comment #4, Tenaska requests this Section be removed and the Aqueous Ammonia Storage Tank moved to the Trivial Activities List in Section H.

Response 7: The Department believes Source 109, Aqueous Ammonia Storage Tank, does not qualify as a Trivial Activity and will keep Source 109 on the source inventory list of the TVOP.

Comment 8: Section D, Source ID 110 (Circuit Breakers)

Per TVOP Comment #3, Tenaska requests the capacity be revised to “5598 lbs.”

Response 8: Please refer to Response 3, above.

Comment 9: Section E, G001, Condition #006(i)(1)

Tenaska requests “@ 15% O₂” be added to the ppmvd limit for consistency with other limits in this Condition.

Response 9: This change has been made as requested.

Comment 10: Section E, G001, Condition #010 and #011

In accordance with the application submitted July 11, 2024, Tenaska requests the testing frequency for VOC, formaldehyde, PM and CO₂ be reduced to once per permit term. As referenced in the application, test results have been consistently within permitted limits. Ongoing compliance with VOC limits (and indirectly, formaldehyde, a component of total VOC), will be demonstrated via the Compliance Assurance Monitoring (CAM) Plan. The CAM program was established by EPA precisely for these situations, as a means for sources to monitor control devices and ensure they are operated in such a way to achieve emission limits as well as provide a method for practical enforceability for agencies to assess compliance. In addition to testing once per permit term, practical enforceability would consist of verifying the catalyst is operated within the temperatures included in the CAM Plan.

Emissions of PM and CO₂ are largely dependent on fuel quality and heat input. Due to the consistent quality of pipeline natural gas, emissions rates are also consistent, as demonstrated by past testing. Therefore, monitoring fuel usage is sufficient for demonstrating ongoing compliance between testing events.

For these reasons, Tenaska believes reducing the test frequency is warranted and compliance will be demonstrated through testing, catalyst temperatures, and catalyst management program (all of which comprise the CAM plan).

Response 10: The Department believes that more stack testing data is needed to ensure compliance with these emission limits before this request can be granted, considering this will be the first iteration of the TVOP. Therefore, stack testing Conditions #010 and #011 in Section E, Group G001 will remain as written.

Comment 11: Section E, G001, Condition #013

Tenaska requests Condition #13(a)-(d) be removed as they have already been completed as a condition of the Plan Approval(s).

Response 11: This change has been made as requested.

Comment 12: Section E, G004, Condition #001

The last paragraph of this Condition references “plan approval” and should be updated to “operating permit.”

Response 12: This change has been made as requested.

Comments on Technical Review Memo for TV-65-00990

The Department considers technical review memos to be final documents and not subject to revision. However, the comments on the technical review memo will be addressed in this Comment and Response Document.

Comment 1: Background, pg. 1

The second paragraph indicates TWGS is a major source of NO_x, CO, VOC, and GHG. TWGS is also a major source of PM₁₀ and PM_{2.5}.

Response 1: The Department concurs with this comment.

Comment 2: Background, pg. 3

The last paragraph indicates Source 109 is remaining a source in the TVOP due to RMP requirements. Per TVOP Comment #4, TWGS is not subject to RMP.

Response 2: Please refer to Responses 4 and 7, above to Comments 4 and 7 on draft TV-65-00990.

Comment 3: Additional Federal Requirements, 40 CFR Part 64, CAM Plan, pg. 14

The CAM Plan included with the application inadvertently stated oxidation catalyst outlet temperature would be monitored via thermocouples. The thermocouples are on the inlet to the oxidation catalyst and therefore, inlet temperature will be monitored. The indicator range has also been updated to reflect the max design operating temperature of the oxidation catalyst (800°F). A revised CAM plan is attached to this letter.

Response 3: The original VOC CAM plan for Sources 101 and 102 was inadvertently omitted from the draft TVOP. The revised CAM plan has been added to the final TVOP as requested.

Comment 4: Additional Federal Requirements, 40 CFR Part 68, pg. 15
Per TVOP Comment #4, TWGS is not subject to 40 CFR Part 68.

Response 4: As discussed in Response 4, the Department concurs that TWGS is not subject to 40 CFR Part 68.

Comment 5: Non-Attainment New Source Review, 40 CFR §81.339, pg. 21
The Memo indicates Westmoreland County is classified as nonattainment for 8-hour ozone, annual PM_{2.5}, and 24-hr PM_{2.5} NAAQS; however, per 40 CFR §81.339, both annual PM_{2.5} and 24-hour PM_{2.5} are in attainment.

Response 5: Per 40 CFR §81.339, Westmoreland County is currently designated as “Attainment/Unclassifiable” for 2015 8-hour ozone NAAQS, as “Unclassifiable/Attainment” for 2012 annual PM_{2.5} NAAQS, and as “Attainment” for 2006 24-hour PM_{2.5} NAAQS.

Department Initiated Changes

- It was brought to the Department’s attention that the requirements in the draft TVOP from 40 CFR Part 60 Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), pertaining to the emergency diesel-fired fire pump engine (Source 104), were outdated. The US EPA revised Subpart IIII following the final issuance of the Plan Approvals for TWGS. As a result, the draft TVOP contained references to sections of Subpart IIII which are now reserved. The conditions in the final TVOP have been updated accordingly to reflect the revised version of Subpart IIII.
- As discussed earlier in this Comment and Response document, the original VOC CAM plan for Sources 101 and 102 was inadvertently omitted from the draft TVOP. The revised CAM plan submitted on October 31, 2025, by Tenaska as part of their comments on the draft TVOP has been added to the final TVOP.
- As discussed earlier in this Comment and Response document, a new permit condition was added to the draft TVOP for the CO:VOC Correlation Factors to ensure continuous compliance with VOC emissions from Sources 101 and 102. In addition, Section E. Group G001 – Combined Cycle Combustion Turbines, Conditions #005 and #008 were revised. These changes are shown below with the revised language for Conditions #005 and #008 shown in bold type:

Section E.1. Condition #XXX (NEW) Operating permit terms and conditions.

To ensure continuous compliance with the steady state VOC emission limits of Conditions #006(c) and #007, the permittee shall use CO CEMS data as a surrogate for VOC emissions. The Correlated VOC Factors shall only apply during normal operations.

The CO:VOC Correlation Factors in the table below shall be used in conjunction with the Department-certified CO CEMS to demonstrate compliance with the aforementioned VOC emission limits.

Correlated VOC Emissions	CO:VOC Correlation Factor
ppm _{vd} @ 15% O ₂ (with duct burners)	3.67
ppm _{vd} @ 15% O ₂ (RACT III) ¹	3.67
ppm _{vd} @ 15% O ₂ (without duct burners)	6.11

The CO:VOC Correlation Factors will be used to calculate Correlated VOC Emissions in terms of ppm_{vd} @ 15% O₂ for comparison to the concentration-based emission limits. The Correlated VOC Emissions will also be used to calculate hourly mass emissions using the molecular weight of propane (i.e., 44.1 lb/lb/mole) for comparison to the mass-based emission limit.

Correlated VOC Emissions will be calculated as follows: CO CEMS data (ppm_{vd} @ 15% O₂), shall be divided by the respective CO:VOC Correlation Factor to determine the Correlated VOC Emissions (ppm_{vd} @ 15% O₂). For example:

$$\frac{\text{CO CEMS Conc. (w/o duct burners)}}{\text{CO:VOC Corr. Factor (w/o duct burners)}} = \text{Corr. VOC Emissions (w/o duct burners)}$$

$$\frac{2.0 \text{ ppmvd CO @ 15\% O}_2}{6.11} = 0.3 \text{ ppmvd VOC @ 15\% O}_2$$

The Department may approve an alternative methodology, in writing, for use as an indicator of compliance with the VOC emissions limit.

Section E.1. Condition #005 (REVISED) Operating permit terms and conditions.

Definitions:

- (a) Startup is defined as the period beginning when fuel begins flowing to the combustion turbine and ending when the combustion process, air pollution control equipment, and associated control systems have attained normal operating conditions.
- (b) Shutdown is defined as the period beginning when the combustion turbine exits DLN mode and ending when fuel flow ceases.
- (c) Combustion tuning is defined as adjustments made to gas turbine components to re-establish maximum efficiency and minimize emissions throughout the operating range following maintenance activities that affect turbine combustion dynamics and in preparation of seasonal ambient temperature regimes.

(d) A run back is a protective load shed that may result in operation below the emission compliance load point for a short period of time. The run back can be triggered during normal operation if the combustion turbine experiences a safety issue, or a system parameter indicates the need for equipment protection.

(de) Normal operation is defined as all times except startup, shutdown, ~~and~~ combustion tuning, **run back, and malfunction.**

Section E.1. Condition #008 (REVISED) Operating permit terms and conditions.

Startups, shutdowns, and combustion tuning:

(a) The durations of startups and shutdowns shall be minimized to the maximum extent possible.

(b) Total startup and shutdown duration for each combined cycle combustion turbine shall not exceed 390 hours in any consecutive 12-month period.

(c) Each startup event shall not exceed one and one half-hour in duration.

(d) Each shutdown shall not exceed one half hour in duration.

(e) Each run back shall not exceed one half hour in duration.

Conclusion

I recommend the issuance of an initial TVOP with a five (5) year permit term for the Tenaska Westmoreland Generating Station with the changes described in this document. This Comment and Response Document and the final TVOP will be forwarded to the US EPA for their review. The TVOP will have an effective date of fifteen (15) days after the date of final issuance.

AVOLIO

LAW GROUP, LLC.

117 N. Main Street
Greensburg, PA 15601
724.834.1002

Scott E. Avolio, Esquire
Eric H. Dee, Esquire
Daniel J. Hewitt, Esquire
Amber R. Leechalk, Esquire
Leslie J. Mlakar, Esquire (PA, WV)
Christopher T. Skovira, Esquire
William A. Brandstetter, II, Esquire (PA, WV)

Dominic Ciarimboli, Esquire (PA, FL)
Of Counsel

June 23, 2025

Eric Gustafson, Regional Director
PA Dept. of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222

Emily Greene, SW Regional Coordinator
PA Dept. of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222

RE: South Huntingdon Township

Dear Mr. Gustafson and Ms. Greene:

Please be advised that this office serves as the Solicitor for the South Huntingdon Township Board of Supervisors. The Board was recently approached by representatives of the Mountain Watershed Association and some local residents expressing concerns over the permitting process and conditions at the Tenaska Gas Plant Facility located in the Township. Residents who spoke at the May meeting of the Board expressed concerns about potential air quality issues. In my conversations with representatives of the Mountain Watershed Association and its affiliates, they expressed concerns about the permitting process for the Tenaska Plant.

At the meeting of the Board of Supervisors held on June 19, 2025, I was asked to submit this letter to the two of you in order to facilitate moving forward with the process of community involvement which, as explained to me, is already in process.

Please accept this letter as a request from the Board of Supervisors that DEP establish a stakeholder group, including potentially affected individuals, which would hold scheduled meetings with DEP staff to better understand the processes that will unfold regarding the current and future permits for the Tenaska Facility.

The Board of Supervisors has found Tenaska to be a very positive community member, and the Board would like to see the permitting process be as open as possible to any interested members of the community.

I understand that similar requests may be coming from the Mountain Watershed Association and affiliated advocacy organizations. Please add this request to that list.

Your consideration of this matter is greatly appreciated.

Very truly yours,

AVOLIO LAW GROUP, LLC



Daniel J. Hewitt
dan@avoliolaw.com

DJH/jlr

cc: Township of South Huntingdon

RECEIVED

October 29, 2025

OCT 30 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

Citizen Comments on Draft Title V Operating Permit No. 65-00990 (Draft TVOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

1. **We request a public hearing.** As you will see, my comments represent substantive changes that need to be made to this draft permit and, therefore, I am requesting the PA DEP hold a public hearing so our concerns can be heard via oral testimony as has been the case for other such permits.
 - a. We have been living with the construction and operation of this facility for almost a decade, and we deserve to have DEP hear our concerns.
 - b. We have serious concerns about how the Tenaska facility's pollution will impact our health, safety, and environment.
 - c. We have serious concerns about whether the Tenaska facility will comply with pollution laws like the Clean Air Act.

We request "substantive changes to the permit" as explained below:

2. **The Draft Permit Does Not Include Monitoring Provisions Sufficient to Determine Compliance with Emissions Limits, which is Required by the Clean Air Act.**
 - a. *The Draft Permit is deficient because it does not include monitoring requirements that are sufficient to ensure compliance with the limits in the permit. The Clean Air Act requires that a Title V Operating Permit must include in the permit itself monitoring requirements that are specific and frequent enough to show if the facility is complying with or violating the limits in the permit, but this permit fails to include this required monitoring.*
 - b. *The Draft Permit sets limits on emissions of seven pollutants (VOCs, total PM, PM10, PM2.5, sulfuric acid mist (H2SO4), sulfur oxides, or greenhouse gases) from the two combustion turbines (see p.37) but does not include sufficient monitoring requirements to assure compliance with the limits.*
 - c. *The Draft Permit must require additional monitoring and maintenance to ensure compliance with NOx, VOC, and CO emission limits.*
3. **The Permit Fails to Limit the Duration of Combustion Tuning, Which Could Lead to High Emissions Releases.**
 - a. *The Draft Permit's section restricting operating hours for "Startups, shutdowns, and combustion tuning" for the combustion turbines (page 39) are actually only limits durations of startups and shutdowns but not combustion tuning. The permit must be changed to limit duration for combustion tuning as well.*

4. Tenaska Must Be Required to Report to DEP All Emissions Monitoring It Does to Determine Compliance with Permit Limits.

- a. The Draft Permit does not require recordkeeping or reporting of all emissions data, and all monitoring that Tenaska does to determine compliance with permit limits for each source should be required to be reported to DEP. Otherwise, DEP and the public cannot readily access that information.

5. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

I grew up in Sutersville. As all small towns people are busy with their own lives and trust the government to keep them safe.

I had relatives that lived in Clarion and suffered greatly because of air pollution (all now deceased - all cancers)

I am not a "tech" person and cannot give you numbers and facts BUT I would expect our laws to be followed by any in shale gas development.

This plant needs to - At the very least - This plant needs to follow a strict monitoring schedule and these reports must be made available to the public. And why was this plant still operating on a construction permit for 9 years!

Name Terrie Baiko
Address 1521 Firehall Ave West Newton PA 15089
Phone Number 724 691 9285
Email address terriebaiko@gmail.com

Need a Public Hearing - Its only RIGHT

Mr. Eric Gustafson, Regional Director
DEP Southwest Regional Office
400 Waterfront Dr
Pittsburgh, PA 15222

Ms. Emily Green, Southwest Regional Coordinator
DEP Office of Environmental Justice
400 Waterfront Dr
Pittsburgh, PA 15222

Dear Mr. Gustafson and Ms. Green,

I live near the Tenaska gas power plant and I have concerns about the plant's current permit and the major operating permit they've applied for at your office. I am writing to request that you convene a series of community meetings, similar to the ones you held in Beaver County for folks living near the Shell ethane cracker plant. These meetings would be in addition to the public hearing that will be required as the plant seeks its Title V operating permit.

(cont. on reverse)

Sincerely,

Dennis H. Cain

Waryanka, Nicholas

From: Gorog, Mark
Sent: Tuesday, February 17, 2026 7:37 AM
To: Waryanka, Nicholas
Cc: Joseph, Thomas
Subject: FW: [External] Tenaska Title V Air Permit and additional protections

From: Teagan Goforth <teagan.goforth@gmail.com>
Sent: Saturday, February 14, 2026 10:44 AM
To: Gorog, Mark <mgorog@pa.gov>
Subject: [External] Tenaska Title V Air Permit and additional protections

ATTENTION: *This email message is from an external sender. Do not open attachments or click links from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

Hello,

I am writing today to urge DEP to add additional protective measures against the Tenaska facility beyond title V measures, like more limits on pollution and monitoring to keep Tenaska accountable and protect our communities.

As someone who lives in the county and has severe asthma, I take the air pollution here very seriously. I purposely limit my time outside when the AQI is over 40, which is quite often in Allegheny county. Our communities have the right to clean air and to not expose themselves to unnecessary harm. I would love to freely enjoy a nice day outside without knowingly damaging my health and life expectancy.

Beyond my personal experience, I have extensive research experience on air pollution and its effect on human health. Air pollution is known to cause developmental issues in children, lung and heart diseases, and premature deaths. It's estimated that the air quality here causes hundreds of deaths per year. Our communities deserve protection from these harms.

Again, I urge you to please take more protective measures against Tenaska to make our communities and environment safer and better for everyone.

Thank you for your time,
Dr. Teagan Goforth

RECEIVED

October 29, 2025

OCT 30 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

Citizen Comments on Draft Title V Operating Permit No. 65-00990 (Draft TVOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

1. **We request a public hearing.** As you will see, my comments represent substantive changes that need to be made to this draft permit and, therefore, I am requesting the PA DEP hold a public hearing so our concerns can be heard via oral testimony as has been the case for other such permits.
 - a. We have been living with the construction and operation of this facility for almost a decade, and we deserve to have DEP hear our concerns.
 - b. We have serious concerns about how the Tenaska facility's pollution will impact our health, safety, and environment.
 - c. We have serious concerns about whether the Tenaska facility will comply with pollution laws like the Clean Air Act.

We request "substantive changes to the permit" as explained below:

2. **The Draft Permit Does Not Include Monitoring Provisions Sufficient to Determine Compliance with Emissions Limits, which is Required by the Clean Air Act.**
 - a. *The Draft Permit is deficient because it does not include monitoring requirements that are sufficient to ensure compliance with the limits in the permit. The Clean Air Act requires that a Title V Operating Permit must include in the permit itself monitoring requirements that are specific and frequent enough to show if the facility is complying with or violating the limits in the permit, but this permit fails to include this required monitoring.*
 - b. *The Draft Permit sets limits on emissions of seven pollutants (VOCs, total PM, PM10, PM2.5, sulfuric acid mist (H2SO4), sulfur oxides, or greenhouse gases) from the two combustion turbines (see p.37) but does not include sufficient monitoring requirements to assure compliance with the limits.*
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4. Tenaska Must Be Required to Report to DEP All Emissions Monitoring It Does to Determine Compliance with Permit Limits.

- a. The Draft Permit does not require recordkeeping or reporting of all emissions data, and all monitoring that Tenaska does to determine compliance with permit limits for each source should be required to be reported to DEP. Otherwise, DEP and the public cannot readily access that information.

5. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

I live in the EJ community of West Newton. I am impacted by this facility and want a public hearing. We deserve to know what is happening and want transparency.

Pollution limits exceed standards set by the Clean Air Act in many cases and need to be corrected. Monitoring needs to be frequent, state of the art, and made available to the public.

The draft permit must be amended to be in compliance with the Clean Air Act. It has been 9 years that you have not done your job and made a big mistake by letting this go on for so long. Shame on you for not wanting us to be heard.

Name Joanne Hall
Address 1116 High St., West Newton, PA 15089
Phone Number 412-427-8962
Email address jjhall3@comcast.net

Waryanka, Nicholas

From: Jeff and Joanne Hall <jjhall3@comcast.net>
Sent: Sunday, November 2, 2025 2:25 PM
To: Waryanka, Nicholas
Subject: [External] Permit No 65-00990

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

Comments on Title V Permit No. 65-00990 for Tenaska PA Partners LLC's Tenaska Westmoreland Generating Station in Smithton, PA 15479

We would like to comment on the above permit. We believe there should be substantive changes to the permit based on the following..

The draft permit does not include monitoring provisions sufficient to determine compliance with emissions limits required by the Clean Air Act. It must include in the permit itself, monitoring requirements that are specific and frequent enough to show if the facility is in compliance with the limits of the permit. This permit fails to include this required monitoring.

The draft permit must require additional monitoring and maintenance to ensure compliance with NOX, VOC, and CO emission limits. The permit must be changed to reflect the DEP's Review Memo that requires Tenaska to monitor and maintain both the selective catalytic converter used to control NOX emissions and the oxidation catalyst used to control CO and VOC emissions.

The permit should require monitoring of total dissolve solids from the cooling tower water more frequently than monthly. Also, the Draft Permit sets limit on 7 pollutants from the auxiliary boiler and the emergency fire pump engine but does not state the method or frequency required to monitor any of them.

The permit fails to limit the duration of combustion tuning which could lead to high emission releases. This permit must be changed to limit duration for combustion tuning. Tenaska must be required to report to the DEP all emissions monitoring it does to determine compliance with permit limits. Each source should be required to be reported otherwise DEP and the public cannot access that information.

This is a new permit for a fairly new facility, and the limits and monitoring should be the best possible and reflect the state-of-the-art controls expected of a new facility which should include CEMS, continuous emission monitoring. We live in the Environment Justice Community of West Newton and are directly impacted by the air pollution from this facility. We are deeply concerned that a public meeting for impacted EJ communities has not been held as required. We ask that both a public hearing and a public meeting in the EJ communities be scheduled before any final decisions are made and the permit issued. There are serious and substantive changes that need to be addressed in this permit. Residents deserve and should have protections from air pollutants and it is your job to protect them. They have been operating without a Title V permit for 8 or 9 years which is a terrible oversight by your regulatory agency. Do the right thing and make sure this permit complies with all aspect of the Clean Air Act and protect the public and the environment.

Respectfully,

Jeffrey and Joanne Hall

412-427-8962

1116 High Street

jjhall3@comcast.net

West Newton, PA 15089

Comments on Title V Permit No. 65-00990 for Tenaska PA Partners LLC's Tenaska Westmoreland Generating Station in Smithton, PA 15479

On February 11, 2015, The DEP held a public hearing on the Tenaska Westmoreland Generating Station's Plan Approval Application right here in this room. I was here and the room was full. Some in favor to the plant but many in opposition. Comments, both at the meeting and later written, numbered 336, mostly from private citizens.

In April of 2015, the DEP issued the Plan Approval and authorized construction and temporary operation of the generating station, which went online in 2018. Tenaska is considered a major source of air pollution and is required to apply for a Title V Operating Permit. It never did until now. You gave them extensions for 7 years. Where were you? Why was this facility allowed to operate without a Title V permit for all these years? How did this happen? Who will be held responsible?

That being said, here we are again in 2026, and I would like to comment on this permit.

I believe there should be substantive changes to the permit based on the following..

The draft permit must require additional monitoring and maintenance to ensure compliance with NOX, VOC, and CO emission limits. The permit must be changed to reflect the DEP's Review Memo that requires Tenaska to monitor and maintain both the selective catalytic converter used to control NOX emissions and the oxidation catalyst used to control CO and VOC emissions.

The permit should require monitoring of total dissolve solids from the cooling tower water more frequently than monthly. Also, the Draft Permit sets limit on 7 pollutants from the auxiliary boiler and the emergency fire pump engine but does not state the method or frequency required to monitor any of them. This should be changed.

The permit fails to limit the duration of combustion tuning which could lead to high emission releases. This permit must be changed to limit duration for combustion tuning. Emissions during this time is typically higher and there should be limits. Will this be added to the permit?

The draft permit does not include monitoring provisions sufficient to determine compliance with emissions limits required by the Clean Air Act. It must include in the permit itself, monitoring requirements that are specific and frequent enough to show if the facility is following the limits of the permit. This permit fails to include this required monitoring.

Tenaska must be required to keep records and report to the DEP all emissions data and monitoring it does to determine compliance with permit limits. Each source should be required to be reported otherwise DEP and the public cannot access that information. Will this be added to the permit?

This is a new permit for a new facility, and the limits and monitoring should be the best possible and reflect the state-of-the-art controls expected of a new facility which should include CEMS, continuous emission monitoring. There also needs to be a schedule for this facility coming into compliance with the Clean Air Act. We can't wait another 7 years for the DEP to act. Will a time line for this be included in the permit?

I live in the Environment Justice Community of West Newton and directly impacted by the air pollution from this facility. Air modeling proves this (See Attached). My husband suffers from pulmonary fibrosis, a progressive, debilitating lung disease that is exasperated by PM 2.5 and other air pollutants emitted from the power plant. If monitoring and controls are not in place, his condition will worsen.

You need to do this right this time. You can change the permit and must consider the comments submitted. There are serious and substantive changes that need to be addressed in this permit. Residents deserve and should have protections from air pollutants, and it is your job to protect them. Make sure this permit complies with all aspects of the Clean Air Act and protect the public and the environment.

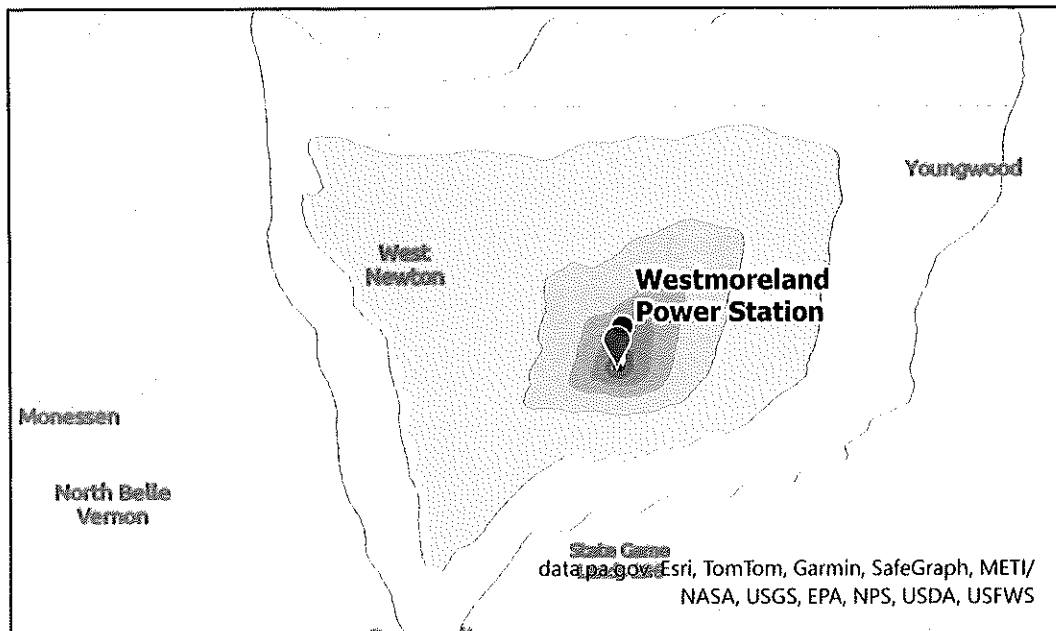
Respectfully,

Joanne Hall
1116 High Street
West Newton, PA 15089

412-427-8962
jjhall3@comcast.net

Modeled Relative Average and Maximum Airborne Pollutant Levels from the Westmoreland Power Station

**ENVIRONMENTAL
HEALTH PROJECT**
DEFENDING PUBLIC HEALTH SINCE 2012



Annual Average Concentration

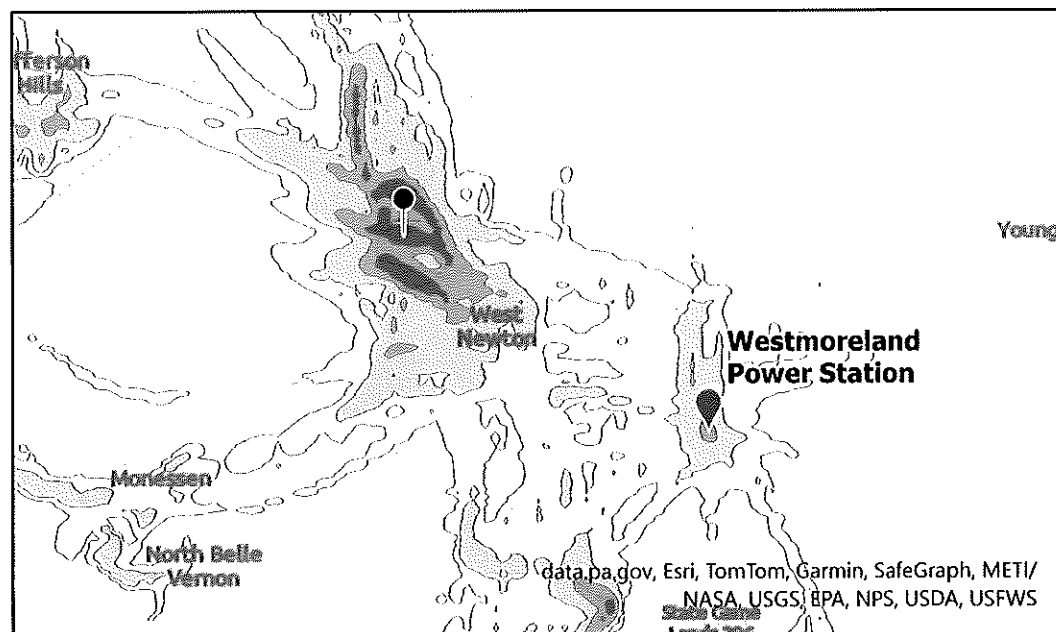
% of Highest Receptor

- >50%
- >25%
- >10%
- >5%
- >2.5%
- >1%
- >0.5%

Highest Receptor

This map shows the modeled average annual concentration of primary air pollutants from the Westmoreland Power Station.

The meteorological data used covered 5/1/2019-4/30/2020.



2-Year Maximum Concentration

% of Highest Receptor

- >50%
- >25%
- >10%
- >5%

Highest Receptor

This map shows the modeled maximum hourly concentration of primary air pollutants from the Westmoreland Power Station over two years.

The meteorological data used covered 3/1/2019-5/1/2021.

Modeling was conducted assuming constant emissions uniformly distributed across 25-50m above ground level at 40.175549, -79.697014.

This map provides an understanding of the geographical distribution of primary pollutants on a relative scale. It does not provide specific levels of pollutants expected at any location. Secondary pollution formation has not been modeled.

Data Source: NOAA High-Resolution Rapid Refresh Atmospheric Model
Modeling Conducted by the Southwest Pennsylvania Environmental Health Project using NOAA HYSPLIT
Contact Nathan Deron at nderon@environmentalhealthproject.org

Initial Title V Operating Permit Application (July 2024)

Potential to Emit

Tenaska Pennsylvania Partners, LLC
Westmoreland County, PA
Facility-Wide Potential to Emit

Pollutant	Combined Cycle Unit #1/#2 ¹ [ID 101/102]				Auxiliary Boiler [ID 031] (tpy)	Emergency Fire Pump Engine [ID 104] (tpy)	Cooling Tower [ID 105] (tpy)	Total (tpy)
	Normal Operation (8760 hrs) ² (tpy)	Normal Operation (8370 hrs) ³ (tpy)	Startup/ (390 hrs) ⁴ (tpy)	Facility Maximum ⁵ (tpy)				
NO _x	224.0	214.5	82.3	296.8	5.76	0.52	--	303.07
CO	135.0	129.3	508.0	637.2	20	0.08	--	657.16
SO ₂	22.5	21.5	--	22.5	0.32	1.06E-03	--	22.79
VOC	69.9	67.6	151.7	219.3	2.89	0.01	--	222.19
PM	84.9	82.3	--	84.9	4.00	0.01	6.57	95.44
PM ₁₀	84.9	82.3	--	84.9	4.00	0.01	3.29	92.15
PM _{2.5}	84.9	82.3	--	84.9	4.00	0.01	0.01	88.88
Sulfuric Acid Mist	15.2	14.5	--	15.2	4.94E-03	2.28E-05	--	15.19
NH ₃	193.8	185.7	--	193.8	--	--	--	193.84
HCHO	8.6	--	--	8.6	3.95E-02	6.89E-06	--	8.67
Total HAPs	21.1	20.3	--	21.1	9.93E-01	3.08E-03	--	22.07
CO ₂	3,630,836	3,478,323	--	3,630,836	62,713	95	--	3,693,644
CH ₄ ^c	434	418	749	1,167	1.18E+00	3.86E-03	--	1,168.13
N ₂ O	7	6	--	7	1.18E-01	7.72E-04	--	6.64
CO ₂ e	3,643,638	--	--	3,661,953	62,778	95	--	3,724,827

Many do not comply with Clean Air Standards.

Potential Health Effects Due to Inhalation of Air Pollutants

The table below is aimed at providing a summary of research about the most common air pollutants and should not be considered a comprehensive list of all toxic exposures. This chart may not include the health effects of high-level exposures. All the information is from Agency for Toxic Substances and Disease Registry (ATSDR) ToxProfiles. There is a rapidly expanding body of scientific evidence linking air pollution and health concerns.

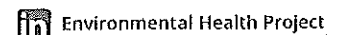
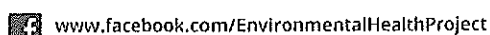
Chemical	Short-term Exposures, Acute Health Symptoms	Long-term Exposures, Chronic Health Effects
Volatile Organic Chemicals (VOCs)	Varies by chemical (see below)	Varies by chemical (see below)
Benzene	Headache, dizziness, fatigue, rapid heart rate, tremors, confusion, unconsciousness	Anemia, leukemia, irregular menstrual periods, increased chance of infection, potential impacts to fertility
Toluene	Headache, fatigue, confusion, dizziness, weakness, memory loss, nausea, loss of appetite	Permanent neurological effects, hearing and color vision loss, during pregnancy can lead to developmental effects such as reduced mental abilities and stunted growth
Ethyl Benzene	Eye and throat irritation, dizziness	Cancer, irreversible damage to the inner ear and hearing
Xylene	Eye, nose, throat, and skin irritation; difficulty in breathing and problems with the lungs; memory difficulties; stomach discomfort; changes in liver and kidney; headaches; lack of muscle coordination; dizziness; confusion; changes in balance	Permanent neurological effects
Polycyclic Aromatic Hydrocarbons (PAHs)	Eye and skin irritation, asthma attacks, acute cardiac events, fertility issues, in pregnancy higher rates of birth defects and lower body weights	Contribute to the development or worsening of pulmonary or cardiac diseases; lung, skin, and bladder cancer
Formaldehyde	Nose and eye irritation, increased risk of asthma and allergies, decrease in weight, stomach ulcers, liver and kidney damage	Asthma, eczema, nasal and throat cancer
Methylene Chloride	Decreased attentiveness, difficult hand-eye coordination, dizziness, nausea, tingling of toes and fingers, burning and redness of skin	Chance of cancer was seen in animals exposed, unsure still whether it can cause cancer in humans

Chemical	Short-Term Exposures, Acute Health Symptoms	Long-Term Exposures, Chronic Health Effects
Hydrogen Sulfide	Eye, nose, and throat irritation; difficulty breathing for asthmatics; headaches; poor memory; fatigue; balance problems	Respiratory distress or arrest if exposed to very high levels, headaches, poor attention span, poor motor function
Diesel Exhaust (contains VOCs and PM _{2.5})	Eye, nose, throat, and lung irritation; Headaches; dizziness; nausea	Worsening respiratory disease, lung cancer
Particulate Matter 2.5 (PM _{2.5})	Asthma attacks, acute bronchitis, heart attacks in individuals with cardiac disease	Reduced lung function, chronic bronchitis, neurodegenerative diseases
Ozone	Chest pain; coughing; throat irritation; congestion; increased symptoms in bronchitis, emphysema, and asthma	Contributes to development of chronic lung disease and worsens pre-existing bronchitis, emphysema, and asthma
Radon	None	Lung cancer
Carbon Monoxide (CO)	Decreased exercise tolerance, decreased vigilance, increased risk for cardiac ischemia in individuals with heart disease	Decreased exercise tolerance, decreased vigilance, increased risk for cardiac ischemia in individuals with heart disease
Nitrogen Oxides (NO _x)	Respiratory symptoms, worsening asthma	Respiratory disease, worsening heart disease

Some sources of shale gas emissions for air pollutants can include well pads, compressor stations, processing facilities, power plants, impoundments, injection wells, storage wells, landfills, oil refineries, etc. More information on these types of facilities can be found at [Illustrated Stages of Shale Gas Development](#). For more information on protecting your health, visit [Protecting Your Health from Shale Gas Development](#).

ENVIRONMENTAL HEALTH PROJECT

DEFENDING PUBLIC HEALTH SINCE 2012



2001 Waterdam Plaza Drive, Suite 201 ■ McMurray, PA 15317 ■ 724.260.5504
www.environmentalhealthproject.org ■ info@environmentalhealthproject.org

RECEIVED

October 29, 2025

OCT 30 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

Citizen Comments on Draft Title V Operating Permit No. 65-00990 (Draft TVOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

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5. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

I live in Sutersville which ~~is~~ is directly impacted by the operations of the Tenaska Plant. Sutersville is designated by ~~as~~ as an environmental justice community which requires a public meeting with PADEP in our community. This has not been done. ^{why?} I've worked with Mountain Watershed and EIP for many years. I agree with everything their engineers have found that are deficient in the draft permit. Thank goodness they are helping us because we feel abandoned by PADEP that by law is supposed to protect our health. We aren't asking to close the plant, we just want the required best protection be in the operating permit. Thank you. Also, how is it possible that they have been operating under a construction permit for 9 years?

Name Lisa Riley
Address 718 MILLER AVENUE
Phone Number 412-431-9608
Email address kresovich@gmail.com

Lisa Riley 10/29/2025

**Draft Title V Operating Permit No. 65-00990 for the Tenaska Westmoreland
Generating Station – Testimony from Lisa Riley Presented on February 4, 2026**

Lisa Riley
718 Miller Avenue
Sutersville, Pennsylvania 15083
kresovich@gmail.com
412-431-9608

SPELL
LISA RILEY
ADDRESS

My name is Lisa Riley and I live in Sutersville.

I am here because how Tenaska operates its ^{generating} power station affects my family's and my community's health. ^{can be}

Some local residents have stated that they don't smell or see any pollution from the facility, but it is actually the pollutants that you don't see or smell that are most harmful. The facility has a right to operate, but it must follow all regulations in order to protect our health.

I am concerned the facility has been in noncompliance with high priority violations of its permit for the last 12 quarters. Despite this, there has been only 1 enforcement action in the last 5 years on September 16, 2022, and their total penalty paid has only been \$14,997

^{the DEP} I am asking ^{the m} you to address the detailed technical deficiencies in the draft permit that are identified in comments provided to ^{ENVIRON} DEP from the Environmental Integrity Project and ^{me} Mountain Watershed Association via letter dated November 3, 2025 on which I was also a signatory.

On a high level I want to mention, two items in the draft permit ^{that} must be revised:

First, it must include provisions to assure all emissions restrictions have not only sufficient monitoring requirements but, also recordkeeping and reporting requirements sufficient to assure compliance with applicable limits.

^{and} Second, it must include a compliance schedule, since an operating permit in Pennsylvania cannot be issued to a facility that is out of compliance with the Air Pollution Control Act, the Clean Air Act, and other regulations unless the operating permit contains "an enforceable schedule requiring the source to attain compliance as soon as possible".

^{to DEP for} Thank you for allowing us to speak on this important matter.

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5. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

I live within the maximum short term impact area for emissions. I am very concerned that this plant has been able to operate for 9 years without a Title V Permit. This is unacceptable as this plant discharges within environmental justice areas. These communities always bear the burden of energy extraction and production. The Draft permit MUST include monitor provisions that show compliance with limits required by the Clean Air Act. I strongly agree the permit must be changed to limit degradation for combustion turning. The public NEEDS the opportunity to be heard and represented.

Name Catherine Anderson

Address 2900 Schwirian Dr. Elizabeth PA 15037

Phone Number 412 302 7014

Email address cathjanderson@verizon.net

RECEIVED

October 29, 2025

OCT 30 2025

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Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

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Catherine Anderson
2900 Schwirian Dr.
Elizabeth PA 15037

February 2, 2025

Thomas Joseph tjoseph@pa.gov
Eric Gustafson egustafson@pa.gov
Pennsylvania Department of Environmental Protection
Southwestern Regional Office
400 Waterfront Dr.
Pittsburgh PA 15222

RE: Public Comment on Proposed Air Permit for Tenaska Westmoreland Generating Station (65-00990)

Dear DEP Representatives,

I am a resident of Elizabeth Township living approximately 6.5 miles from the Tenaska Station. I am seriously concerned that our community, along with many others in the Monongahela River valley is dealing with the cumulative effects of many different energy projects of which the Tenaska Station is only one. For generations our environment has been degraded by mining, gas extraction and transmission and power plants. This costs all of us in terms of health effects, quality of life and a degraded environment.

Although I do not understand what "out of compliance" truly means, I see on the Detailed Facility Report published by the EPA, that Tenaska has been "out of compliance" for the last 12 quarters with violations every quarter. Given that as well as the fact that the plant has been operating for nine years without a permit I strongly recommend substantive changes to the permit including:

MONITORING PROVISIONS sufficient to determine compliance with emissions limits. It must include monitoring requirements that are specific and frequent enough to determine if it is complying with limits of the permit.

REPORTING EMISSIONS MONITORING DATA TO THE DEP: all monitoring data must be reported to the DEP to ensure compliance with permit limits.

BEST AVAILABLE CONTROL TECHNOLOGY must be used to reduce emissions as much as possible and to reflect state of the art controls for a new power plant.

COMBUSTION TUNING must be limited to curtail high emissions releases.

I also am a signatory to comments provided to DEP by The Environmental Integrity Project and The Mountain Watershed Association on November 3, 2025. I request that you take those comments into consideration in the Draft Permit.

Thank you for the opportunity to comment via this hearing.

Catherine Anderson

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5. **This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.**

I live in the impact area of this plant. It's vitally important this plant operates within the limits of the permit. This plant will add to the negative cumulative effect to already heavy pollution the fracking industry produces. The people living the impact area deserve clean air, it's a right, given by the Constitution of the Commonwealth of Pennsylvania. Please provide a Public Hearing for the residents of this area. The effected residents have not been given a chance to comment — this is wrong. DEP = Department of Environmental Protection → DO YOUR JOB! This plant should be forced to have a CIMS!

Name David Holliday
Address 327 Karen Drive Elizabeth PA 15037
Phone Number 724.444.4437
Email address dpholliday@hotmail.com

David Holliday
327 Karen Drive
Elizabeth, PA 15037
dpholliday@hotmail.com

February 2, 2026

Thomas Joseph: tjoseph@pa.gov
Eric Gustafson: egustafson@pa.gov
Pennsylvania Department of Environmental Protection
Southwestern Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222
(delivered via email – Feb 2, 2026)

Re: Public Comment on Proposed Air Permit for Tenaska Westmoreland Generating Station (65-00990)

Dear DEP Representative,

I am writing as a resident of Elizabeth Township, to express serious concerns regarding the proposed air permit for **Tenaska Westmoreland Generating Station**. Elizabeth Township is directly affected by the air pollution of this plant. My primary concern is the potential impact on **public health**, particularly for vulnerable residents such as children, older adults like me, and individuals with existing respiratory or cardiovascular conditions. This plant has been operating under a plan approval construction permit for 9 years which is an injustice to the residents subjected to its air pollution.

The proposed permit would allow emissions of pollutants that are well-documented to contribute to adverse health outcomes. Our area is already burdened by unhealthy air quality by multiple major pollution sources. Even when emissions comply with regulatory limits, **cumulative exposure**—especially in our area—can increase risks of:

- Asthma attacks and chronic respiratory irritation
- Cardiovascular stress
- Worsening symptoms for individuals with COPD or other lung diseases
- Increased emergency room visits during high-pollution days
- Long-term risks associated with particulate matter and hazardous air pollutants

Residents in our area already experience higher-than-average asthma rates, frequent odor complaints, and pollution from multiple nearby industrial sources. The Tenaska Westmoreland Generating Station is yet another pollution source impacting our area. Adding another source of emissions raises serious concerns about whether DEP's permitting process is adequately protecting public health.

I respectfully request that DEP:

1. **Conduct a cumulative impact assessment** that considers existing pollution sources and health burdens in our community.
2. **Require the facility to use the best available control technology (BACT)** or more protective alternatives to minimize emissions. This is a new Title 5 permit for the facility; therefore, the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.
3. **Increase air monitoring**, including publicly accessible real-time data, to ensure transparency and accountability.
4. **Require compliance schedules:** The Tenaska facility had been in non-compliance with the Clean Air Act for all 12 of the last 12 quarters, but the Draft Permit fails to include a schedule for when and how they will comply.
5. **Require monitoring data to be submitted to the PA DEP:** The Draft Permit does not require recordkeeping or reporting of all emissions data, and all monitoring that Tenaska collects to determine compliance with permit limits for each source should be required to be reported to DEP. Otherwise, DEP and the public cannot readily access that information.
6. **Hold an additional public hearing** if significant changes to the permit occur or if new information becomes available
7. **Evaluate operational options** that would reduce exposure to nearby residents.

DEP's mission includes protecting the health and safety of Pennsylvania residents. Approving a permit without fully addressing the potential health impacts would undermine that mission. Our community deserves clean air, transparent oversight, and assurance that industrial development will not come at the cost of our well-being.

Thank you for considering my comments. I ask that you prioritize the health of residents as you evaluate this permit. Please include this letter in the official public record for permit number [65-00990].

Sincerely,

David Holliday

RECEIVED

October 29, 2025

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Attention: Nick Waryanka and Eric Gustafson

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DEP, SOUTHWEST REGION

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5. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

We would like a public hearing where we would have the opportunity to express our concerns and get questions answered about the permit. The mere fact that this facility is still operating on a construction permit nine years after opening is enough to raise many questions and concerns. ~~deleted~~

~~As~~ As a family living in this community with young children I want to make sure we have the opportunity to share these concerns. This plant is within two miles of where ~~our~~ children will go to school and ~~four~~ miles of our home. We want the opportunity to keep our families safe and to be a check in place before a permit is issued. We are owed this right.

Name KALEIGH & ZACHARY SHUSTER

Address 166 NIGHTMAN LN

Phone Number 724-689-6245 and 724-493-6040

Email address KERUFFNER@GMAIL.COM ZSTEELERS@GMAIL.COM

Hello, My name is Zachary Shuster.

166 Nightman Lane

I live on Nightman Lane in Smithton, just a couple of miles from the Tenaska power plant. My wife Kaleigh and I have two small children, age 1 & 4. We work hard to do our best for them. We give them healthy food. We limit screen time. We take them outside whenever we get a chance. Most importantly, we try to teach them to be good people. To be respectful. To care for others.

As I said, we live within a couple miles of the Tenaska power plant. Our children will go to school within walking distance of the plant. They will have recess, play sports, and live the vast majority of their lives within miles of the plant.

The EPA website states that the plant has been out of compliance for the last 12 quarters, listing it as a "high priority violation". This means that for the last 12 quarters, my family has been exposed to toxins in the air higher than those established by the clean air act. As far as I understand, there is no plan or timeline in place for them to come into compliance.

The Title V permit can be written to ensure they are following federal and state guidelines on air pollution, and it determines what will happen if they don't. As the Title V permit stands currently, it lacks information about specific concerns previously highlighted from the DEP's own review memo. It lacks specific details on how frequently testing is to occur. It lacks information about how that testing is to be recorded and subsequently reported to the DEP. It lacks information on how the plant will be held

accountable if they are out of compliance, which they have been for the past 12 quarters.

Please strongly consider these changes before issuing a permit that could significantly limit our ability to keep our families and communities safe.

- The permit should, at a minimum, specifically outline the federal standards, according to the Clean Air Act, on how frequently testing should be conducted, what the specific pollution limits are, and how records should be kept and reported to the DEP and the public.

(Disclosure of their air quality reports to DEP and the public needs to be explicitly stated to ensure we will have the ability to stand up and protect our children and our community.)

- It also needs to include a detailed plan and timeline for remediation should it fail to meet the standards listed there-in.

I am concerned with the past performance of the plant. Are the operators not concerned with remaining in compliance with the Clean Air Act standards? Do they not deem it necessary to provide clean air to our community? Specific deadlines, timelines, and consequences should be a top priority in this document so we retain the ability to protect ourselves from toxic emissions.

Is there some benefit to them in not being in compliance?

I don't have a problem with the plant being there. We need electricity, and I'm glad that they've given jobs to some community members.

But I don't want my family, my children, to have an increased risk of cancer, asthma, heart disease, and lung disease.

Please, for the sake of my family and the families of everyone living close to this plant, make the necessary changes to ensure we are breathing clean air, air that does not have pollutants higher than the thresholds that scientists and the EPA has decided is safe. We can not protect ourselves from these pollutants. We can't control the quality of the air we live in. But you can. It's your job. Please, I ask you to make sure the air is tested frequently enough, that the results are reported regularly to the EPA, and that effective consequences exist to keep the plant in compliance. Thank you!

*and to keep
us
healthy*

[illegible]

Tenaska Westmoreland Title V Permit

Date of Hearing: February 4, 2026

Citizen Public Hearing on Draft Title V Operating Permit

65-0090

DRAFT TVOP

For Tenaska Pennsylvania

Partners LLC's

Tenaska Westmoreland Greensburg Station Located at 446 Smithton Pike, Smithton PA 15479

South Huntingdon Township, Westmoreland County

Location: Huntingdon Place (Turkeytown Fire Hall), West Newton, PA

Public Testimony by Nancy Ivan, resident of West Newton , PA

"Good evening. My name is Nancy Ivan , and I am a resident of West Newton Borough.. I am here to formally oppose the draft Title V Operating Permit for the Tenaska Westmoreland Generating Station.

First, we must address the timeline. Tenaska has been operating on a 'temporary' basis for **nine years**. Their initial Plan Approval was issued in April 2015. This 'shakedown' period has been extended repeatedly, allowing a major pollution source to avoid the permanent, federal oversight that a Title V permit requires.

Second, this facility is a chronic violator. According to EPA Registry ID **110064115598**, Tenaska has been in a state of **non-compliance for the last 12 consecutive quarters**. For three straight years, this plant has failed to meet Clean Air Act standards. The DEP cannot legally issue this permit without a binding, enforceable **Compliance Schedule** to remediate these violations.

Third, the draft permit is a 'hollow' document. Section 504(c) of the Clean Air Act requires permits to include monitoring that 'assures compliance.' Yet, this draft lacks **Continuous Emissions Monitoring Systems (CEMS)** for all key pollutants and contains no site-specific monitoring in the West Newton valley.

This is especially dangerous because of our topography. Air modeling shows that the West Newton valley acts as a basin that **accumulates direct particulate matter**. Your own draft permit allows for **92.2 tons of particulate matter** and **222.2 tons of Nitrogen Oxides** per day. In a valley basin like ours, these aren't just numbers—they are health risks trapped at the street level where our children play and senior citizens live.

I demand that the DEP deny this permit until it includes:

1. **Site-specific, real-time monitoring** in the West Newton valley and neighboring communities of Wyano, Smithton, Yukon, Ruffsdale and Buena Vista in Allegheny County.
2. **Continuous Emissions Monitoring** with a public, digital reporting portal.
3. A **strict compliance schedule** to address the 12 quarters of violations.

Thank you."

Nancy Ivan

320 N. Water Street

West Newton, PA 15089

Email: nivan.eatright@gmail.com

412-298-9194

RECEIVED

October 29, 2025

OCT 30 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

Citizen Comments on Draft Title V Operating Permit No. 65-00990 (Draft TVOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

1. **We request a public hearing.** As you will see, my comments represent substantive changes that need to be made to this draft permit and, therefore, I am requesting the PA DEP hold a public hearing so our concerns can be heard via oral testimony as has been the case for other such permits.
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 - b. We have serious concerns about how the Tenaska facility's pollution will impact our health, safety, and environment.
 - c. We have serious concerns about whether the Tenaska facility will comply with pollution laws like the Clean Air Act.

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5. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

The Citizens of this community should have a right to have input to say how this permit is finalized. I feel this plant was forced into a Residential area. The noise and pollution they are releasing. In the future Residence health & environment they need to follow all dep Regulations (NO Exceptions) Think of the people the Children that Live in this Area. We deserve to have a Citizen Right to speak.

Name Wanda Greenawalt

Address 360 Menden Rd Smithton PA 15479

Phone Number 724-872-7710

Email address dwgreenawalt@zoominternet.net

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This permit should have been written ten years ago.

this is wrong.

The Tenaska Power Station is a top polluter and is getting away with it.

I live in the affected area and am very ~~upset~~ upset that my health and environment are being ignored.

I want the draft title v to be written to include all the necessities listed and the results made available to me.

Name Dianne B. Walters

Address 1212 Pinewood Rd, Irwin, PA 15642

Phone Number 724 989 1820

Email address Dwalters2001@aol.com

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I ask that the DEP hold a public hearing. People who have to breathe the air in this community deserve a public hearing to air their concerns. Without fence line monitoring that the community can see & follow - there is no way to be sure that the air they are breathing is safe. People matter! No one in this community cares if it takes the DEP time to GET IT RIGHT! This permit has waited over 9 years - it can wait long enough to hear from the community. I Demand CIMS monitoring!

Name Mary Lou Mills

Address 1007 Thomas St Monongahela, PA 15063

Phone Number 352-552-2417

Email address m/mscarlatti@gmail.com

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REAL PROBLEMS EXIST — HELP!

Near DEP and Gov. Shapiro:

I voted for the Governor and am now somewhat disappointed at your whole approach to our Earth and health.

→ Please schedule the Public Hearing!

I and many others will attend. We are caring for each other's health and the

Earth of which we are part... Our Home!

Name Dennis A. McAndrew

Address 327 KAREN DR, Elizabethtown PA 15037

Phone Number 724 444 4434

Email address dennismcandrew@yahoo.com

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As land adjoining neighbors of the
plant, we have health concerns for
our family.

Name Keith Hughes & Lori Hughes
Address 175 Davis Rd Smithton Pa 15479 (off of Smithton Pike)
Phone Number 724-680-3704
Email address royal oaks fyne foods @ yahoo . com . 38 acres w/ ponds + streams.

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Insufficient monitoring, needs to be done on a frequent basis, to ensure maintenance & compliance with NO_x emissions. I live next to the plant. Readings need to be made public. I live there!

Name

John Momyer

Address

525 Smithton Pike Smithton PA

Phone Number

412-877-3457

Email address

johnmoyer@gmail.com

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Emission releases need monitored
on a frequent basis with emission
limits required by the Clean Air Act.
These need monitored + tracked on a
regular basis. I live within a
half mile of the facility. Must be
continuous monitoring published
and available to the public. I've
had constant allergies and cough
since I have moved here 3 years ago.

Name

Sandra Momyer

Address

525 Smithton Pike Smithton PA

Phone Number

724 69 1-9496

Email address

Sandie.Sweets777@yahoo.com

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I'm a resident of West Newton, PA.
There is concern with the Tenaska permit
for monitoring and record keeping. The DEP
will make the needed monitoring changes.
Items showed in the original review
apparently were missed in the original draft.
A public hearing is needed and would
be appreciated for your concern to help
our communities stay safe & healthy.

Name Jocelyn McLann
Address 100 S. 6th St. West Newton, PA 15089
Phone Number 724-872-7994
Email address jociebob@outlook.com

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We Are AN Elderly Couple Who ARE
CONCERN ABOUT CLEAN AIR FOR OUR HEALTH.
We would like to see the government
AGENCIES TO MAKE SURE THAT THE
TENASKA PLANT IS OBEYING THE LAW.

Name RICHARD AND NANCY NEEL
Address 30 DERR RD West Newton PA 15089
Phone Number 724 872-6129
Email address SSPROUTS@COMCAST.NET

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5. **This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.**

I am from West Newton, PA. I have ~~health~~ concerns that the plant is not in compliance with the Federal Clean Air Act. I have health issues (asthma) and I feel the effects (at times) & I personally feel it is from the pollutants at this plant.

I am concerned about the monitoring at the plant. I feel that the monitoring should be more frequent, and on a continuous basis.

Name Terri Sims

Address 204 S 5th St. West Newton, PA 15089

Phone Number 724-872-4175

Email address terrisims@hotmail.com

RECEIVED

October 29, 2025

OCT 30 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

Citizen Comments on Draft Title V Operating Permit No. 65-00990 (Draft TVOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

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I AM A RESIDENT OF WEST NEWTON, PA,
WHICH HAS BEEN IDENTIFIED AS A
"ENVIRONMENTAL JUSTICE AREA."

I REQUEST THE OPPORTUNITY FOR A PUBLIC
HEARING WHERE RESIDENTS AND STAKEHOLDERS
WOULD BE ALLOWED TO GATHER AND VOICE
THEIR CONCERNS.

Name JAMES SIMS
Address 321 N. WATER ST. WEST NEWTON, PA 15089
Phone Number 724-872-5453
Email address army379@yahoo.com

October 29, 2025

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WE REQUEST A PUBLIC HEARING.

TENASKA SHOULD NOT SELF MONITOR.

TENASKA REPORTING OF POLLUTANTS SHOULD
BE KEPT RECORDS THAT ARE TRANSPARENT.

THE DEP DRAFT IS INSUFFICIENT.

THE TENASKA PLANT IS INSUFFICIENTLY
MONITORED.

THE PLANT NEEDS CEMS INSTALLED.

Name LINDA POCHATSKA

Address 818 ROLLING HILLS RD RUFFS DALE PA 15679

Phone Number 724.696.9421

Email address LPCHATSKA@GMAIL.COM

RECEIVED

OCT 30 2025

October 29, 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

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GOT ASTHMA & ALLERGIES.

HUSBAND HAD PARKINSON'S AND CANCER.

Name JOAN KODRIN
Address 405 BELLS MILLS ROAD - WEST NEWTON, PA 15089
Phone Number 724-722-3843
Email address _____

RECEIVED

OCT 30 2025

October 29, 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

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The facility, any facility, should follow the letter of the law, as to what their permit reflects. Any testing should also be made available for the public to see any and all results.

The Draft Permit ^{or plan approval} should be only 1 year or ^{up to} 18 months long — not 2 years.

DEP should have a public hearing so all residents can air their concerns.

Constant monitoring of emissions should be done all the time, not sporadically, to best insure compliance to regulations by DEP/EPA.

Areas surrounding plant should have monitors in place to alert residents of pollutants they are exposed to.

Name DEBORAH M. FRANZETTA

Address 308 BELLS MILLS ROAD WEST NEWTON PA 15089

Phone Number 724/722-3695

Email address ~~franzetta@yukonwultz.com~~
franzetta@yukonwultz.com

October 29, 2025

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

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Air Quality
DEP Southwest Regional Office

Citizen Comments on Draft Title V Operating Permit No. 65-00990 (Draft TVOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

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TV-65-00990

I am very concerned about my two
grandchildren that have asthma and
could be caused by Tenaska criminal
negligence

Please look at attached
presentation

We are requesting a public hearing

Name Alessandro Cerretti
Address 218 Pittsburgh Pike, Rt 101 Dale, PA 15670
Phone Number 724-635-3295
Email address apcerretti@gmail.com

October 29, 2025

RECEIVED

Hand-delivered comments to SW Regional Office
Attention: Nick Waryanka and Eric Gustafson

OCT 30 2025

DIRECTOR'S OFFICE

DEP SOUTHWEST REGION

Citizen Comments on Draft Title V Operating Permit No. 65-009-99 (Draft VOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County.

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5. **This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.**

I share the TENASKA Air shed for trips for pleasure or for business - in that sense I'm a stakeholder in this facility. It is crucial that complete records be kept of Emissions data, AND that the monitoring be continuous! These data must be reported to the DEP continuously. THE TECHNOLOGY EXISTS (CEM_s) Afflicted Environmental Justice communities need to have their concerns heard (Sutersville and West Newton). A public hearing on this permit is necessary and fair to all parties.

What's emitted at TENASKA does NOT stay at TENASKA.

Name Janet Roslund
Address 1007 Thomas St. Monongahela PA 15063
Phone Number 352 552-2418
Email address mmotenaj@gmail.com

✓ Better
copy

Janet Roslund
1007 Thomas Street
Monongahela, PA 15063
jnmtenaj@gmail.com
352-552-2417

Citizen Public Hearing, Comments on Draft Title V Operating Permit
NO 65-00990 (Draft TVOP) for Tenaska Pennsylvania Partners LLC's
Tenaska Westmoreland Generating Station, located at 446 Smithton
Pike, Smithton, PA 15479, South Huntingdon Township,
Westmoreland County

TO: Department of Environmental Protection

I am writing as a property owner in Elizabeth Township concerned about air quality.

The **Tenaska Power Plant** proposed Title V Air Permit is especially worrisome to me in two regards.

First: The Draft Permit does not have adequate monitoring requirements that would secure compliance with the emission limits in the permit. Emissions include VOCs, Total PM, PM10, PM 2.5, CO2, NOx, CO and Sulfuric Acid Mist, **ALL** with established emissions limits, but WITHOUT sufficient monitoring that assures compliance with the limits.

Second: The Draft Permit has no requirement for Recordkeeping or Reporting of the monitored emissions data!

Why Be Concerned:

Each emitted pollutant is detrimental to human and/or environmental health (see the CHPNY Compendium, October 2023.) Harmful effects are magnified when limits are exceeded.

Request for Remediation of Deficiencies

I request that the DEP make the following additions to the Tenaska Title V permit.

- 1) As a new facility, state-of-the-art monitoring equipment shall be installed to measure each pollutant for which limits have been established. Monitoring should be continuous.
- 2) All data that emission monitors collect must be RECORDED and REPORTED to the DEP. Because of the immediate impact pollutants can have on public health, real-time reporting to DEP should be enforced.

Respectfully submitted,

Janet Roslund

RECEIVED

OCT 30 2025



Unitarian Universalist Congregation of Smithton (UUCS)

P.O. Box 568

Smithton, PA 15479-0568

Phone: (724) 872-5056 Email: uucofsmithton@gmail.com

DIRECTOR'S OFFICE
DEP, SOUTHWEST REGION

PA-DEP

ATTN: NICK WARYANKA

28 October 2025

We are the Unitarian Universalist Congregation of Smithton, Pennsylvania. We are located on 251 Second Street in Smithton, Pennsylvania our building is near the Tenaska Westmoreland Generating Station located at 446 Smithton Pike, Smithton.

We would like to address the upcoming pending Title V permit for the operation of the facility. Title V Permits are legally enforceable documents designed to improve compliance by clarifying what facilities must do to control air pollution.

Our congregation fully supports a decision where individuals are provided the opportunity for a public hearing where residents and stakeholders would be allowed to gather and voice their concerns.

Our Unitarian Universalist theological and spiritual grounding guides us to uphold an ethic of intergenerational justice in relation to access to, use of and preservation of natural resources. We affirm that all people deserve a healthy and safe environment wherever they live, work, play, worship, and go to school. Human beings are part of the natural world and are affected by environmental decisions both unequally and unpredictably.

On Behalf of the members of this congregation:

Rev. Tasha N. Brownfield - Minister

Email: tasha.brownfield8383@gmail.com

James A. Sims- UUCS Board President

Email: army379@yahoo.com

UUC of Smithton
P.O. Box 568
Smithton, PA 15479-0568
724-872-5056 uucofsmithton@gmail.com

Department of Environmental Protection
Commonwealth of Pennsylvania

February 4, 2026

The Unitarian Universalist Congregation of Smithton (UUCS), a member congregation of the Unitarian Universalist Association. Our building is located in the borough of Smithton, PA we are located near the Tenaska Power Plant Facility.

Our congregation would like to voice concern in the upcoming decision for the Tenaska Title V Operating Permit. The Key points and concerns pointed out by the environmental oversight groups need to be addressed. We live, work and worship in this community. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

As pointed out:

***The Draft Permit Does Not Include Monitoring Provisions Sufficient to Determine Compliance with Emissions Limits, which is required by the Clean Air Act.**

***The Permit Fails to Limit the Duration of Combustion Tuning, Which Could Lead to High Emissions Releases.**

*** Tenaska Must Be Required to Report to DEP All Emissions Monitoring it does to Determine Compliance with Permit Limits.**

***The Draft Permit Impermissibly Fails to Include a Schedule for Coming into Compliance with the Clean Air Act.**

As a Religious Organization the Unitarian Universalists care for our environment so that it may sustain life for generations to come. The power facility is our neighbor, the greater Smithton area is a "frontline" community, and these areas are impacted hardest and often have fewest resources to recover.

On behalf of our congregation members and neighbors.

We ask that the fullest protection available be mandated to protect this community.

Rev. Tasha Brownfield
UUCS Minister

James Sims
UUCS Board President



Borough of West Newton

112 South Water Street
West Newton, PA 15089

Mayor
(724) 872-3537

Chief of Police
(724) 872-8610

DEP, SOUTHWEST REGION
Borough Secretary
(724) 872-6860

OCT 30 2025
Fax Number
(724) 872-8333

RECEIVED

Date: October 21, 2025

Nick Waryanka, P.E., Air Quality Engineer
Thomas Joseph, P.E., Facilities Permitting Chief, Environmental Engineering Manager
Eric Gustafson, Regional Director
Southwest Regional Office
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222

Re: West Newton Borough Council's Request for a Public Hearing Regarding Draft Title V
Operating Permit No. 65-00990 for the Tenaska Westmoreland Generating Station

Dear Mr. Waryanka, Mr. Joseph, and Mr. Gustafson:

As one of the neighboring communities impacted by emissions from this facility, West Newton Borough respectfully requests that the Pennsylvania Department of Environmental Protection ("DEP") hold a public hearing on Draft Title V Operating Permit No. 65-00990 ("Draft TVOP") for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County ("the Facility").

DEP announced its intent to issue this permit in the Pennsylvania Bulletin, 55 Pa.B. 6967 (October 4, 2025). That notice states that any person may request that the DEP hold a public hearing, and that such hearings may be held in accordance with 25 Pa. Code §127.429.

On behalf of our residents, we respectfully make this request for the following reasons:

1. This is a Title V facility.
2. The Facility's emissions heavily impact environmental justice areas, including West Newton Borough.
3. There is significant public interest in this facility and this permit.
4. We understand that this facility has operated without a federally required operating permit for nine years, and our residents deserve the opportunity to be heard by the Department.

We specifically request that the public hearing be scheduled at a time and location convenient for the affected community. The most suitable venue is the Turkeytown Volunteer Fire Company

THE UNIVERSITY OF CHICAGO
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community meeting facility, located at 90 Supervisor Drive, West Newton, PA. We request the hearing be held after standard work hours (no earlier than 6:00 PM) and that a remote participation option be provided to ensure full accessibility.

Thank you for your prompt attention to this matter and for your continued service in protecting the health and welfare of Westmoreland County residents.

Respectfully submitted,

Jason Cooper
Council President

Feb. 4, 2026
PA DEP Public Hearing
Tenaska Title V Air Permit
Huntingdon Place
90 Supervisor's Drive
West Newton, PA 15089

Kenneth D. Ball
738 Boyds Hollow Road
PO Box 53
Buena Vista, PA 15018
["kenball2@aol.com"](mailto:kenball2@aol.com)
(412)427-4297

Good evening. I want to thank the Department of Environmental Protection for holding this important meeting and for the opportunity to speak.

I am a farmer and I know I'm supposed to keep personal issues out of this consideration and stick to the facts as the permit application pertains to meeting DEP and Clean Air Act requirements. But for me, this is personal. On our farm we raise sheep and beef cattle. Our beef cattle are grass-fed...an all natural diet...free of antibiotics, steroids, hormones and pesticides. My wife and I bale the hay it takes to carry our animals thru the winter. So all the grass they eat, all the water they drink, all the air they breathe is supplied downstream and downwind from the Tenaska plant.

The draft permit lists emissions from the plant:

222 tons per year of nitrogen oxides, 92 TPY of particulate matter, 193 tons of ammonia, sulfuric acid mist, carbon monoxide, and almost 4 million tons of carbon dioxide annually. I also want to respectfully highlight the map modeled by the Environmental Health Project, showing impacts along the Youghiogheny River, affecting areas like Sutersville, West Newton, and Buena Vista. Our farm is in an area of greatest impact so as these pollutants travel, they will affect our air, land, water...our health, our cattle and our customers' confidence in the product we provide. This is potentially a risk to life and livelihood. This is personal.

According to the EPA's "Enforcement and Compliance History Online" over the past 12 quarters, Tenaska has been in noncompliance with its permit for all 12 of the last 12 quarters, and the compliance status is marked in red and labeled "High Priority Violation." Despite this, there has only been 1 enforcement action in the last 5 years (dated September 16, 2022) with a penalty under \$15,000.

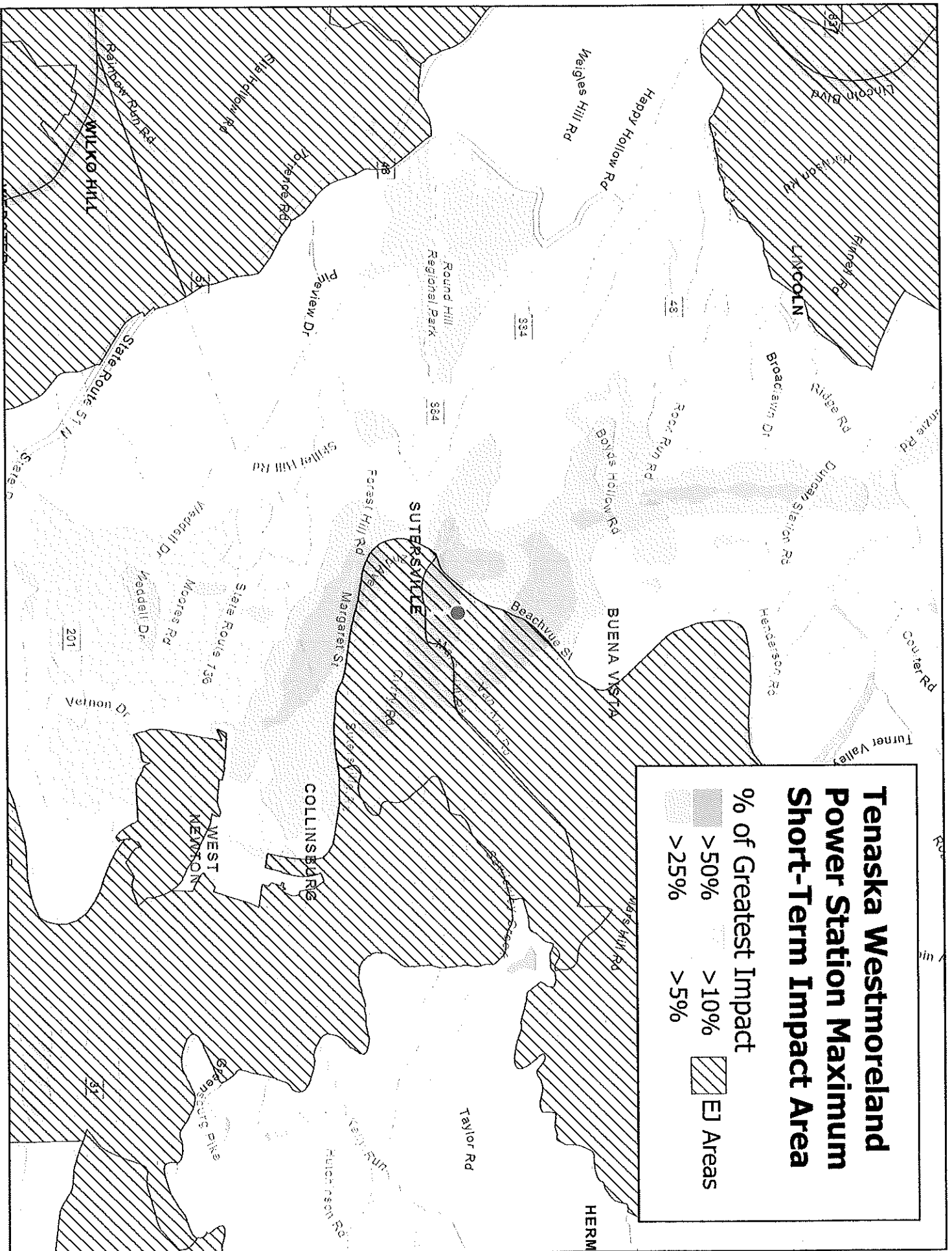
These are my concerns: The draft permit lacks sufficient monitoring, lacks a compliance schedule, doesn't restrict the duration of combustion tuning, and doesn't require Tenaska to report to DEP all emissions monitoring it does to determine compliance with permit limits. It's bad enough that you are asking the fox to monitor the hen house, but you don't even get the camera feed?

With Title V, I respectfully urge DEP to enforce clear, strong limits under the Clean Air Act, to protect our farm, our community, and our environment. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility. The ownership, Tenaska Pennsylvania Partners include affiliates of Nebraska based Tenaska and two Japanese firms-a Mitsubishi subsidiary and a Tokyo-based power plant developer. Come on...they can do better.

Again on a personal note, I traced our farm deed back to 1784 when a grant was issued from the William Penn family to a Colonel Lewellen Howell and the property was given the name "Peaceful". Since then over 7 generations of farmers have upheld that title by serving as stewards of the land. Please serve as "STEWARDS OF THE COMMUNITY" by thinking 7 generations ahead and considering the cumulative impact the approval of this permit will have. Make your grandchildren proud when they ask you what you did to protect the environment. Thank you!

Feb. 4, 2026
PA DEP Public Hearing
Tenaska Title V Air Permit
Huntingdon Place
90 Supervisor's Drive
West Newton, PA 15089

Kenneth D. Ball
738 Boyds Hollow Road
PO Box 53
Buena Vista, PA 15018
"kenball2@aol.com"
(412)427-4297



February 4, 2026

Tenaska Gas Electric Plant-Westmoreland OP#65-00990

Thank you to DEP staff for having this public hearing. Thank you especially to the Mountain Watershed Association leaders and membership. We only get our "Right to be Heard" because of you. I have repeatedly requested public hearings on every mining and pollution permit I have seen. The DEP staff has discretion. I usually get no response.

For the record, I have attached ALL the other permit public notices.

As communities grapple meeting energy demands while addressing pollution, the debate over gas-fired plants has become increasingly contentious. Yes, natural gas offers a cleaner alternative to coal, but approving new gas-fired power plants poses serious risks and harm that outweigh potential benefits.

To me, the most compelling argument against permitting Tenaska's Title V gas-fired power plant is their contribution to greenhouse gas emissions and localized air and water pollution. Our State Constitution prohibits this permit. Although natural gas burns cleaner, it still emits substantial amounts of carbon dioxide (CO₂). Furthermore, extraction, processing, and transportation of natural gas often result in methane emissions. Methane is even worse than carbon dioxide.

These local emissions undermine global efforts to reduce the carbon footprint and limit temperature increases.

Beyond GHGs, these plants emit nitrogen oxides and volatile organic compounds, which can lead to smog and respiratory issues. The water usage and potential contamination of the Yough with treated wastewater is another problem.

Continuing, this facility in Smithton, I am concerned about the insufficient monitoring and record keeping by Tenaska and the DEP, no limits on combustion tuning, and no compliance schedule for the Clean Air Act which they have failed for 12 straight quarters. They are one of the newest yet dirtiest facilities in the Commonwealth. Why? How?

Tenaska produces energy here, but also (5.2 billion Lbs.) of greenhouse gas pollution.

The impacts of GHG catalyzed global climate change are too numerous to list tonight, but some include extreme weather, increased intensity of tornadoes, hurricanes, cyclones, wildfires, sea level rise, king tides, loss of biodiversity, drought, loss of arable land, food insecurity, and increased disease transmission.

Who is this applicant? Tenaska is an independent energy company from Omaha that developed and manages the facility and owns less than a quarter. This facility is about 75% owned and controlled by Japanese industrialists-globalists Mitsubishi and Electric Power Development Corporation. I remind every man in this room that you are obligated by treaty to protect the Japs from North Korea and China. We protect them and they kill us with pollution.

While natural gas plants are often promoted as a cost-effective solution for electricity generation, their long-term economic viability is increasingly questionable. The global energy landscape is rapidly shifting toward cost efficient renewables like wind, solar, geothermal, tidal, wave, biomass, and hydro.

Investing in new gas infrastructure in 2026 is wasteful. It risks creating stranded assets—facilities that may become obsolete before their projected lifespan is reached.

Moreover, public investment in gas-fired power diverts resources from renewables and energy efficiency measures. The volatility of natural gas markets, influenced by geopolitical events and supply disruptions, can also expose consumers to price spikes and undermine economic stability at local and national levels.

Gas-fired power plants are often sited near low-income, rural communities, and communities of color, exacerbating existing social inequalities.

These populations are disproportionately affected by air and water pollution and the associated health risks, including asthma, COPD, heart disease, infertility, stroke, cancer, other respiratory conditions and early death.

The burden of environmental degradation and health costs falls heavily on these vulnerable groups, raising serious questions about environmental justice. Additionally, the focus on fossil fuel-based infrastructure delays the transition to a cleaner and more equitable energy system.

In conclusion, considering the environmental, economic, and social drawbacks, the approval of new gas-fired power plants is a step in the wrong direction. Sustainable alternatives are available and affordable. Policymakers and communities should reject further investment in fossil fuel infrastructure and instead support a transition toward renewables that protect public health, foster economic resilience, and address the urgent challenge of climate change.

Please deny this Title V Operating Permit for the Tenaska Westmoreland Generating Station on the grounds it clearly violates the PA Constitutional Right to Clean Environment. Ban Fracking in Pennsylvania.

Thank you.

May God Bless this Commonwealth and All who call her home.

Benjamin John Chiszar MPA, MS

Veteran – US Army MI Corps

Pittsburgh, PA (305)-433-0288 bjchiszar@yahoo.com

Attached :

Several Permits Noticed w/ No Hearing !

A handwritten signature in black ink, appearing to read 'B. Chiszar', with a horizontal line underneath.

2/4/2026

Public Notices

Enlow Fork Mine

PUBLIC NOTICE

Pursuant to the Pennsylvania Clean Streams Law, the Pennsylvania Department of Environmental Protection Rules and Regulations, the Surface Mining Conservation and Reclamation Act, and the Bituminous Mine Subsidence and Land Conservation Act as amended, notice is hereby given that Consol Pennsylvania Coal Company LLC, 275 Technology Drive, Suite 101, Canonsburg, PA 15317 is making application to the Pennsylvania Department of Environmental Protection to revise Coal Mining Activity Permit (CMAP) No. 30841317.

The proposed revision is for the addition of 4.380 acres to the Enlow Fork Mine underground permit area and underground subsidence control plan area for development mining.

The proposed revision is located Morris Township, Washington County and can be found on the Prosperity, PA U.S. Geological Survey 7.5 minute topographic map and mapping provided in the permit application.

The revision to the permit area and subsidence control plan area for development mining begins at a point approximately 4,230 feet Southeast of the intersection of Mt. Zion Road and Drun Run Road, then approximately 3,415 feet southeast of the intersection of Mt. Zion Road and Dry Run Road, to a point approximately 5,660 feet southeast of the intersection of S. Bridge Road and Pleasant Grove Road then approximately 250 feet south from the intersection of Weir Cole Road and Pine Ridge Road, to a point approximately 1,660 feet north of the intersection of Timberline Drive and Wilbert Way then approximately 2,025 feet northwest of the intersection of Timberline Drive and Wilbert Way to a point approximately 1285 feet West of the intersection of Timberline Drive and Wilbert Way then approximately 15,130 feet West to the point of origin.

A copy of the application is available for public inspection and copying for a fee, by appointment at the Department of Environmental Protection, California District Office, District Mining Operations, 25 Technology Drive, California Technology Park, Coal Center, Pennsylvania 15423 Telephone: 724-769-1100. A copy of this application is also available for public inspection at the Washington County Recorder of Deeds Office, 95 West Beau Street, Suite 520, Washington, PA 15301.

Written comments, objections and requests for a public hearing or informal conference may be submitted to the Department of Environmental Protection, California District Office at the above address, within thirty (30) days from the date of the final publication of this Notice and must include the person's name, address, telephone number, and a brief statement as to the nature of his or her objection.

11-6,13,20,27

Tunnel Ridge Mine

PUBLIC NOTICE

Pursuant to the Pennsylvania Clean Streams Law, The Pennsylvania Department of Environmental Protection Rules and Regulations, the Surface Mining Conservation and Reclamation Act, and the Bituminous Mine Subsidence and Land Conservation Act as amended, notice is hereby given that Tunnel Ridge, LLC, 878 Old Brick Road, West Alexander, PA 15376 is making application to the Pennsylvania Department of Environmental Protection to revise Coal Mining Activity Permit (CMAP) No. 63091301 for Tunnel Ridge Mine. The proposed revision is to revise 1,914.45 acres of the underground and subsidence control plan boundaries from development mining only to longwall mining.

The proposed revision area is in Donegal, West Finley, and East Finley Townships, Washington County, and can be found on portions of the Claysville, PA U.S. Geological Survey 7.5 minute topographic maps as well as mapping provided in the permit application. This area can be described as follows:

The permit and subsidence control plan revision area begins at a point 1,695 FT southwest of the intersection of Waynesburg Road and Kennedy Road then 22,985 FT southeast a point 465 FT northeast of the intersection of Burnsville Ridge Road and Pine Road then 3,715 FT southwest to a point 1,826 FT east of the intersection of Dogwood Hill Road and Burnsville Ridge Road then 22,730 FT northwest to a point 5,275 FT southwest of the intersection of Waynesburg Road and Kennedy Road then 3,635 FT northeast to the point of origin. All distances and headings are approximate.

The proposed revision requests approval to perform minor forms of stream restoration as necessary for stream locations within the proposed revision area. If necessary, restoration plans will be evaluated with the PADEP and restoration plans will be implemented for minor forms of stream restoration. Stream segments anticipated to have restoration activities associated with subsidence are as follows:

- Restoration area on UNT 32682 to Middle Wheeling Creek identified as 32682 N3 (Station 85+87 to 89+74), which begins approximately 1,515 feet southwest of the intersection of Ranch Road and Green Haven Road and proceeds downstream approximately 387 feet in length.
- Restoration area on UNT 32682 to Middle Wheeling Creek identified as 32682 N4 (Station 104+14 to 110+69), which begins approximately 1,445 feet northeast of the intersection of Green Haven Road and Good Intent Road and proceeds downstream approximately 655 feet in length.

A copy of the application is available for public inspection and copying for a fee, by appointment at the Washington County Recorder of Deeds Office, 95 W. Beau Street, Suite 520, Washington, PA 15301. A copy of this application is also available for public inspection at the Department of Environmental Protection, California District Office, District Mining Operations, 25 Technology Park, Coal Center, Pennsylvania 15423. Telephone: (724) 769-1100.

Written comments, objections and requests for a public hearing or informal conference may be submitted to the Department of Environmental Protection, California District Office at the above address, within thirty (30) days from the date of the final publication of this Notice and must include the person's name, address, telephone number, and a brief statement as to the nature of his or her objection.

8-4,11,18,25

Government Notice

LEGAL NOTICE

In accordance with 25 Pa. Code §§ 127.441, 127.425, and 127.521, the Department is providing notice that it intends to issue a Title V Operating Permit renewal to General Carbide Corporation for the continued operation of its tungsten carbide powdered metal and products manufacturing facility located in Hempfield Township, Westmoreland County.

The facility consists of a powder manufacturing process comprising of ten (10) ball mills, ten (10) conical dryers, one (1) spray dryer, three (3) condensers, a cooling tower, and a 15,000 acfm baghouse; a powder preparation area, a final fitz preparation area, and two (2) Isopress rooms all controlled by a 15,000 acfm baghouse; a nickel room and shape room both controlled by a 15,000 acfm baghouse; a finishing area controlled by three (3) fume collectors rated at 4,000 acfm, 1,800 acfm, and 2,400 acfm, respectively; a brazing area; a second shape room controlled by a 20,000 acfm baghouse; a 21,222 acfm baghouse, and a 3,500 acfm fume collector; one (1) 260-kW diesel-fired emergency generator; one (1) 48-kW natural gas-fired emergency generator; nine (9) parts washers of various capacities; and miscellaneous sources including heptane storage tanks ranging from 375-10,000-gallon capacities, a 0.6 MMBtu/hr boiler, a 0.63 MMBtu/hr boiler, shaping operations, polishing operations, and two (2) cooling towers.

Potential emissions from the sources covered under this Title V operating permit are 79.43 TPY VOC, 36.1 TPY PM-10, 36.1 TPY PM-2.5, 3.6 TPY NOx, 6.92 TPY total HAP, 5.00 TPY of any individual HAP, 1.0 TPY CO, 0.2 TPY SOx, and 823 TPY CO2e.

Those who wish to provide the Department with additional written information that they believe should be considered prior to authorization of the Title V operating permit may submit the information to Thomas Joseph, Environmental Engineering Manager, Department of Environmental Protection, Southwest Regional Office, 400 Waterfront Drive, Pittsburgh, PA 15222. Written comments must contain the following:

Name, address, and telephone number of the person submitting the comments.

Identification of the proposed Operating Permit (65-00622).

Concise statements regarding the relevancy of the information or objections to issuance of the Operating Permit.

A public hearing may be held if the Department, in its discretion, decides that such a hearing is warranted based on the information received. All persons submitting comments or requesting a hearing will be notified of the decision to hold a hearing by publication in the newspaper or by the Pennsylvania Bulletin, or by telephone, where the Department determines such notification by telephone is sufficient. Written comments or requests for a public hearing should be directed to Thomas Joseph, Environmental Engineering Manager, at the above address or to tjoseph@pa.gov.

All comments must be received within 30 days after the date of this publication.

The application, DEP's Review Memorandum, and the proposed permit are available for public review during normal business hours at DEP's Southwest Regional Office, 400 Waterfront Drive, Pittsburgh, PA 15222. A file review can be scheduled through the DEP's website at: <https://www.dep.pa.gov/Citizens/PublicRecords/Pages/Informal-File-Review.aspx> or by contacting Thomas Joseph, Environmental Engineering Manager, directly. 396144 (12/9, 10, 11/25)

4-West Mine Land

PUBLIC NOTICE

Pursuant to the PENNSYLVANIA CLEAN STREAMS LAW, the PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION Rules and Regulations, the SURFACE MINING CONSERVATION AND RECLAMATION ACT, and the BITUMINOUS MINE SUBSIDENCE AND LAND CONSERVATION ACT as amended, notice is hereby given that Dana Mining Company of Pennsylvania, LLC, doing business at 966 Crafts Run Road, Maidsville, WV 26541, has made application to the Pennsylvania Department of Environmental Protection for a revision to Coal Mining Activity Permit No. 30031301, and its associated NPDES permit No. PA0235610 located in Dunkard, Perry and Whiteley Townships, Greene County and is known as the 4-West Mine. The underground permit is located on the Garards Fort, PA USGS Map. The receiving streams for the permit area are Dunkard Creek, Watkins Run, Unnamed Tributary to Glade Run, and Unnamed Tributary to Meadow Run.

The revision requests a land use change at the Eisenhower Shaft Site consisting of approximately 2.6 acres of the 2.6 surface acres to have the sites contours remain as is and the access road remain for the Pennsylvania Department of Environmental Protection's use. No other changes are proposed to the issued permit. The boundary of the area requested for a land use change begins on Davistown Road approximately 1,500 feet east of the intersection of Steel Hill Road (T-342) and Davistown Road (SR-2006) on the property of James Tennant.

A copy of the application is available for public inspection, and copying for a fee, by appointment at the Department of Environmental Protection, California District Mining Office, 25 Technology Drive, California Technology Park, Coal Center, PA 15423. Written comments, objections, or a request for an informal conference may be submitted to the Department of Environmental Protection at the aforementioned address no later than thirty (30) days following the last date of the publication of this notice.

9-28, 10-5, 12, 19

PUBLIC NOTICE NPDES RENEWAL

Pursuant to the "Noncoal Surface Mining Conservation and Reclamation Act" and the "Clean Streams Law," notice is hereby given that Heidelberg Materials Northeast LLC, doing business at 2200 Springfield Pike, Connellsville, PA 15425, has made application to the Pennsylvania Department of Environmental Protection (DEP) to renew the existing NPDES Permit No. PA 0591483, that is associated with the Connellsville Quarry (SMP 26900306). The site is located in Connellsville Township, Fayette County. The current permit area is 51.4 acres and is located just south of McCoy Hollow Road (TR-679), approximately 1/2 mile south of SR-711 and 1 mile east of Connellsville. The receiving streams for the permit area are unnamed tributaries to Connell Run (WWF). The Connellsville U.S. Geological Survey 7.5-minute topographic map contains the area described.

A copy of this application is available for public inspection at the Connellsville Township Municipal Building, 186 McCoy Hollow Road, Connellsville, PA 15425. Written comments, objections, or requests for a public hearing or informal conference may be submitted to the DEP, New Stanton District Office, 131 Broadview Road, New Stanton, PA 15672, within thirty days from the date of the final (4th) publication of this notice and must include the person's name, address, telephone number, and a brief statement as to the nature of the comment(s).

388463 (9/26/25) (10/3, 10, 17/25)

Enlow Mine

Public Notice

Pursuant to the Pennsylvania Clean Streams Law, the Pennsylvania Department of Environmental Protection Rules and Regulations, the Surface Mining Conservation and Reclamation Act, and the Bituminous Mine Subsidence and Land Conservation Act as amended, notice is hereby given that CONSOL Pennsylvania Coal Company LLC, 275 Technology Drive, Suite 101, Canonsburg, PA 15317 has made application to the Pennsylvania Department of Environmental Protection to renew its existing Coal Mining Activity Permit (CMAP) No. 30841317 for the Enlow Fork Mine and the related NPDES Permit No. PA0213527. The current permit was issued on May 9, 1986 and will expire on January 29, 2026. The permit consists of 50,987.89 underground acres and 19,470.96 acres in the subsidence control plan area. The renewal does not contain revisions to the permit, other than the deletion of approximately 3,460.04 acres from the subsidence control plan area. The surface site area encompasses 1,921.45 acres. Stormwater is discharged at the following twenty four NPDES points: 003-(39° 59' 32" 80° 24' 48"), 008-(40° 00' 22" 80° 23' 36"), 009-(39° 59' 19" 80° 21' 08"), 010-(40° 01' 22.7" 80° 22' 58.6"), 011-(40° 02' 13" 80° 25' 39"), 012-(40° 02' 12.3" 80° 22' 38.3"), 014-(40° 03' 29" 80° 21' 53"), 016-(40° 02' 09" 80° 19' 33"), 017-(40° 02' 13" 80° 19' 37"), 025-(40° 04' 53" 80° 21' 13"), 027-(40° 02' 29.1" 80° 22' 28.5"), 028-(40° 03' 38" 80° 18' 48"), 029-(40° 00' 56" 80° 23' 14"), 030-(40° 08' 01.6" 80° 20' 41.9"), 031-(39° 59' 52" 80° 24' 53"), 032-(39° 59' 20" 80° 25' 9"), 033-(39° 58' 33" 80° 25' 3"), 034-(39° 58' 19" 80° 25' 31"), 035-(40° 06' 12.4" 80° 20' 30.1"), 036-(40° 06' 52.3" 80° 22' 38.7"), 037-(40° 01' 24.0" 80° 16' 18.4"), 038-(40° 00' 21.4" 80° 16' 21.4"), 039-(40° 00' 18.1" 80° 16' 31.3"), 040-(39° 59' 22.2" 80° 17' 23.5"). The receiving streams for the permit area are Enlow Fork to Wheeling Creek (TSF), Unnamed Tributary to Long Run (WWF), Unnamed Tributary to Booth Run (WWF), Unnamed Tributary to Enlow Fork (WWF), Unnamed Tributary to Templeton Fork (WWF), Unnamed Tributary to Robinson Fork (WWF), Unnamed Tributary to Beham Fork (WWF), Unnamed Tributaries to Rocky Run (TSF), Rocky Run (TSF), Unnamed Tributaries to Short Creek (TSF), Archer Run (TSF), Unnamed Tributaries to Buffalo Creek (HQ-WWF), Unnamed Tributary to Crafts Creek (WWF), Long Run (TSF), Unnamed Tributary to Enlow Fork (WWF), Enlow Fork (TSF), Unnamed Tributaries to Tenmile Creek (WWF) and unnamed tributaries Bates Fork (WWF). The underground permit area is located in Richhill, Washington and Morris Townships, Greene County and Amwell, Buffalo, East Finley, Morris, South Franklin, Green Hills Borough and West Finley, Washington County and can be found on the Claysville, Rogersville, Amity, Wind Ridge, Waynesburg and Prosperity, PA U. S. Geological Survey 7.5 minute topographic maps and mapping provided in the permit application.

The underground permit area can be described as follows: begins at a point approximately 5,750 feet northwest of the intersection of T430 and S.R. 3009, then approximately 23050 feet southeast to a point approximately 2000 feet northwest of the intersection of S.R. 18 and S.R. 3014, then approximately 41500 feet southeast to a point approximately 10000 feet southeast of the intersection of S.R. 3039 and S.R. 221, then approximately 18,200 feet southwest to a point 1700 feet northeast of the intersection of S.R. 18 and T637, then approximately 50000 feet southwest to a point 9,000 feet southeast of the intersection of S.R. 4013 and T637, then 35000 feet northwest to a point approximately 7000 feet southwest of the intersection of SR3037 and SR3035, then approximately 55000 feet northeast back to the point of origin.

A copy of the application is available for public inspection and copying for

PUBLIC NOTICE

Pursuant to the "Surface Mining Conservation and Reclamation Act" and the "Clean Streams Law," notice is hereby given that BOCA Coal, Inc., 100 Old Pond Road, Bridgeville PA 15017, has made application to the Pennsylvania Department of Environmental Protection for revising its existing Surface Coal Refuse Reprocessing Permit and related NPDES permit. The current permit, SMP #63070202 and PA021119, is revised to delete 73.9 acres of the original 98.9 acres. The reduced Surface Mine Permit boundary is 25.0 acres. The receiving streams for the permit area are unnamed tributaries to Piney Fork, a Trout Stocking Fishery (TSF). The operation is located in South Park and Union Townships of Allegheny and Washington Counties and known as the Phoenix Reclamation Park. The permit is situated north of State Route 088, south of Sebolt Road, and east of Cardox Road. The Bridgeville, Pa., U.S. Geological Survey 7.5 minute topographic map contains the area described. A copy of the revision application is available for public inspection at the PA DEP New Stanton Office, Bureau of District Mining Operations, at 131 Broadview Road, New Stanton, PA 15672. Written comments, objections, or a request for public hearing or informal conference may be submitted to the Environmental Program Manager at the above address within 30 days of the date of the final publication of this notice and must include the person's name, address, telephone number, and a brief statement as to the nature of the objection(s).

391242 (10/27/25) (11/3,10,17/25)

Public Notices

Enlow Fork

Public Notice

Pursuant to the Pennsylvania Clean Streams Law, the Pennsylvania Department of Environmental Protection Rules and Regulations, the Surface Mining Conservation and Reclamation Act, and the Bituminous Mine Subsidence and Land Conservation Act as amended, notice is hereby given that Consol Pennsylvania Coal Company LLC, 275 Technology Drive, Suite 101, Canonsburg, PA 15317 is making application to the Pennsylvania Department of Environmental Protection to revise Coal Mining Activity Permit (CMAP) No. 30841317 and related NPDES permit for the Enlow Fork Mine.

The proposed revision is for the addition of 3,088 acres to the Enlow Fork Mine underground permit area and underground subsidence control plan area for development mining.

The proposed revision is in Morris & Washington Townships, Greene and County and can be found on the Rogersville and Waynesburg, PA U. S. Geological Survey 7.5-minute topographic map and mapping provided in the permit application.

The revision to the permit area and subsidence control plan area for longwall mining begins at a point approximately 1,900 feet northwest of the intersection of Barker Road and Dunn School Road then approximately 15,500 feet southeast to a point approximately 2000 feet southwest of the intersection of Dille Road and Pettit Road then approximately 7,600 feet southwest to a point approximately 2,200 feet northeast of the intersection of Dille Road and WV Railroad road then approximately 15,600 feet northeast to a point approximately 900 feet southeast of the intersection of Reeves Road and Deerlick Station Road then approximately 7,600 feet northeast to the point of origin.

A copy of the application is available for public inspection and copying for a fee, by appointment at the Department of Environmental Protection, California District Office, District Mining Operations, 25 Technology Drive, California Technology Park, Coal Center, Pennsylvania 15423. Telephone: 724-769-1100. A copy of this application is also available for public inspection at the Greene County Recorder of Deeds Office, Greene County Court House, East High Street, Waynesburg, Pennsylvania 15370.

Written comments, objections and requests for a public hearing or informal conference may be submitted to the Department of Environmental Protection, California District Office at the above address, within thirty (30) days from the date of the final publication of this Notice and must include the person's name, address, telephone number, and a brief statement as to the nature of his or her objection.

7-10,17,24,31

Tunnel Ridge

Public Notice

Pursuant to the Pennsylvania Clean Streams Law, The Pennsylvania Department of Environmental Protection Rules and Regulations, the Surface Mining Conservation and Reclamation Act, and the Bituminous Mine Subsidence and Land Conservation Act as amended, notice is hereby given that Tunnel Ridge, LLC, 878 Old Brick Road, West Alexander, PA 15376 is making application to the Pennsylvania Department of Environmental Protection to revise Coal Mining Activity Permit (CMAP) No. 63091301 for Tunnel Ridge Mine. The proposed revision includes the addition of 2,848.10 acres to the underground permit area and the underground subsidence control plan area for underground development mining only.

The proposed revision area is in West Finley and East Finley Townships, Washington County, and can be found on portions of the Claysville, PA U.S. Geological Survey 7.5 minute topographic maps as well as mapping provided in the permit application. This area can be described as follows:

The permit and subsidence control plan revision area begins at a point 2,470 FT southwest of the intersection of Memorial RD and McGuffey RD then 18,827 FT southeast to a point 1,740 FT east of the intersection of Dogwood Hill RD and Burnsville Ridge RD then 7,702 FT southwest to a point 1,755 FT east of the intersection of Burnsville Ridge RD and Sprowls RD then 803 FT northwest to a point 954 FT east of the intersection of Burnsville Ridge RD and Sprowls RD then 1,378 FT northeast to a point 1,591 FT northeast of the intersection of Burnsville Ridge RD and Sprowls RD then 20,810 FT northwest to a point 1,499 FT east of the intersection of Chambers Ridge RD and Erskine RD then 1,331 FT northeast to a point 2,207 FT northeast of the intersection of Chambers Ridge RD and Erskine RD then 3,309 FT southeast to a point 1,269 FT northeast of the intersection of Old Brick Road and Mellisko LN then 5,047 FT northeast to the point of origin. All distances and headings are approximate.

A copy of the application is available for public inspection and copying for a fee, by appointment at the Washington County Recorder of Deeds Office, 95 W Beau Street, Suite 520, Washington, PA 15301. A copy of this application is also available for public inspection at the Department of Environmental Protection, California District Office, District Mining Operations, 25 Technology Park, Coal Center, Pennsylvania 15423. Telephone: (724) 769-1100.

Written comments, objections and requests for a public hearing or informal conference may be submitted to the Department of Environmental Protection, California District Office at the above address, within thirty (30) days from the date of the final publication of this Notice and must include the person's name, address, telephone number, and a brief statement as to the nature of his or her objection.

10-2,9,16,23

Tunnel Ridge

Public Notice

Pursuant to the Surface Mining Conservation and Reclamation Act, and the Bituminous Mine Subsidence and Land Conservation Act, the Pennsylvania Department of Environmental Protection Rules and Regulations and Clean Streams Law notice is hereby given that Tunnel Ridge, LLC, 184 Schoolhouse Lane, Valley Grove, WV 26060 has made application to the Pennsylvania Department of Environmental Protection for renewing its existing underground coal mine permit and the related NPDES permit. The current underground permit No. 63091301 and associated NPDES permit No. PA0236004 A-1 was issued on March 7, 2011 and will expire on March 6, 2026. This renewal does not contain revisions to the existing operation.

The operation is located in Donegal and West Finley Townships of Washington County and is known as Tunnel Ridge Mine. The permit contains 142.79 acres for Surface Activity Sites with receiving waters being Little Wheeling Creek and Unnamed Tributaries to Middle Wheeling Creek and 12,035.37 acres of underground mining area and subsidence control plan area.

The existing permit areas begin at a point 325 FT north of the intersection of Middle Creek Road and the PA-WV state line then follows the state line 29,600 FT north to a point 1,900 FT northeast of the intersection of Castleman Run and Crupes Run Road, then 20,200 FT southeast to a point 1,250 FT southwest of the intersection of Sportsman Club Road and Cunningham Road, then 16,400 FT south-southwest to a point 1,400 FT southwest of the intersection of Waynesburg Road and Toll Gate Road, then 17,260 FT southeast to a point 1,258 FT southwest of the intersection of Green Haven RD and Burnsville Ridge RD, then 7,390 FT southwest to a point 1,080 FT east of the intersection of Dogwood Hill RD and Burnsville Ridge RD, then 18,830 FT northwest to a point 2,470 FT southwest of the intersection of Memorial RD and McGuffey RD, then 5,050 FT southwest to a point 3,800 FT southwest of the intersection of McGuffey Road and Walnut Valley Road, then 9,350 FT west-northwest to the point of origin. All distances and headings are approximate. Portions of the Bethany, WV; Claysville, PA; Valley Grove, WV, and West Middletown, PA USGS 7.5 Minute topographic map contain the area described.

A copy of the application is available for public inspection and copying for

My name is Larisa Mednis and I'm an Advocacy Coordinator with Clean Air Council. On behalf of the Council and its members, I am here to testify in favor of stronger emissions monitoring and limits for the Tenaska Westmoreland Generating Station as the facility applies for its long-overdue Title V permit. I call upon the DEP to utilize the full extent of your power to protect local residents, including creating a public website where Tenaska must post their emissions readings daily. Currently, publicly available information about the Tenaska plant is notably lacking on the DEP's website. Tenaska's permits have not been updated since 2015, and zero Notices of Violation have been published despite this facility's consistent violations of the Clean Air Act. It is misleading for the DEP to maintain a website without publishing updated permits and information about public hearings on the site. In comparison, the DEP's webpage for Shell Chemicals Appalachia lists every NOV and every permit approval draft and document through 2025.

According to PennEnvironment, the Tenaska generating station is one of the top 12 largest polluters in Pennsylvania. Out of these facilities, nearly half are located in Southwestern Pennsylvania. The Tenaska plant alone emitted over 2.6 million tons of greenhouse gas pollution in 2020. This level of emissions is comparable to a coal-fired power plant, yet with nearly all coal-fired plants out-of-commission in Pennsylvania, Tenaska is one of the most polluting facilities in the state.

As a representative of Clean Air Council and its members, I am concerned about the ongoing exposure to VOCs and PM2.5 air pollutants in the region. Air and water pollution from these facilities frequently impacts surrounding areas. The DEP must consider the cumulative pollution burdens that we face. The Tenaska facility is located within an Environmental Justice area in the 80-89.9th percentile, and is less than 2 miles from an Environmental Justice area with pollution exposure in the 98th percentile.

The Tenaska facility has been out of compliance with the Clean Air Act for all 12 out of the last 12 quarters. Frankly, a facility that has demonstrated incompetence and inability to comply with pollution limits should not be granted a Title V permit. A facility's ability to comply with permit requirements is a vital factor to consider according to the Air Pollution Control Act and the Clean Air Act, which were created to protect people from the most harmful effects of air pollution. A plan for coming into compliance must be developed before the Tenaska plant receives this permit.

In the event the Title V permit is granted, I recommend several changes that would better protect those living around the Tenaska facility. First of all, I recommend that the DEP implement more frequent monitoring and stack testing at the plant. Secondly, I recommend that the monitoring of dissolved solids from the cooling tower take place daily instead of monthly, to ensure that pollutants such as particulate matter are accounted for. Particulate matter, a known carcinogen, must remain within permit limits with frequent monitoring to ensure that the impact on public health is minimal. I recommend that the DEP create much more stringent guidelines than the 3.7 million tons of annual greenhouse gas emissions allowed under the current draft permit.

As we catapult increasingly towards catastrophic levels of human-induced climate change, it is more important than ever that the DEP use their regulatory powers to keep polluters in check. We have the science, research, and technology in our arsenal to demonstrate that fossil fuel extraction endangers human and environmental health. We deserve a better future for ourselves and for generations to come. We should be decarbonizing, including transitioning to renewable energy and reducing our reliance on plastics. Pennsylvania is ranked 49th out of 50 states for renewable energy growth, and is far behind other large energy-producing states such as Texas, which is leading the nation in installing renewable energy capacity. Wind and solar farms account for about 30% of Texas' energy generation, while only about 4% of our energy in Pennsylvania is renewable. DEP must execute its statutory duties to protect Pennsylvanians and to hold polluting facilities accountable that repeatedly violate the law. Thank you for providing the opportunity to speak this evening.

Good evening,

My name is Natalie Davidson and I am here to speak on behalf of PennFuture and our members in the area. Our organization has joined the community members and organizations to submit formal comments regarding the necessary measures needed for the Tenaska Plant Title V operating permit. The Tenaska Plant has spent close to a decade operating without the necessary permit which makes it even more critical that DEP should ensure that this permit meets all standards. The current permit is lacking in monitoring requirements that would ensure the plant is in compliance with federal and state clean air standards. Also there are not proper monitoring requirements to protect the community against the emissions of several pollutants (sulfuric acid mist (H_2SO_4), PM 2.5, PM10, sulfur oxides and greenhouse gases) as outlined in the Clean Air Act requirements for Title V Operating Permits. This raises concerns for the health and safety of residents as it would mean that proper measures cannot be taken to protect the public or monitor compliance sufficiently.

As it appears in the draft permit the plant is only responsible for continuous emission monitoring systems for three pollutants (NO_x , CO and ammonia) with limits while still lacking a set of monitoring methods, calculations and frequencies

for the other seven pollutants identified above. Since the permit fails to set specific monitoring requirements to assure compliance with limits for seven pollutants it is failing to comply with the Clean Air Act and PA Air Pollution Control Act. We ask that the permit be redrafted to include the proper amount of monitoring for compliance.

Additionally, the draft permit should also include requirements for recordkeeping or reporting of all emissions data and any data used to determine compliance with permit limits for each source should be reported to DEP. It would be insufficient to exclude this data and result in limitation to DEP and the public's ability to ensure that the Tenaska Plant would be in full compliance with their emission limits per the EPA and PA Title V regulation. Therefore, the permit must be revised to ensure all emissions restrictions have sufficient monitoring and recordkeeping requirements.

Finally, the draft permit fails to meet requirements to include plans for coming into compliance with the Clean Air Act. Tenaska has been out of compliance for 12 of the last 12 quarters according to the EPA's Enforcement and Compliance History Online Database it is required to include a schedule for when and how they plan

to comply with regulation. The compliance plan for outstanding violations must be included in the permit in order for an Operating permit to be issued. The residents that are impacted by the operation of the plant should be able to live with faith that this plant is operating in accordance with all legal requirements but that is not true for the past 12 of 12 quarters so it is imperative that DEP ask for a revision of this permit with a compliance plan.

Today I am here to ask the DEP to make changes to ensure this permit is up to the required standards per federal and state regulation before the issuance of an operating permit to the Tenaska Plant. This permit is already far too late but we must ensure it has the best parameters in place to safeguard the community under all legal standards. As stated in the comments submitted there are many insufficient requirements included into the permit which should be addressed promptly to ensure the community is not put at risk. The Tenaska Plant's lack of proper and thorough plans for monitoring is greatly concerning for the immediate health of residents in any proximity of the plant. On behalf of residents and the members of PennFuture we thank DEP for all the work you have done and will do to ensure this operating permit is as protective as possible.

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February 13, 2026

Thomas Joseph

Environmental Engineering Manager

Pennsylvania Department of Environmental Protection, Southwest Regional Office

400 Waterfront Drive,

Pittsburgh, PA 15222-4745

412-442-4000

Re: Tenaska Westmoreland Generating Station Draft Title V Operating Permit No. 65
00990

Introduction

The Environmental Health Project (EHP) is submitting this written comment for the Citizen Public Hearing on Draft Title V Operating Permit No. 65-0090 (TVOP) for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station, located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County. EHP is a nonpartisan, data-driven nonprofit organization that has defended public health in the face of oil and gas development since 2012. We provide frontline communities with data collection and analysis tools, health and wellness education, and policy and advocacy resources. Our team of public health professionals, community educators, analysts, and communications experts is committed to securing health-protective solutions to reduce harm from exposure to oil and gas pollution. EHP wishes to express our concerns about the public health impacts of the new Title V facility.

The two-turbine and 940-megawatt natural gas-fired power plant has put undue risk on community members and the environment for the past decade, the entirety of which the facility has been operating without a TVOP. The new first-ever drafted TVOP for the facility requires adjustments to ensure greater protection of the health of community members. First, the permit sets limits for various pollutants but excludes monitoring provisions required by the Clean Air Act that are specific and frequent enough to evaluate compliance with emissions limits. Second, the permit fails to require reporting of all emissions data to the PA DEP, making the information largely inaccessible to regulators and the public. EHP recommends that the PA DEP require that the TVOP include more comprehensive monitoring provisions that ensure compliance with emissions limits as well as recordkeeping and reporting of all emissions data to the PA DEP to ensure transparency.

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Public Health Impacts

Every stage of shale gas development poses public health risks and is known to emit hazardous substances that are harmful to human health, including downstream facilities such as the Tenaska Westmoreland Generating Station.

Including comprehensive monitoring, reporting, and enforcement requirements in the TVOP for the Tenaska Westmoreland Generation Station will ensure compliance with air quality standards. Without a TVOP, Tenaska already emits over 2.6 million tons of greenhouse gases each year¹², such as carbon dioxide, and around 300 tons of other toxic compounds², all of which are harmful to human health. Below are the health impacts of these air pollutants:

- **Carbon Dioxide:** climate change-induced health impacts, such as insect borne diseases, heat-related illnesses, and injuries and deaths from storms, floods, and ³⁴.
- **Nitrogen Oxides:** respiratory irritation and infections; exacerbation of respiratory diseases, such as asthma⁵⁶
- **Particulate Matter, including Coarse Particulate Matter (PM10) and (most impactful) Particulate Matter 2.5 (PM2.5):** impaired lung function, asthma exacerbation, irregular heartbeat and heart attacks; can lead to premature death in those with heart and lung diseases, such as chronic obstructive pulmonary disease (COPD)⁷.
- **Ammonium:** abdominal pain, nausea, vomiting, skin blisters, burning feeling in the nose, throat, lungs, and eyes⁸⁹
- **Carbon Monoxide:** decreased exercise tolerance, decreased vigilance, and increased risk for cardiac ischemia in individuals with heart ¹⁰¹¹.
- **Sulfur Oxides:** Breathing difficulties, particularly during exercise; aggravation of existing respiratory ¹²¹³.
- **Formaldehyde:** Nose and eye irritation, eczema, asthma, increased risk of nasal and throat ¹⁴¹⁵.
- **Hazardous Air Pollutants (HAPs):** linked to cancer, neurological damage, developmental and reproductive harm, and respiratory and cardiovascular disease; may cause irritation of the eyes, nose, and throat; harm the liver, kidneys, and immune system; and contribute to premature mortality in exposed populations¹⁶.

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- **Volatile Organic Compounds:** varies by compound but most commonly headaches, fatigue, and irritation of the eyes, nose, and throat¹⁷.

Note: The above list is not exhaustive and does not include other potential pollutants such as methane or those formed in the atmosphere like ozone.

These health impacts can be worse for vulnerable populations. Some populations, including children, older adults, expecting or new parents, and individuals with chronic respiratory or cardiovascular conditions, are more sensitive than the general population to the impacts of air pollution. A quarter of the host community of Tenaska Westmoreland Generating Station is above the age 65, and the community also experiences a cancer (non-skin) rate that is worse than 79% of the U.S. population and high cholesterol rates that are worse than 89% of Pennsylvania's population¹⁸.

Moreover, there are three schools near the Tenaska Westmoreland Generating Station. Figure 1, below, shows the schools as green dots and Tenaska as a dark red dot, surrounded by a purple circle representing all areas within 5 miles. The three schools within this radius are West Newton Elementary School and neighboring schools Yough Intermediate Middle School and Mendon Elementary School. For the past decade, Tenaska has been operating without a TVOP and jeopardizing the health of these young students.

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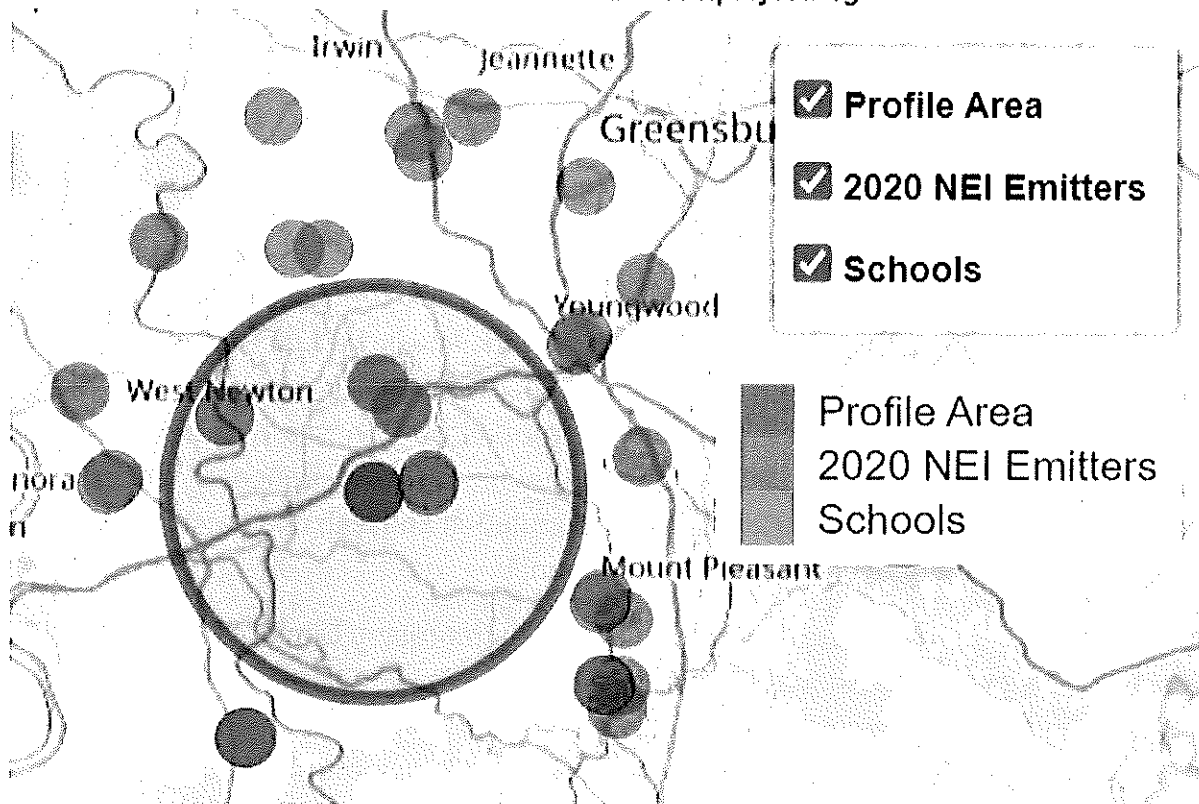


Figure 1. Schools, hospitals, and point source emitters within 5 miles of the Tenaska Westmoreland Generating Station. Map created by EHP.

Toxic pollutants are emitted from facilities such as the Tenaska Westmoreland Generating Station in a variety of ways, both directly when shale gas is burned to produce electricity as well as through auxiliary structures such as cooling towers or through incomplete combustion. Once emitted, these pollutants can travel significant distances from the site of emission depending on various factors including weather conditions, wind direction, and topography.

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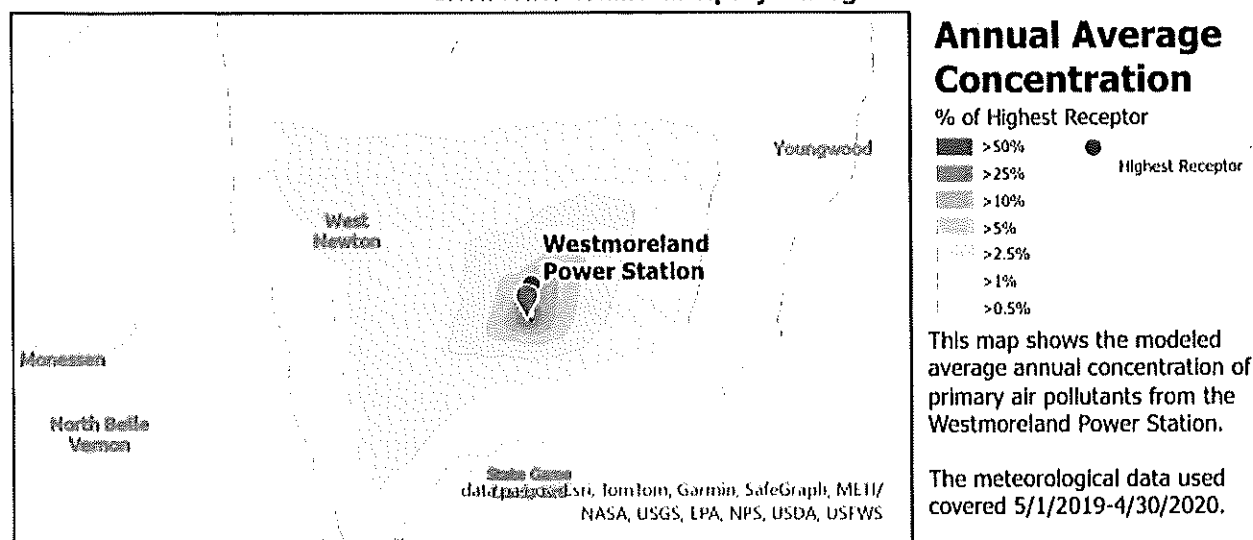


Figure 2. Modeled relative annual average airborne pollutant levels from the Tenaska Westmoreland Generating Station. Modeling conducted by EHP.

Figure 2, above, is an analysis conducted by EHP using a NOAA HYSPLIT model to show how air emissions from the Tenaska Westmoreland Generating Station disperse in nearby communities on an annual basis. As indicated in the legend on the right, the purple pin indicates the highest receptor location, or the location that experiences the highest 1-hour concentration of primary air pollutants over the course of two years, while the innermost dark red ring represents areas experiencing at least 50% of the highest annual average ground-level air pollution concentration from Tenaska. Successive rings moving outward represent areas experiencing 25%, 10%, and 5% of the annual average concentration, respectively. Local topography and weather patterns result in uneven dispersion from the new Title V facility.

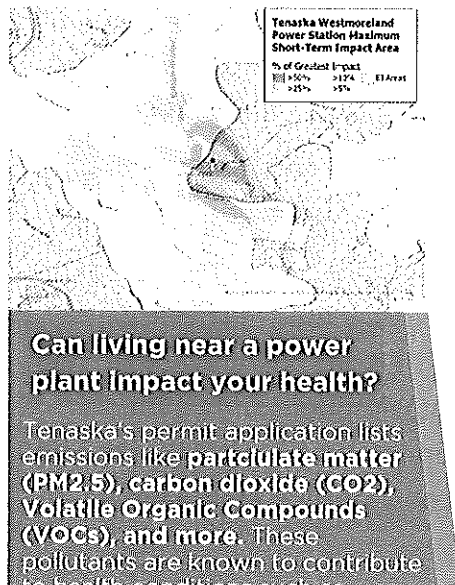
Figure 2 demonstrates that pollution affects not only Smithton, the community in which Tenaska is located, but many of the surrounding communities as well. In fact, as of 2026, Smithton and its immediate surrounding communities are all designated Environmental Justice (EJ) communities by the PA DEP. By doing this, the PA DEP has acknowledged that these communities experience disproportionate environmental impacts and pollution burden which are exacerbated by their pre-existing health conditions. It is vital that the PA DEP swiftly act in this Title V permit to design measures that best protect the health of residents of these EJ communities¹⁹.

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EHP notes that a concern was raised during the public hearing on February 4th about inaccuracies relating to a different version of this dispersion map included in a postcard mailer for an October 2025 community meeting, claiming that the map misrepresented the Tenaska facility to be in Sutersville, about 7 miles away. Figure 3, below, shows this version of the dispersion map with the modeled relative maximum airborne pollutant levels (instead of average concentration) from the facility. Like the previous dispersion map, the purple pin, this time located in Sutersville, indicates the highest receptor location. Because the map is zoomed into this area of greatest impact, the pin showing where Tenaska is located is not pictured. This omission led to the misinterpretation of the purple pin as the location of Tenaska Westmoreland Generating Station. Figure 4, below, shows the zoomed-out version of the same dispersion map, with the facility now marked in Smithton with a blue pin and label. Importantly, Figures 3 and 4 show the highest short-term 1-hour impact observed over two years, revealing higher maximum concentrations of air pollution in communities farther away such as Sutersville than those living immediately next to the facility. This differs from Figure 2, which reflects longer annual average impacts over an entire year, and reports them closer to the facility. Taken together, these dispersion maps show that communities more than 7 miles away can experience significant short-term spikes while nearby communities continually experience sustained long-term exposure, demonstrating that Tenaska's pollution impacts are more widespread than typically acknowledged.



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Figure 3. October 2025 mailer that included a zoomed in version of an EHP dispersion map. This map shows the modeled relative 2-year maximum airborne pollutant levels from the Tenaska Westmoreland Generating Station.

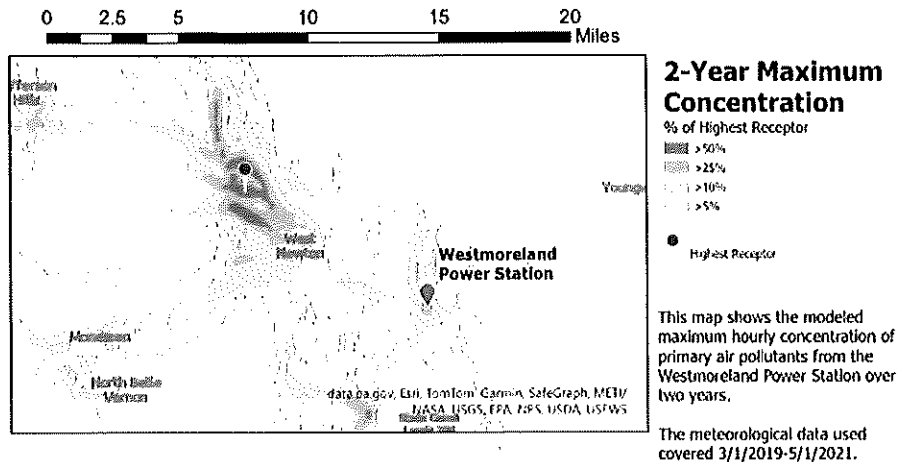


Figure 4. Full size version of the 2-year maximum concentration map included in the October 2025 mailer. The location of the Tenaska Westmoreland Generating Station is accurately labeled.

Recommendations

In summary, EHP recommends the PA DEP mandate that the new and long-awaited TVOP for the Tenaska Westmoreland Generating Station be amended in the following ways.

Increased Monitoring Frequency:

- Increase the frequency of the current mandated stack testing for VOCs and PM to at least annually from the current mandated frequency of once every two years
- Establish a VOC to CO correlation during VOC stack testing to ensure continuous monitoring of VOC emissions using CO as a surrogate

Adding emissions control technology:

- Implement Selective Catalytic Reduction for NOx emissions to reduce environmental impact

Mandated reporting of emissions data:

- Specify all monitoring systems for PM10, PM2.5, H2SO4, sulfur oxides, and greenhouse gases, as well as a regular schedule and format for the reporting of monitoring data

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- Require Tenaska to report all monitoring data to the PA DEP

Ensure compliance with legal requirements:

- Create a schedule to ensure compliance with Clean Air Act as soon as possible

These specifications on monitoring frequency and reporting, as well as emissions control technology and compliance schedules are needed in the permit to protect residents' health. As previously stated, this facility is located near EJ communities with vulnerable populations. For the past decade, Tenaska has been out of compliance with the Clean Air Act, putting these communities at higher risk because of the health impacts associated with the pollutants they emit. These recommendations are designed to ensure regulators and community members can take preventative measures necessary to reduce emissions and protect public health.

Thank you for the opportunity to comment on this matter.

Santosh Muralidaran

Project Coordinator

Environmental Health Project

4165 Blair Street, Pittsburgh, PA 15207

724.260.5504

smuralidaran@environmentalhealthproject.org

¹ Mountain Watershed Association. Tenaska Generating Station. <https://mtwatershed.com/tenaska/>

² National Emissions Inventory (NEI) of the Environmental Protection Agency (EPA). (2020). <https://awsedap.epa.gov/public/single/?appid=20230c40-026d-494e-903f-3f112761a208&sheet=5d3fdda7-14bc-4284-a9bb-cfd856b9348d&opt=ctxmenu,currrel>

³ Centers for Disease Control and Prevention (CDC). (2024, February 29). Effects of Climate Change on Health. Climate and Health. <https://www.cdc.gov/climate-health/php/effects/index.html>

⁴ Centers for Disease Control and Prevention (CDC). (2024, February 29). Effects of Climate Change on Health. Climate and Health. <https://www.cdc.gov/climate-health/php/effects/index.html>

⁵ Environmental Protection Agency (EPA). "Basic Information about NO₂ ." (2025, July 10). www.epa.gov/no2-pollution/basic-information-about-no2

⁶ Environmental Protection Agency (EPA). "Basic Information about NO₂ ." (2025, July 10). www.epa.gov/no2-pollution/basic-information-about-no2

⁷ Environmental Protection Agency (EPA). (2022, August 30). Health and Environmental Effects of Particulate Matter (PM). <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>

⁸ Center for Disease Control and Prevention (CDC). (2024, September 6). Ammonia. [Ammonia | Chemical Emergencies | CDC](https://www.cdc.gov/ammonia/)

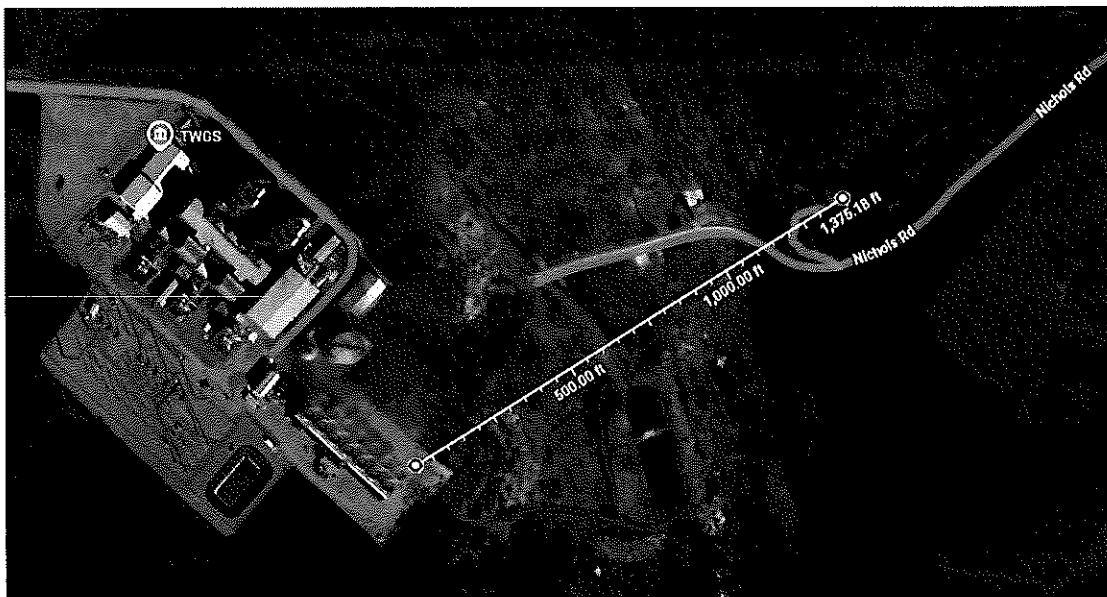
USA EPA Region 3 – Philadelphia
Four Penn Center
1600 JFK Boulevard
Philadelphia, PA 19103-2029
Attn: Ms. Amy Van Blarcom-Lackey

PA Department of Environmental Protection.
400 Waterfront Drive
Pittsburgh, PA 15222

Subject: Tenaska – a major local source of all types of pollutants.

Dear EPA and PADEP:

For years the Tenaska power plant's cooling tower has been raining down on my household. But no one appears to care about the Rupert family, except us. We live, 1,375 feet from the dreaded cooling tower, which produces Tenaska's own fog, rain, snow, and ice. This is just one problem with the Tenaska site, the second problem is the smells of hydrocarbons, fuels, fumes, and other foul smells that roll down the hillside into our house. This makes us wonder about all the chemicals we cannot smell. This is a Google picture of the distance. The Tenaska plant sits on the hilltop, and we live at the bottom.



VISUAL POLLUTION.

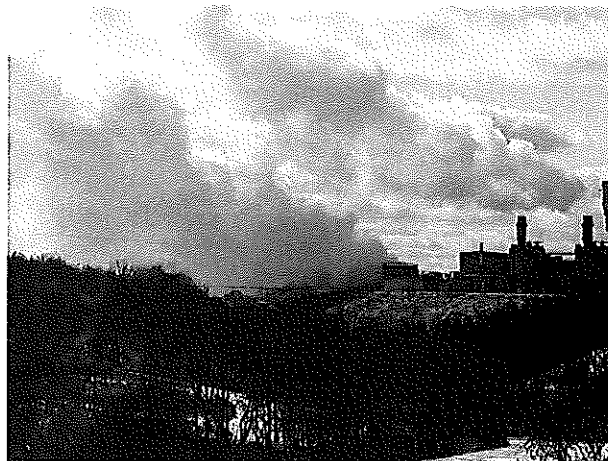
If anyone noticed, this past Sunday, January 18, 2026, early morning. The cooling tower plume was rolling down the hillside into our house – but the wind carried the cooling tower plume directly over the Mendon Elementary School. I do not think this is good for those children but thank God, it was a Sunday.

Countless days each year the Tenaska cooling tower produces fall out on our home and family members. This is a common occurrence the wind blows the Tenaska cooling tower plume over our house, but then and very frequently something else occurs.

Something else works just like this, below, these pictures were taken in December 2025, but this just routinely occurs. The Tenaska cooling tower plume starts rolling down the hill and right into our house, our shop, and our property. The gray colored "clouds" are those from the Tenaska cooling tower rolling in on us. The brighter white clouds are from the Tenaska boiler stacks (they call them HRSG stacks).



As the Tenaska cooling tower plume continued to roll in over us, we moved to capture a side view of this rolling in action. This we are told is a localized Eddy. The third picture below, taken from PA State Route 31, shows the Tenaska cooling tower plume starting to roll in on top of our house.



Depending on conditions, this rolling "eddy" current brings the Tenaska Cooling Tower plume directly into our house. And while others and certainly, Tenaska corporate people may not care about the few local people, and we are all too familiar with the arrogant plant manager. This Tenaska plume is not clean and pure. In fact, recently, we would go as far as to suggest that the noise levels have increased over the years. But what is constantly annoying is the cooling tower "rain"

For years, the constant operations has impacted the Rupert family, our first grandson was born shortly before the Tenaska plant started operation. No other person in the Rupert family ever had cancer, until the Tenaska power plant equipment and its cooling towers started raining on us. And it is not just the cooling tower.

We were told that the Tenaska cooling tower would have drift eliminators, but as you can clearly see every day, that tower's plume rains on our family. The plume works to scrub the plant air of hydrocarbon, and other equipment vapors and emissions. God only knows what it picks up and dumps. There should be a complete log of all chemicals used on site, the quantities, and all emissions sources, including safety valves, diesel tank vents, down to the number and types of vehicles on site for outages. Diesel fuel oil fumes must be monitored. These seem to roll down the hillside diesel and lubricating oil vapors and not just float off the site. We were told Tenaska doesn't monitor emissions from all sources 24-7 and this is unacceptable. Tenaska, especially its corporate staff, do not care about the local people, this is why the plant was build in South Huntingdon Township and not in, say McMurray, PA. This location increased their profits at the expense of our health, certainly that of my grandson.

Non-Visual Pollution.

There are fumes and odors that we smell directly, and we worry about those chemicals that have no smell but constantly damage our physical health. Our grandson, born healthy, developed cancer, and these past few years have been a difficult period of time for us, as you cannot image.

Having one child and family fight cancer would seem to be more than enough, but the Tenaska plumes, gas and oil vapors, exhaust flow, directly over the Mendon Elementary and Middle Schools – exposing each of those kids for an 8 year period until they move to the Senior High School. We request that an independent group walk the entire power plant down and record each piece of plant equipment to document its source of pollution. This then can be compared to a real air and water permit application. And since Tenaska has waited so long, it is apparent they are now willing to accept the best known available emissions technology.

We are not power people but have spent time researching technology. Recent power plants are built with air-cooling-condensers and have no need to use the clean Youghiogheny River water, returning higher temperature waters back into the river, which now after the Tenaska power plant is suffering from bacterial growth. We were told the plant would only run in the summer and winter, but the plant runs throughout the year. These air-cooling towers are known and effective and commonly used. They are now the choice for new power plants. Tenaska's permit should only be awarded contingent on them installing an air-cooled tower in installed to replace the evaporative plume-manufacturing water cooling tower. The plant will make billions of dollars, the locals know, it reneged on its promise to pay \$1 million per year in property taxes and but why is public health less important than profits?

Hydrocarbon emissions are a great concern for all children. Would it be correct to assume that neither the EPA or the PA DEP cares about us older people, we will just be fall-out?

We have heard other discuss that a 3rd party medical study needs to be set up to track all forms of respiratory ailments and cancers from all the children that have attended the Mendon schools and live within a mile or two radius of the Tenaska power plant. This is a good idea. The community

should discuss whether Tenaska should fund an independent health fund to help any local community member that contracts any respiratory ailment or cancer.

It is appalling that Tenaska could actually continue to operate a power plant and not be responsible. We have lived in this area over 30 years, and not until Tenaska have we been sick.

By default, we will fight all the sloppy compliance and less-than-state-of-the-art emissions technology. The fight will be short as if they continue polluting us all so they can make private corporate profits at our expense.

Only Tenaska benefits when they do not have to track and trace all forms of pollutants, emissions, and contaminants. But why would they want to get track of this, not doing so makes it impossible for the little people to fight them and that is exactly why they chose to build in South Huntingdon, Township, as we were told years ago.

If you have any questions, please contact my family directly. We have to breathe in and live with all the various outfalls from the Tenaska Westmoreland Power Plant – “our next door neighbor”.

Sincerely,

Lane & Geri Rupert
And the Rupert Family
400 Nichols Road
Ruffs Dale, PA 15679

We appreciate the DEP listening to us and holding this long overdue public hearing. Allowing community voices to be heard is essential to the permitting process and we appreciate this opportunity.

Although we are grateful the DEP is working to finalize a Title V permit for this facility, it is unconscionable that it has taken nine years, particularly since this facility has been out of compliance for the past 12 quarters for carbon monoxide, nitrogen oxide and volatile organic compounds. The US EPA's ECHO data base labeled these events as "High Priority Violations."

No facility should be allowed to operate without its federally required Title V permit, particularly one that is non-compliant.

I do hope the PA DEP will be instituting internal fact checking to ensure this never happens again.

After reviewing the draft permit, there remain some serious concerns that the draft permit the PA DEP is considering is not fully in compliance with the federal Clean Air Act. To that end, we request substantive changes to the permit including the following:

1. The Draft Permit does not require recordkeeping or reporting of all emissions data, and all monitoring conducted by Tenaska to determine compliance with permit limits for each source to be reported to DEP.

- Tenaska must be required to report to PA DEP ALL emissions monitoring it does to determine if the facility is in compliance with their permit limits.
- And that data must be accessible to the public through Right to Know requests.

2. The Draft Permit Does Not Include Monitoring Provisions Sufficient to Determine Compliance with Emissions Limits, which is Required by the Clean Air Act.

- The Draft Permit is deficient because it does not include monitoring requirements that are sufficient to ensure compliance with the limits in the permit. The Clean Air Act requires that a Title V Operating Permit must include in the permit itself monitoring requirements that are specific and frequent enough to show if the facility is complying with or violating the permit limits. This permit fails to include this required monitoring.
- The Draft Permit sets limits on emissions of seven pollutants (VOCs, total PM, PM10, PM2.5, sulfuric acid mist (H2SO4), sulfur oxides, or greenhouse gases) from the two combustion turbines (see p.37) but does not include sufficient monitoring requirements to assure compliance with the limits.

- The Draft Permit must require additional monitoring and maintenance to ensure compliance with NOx, VOC, and CO emission limits.

2. The Permit Fails to Limit the Duration of Combustion Tuning, Which Could Lead to High Emissions Releases.

- The Draft Permit's section restricting operating hours for "Startups, shutdowns, and combustion tuning" for the combustion turbines (page 39) are actually only limits durations of startups and shutdowns *but not combustion tuning*. The permit must be changed to limit duration for combustion tuning as well.

4. The Draft Permit Impermissibly Fails to Include a Schedule for Coming into Compliance with the Clean Air Act.

- The Tenaska Westmoreland facility has been in non-compliance with the Clean Air Act for all 12 of the last 12 quarters, but the Draft Permit fails to include a schedule for when and how they will comply.
- A compliance schedule must be included in the permit.

5. This is a new facility with a new permit, and the limits and monitoring should be the best possible to reflect the state-of-the-art controls expected of a new facility.

The current draft permit is not acceptable. It needs important changes that will ensure full compliance with the Clean Air Act including, more accountability through proper monitoring and guaranteed transparency for public access to all monitoring data.

The community has a right to these protections, and we are counting on the Department to make the necessary changes.

Thank you,

Lisa Graves Marcucci

PA Community Outreach Coordinator, Environmental Integrity Project

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November 3, 2025

Via Electronic Mail

Nick Waryanka, P.E., Air Quality Engineer
Thomas Joseph, P.E., Facilities Permitting Chief, Environmental Engineering Manager
Eric Gustafson, Regional Director
Southwest Regional Office, Pennsylvania Department of Environmental Protection
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Re: Written Comments of Environmental Integrity Project, Mountain Watershed Association, Health and Environmental Groups, and Residents Regarding Draft Title V Operating Permit No. 65-00990 for the Tenaska Westmoreland Generating Station

Dear Mr. Waryanka, Mr. Joseph, and Mr. Gustafson:

The Environmental Integrity Project ("EIP"), Mountain Watershed Association ("MWA"), Environmental Health Project ("EHP"), and Yough Communities CARE ("YCC"), and the additional undersigned groups and individuals ("Commenters") (public interest groups or nearby residents to this facility) submit these comments to the Pennsylvania Department of Environmental Protection ("DEP" or the "Department") on Draft Title V Operating Permit No. 65-00990 ("Draft Permit") for Tenaska Pennsylvania Partners LLC's Tenaska Westmoreland Generating Station located at 446 Smithton Pike, Smithton, PA 15479, South Huntingdon Township, Westmoreland County ("the Facility").

Commenters ask DEP to consider each group and individual signatory who has signed at the bottom of this document as a separate Commenter.

DEP noticed its intent to issue this permit in the *Pennsylvania Bulletin*.¹ The comment period closes November 3, 2025; these comments are therefore timely. Furthermore, that notice states that any person may request that the DEP hold a public hearing and states that "[a] public hearing may be held in accordance with 25 Pa. Code § 127.429."²

Commenters submitted a request for a public hearing for this Draft Permit on October 7, 2025. Commenters have not received a written response to that request.

¹ 55 Pa.B. 6967 (Oct. 4, 2025), <https://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol55/55-40/1356a.html&search=1&searchunitkeywords=tenaska>.

² *Id.*

This comment letter: 1) sets forth substantive comments regarding legal and technical deficiencies and substantive changes that need to be made in the Draft Permit, and 2) requests, again, a public hearing for this Draft Permit given the significant issues with the Draft Permit and the immense public interest in this first Title V permit for the Facility.

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I. Background - Commenters

Commenter the Environmental Integrity Project (“EIP”) is a national nonprofit organization headquartered in Washington, D.C., and with several full-time staff throughout Pennsylvania. EIP is dedicated to advocating for more effective environmental laws and better enforcement. EIP has three goals: (1) to provide objective analyses of how the failure to enforce or implement environmental laws increases pollution and affects public health; (2) to hold federal and state agencies, as well as individual corporations, accountable for failing to enforce or comply with environmental laws; and (3) to help local communities obtain the protection of environmental laws. www.environmentalintegrity.org.

Commenter Mountain Watershed Association is a non-profit, 501(c)(3) organization with the mission to protect, preserve and restore the Youghiogheny River watershed and its broader communities through conservation, recreation, education, and advocacy. Our organization is unique in that we pursue on-the-ground restoration of past environmental damages while we advocate to protect the watershed from new sources of pollution, primarily caused by fossil fuel development. We achieve our mission through a variety of initiatives including abandoned mine drainage remediation, water quality monitoring, trail development, educational programming, grassroots organizing, and legal advocacy. <https://mtwatershed.com/>

The additional Commenters are other public health and environmental organizations with a focus on Pennsylvania and residents who live near the Tenaska Westmoreland Facility.

II. The Draft Permit Does Not Include Monitoring Provisions Sufficient to Determine Compliance with Emissions Limits, Which is Required by the Clean Air Act.

The Draft Permit is deficient because it does not include monitoring requirements that are sufficient to assure compliance with the limits in the permit. Pennsylvania’s Title V regulations

require that a Title V Operating Permit *must* include in the permit itself monitoring requirements that are specific and frequent enough to show if the facility is complying with or violating the limits in the permit, stating: “The monitoring requirements shall assure use of terms, test methods, units, averaging periods and other statistical conventions are consistent with the applicable requirement.”³

The U.S. Environmental Protection Agency (“EPA”) delegated authority to Pennsylvania to administer the Title V program of the federal Clean Air Act in 1996. Pennsylvania issues air pollution permits for major sources of regulated pollutants under the Title V program based on the regulations at 25 Pa. Code Chapter 127, Subchapter F, which EPA approved and which incorporate the requirements of Title V of the federal Clean Air Act contained at 42 U.S.C. Chapter 85, Subchapter V, and implementing regulations at 40 C.F.R. Part 70.

The Clean Air Act requires that “[e]ach permit” issued under the Title V program “shall set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.”⁴ Similarly, Pennsylvania’s Title V regulations require that monitoring must be sufficient to assure compliance, stating, “Title V permits shall contain the following elements . . . compliance certification, testing, monitoring, reporting and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit.”⁵

As explained by EPA in a recent Order granting a petition by EIP asking EPA to object to the Title V permit for U.S. Steel’s Edgar Thomson Plant:

The title V operating permit program . . . does require permits to contain adequate monitoring, recordkeeping, reporting, and other requirements to assure compliance with applicable requirements. 40 C.F.R. § 70.1(b); 42 U.S.C. § 7661c(c). One purpose of the title V program is to “enable the source, States, EPA, and the public to understand better the requirements to which the source is subject, and whether the source is meeting those requirements.” 57 Fed. Reg. 32250, 32251 (July 21, 1992). Thus, the title V operating permit program is a vehicle for compiling the air quality control requirements as they apply to the source’s emission units and for providing adequate monitoring, recordkeeping, and reporting to assure compliance with such requirements.⁶

However, the Draft Permit fails to include this required monitoring from several sources for many pollutants and limits. The DEP must make the substantive changes noted below in order for the Draft Permit to comply with federal and state clean air pollution law requirements.

³ See 25 Pa. Code § 127.511(a)(2).

⁴ 42 U.S.C. § 7661c(c).

⁵ 25 Pa. Code § 127.513(1).

⁶ *In the Matter of United States Steel Corporation, Edgar Thomson Plant Permit No. 0051-OP23 Issued by the Allegheny County Health Department*, EPA Order on Title V Petition No. III-2023-15, at 2 (Feb. 7, 2024), https://www.epa.gov/system/files/documents/2024-02/us-steel-edgar-thomson-order_02-07-2024.pdf [hereinafter “EPA Order on Edgar Thomson”].

a. **The Draft Permit Does Not Require Sufficient Monitoring to Assure Compliance with Applicable Limits for VOCs, Total PM, PM₁₀, PM_{2.5}, Sulfuric Acid Mist, Sulfur Oxides, or Greenhouse Gases from the Combustion Turbines.**

The Draft Permit does not include sufficient emissions monitoring requirements to assure compliance with applicable limits for seven pollutants (VOCs, total PM, PM₁₀, PM_{2.5}, sulfuric acid mist (H₂SO₄), sulfur oxides, or greenhouse gases) for which there are emissions limitations set for the two combustion turbines.⁷ The Draft Permit's emissions restrictions for the combined cycle combustion turbines include the following emissions restrictions on ten pollutants that apply on a 12-month rolling basis⁸:

SECTION E. Source Group Restrictions.	
Group Name: G001	
Group Description: Combined Cycle Combustion Turbines	
Sources included in this group	
ID	Name
101	COMBINED CYCLE UNIT #1 (3,147 MMBTU/HR)
102	COMBINED CYCLE UNIT #2 (3,147 MMBTU/HR)
I. RESTRICTIONS.	
Emission Restriction(s).	
# 001 [25 Pa. Code §127.441]	
Operating permit terms and conditions.	
At all times, including startup, shutdown, and combustion tuning, emissions from each combined cycle combustion turbine, Source IDs 101 and 102, shall not exceed the following on a 12-month rolling basis:	
(a) Nitrogen Oxides (NOx): 148.4 tpy	
(b) Carbon Monoxide (CO): 318.6 tpy	
(d) Volatile Organic Compounds (VOC): 109.6 tpy	
(e) Total Particulate Matter (PM): 42.5 tpy	
(f) Total Particulate Matter with an aerodynamic diameter less than 10 microns (PM10): 42.5 tpy	
(g) Total Particulate Matter with an aerodynamic diameter less than 2.5 microns (PM2.5): 42.5 tpy	
(h) Sulfuric Acid Mist (H ₂ SO ₄): 7.5 tpy	
(c) Sulfur Oxides (SOx): 11.25 tpy	
(i) Ammonia (NH ₃): 96.9 tpy	
(j) Greenhouse Gases, expressed as Carbon Dioxide Equivalent (CO ₂ e): 1,830,976 tpy	

However, while the Draft Permit requires continuous emissions monitoring systems ("CEMS") for three pollutants with limits (NOx, CO, and ammonia), the permit fails to set required monitoring methods, calculations, or frequencies for these other seven pollutants. While the permit states "[s]ources subject to this section shall install, operate and maintain continuous nitrogen oxides monitoring systems and other monitoring systems to convert data to required reporting units in compliance with Chapter 139, Subchapter C (relating to requirements for continuous in-stack monitoring for stationary sources)," and "(c) Sources subject to this section shall submit results on a regular schedule and in a format acceptable to the Department and in compliance with Chapter 139, Subchapter C,"⁹ the permit itself does not include or specify the

⁷ See Draft Permit, at 37.

⁸ Draft Permit, at 37.

⁹ Draft Permit, at 39, Section E.III #012.

“other monitoring systems,” the “regular schedule,” or the “format” so the permit fails to assure compliance with the applicable limitations for pollutants without CEMs.

By failing to specify in the text of the permit itself what monitoring is required to assure compliance with the applicable limits for these seven pollutants, the Draft Permit fails to comply with the Clean Air Act’s requirements at 42 U.S.C. § 7661c(e) or Pennsylvania Air Pollution Control Act regulations at 25 Pa. Code § 127.513(1). DEP must make specific, substantive changes to the permit to set forth the exact monitoring requirements applicable to Tenaska that will assure compliance.

i. The Draft Permit Should Require Stack Testing At Least Annually of the Seven Pollutants for Which CEMS is Not Required.

The Draft Permit should require at least annual stack test testing for the seven pollutants for which CEMS is not required that have rolling 12-month permit limitations. As stated above, there are rolling 12-month permit limits for VOCs, total PM, PM₁₀, PM_{2.5}, sulfuric acid mist (H₂SO₄), sulfur oxides, or greenhouse gases from each of the combustion turbines.¹⁰ The Draft Permit only requires stack testing of VOCs, formaldehyde, and PM “no less often than every two years after initial testing,”¹¹ requires stack testing every 25,000 hours (approximately 2.85 years) for CO₂,¹² and does not specify the frequency of stack testing for the other pollutants. A single stack test performed every two years or more is not sufficient to determine hourly or even annual emissions.

Under Title V, the frequency of monitoring must be reasonably related to the averaging time to determine compliance with a limit.¹³ Pennsylvania regulations are similar, requiring each permit to “contain...periodic monitoring sufficient to yield accurate and reliable data from the relevant time that are representative of the source’s compliance with the permit,” and stating that “the monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions are consistent with the applicable requirement.”¹⁴

In 2008, the D.C. Circuit Court of Appeals vacated an EPA rule that would have prohibited state and local authorities from adding monitoring provisions to Title V permits if needed to “assure compliance.”¹⁵ The court stated that a “monitoring requirement insufficient ‘to assure compliance’ with emission limits has no place in a [Title V] permit unless and until it is supplemented by more rigorous standards.”¹⁶ In addition, the court acknowledged that the mere

¹⁰ Draft Permit, at 37.

¹¹ Draft Permit, at 39.

¹² Draft Permit, at 39, Section E.III #011.

¹³ 40 C.F.R. § 70.6(a)(3)(i)(B) (“Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the permit, as reported pursuant to paragraph (a)(3)(iii) of this section. Such monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. Recordkeeping provisions may be sufficient to meet the requirements of this paragraph (a)(3)(i)(B) of this section.”).

¹⁴ 25 Pa. Code § 127.511(a)(1), (a)(2).

¹⁵ See *Sierra Club v. EPA*, 536 F.3d 673 (D.C. Cir. 2008).

¹⁶ *Id.* at 677 (citing 40 C.F.R. § 70.6(c)(1)).

existence of periodic monitoring requirements may not be sufficient.¹⁷ For example, the court noted that annual testing is unlikely to assure compliance with a daily emission limit.¹⁸ In other words, the frequency of monitoring must have a reasonable relationship to the averaging time used to determine compliance.¹⁹

Since then, EPA has expressly found that annual testing alone is insufficient to assure compliance with an hourly limit.²⁰ In *In re Northeast Maryland Waste Disposal Authority*, Order on Petition No. III-2019-2 (“NMWDA Order”), EPA found that petitioners demonstrated that the annual stack testing required to demonstrate compliance with an hourly limit for HCl at Covanta’s incinerator in Montgomery County, Maryland was insufficient and that the additional monitoring measures cited by the permitting agency did not cure the deficiency.²¹ In fact, in the NMWDA Order, the EPA strongly suggested that even monitoring on a 3-hour basis is likely inadequate to assure continuous compliance with an hourly standard.²²

In 2024, EPA issued an Order granting to a petition filed by Commenter EIP that objected to a Pennsylvania Title V Permit for the U.S. Steel Edgar Thomson Plant based on four claims that the permit had “insufficient periodic stack tests (every two years four years, or five years) . . . to assure compliance with emission limits that appl[ied] on a much shorter time period (hourly and any consecutive 12-month period).”²³ EPA cited its 2023 Order objecting to U.S. Steel’s Clairton Coke Works’ Title V Permit, stating:

As a general matter, EPA agrees with the Petitioners that the time period associated with monitoring or other compliance assurance provisions must bear a relationship to the limits with which the monitoring assures compliance. See 40 C.F.R. § 70.6(a)(3)(i)(B); In the Matter of Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations, Order on Petition Nos. VI-2018-3 and VI-2019-12 at 18–19 (Feb. 22, 2023) (Crossett Order); MCRRF Order at 9.²⁴

In the Edgar Thomson Order, EPA explained that:

¹⁷ *Id.* at 676–77.

¹⁸ *Id.* at 675.

¹⁹ *Id.*

²⁰ *In re Northeast Maryland Waste Disposal Authority*, Order on Petition No. III-2019-2, at 9, (Dec. 11, 2020) (“NMWDA Order”), available at https://www.epa.gov/sites/default/files/2020-12/documents/montgomery_response2019.pdf. The Order granted Petitioners’ objections to more than just these four claims.

²¹ *Id.*

²² *Id.* at 10–11, note 10 (“use of a 3-hour block average, even if using a certified HCl CEMS, is likely inappropriate for demonstrating compliance with a 1-hour standard.”).

²³ *In re*

United States Steel Corporation, Edgar Thomson Plant, Order on Petition No. III-2023-15, at 11 (Feb. 7, 2024) (“Edgar Thomson Order”) (objecting to Permit No. 0051-OP23 Issued by the Allegheny County Health Department), available at https://www.epa.gov/system/files/documents/2024-02/us-steel-edgar-thomson-order_02-07-2024.pdf.

²⁴ Edgar Thomson Order, at 12, (citing *In the Matter of U.S. Steel Corp., Clairton Coke Works*, Order on Petition Nos. III-2023-5 & III-2023-6 at 10 (Sept. 18, 2023) (“Clairton Order”).

To assist with these case-by-case determinations, the EPA has described five factors permitting authorities may consider as a starting point in determining appropriate monitoring for a particular facility: (1) the variability of emissions from the unit in question; (2) the likelihood of a violation of the requirements; (3) whether add-on controls are being used for the unit to meet the emission limit; (4) the type of monitoring, process, maintenance, or control equipment data already available for the emission unit; and (5) the type and frequency of the monitoring requirements for similar emission units at other facilities.²⁵

EPA held in the Edgar Thomson Order that biannual stack testing was insufficient to assure compliance with annual limits, and ordered the permitting authority, the Allegheny County Health Department (“ACHD”), to revise the permit, stating: “ACHD must ensure that the Permit contains sufficient testing, monitoring, and recordkeeping requirements to assure compliance with the hourly and 12-month emission limits at issue” for each of the four claims.²⁶

Similarly, the Draft Permit fails to set forth monitoring requirements that assure compliance with the rolling 12-month limits in the permit for 7 pollutants from the combustion turbine. DEP must revise the permit terms to include more frequent and specific monitoring requirements that are capable of assuring compliance with permit limits in order to comply with Title V of the Clean Air Act.

In addition, EPA’s Title V Regulations require that the rationale for the selected monitoring requirements must be clear and documented in the permit record.²⁷ EPA has reinforced and supported these decisions in multiple orders it has issued in response to Title V petitions.²⁸

In the Draft Permit, permit monitoring requirements that require stack testing only once every two years, or that do not specify the method or frequency at all for some pollutants are

²⁵ Edgar Thomson Order, at 12 (citing *In the Matter of CITGO Refining and Chemicals Company, L.P.*, Order on Petition No. VI-2007-01 at 7–8 (May 28, 2009) (“CITGO Order”)).

²⁶ Edgar Thomson Order, at 17.

²⁷ 40 C.F.R. § 70.7(a)(5); *In the Matter of Consolidated Environmental Management, Inc. – Nucor Steel St. James Parish, Louisiana Pig Iron and DRI Manufacturing*, Order on Petition Nos. VI-201-05, VI-2011-06 and VI-2012-07, at 46 (Jan. 30, 2014) (referencing *In the Matter of CITGO Refining & Chemicals Co.*, Order on Petition No. VI-2007-01 at 7 (May 28, 2009)); *In the Matter of United States Steel, Granite City Works* (“Granite City I Order”), Order on Petition No. V-2009-03, at 7–8 (Jan. 31, 2011).

²⁸ See, e.g., *In the Matter of: Wheelabrator Baltimore, L.P., Baltimore Maryland*, Order Responding to Petitioners’ Request that Administrator Object to the Issuance of a Title V Operating Permit, Permit No. 24-510-01886 (Apr. 14, 2010) (“Wheelabrator Baltimore Order”) (finding that MDE failed to analyze whether multiple monitoring requirements sufficiently assured compliance with emission limits and failed to include the methodology for monitoring to assure compliance with applicable requirements in the Title V permit); *In the Matter of: Tennessee Valley Authority, Bull Run, Clinton, Tennessee*, Order Responding to Petitioners’ Request that the Administrator Object to the Issuance of a Title V Operating Permit, Petition No. IV-2015-14 (Nov. 11, 2016) (“TVA Bull Run Order”) (finding that the permit did not include sufficient monitoring requirements for an applicable opacity limit and directing TDEC to require PM CEMS to demonstrate compliance with the limit); *In the Matter of: Kinder Morgan Crude & Condensate LLC, Galena Park, Harrison County, Texas*, Order Responding to Petition Requesting Objection to the Issuance of Title V Operating Permit, Petition No. VI-2017-15 (Dec. 16, 2021) (“Kinder Morgan Order”) (where EPA granted petitioners’ objection that monitoring associated with emissions limits on two heaters failed to assure compliance with emissions limits for VOCs because there was no indication in the permit that there were monitoring requirements associated with VOCs).

clearly not sufficient to assure continuous compliance with emission limits that apply continuously on 12-month rolling bases.

The Department has not identified any other testing or monitoring requirements for these emission limits in the Renewal Permit or provided a clear and documented rationale for how biennial stack tests or unspecified monitoring could possibly assure compliance with the emission limits in the Draft Permit as required by 40 C.F.R. Section 70.6(a)(3)(i)(B) and 25 Pa. Code Section 127.511(a).

As such, DEP should require more frequent monitoring that is hourly or, at the very least, annual stack testing for all pollutants with annual limits from the combustion turbines in order to comply with applicable Title V requirements.

- ii. The Draft Permit Fails to Specify Monitoring Requirements for VOCs or Formaldehyde from the Combustion Turbines and DEP Should Establish a VOC to CO Ratio to Continuously Measure VOCs Using CO as a Surrogate.

The proposed permit fails to include any specific requirements for monitoring or calculating emissions of VOC or formaldehyde from the combustion turbines. The Draft Permit sets a VOC limit of 109.6 tpy for each of the two turbines,²⁹ but does not establish a VOC monitoring method or frequency. As such, the Draft Permit's monitoring requirements are not sufficient to assure compliance with permit limits for VOCs from the combustion turbines.

VOCs, including formaldehyde, are emitted from turbines as the result of incomplete combustion.³⁰ Emissions of VOC follow a pattern similar to emissions of CO, with higher emissions at lower operating loads.³¹ In addition, the performance of the oxidation catalyst, which controls both CO and VOC emissions, varies with the condition of the catalyst. While a catalyst's life can extend for many years, the performance can deteriorate over time, with periodic cleaning and eventual replacement of the catalyst required to restore the performance to the original activity levels.³² DEP should require VOC and formaldehyde monitoring and emission calculation methods that appropriately document any variability in emissions.

DEP should require Tenaska to establish a VOC to CO correlation during VOC stack testing to ensure continuous monitoring of VOC emissions using CO as a surrogate. DEP has required VOC monitoring using this method at the Birdsboro Power Project in Birdsboro, PA,³³ which also operates a natural gas powered combined cycle turbine of similar size to the turbines at Tenaska.³⁴ The permit requires that continuous compliance with the VOC emission limit for the

²⁹ See Draft Permit, at 37.

³⁰ AP-42 Chapter 3.1 Stationary Gas Turbines at 2.

³¹ AP-42 Chapter 3.1 Stationary Gas Turbines at 4.

³² EPA, Air Pollution Control Cost Manual, Section 3, Chapter 2: Incinerators and Oxidizers, at 18 (Nov. 2017).

³³ DEP Title V/State Operating Permit No. 06-05154, available at [https://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Permits/PermitDocuments/1294817\[06-05154\]_Issued_v2.pdf](https://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Permits/PermitDocuments/1294817[06-05154]_Issued_v2.pdf).

³⁴ The Birdsboro turbine capacity is 3,000 MCF/hr, nearly identical to the 3,026 MCF/hr capacity of the Tenaska turbines. Compare Permit No. 06-05154, at 4, Section A, with Draft Permit, at 4, Section A.

Birdsboro turbine be ensured by establishing a VOC to CO ratio during VOC stack testing, which is then used to calculate VOC emissions on an ongoing basis while the turbine is in operation.³⁵ This monitoring method is also already required at other regional Natural Gas Power Stations, including Kleen Energy Systems in Dayville, Connecticut; CPV Towantic Power Station in Oxford, Connecticut and the Keys Energy Center in Brandywine, Maryland.³⁶ In order to assure continuous compliance with applicable VOC limits here, the Draft Permit should, likewise, establish a VOC to CO correlation during VOC stack testing to ensure continuous monitoring of VOC emissions using CO as a surrogate.

b. The Draft Permit Must Require Additional Monitoring and Maintenance To Assure Compliance with NOx Emissions from the Power Blocks, Sources 101 and 102 (Combustion Turbines).

The Draft Permit does not include monitoring and maintenance requirements for NOx emissions sufficient to assure compliance with applicable limits. Specifically, the DEP's Review Memo says that DEP's BACT determination for control of NOx was good combustion practices and installation of Selective Catalytic Reduction ("SCR"), and states that "Tenaska is required to":

- 1) continuously measure and record the SCR pressure differential;
- 2) continuously monitor and record the inlet and outlet temperatures;
- 3) continuously monitor and record the ammonia injection rate of the SCR;
- 4) conduct maintenance per the manufacturer's specifications; and
- 5) visually inspect the catalyst during planned outages and clean/replace as needed.³⁷

However, the Draft Permit fails to include any of these requirements.

³⁵ Permit No. 06-05154 at 24 (Section D, Source ID 101 #012).

³⁶ CTDEEP Permit No. 104-0150-TV at 18 (III.A.4.b.x.), *available at* https://portal.ct.gov/-/media/deep/air/permits/titlev/kleen_energy/p-104-0150-tv.pdf?rev=7c355a1f734e48d1b694733b7bd576e7&hash=88E754AC85146F39E90873C3604E2162 (stating that VOC emissions "shall be determined by correlating the VOC emissions to the CO emissions using manufacturer's data and tracked using the CO CEMS"); CTDEEP Permit No. 144-0033-TV at 21 (III.A.2.c.i(D)), *available at* https://portal.ct.gov/-/media/deep/air/permits/titlev/cpv_towantic_oxford/p-144-0033tv.pdf?rev=7d3a417369a947fcb8229ad2c78a92b9&hash=B591F6D342144CDC9A3020407617AD371 (stating that VOC emissions from the turbines are to be "determined by correlating the VOC emissions to the CO emissions using the results of a diagnostic stack test or vendor correlation data and tracked using the CO CEMS"); MDE Permit No. 24-033-2737 at 41-42 (Table IV-1:1.3.E), *available at* <https://mde.maryland.gov/programs/permits/AirManagementPermits/Documents/Public-Review/new%20Title%20V%20public%20review/PSEIG%20Keys%20Docket%202.pdf> (stating that "CO CEMS data shall be used as a surrogate for VOC emissions. A correlation shall be developed between CO and VOC emissions based on an initial stack test. The emission correlation shall be verified annually by stack test, or a new correlation established.").

³⁷ Technical Review Memo, at 22.

Similar Pennsylvania Title V permits include these requirements. For example, DEP Title V permits that require monitoring pressure differential and inlet and outlet temperatures include: the Hummel Station LLC Sunbury Natural Gas Plant,³⁸ Hamilton Liberty,³⁹ and Moxie Freedom.⁴⁰ DEP Title V Permits that require monitoring of the ammonia injection rate include Birdsboro⁴¹ and Ironwood.⁴²

The Permit must be changed to require each of these practices from each of the combustion turbines in order to require BACT is being achieved and to assure compliance with NOx limits.

c. The Draft Permit Must Require Additional Monitoring and Maintenance To Assure Compliance with CO and VOC Emissions from the Power Blocks, Sources 101 and 102 (Combustion Turbines).

The Draft Permit does not include monitoring and maintenance requirements for CO or VOC emissions sufficient to assure compliance with applicable limits. Specifically, the DEP's Review Memo says that the "Department has determined the appropriate control technology for both CO and VOC is the use of good combustion practices and operation of an oxidation catalyst," and states that "Tenaska is required to":

- 1) continuously monitor and record the pressure differential across the oxidation catalyst;
- 2) continuously monitor and record the inlet and outlet temperatures to ensure proper operation;
- 3) conduct maintenance as per the manufacturer's specifications; and
- 4) visually inspect the catalyst during planned outages and clean/replace as needed.⁴³

However, the permit fails to include any of these requirements. The Permit must be changed to require each of these.

³⁸ DEP, Title V Permit No. 55-00026 for the Hummel Station LLC Sunbury Natural Gas Plant (issued Nov. 25, 2024) (requiring SCR catalyst monitoring at #012 at 38 and #012 at 43 (required separately for each turbine) and also requiring oxidation catalyst monitoring at #014 at 38, 43).

³⁹ DEP, Title V Permit No. 08-00045 for the Hamilton Liberty LLC Hamilton Liberty LLC Plant Plant (issued Oct. 15, 2023) (with SCR catalyst monitoring at #016 at 52-53 and oxidation catalyst monitoring is #014 at 52).

⁴⁰ DEP, Title V Permit No. 37-1751759-1 for the Moxie Freedom LLC Caithness Moxie Freedom Generation Plant (issued Aug. 13, 2025) (with SCR catalyst monitoring at #011 at 44 and oxidation catalyst monitoring on #010 at 44, and also requiring maintenance per manufacturer's recommendations at #002 at 63).

⁴¹ DEP, Title V Permit No. 37-1779677-1 for the Birdsboro Power LLC Birdsboro Power Project (issued Dec. 31, 2020) (#011 at 24 (which also requires monitoring inlet temp (but not outlet) and pressure differential), and also requiring maintenance per manufacturer's recommendation for both SCR catalyst and oxidation catalyst at requirement #022 at 26).

⁴² DEP, Title V Permit No. 27-1923399-1 for the Helix Ironwood LLC Helix Ironwood LLC/Lebanon Plant (issued Aug. 27, 2024) (#001 at 66, #001 at 68 (both conditions also require monitoring inlet temperature)).

⁴³ Technical Review Memo, at 22.

d. The Draft Permit Should Specify Exactly How Cooling Tower PM Emissions Must Be Calculated and Should Require Daily Monitoring of Total Dissolved Solids from the Cooling Tower Water Instead of Monthly Monitoring.

DEP states that PM, PM₁₀, and PM_{2.5} emissions will be recorded “based upon the measured parameters,”⁴⁴ but fails to specify anywhere in the permit what that means or how such measurements and recordings will be calculated. The Draft Permit must specifically set forth, in the permit itself, the method by which PM emissions will be recorded to ensure these emissions are being recorded in a way that will ensure compliance with permit limits.

In addition, the Draft Permit should require monitoring of Total Dissolved Solids (“TDS”) from the cooling tower on a daily, rather than monthly, basis. The Draft Permit establishes an emission restriction of 2,000 ppm of TDS from the cooling tower water in addition to setting emissions limits from the cooling tower for Total PM (limits of 1.5 lb/hr and 6.57 tpy on a 12-month rolling basis), Total PM₁₀ (limits of 0.75 lb/hr and 3.29 tpy on a 12-month rolling basis), and Total PM_{2.5} (limits of 0.002 lb/hr and 0.009 tpy on a 12-month rolling basis).⁴⁵ However, the Draft Permit requires monitoring of the circulating water TDS content only on a monthly basis as well as continuous monitoring and recording of the circulating water and make up water flow rates on a 24-hour average.⁴⁶

DEP should require that the sampling of the circulating water TDS content is conducted on a daily basis (rather than monthly) in order to assure accurate TDS concentrations. DEP should require more frequent monitoring of TDS – either through direct sampling or through establishing a TDS-to-conductivity ratio and then monitoring conductivity more frequently, in order to assure that the monitoring will assure compliance with permit limits. DEP did not explain how monthly monitoring of TDS will assure compliance with permit limits. There are numerous examples of permits that require daily monitoring, including the Birdsboro TVOP, which has daily conductivity monitoring requirement.⁴⁷

e. The Draft Permit Sets Limits on Eight Pollutants from the Auxiliary Boiler But Does Not State the Method or Frequency Required to Monitor Any of Them, So the Draft Permit Does Not Assure Compliance With Limits As Required by the Clean Air Act.

The Draft Permit sets limits on NO_x, CO, VOC, Total PM, Total PM₁₀, Total PM_{2.5}, H₂SO₄, and SO₂ that apply on a 12-month rolling basis, but fails to require any monitoring or testing requirements to ensure compliance with permit limits⁴⁸:

⁴⁴ Draft Permit at 32.

⁴⁵ Draft Permit at 32.

⁴⁶ *Id.*

⁴⁷ DEP, Title V Permit No. 06-05154 for the Birdsboro Power LLC Birdsboro Power Project, at 36 (issued Dec. 31, 2020); *see also* EPA, *In the Matter of Valero Refining-Texas, L.P. Valero Houston Refinery Harris County, Texas Permit No. 01381*, Order Responding to Petition No. VI-2021-S, at 58-59 (June 30, 2022) (“Valero Order”).

⁴⁸ Draft Permit, at 25.

I. RESTRICTIONS.

Emission Restriction(s).

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The emissions from the auxiliary boiler shall not exceed the following:

- (a) NOx: 0.011 lb/MMBtu or 5.76 tpy on a 12-month rolling basis.
- (b) CO: 0.037 lb/MMBtu or 19.85 tpy on a 12-month rolling basis.
- (c) VOC: 0.0054 lb/MMBtu or 2.89 tpy on a 12-month rolling basis.
- (d) Total PM: 0.0075 lb/MMBtu or 4.00 tpy on a 12-month rolling basis.
- (e) Total PM₁₀: 0.0075 lb/MMBtu or 4.00 tpy on a 12-month rolling basis.
- (f) Total PM_{2.5}: 0.0075 lb/MMBtu or 4.00 tpy on a 12-month rolling basis.
- (g) H₂SO₄: 9.20E-06 lb/MMBtu or 4.94E-03 tpy on a 12-month rolling basis.
- (h) SO₂: 0.0006 lb/MMBtu or 0.32 tpy on a 12-month rolling basis.

Compliance with the above emission limits ensures compliance with 25 Pa. Code §§ 123.11, 123.22, and the applicable RACT III requirement of § 129.112(g)(1)(i).

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not allow the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (a) Equal to or greater than 10% for a period or periods aggregating more than 3 minutes in any one hour.
- (b) Equal to or greater than 30% at any time.

Throughput Restriction(s).

[25 Pa. Code §127.441]

Operating permit terms and conditions.

Total fuel usage of the auxiliary boiler shall not exceed 1,052 MMBtu/yr on a 12-month rolling basis.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

Title V requires monitoring requirements sufficient to assure compliance with permit limits.⁴⁹ DEP must revise the Draft Permit to include specific monitoring requirements, including frequencies and methods sufficient to assure compliance with applicable permit limits can be determined.

f. The Draft Permit Sets Limits on Seven Pollutants from the Emergency Fire Pump Engine But Does Not State the Method or Frequency Required to Monitor Any of Them.

The Draft Permit sets limits on NO_x, CO, VOC, Total PM, Total PM₁₀, Total PM_{2.5}, and SO₂ emissions from the emergency fire pump engine that apply on a 12-month rolling basis, but fails to require any monitoring or testing requirements to ensure compliance with permit limits⁵⁰:

⁴⁹ See, e.g., 40 C.F.R. § 70.6(a)(3)(i)(B); 25 Pa. Code § 127.511(a)(1), (a)(2).

⁵⁰ Draft Permit, at 30.

I. RESTRICTIONS.

Emission Restriction(s).

[25 Pa. Code §127.441]
Operating permit terms and conditions.

The emissions from the emergency fire pump engine shall not exceed the following:

- (a) NO_x: 3.30 lb/hr and 0.82 tpy on a 12-month rolling basis.
- (b) CO: 0.85 lb/hr and 0.21 tpy on a 12-month rolling basis.
- (c) VOC: 0.11 lb/hr and 0.03 tpy on a 12-month rolling basis.
- (d) Total PM: 0.13 lb/hr and 0.03 tpy on a 12-month rolling basis.
- (e) Total PM₁₀: 0.11 lb/hr and 0.03 tpy on a 12-month rolling basis.
- (f) Total PM_{2.5}: 0.11 lb/hr and 0.03 tpy on a 12-month rolling basis.
- (g) SO₂: 0.007 lb/hr and 0.002 tpy on a 12-month rolling basis.

Fuel Restriction(s).

[25 Pa. Code §127.441]
Operating permit terms and conditions.

Sulfur content of the diesel fuel combusted by the fire pump engine shall not exceed 15 ppm.

Operation Hours Restriction(s).

[25 Pa. Code §127.441]
Operating permit terms and conditions.

Operation of the emergency fire pump engine shall not exceed 500 hours on a 12-month rolling basis.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

Title V requires monitoring requirements sufficient to assure compliance with permit limits.⁵¹ DEP must revise the Draft Permit to include specific monitoring requirements, including frequencies and methods sufficient to assure compliance with applicable permit limits can be determined from this source.

III. The Draft Permit Fails to Limit the Duration of Combustion Tuning, Which Could Lead to High Emissions Releases.

The Draft Permit fails to limit the duration of combustion tuning and it must be revised to do so in order to assure compliance with emission limits in the permit. The Draft Permit's section restricting operating hours for "Startups, shutdowns, and combustion tuning" for the combustion turbines actually only limits durations of startups and shutdowns *but not combustion tuning*.⁵² The permit must be changed to limit duration for combustion tuning as well.

A review of previously issued plan approvals for this facility shows that DEP did include tuning in its section limiting durations of startups and shutdowns previously, but that it was later removed, perhaps erroneously. In Plan Approval 65-00990F that was issued in 2023, limits on

⁵¹ See, e.g., 40 C.F.R. § 70.6(a)(3)(i)(B); 25 Pa. Code § 127.511(a)(1), (a)(2).

⁵² Draft Permit, at 39, Operation Hours Restriction(s) #008.

the duration of combustion tuning were included, stating “[t]otal startup, shutdown, and combustion tuning duration for each combined cycle combustion turbine shall not exceed 390 hours in any consecutive 12-month period.”⁵³ However, when Plan Approval 65-00990C was approved on Jun 7, 2024 the words “combustion tuning” were removed, with the permit stating “[t]otal startup and shutdown duration for each combined cycle combustion turbine shall not exceed 390 hours in any consecutive 12-month period.”⁵⁴ The omission of “combustion tuning” from the hourly duration restriction was carried over into the Draft Title V Operating Permit. Excluding tuning events could lead to unfettered emissions, so the failure to limit their duration makes the permit unable to assure compliance with permit limits. The Draft Permit should be revised accordingly.

IV. Tenaska Must Be Required to Report to DEP All Emissions Monitoring It Does to Determine Compliance with Permit Limits.

The Draft Permit does not require recordkeeping or reporting of all emissions data, and all monitoring that Tenaska does to determine compliance with permit limits for each source should be required to be reported to DEP. Both EPA and Pennsylvania Title V regulations require that reporting requirements must assure compliance with permit limits.⁵⁵ In addition, in the absence of the facility having to report all emissions data that Tenaska uses to determine compliance with permit restrictions, neither DEP nor the public would be able to access that information or determine compliance. The Draft Permit must be revised to assure all emissions restrictions have not only monitoring requirements but also recordkeeping and reporting requirements sufficient to assure compliance with applicable limits.

V. The Draft Permit Violates Pennsylvania Regulations Because It Fails to Contain a Compliance Schedule that Is Required Since the Tenaska Westmoreland Facility Has Been in Non-Compliance With the Clean Air Act for All 12 of the Last 12 Quarters.

An operating permit in Pennsylvania cannot be issued to a facility that is out of compliance with the Air Pollution Control Act, the Clean Air Act, or the regulations thereunder unless the operating permit contains “an enforceable schedule requiring the source to attain compliance as soon as possible.”⁵⁶

According to EPA’s Enforcement and Compliance History Online (“ECHO”) Database, the Tenaska Westmoreland facility has been in noncompliance with the Clean Air Act for all 12 of

⁵³ DEP, Plan Approval Permit No. 65-00990F for the Tenaska PA Partners Westmoreland Generating Facility, at 14 (issued Nov. 28, 2023) (stating that “a) The durations of startups, shutdowns, and combustion tuning events shall be minimized to the maximum extent possible,” and “b) Total startup, shutdown, and combustion tuning duration for each combined cycle combustion turbine shall not exceed 390 hours in any consecutive 12-month period.”).

⁵⁴ DEP, Plan Approval Permit No. 65-00990C for the Tenaska PA Partners Westmoreland Generating Facility, at 36 (issued June 7, 2024).

⁵⁵ 40 C.F.R. § 70.6(a)(3)(i)(B); 25 Pa. Code § 127.511(a)(1), (a)(2).

⁵⁶ 25 Pa. Code §§ 127.445(a), (b), 127.513(3).

the last 12 quarters, with the compliance status listed as “high priority noncompliance,” the 12 quarters all “quarters with significant violation,” and the violations are labeled “unresolved”⁵⁷:

Detailed Facility Report



TENASKA PA PARTNERS/WESTMORELAND GEN TAC
418 NICHOLS RD, RUETS DALE, PA 15679

FPS ID: 110600078810
EPA Region: 03
Latitude: 43.125425
Longitude: -120.67435
Locational Data Source: 11.5
Industry: 6575.1
Indian Country: 11

Related Reports

K 110600078810
110600078810

Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	1-6-2	06/14/2015	High Priority Violation	12	12	1	1	\$18,500	1	0

Regulatory Information

Clean Air Act (CAA): 01/01/2015 (01/01/2015)

Clean Water Act (CWA): 10/1/2015

Resource Conservation and Recovery Act (RCRA): 10/1/2015

Safe Drinking Water Act (SDWA): 10/1/2015

10/1/2015 (10/1/2015)

10/1/2015 (10/1/2015)

Other Regulatory Reports

Air Emissions Inventory (EIS): 10/1/2015

Greenhouse Gas Emissions (eGGH): 10/1/2015

Toxic Releases (TRI): 10/1/2015

Compliance and Emissions Data Reporting Interface (CEDRI): 10/1/2015

CAA Compliance Pipeline (Compliance Monitoring → Violations → Enforcement Actions) (10 Years)												
This table shows the compliance pipeline for the facility, including compliance monitoring, violations, and enforcement actions over a 10-year period.												
PA000716802: TENASKA PA PARTNERS/WESTMORELAND GEN TAC												
Compliance Monitoring			Violations					Enforcement Actions				
Compliance Monitoring Type	Compliance Monitoring Agency	Compliance Monitoring Date	Violation Type	Violation Agency	Violation Programs	Violation Determin. Date	Violation End Date	Enforcement Action Type	Enforcement Action Date	Penalty Assessed	Comp. Action Cost	
—	—	—	101	EA	CAAS-P	05/15/2013	N/A	—	—	—	—	
—	—	—	102	EA	CAAS-P	01/15/2013	N/A	—	—	—	—	
—	—	—	103	EA	CAAS-P	01/15/2013	N/A	—	—	—	—	
—	—	—	104	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	105	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	106	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	107	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	108	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	109	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	110	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	111	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	112	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	113	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	114	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	115	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	116	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	117	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	118	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	119	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	120	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	121	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	122	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	123	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	124	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	125	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	126	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	127	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	128	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	129	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	130	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	131	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	132	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	133	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	134	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	135	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	136	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	137	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	138	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	139	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	140	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	141	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	142	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	143	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	144	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	145	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	146	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	147	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	148	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	149	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	150	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	151	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	152	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	153	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	154	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	155	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	156	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	157	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	158	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	159	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	160	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	161	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	162	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	163	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	164	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	165	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	166	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	167	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	168	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	169	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	170	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	171	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	172	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	173	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	174	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	175	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	176	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	177	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	178	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	179	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	180	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	181	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	182	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	183	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	184	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	185	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	186	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	187	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	188	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	189	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	190	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	191	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	192	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	193	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	194	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	195	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	196	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	197	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	198	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	199	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	200	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	201	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	202	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	203	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	204	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	205	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	206	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	207	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	208	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	209	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	210	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	211	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	212	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	213	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	214	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	215	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	216	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	217	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	218	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	219	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	220	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	221	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	222	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	223	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	224	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	225	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	226	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	227	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	228	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	229	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	230	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	231	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	232	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	233	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	234	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	235	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	236	EA	CAAS-P	10/15/2013	N/A	—	—	—	—	
—	—	—	237									

subsection “(c)” appearing between “(h)” and “(i)” rather than between “(b)” and “(d).” This, and any other errors, must be corrected in the final permit.

VII. Commenters Request A Public Hearing Before A Final Permit Issued Given the Numerous Substantive Deficiencies in This Draft Permit.

Commenters renew and re-state our request for a public hearing as made in our October 7, 2025 letter requesting a public hearing. A public hearing is warranted for the Draft Permit because:

- 1) this is a Title V facility;
- 2) the Facility’s emissions heavily impact environmental justice areas; and
- 3) there is significant public interest in this facility and this permit.

Commenters specifically request that the public hearing be held in the host municipality at a time convenient for the community. Here, the best location is the Turkeytown Volunteer Fire Co. at 90 Supervisor Drive, West Newton, PA. We request the public hearing be held after work hours, commencing no earlier than 6pm, and include a remote participation option.

a. A Public Hearing Is Warranted for this Major Source’s First Operating Permit.

Residents who live near the Tenaska Westmoreland facility have been dealing with Tenaska’s operation and breathing its emissions since it was first permitted with a Plan Approval in April 2015, but this is the very first operating permit proposed for this plant. *See, e.g.,* Tenaska Pennsylvania Partners LLC, Initial Title V Operating Permit Application, at 1 (July 2024) (“TVOP Application”). This is the first time impacted residents have been able to formally comment on an operating permit for this major emitter of pollutants despite it being built and allowed to “temporarily operate” for a decade. A public hearing allowing DEP to hear from the community about improvements needed for this permit is important, especially given that some people are more comfortable providing their comments verbally than in writing. Failing to grant a public hearing to this community would be devastating to concerned community members and would be, frankly, unkind.

According to Tenaska’s TVOP Application, the Facility is a major source of nitrogen oxides (“NOx”), carbon monoxide (“CO”), and volatile organic compounds (“VOCs”), and also emits significant emissions of many other pollutants that can pose risks to health and the environment:⁵⁸

⁵⁸ TVOP Application, at 5.

3.0 Potential Emissions

The Facility is considered a major source of NO_x, CO, and VOC emissions. A summary of facility potential emissions is provided in Table 4. Detailed calculations are provided in Appendix E.

Table 4 – Facility Potential Emissions

Pollutant	Total Emissions (tpy)
NO _x	303.07
CO	657.16
SO ₂	22.79
VOC	222.19
PM	95.44
PM ₁₀	92.15
PM _{2.5}	88.88
Sulfuric Acid Mist	15.19
NH ₃	193.84
HCHO	8.67
Total HAPs	22.07
CO ₂	3,693,644
CH ₄	1,168.13
N ₂ O	6.64
CO _{2,e}	3,724,827

DEP should use its discretion to grant a public hearing because the Facility is a major source polluter of several pollutants and a significant emitter of other pollutants and the people most at risk of being harmed by exposure to these pollutants deserve to have their voices heard by DEP as it is making permitting decisions.

Pennsylvania regulations state that DEP may hold a public hearing for operating permits.⁵⁹ For major sources of pollution like the Facility that require Title V Operating Permits, there are additional regulations regarding public hearings.⁶⁰

b. A Public Hearing is Warranted Because Emissions from This Facility Impact Environmental Justice Areas.

The Tenaska Westmoreland Generating Station is located in an area such that its emissions disperse into environmental justice areas with high environmental justice scores on Pennsylvania's PennEnviroScreen mapping tool. DEP defines an "environmental justice area" as "[a] geographic area characterized by increased pollution burden, and sensitive or vulnerable populations based on demographic and environmental data."⁶¹

⁵⁹ 25 Pa. Code § 127.401(b).

⁶⁰ See, e.g., 25 Pa. Code § 127.521(c) (DEP "will give notice of a public hearing at least 30 days in advance of the hearing").

⁶¹ Environmental Justice Office, DEP, Environmental Justice Policy, Doc. No. 015-0501-002, at 3 (Sept. 16, 2023), <https://greenport.pa.gov/eLibrary/GetDocument?docId=5600403&DocName=ENVIRONMENTAL%20JUSTICE%20POLICY.PDF%20%20%3cspan%20style%3D%22color:green%3b%22%3cCOMMENTS%20DUE%20OCTOBER%2029%2c%202023%3cspan%3c%20%3cspan%20style%3D%22color:blue%3b%22%3c%28NEW%20%3cspan%3c> ("DEP EJ Policy").

While the Facility, marked with a pin in “Map A,” below, is not in a tract with a high environmental justice score, it is located very near to an area with a very high environmental justice score of 96%, as displayed in “Map B,” below.⁶² As displayed on Map B, below, the area shaded in dark below to the west of the facility received the following scores in PennEnviroScreen⁶³:

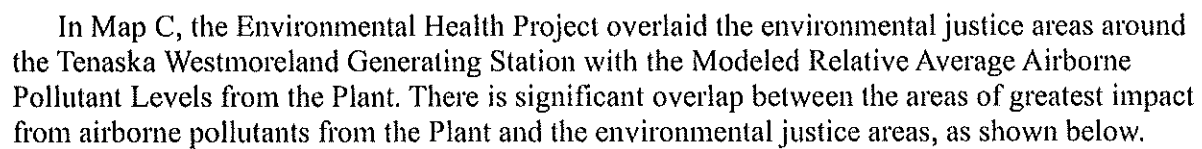
Exposure :	98 th
Environment Effects :	> 99.5 th
Pollution Burden :	> 99.5 th

Map A: PennEnviroScreen Map Showing Tenaska Westmoreland Facility with Blue Pinmark.



⁶² PennEnviroScreen, <https://gis.dep.pa.gov/PennEnviroScreen/> (last visited Oct. 6, 2025).

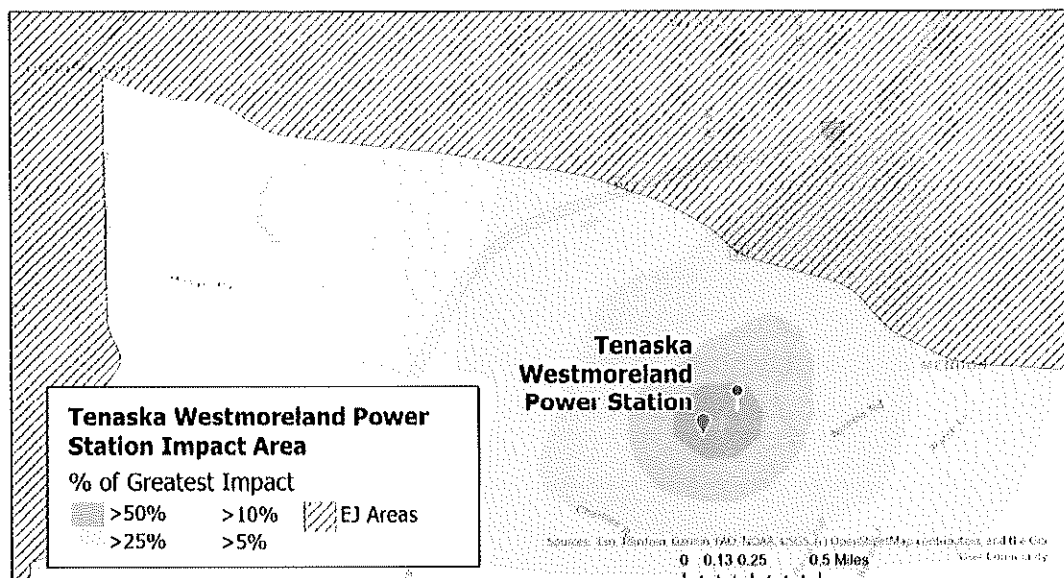
⁶³ *Id.*

**Pennsylvania
Department of
Environmental Protection**

Map C: Modeled Relative Average Airborne Pollutant Levels from the Westmoreland Power Station

Modeled Relative Average Airborne Pollutant Levels from the Westmoreland Power Station

**ENVIRONMENTAL
HEALTH PROJECT**
DEFENDING PUBLIC HEALTH AND JUSTICE



This map shows the modeled average annual concentration of primary air pollutants from the Westmoreland Power Station. The meteorological data used covered 5/1/2019-4/30/2020. Modeling was conducted assuming constant emissions uniformly distributed across 25-50m above ground level at 40.175549, -79.697014.

This map provides an understanding of the geographical distribution of primary pollutants on a relative scale. It does not provide specific levels of pollutants expected at any location. Secondary pollution formation has not been modeled.

Data Source: NOAA High-Resolution Rapid Refresh Atmospheric Model
Modeling Conducted by the Southwest Pennsylvania Environmental Health Project using NOAA HYSPLIT
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DEP's Environmental Justice Policy requires enhanced public participation for Title V permit comment periods in areas with high environmental justice scores on PennEnviroScreen. For an environmental justice area, DEP must consider and make available additional public participation measures according to DEP's recently updated Environmental Justice Policy.⁶⁴

Projects in Environmental Justice areas can either automatically trigger ("Trigger" projects) or opt-in on account of public request or DEP determination ("Opt-In" projects) to Enhanced Public Participation procedures. The DEP EJ Policy defines Enhanced Public Participation as:

Outreach activities and other support for EJ communities regarding public participation Trigger and Opt-In Projects that is in addition to minimum legal requirements related to municipal or public notice, public meetings, public hearings and the opportunity for comment on applications or other regulatory decisions

⁶⁴ See DEP EJ Policy.

under review by DEP. Enhanced Public Participation may additionally facilitate meaningful public comment through technical or other consulting support.⁶⁵

Under DEP's Environmental Justice Policy, public hearings are expressly discussed as one example of the type of Enhanced Public Participation that should be made available for an environmental justice community confronting the permitting of a facility. The Environmental Justice Policy states that permitting of facilities in environmental justice areas subject to enhanced public participation procedures means that "[a]t a minimum, in addition to regulatory requirements, the public participation strategy for Trigger and designated Opt-In Projects should evaluate additional outreach methods to engage the public. **This Enhanced Public Participation can include as appropriate, but is not limited to, notice, one or more public meetings or hearings (virtual or in-person),** and the opportunity for comment that is consistent with regulatory review timeframes, or other appropriate Enhanced Public Participation."⁶⁶

Given the Facility's close proximity to areas with very high environmental justice scores, DEP should grant this public hearing request for the Tenaska Westmoreland TVOP Draft permit. Denying the nearby citizens, especially those residing in EJ communities, any opportunity to present their comments at a public hearing would circumvent the spirit and purpose of public participation and public engagement in the permitting process that the Department is supposed to support.

c. A Public Hearing Is Warranted Because There is Significant Public Interest in this Facility, this Permit, and the Emissions from this Large Pollution Source.

There is already significant public interest in this Facility, this TVOP, and the emissions from this facility, which further supports the need for DEP to grant a public hearing. The community has been meeting with organizers from EIP, EHP, and MWA regularly for many months expressing concerns about this permit and wanting to prepare for a public hearing. The DEP is well aware of this, as DEP's Emily Green was present on a virtual meeting that included more than 30 community members regarding the Tenaska TVOP, held at the Turkeytown VFD community meeting room on April 30, 2025.

Commenters have serious concerns about how the Tenaska facility's pollution will impact our health, safety, and environment.

Commenters also have serious concerns about bringing this Draft Permit's monitoring requirements into compliance with the Clean Air Act and the Air Pollution Control Act, which require monitoring sufficient to assure compliance with applicable limits.

Commenters also have serious concerns about whether the Tenaska facility, without appropriate monitoring requirements and operating limits will be in compliance with these air pollution laws.

⁶⁵ DEP EJ Policy, at 2–3.

⁶⁶ *Id.* at 8–9 (emphasis added).

VIII. Conclusion

The Draft TVOP for the Tenaska Westmoreland Generating Station contains many substantive deficiencies that must be fixed before the permit is issued, including failing to require adequate monitoring to assure compliance with applicable pollution limits for several pollution sources for several pollutants. This is a new facility with a new permit and the limits and monitoring should be the best possible reflect the state of the art controls expected of a new facility. Given the plethora of substantive issues and the significant public interest in this permit, DEP should act swiftly to grant a public hearing for the Tenaska Westmoreland Generating Station's first operating permit, a Title V Operating Permit that would authorize major source emissions of NO_x, CO, and VOCs as well as emissions of many other pollutants.

Respectfully submitted,

/s/ Lisa Hallowell

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October 31, 2025

Commonwealth of Pennsylvania
Bureau of Air Quality – Harrisburg
Region V – Pittsburgh

United States Environmental Protection Agency
Washington D.C. – Lee Zeldin
Region 3 – Amy Van Blarcom-Lackey,
Catherine Libertz, Bill Jones
Chesapeake Bay Program – Dan Doogan
EPA Region 4 Gulf of America – Marc Wyatt

Ref. Review of Plan Approval Application,
Tenaska Pennsylvania Partner, LLC.
Westmoreland Generating Station
South Huntingdon Township, Westmoreland County
APS 828023 Auth 1001276 PF 716802

Subject: Title V Permit Application Comments

To All Concerned Stakeholders:

Some residents and our local state Representative have requested a concerted review of the Tenaska Westmoreland Title V permit application. Since it has taken Tenaska several years to get to its Title V permit application – there should be no rush to process it without proper due-diligence.

Many Westmoreland County citizens are very concerned due to the increase in asthma cases, the recent sharp increase in Youghiogheny River E.coli dangerous warnings, crop losses, and the general lack of concern from the local power plant manager. The primary reason for requesting our review the application is the increase in asthma cases in Westmoreland County. National asthma rates have been declining, with asthma-related emergency room visits decreasing by about 29.8 per 10,000, and the hospitalization rate decreasing to 2.9 per 10,000. Alarming, the Westmoreland County, Pennsylvania, asthma-related emergency room visits are reported as 34.7 per 10,000, and the hospitalization rate of 6.1 per 10,000.

The data shows Westmoreland County hospital emergency room visits are 116% higher than the National rate. And the hospitalization rates are 210% higher. Other sources show rates 220 to 240% higher since 2023, compared to the rest of the USA, and only examine the period following the post-COVID-19 event.

The community and agencies have noticed an increase in Youghiogheny River quality concerns, and although the power plant may draw only 2% or so of the waterflow, that is really quite significant, especially since it discharges back into the river. Major problems are occurring during low-flow, high-temperature periods and this is exactly when biological stress is the highest. The Youghiogheny River is a worldwide-known destination place for fishing, canoeing, swimming, and floating. But as Tenaska pulls water from the Youghiogheny is grossly reduces riffing and waterdepth critical for trout and fish spawning. The slower water velocities reduce oxygen uptake, increases stagnation, and concentrates pollution and pathogens like E.coli, exactly what we are now experiencing. Tenaska exacerbates this problem by drawing in cold water from

the Indian Creek withdrawal area and returns warmer water farther down river, creating more problems from Westmoreland and Allegheny Counties. These slight changes in water temperature allow for invasive species to overtake native species. For Fayette and Westmoreland County portion of the Youghiogheny River, all of this is extremely detrimental to native trout populations and all the successful gains made by the PA DEP and EPA in cleaning up our waterways look to be reversed by this excess withdrawal of water. Wording is critical withing permits because cooling tower evaporative losses are not recognized as consumptive withdrawals, but the water is gone from the Youghiogheny River, negatively impacting aquatic life and destroying the previous gains made by the PA DEP and EPA. The worst part of all this is Tenaska's disdain to address it or mention it and the fact that it has taken several years for them to be concerned with getting a Title V permit means that great damage will be done and not prevented. Does Tenaska have a Drought Contingency Plan? What are the drought contingency triggers? Instead of waiting for irreparable damage to occur, the solution is to no longer permit the Wet Cooling Tower. The Cooling Tower's plume causes much local grief and distress as it is. The practical solution is for Tenaska Westmoreland to upgrade the wet cooling tower to a hybrid, specifically a wet-to-hybrid and not some half-ass approach, but a conversion that saves 90% of the water and in addition Tenaska needs to install a plum abatement system.

This Title V permit application appears to be an internal document based on information provided by Tenaska, and it was submitted several years after the power plant began commercial operations (started generating revenue). It appears that the PA DEP tried try to make the best out of the bad information provided by Tenaska. Both these systems exist, they are readily available, and cost-effective. Other power plants have been upgrading the wet systems to a hybrid system specifically to save water; these power companies have retrofitting costs of around \$40 million for similarly sized power plants. Retrofits are now commonplace and can be achieved within a short timeframe. Witnessing Tenaska's procrastination practices, this is an area where the EPA can shut down the facility until it makes the incremental change. Only when Tenaska shares and feels some pain will it ever care about the locals and the local environment. The \$40 million can be capitalized over a 40-year period, with minimal impact on Tenaska's cash flow.

It has taken Tenaska several years to apply for this Title V permit; most power plants submit their Title V permit application immediately after performance and emissions testing. And while several years of demonstrated power plant management incompetence may seem trivial, what will happen when a major accident, ammonia, or gas rupture occurs? Will the community have to wait months or years to figure out that people have been poisoned?

The information provided by Tenaska has numerous inconsistencies, errors, omissions, and, if not misrepresentations, on which the DEP relies to generate a Title V permit application. The onus is on the plant to get proper and accurate information to the PA DEP and US EPA. The only legal or non-criminal reason why the plant manager has delayed its Title V permit application could only be to give them time to incorporate new technology into their plant; otherwise, about seven years of criminal penalties should be charged against the power plant's designated felon. The various EPA and DEP penalties can range from \$5,000 to \$10,000 per day, resulting in a potential fine of \$12,775,000 and possibly 2 or more years in jail. Some RCRA penalties can be as high as \$50,000 per day. So the suggested EPA penalty should be \$25 million to \$40 million, this can be in addition to Tenaska incorporating a Hybrid Cooling Tower. This is really very minor compared to Tenaska corporate income of \$12.5 billion.

Similar Environmental Permit Penalties.

While a \$12.8 million fine may seem substantial, here are a few examples:

1. AEP and the EPA/DEPs resolved their New Source permit violations with a \$15 million civil penalty and a commitment to spend \$4.6 billion on new pollution control equipment.
2. First Energy, the EPA imposed a \$15 million civil penalty and imposed \$1.1 billion of improved pollution control equipment.
3. Talen Energy facing various allegations, the EPA imposed a \$4.25 million civil penalty and imposed \$200 million in new pollution controls.

It is this enforcement that ensures cleaner healthier lives for local communities. That work does not go unseen. And to further note, without the EPA and DEP penalties, some of these companies would not comply, especially without continuous monitoring and multiple controls. In general, every citizen reported that Tenaska Westmoreland is completely non-responsive and maybe it will take a \$12 or \$20 million penalty and management replacements to have a good neighbor?

To this regard, recommendations, even to convert the Wet Cooling Tower to a Hybrid or to replace it with an Air Cooled Condenser to conserve water, these are minor issues \$100 million in pollution control upgrades would be capitalized over a twenty year period, or about \$5 million per year.

Tenaska is not a poor company, and can easily afford to pay the penalties and make all the upgrades:

Tenaska & Tenaska Westmoreland

- Nominal rating 940 MW summer to 1,065 MW winter
- PJM Power prices (2025 average) \$76/MWhr
- Tenaska corporate earnings (2024) \$ 12,500,000,000
- Plant income: 1,000 MW * \$76/MWhr * 8250 hr = \$ 627,000,000
- Yough School & S.H. Property Taxes combined \$ 240,000

Tenaska's 25-year projected income, + a 2% inflation offset: \$400,000,000,000

How does Tenaska keeps the community poor and impoverished, Yough School District and South Huntingdon Township payments.

Tenaska Power Plants & Property Taxes

Plant	Location	Nameplate MW	Taxes paid
Tenaska Frontier Generating Station	Shilo, Grimes Co., TX	630 MW	\$60.8 million \$2.43mm/year
Tenaska Gateway Generating Station	Mt. Enterprise/Long Branch, Rusk Co., TX	845 MW	\$49.2 million \$2.05mm/year
Tenaska Klamath Generating Station	Kiowa, Pittsburg Co., OK	1,220 MW	\$67.5 million \$3.07mm/year
Tenaska Virginia Generating Station	Scottsville, Fluvanna Co., VA	940 MW	\$34.8 million \$1.66mm/year
Tenaska Westmoreland Generating Station	Smithton, Westmoreland Co., PA	940 MW	\$1.7 million \$0.24mm/year

Tenaska Westmoreland 7 times less

Specific application concerns, as identified by skimming through the reference document.

Page 2 of 58. "Emissions will be controlled at all possible times." Probably technically accurate, but it should read "Emissions shall be controlled at all times." Each year, turbines experience tens of thousands of failure events, including thermal degradation of combustion

hardware components, burners, controls, etc. This is exactly why the EPA requires continuous monitoring.

Page 4 of 58. CEMS for engines, are now available and reliable. CEMS are deployed and used for engines (emergency generators, diesel fire pumps, etc.) for as small as 100 hp. Tenaska's engines are much larger. CEMS helps to ensure compliance. While periodic certifications do not. The applicant shall install CEMS and retain records.

Page 6 of 58. Applicant desires that the Cooling Tower Emissions (NESHAPS) does not apply. The cooling tower plume expels hundreds of tons of contaminated water vapor, and the plume needs to be continually sampled. Technology to do this has been around for many decades.

Page 7 of 58. The applicant states that CAM does not apply, but the paragraph contradicts itself by stating that Tenaska is required to submit a complete CAM plan. The CAM plan requires a detailed review by the community. In a later paragraph, Tenaska desires that its "engines will not be equipped with control devices." The current BACT is applicable to small engines, and CEMS for these engines are available and reliable. An operating CEMS will flag when poor or inadequate fuels are used and when operators attempt to burn off-spec fuels and oils.

Page 7 of 58. The Anhydrous Ammonia Storage Tank Accident Prevention Plan. The accident prevention and emergency response plan should be shared with the local community and State Representative Eric Davanzo expressed interest in reviewing and commenting on it on behalf of the nearby towns of Ruffs Dale and Smithton. The latest NH₃ tank rupture occurred in August 2023, (at another facility) but this event makes this a realistic concern. Based on years of trying to work with Tenaska and its indifference and non-responsive plant management, citizens will be left to fend for themselves.

Page 8 of 58. 40 CFR part 72-78. Acid Rain. Tenaska was required to submit a complete Acid Rain Permit Application 24 months prior to commencing commercial operations. Please provide this permit application for a community review through Rep. Eric Davanzo.

Page 8 of 58. In other projects Environmental Justice's (E.J.) intent and jurisdiction differs than what has been stated. The community representatives, local State Representative, and their attorney base E.J.'s on past cases in which E.J. certainly applies to Low Income Communities. E.J. does not require a "pre-designation" or to be pre-labeled. E.J. applies to rural and disadvantaged regions and communities, based on previous cases. These are primary reasons that Tenaska selected Westmoreland County and specifically South Huntingdon Township. The plant itself and now the Westmoreland medical records demonstrate that the Tenaska plant is a true and heavy new burden for this low-income area. Moreso, in that Tenaska refuses to pay comparable school and property taxes, compared to many other Tenaska projects, keeping the area even more distressed to leave the local community to bear the increased burden and costs for road crews, road maintenance, and winter snow removal. Monitoring and clearing of industrial ice and snow precipitating onto local roads. Tenaska keeps the local community impoverished.

Page 8 and 9...continued... The application states the additional modeling, rightfully requested by the PA DEP, shows as stated: the subsequent modeling... "does exceed the significance level in the EJ area. The Department's Office of Environmental Advocate will ensure the enhanced

public participation requirements of the EJ Policy are met.” This means to the community that they will be heard.

Page 9 of 58. 25 PA Code §123.21. and Code §123.22(a)(2). Need to be amended to include BACT, emergency generator, and fire pump engine emissions shall be monitored by CEMS. There is no expectation that the plant will use ULSD fuel, without complete oversight. The years of management's disregard for the local community, PA DEP and US EPA regulations, mandate continual oversight and controls. The DEP and EPA have demonstrated higher expectations and have approved other cleaner fuels, HVO, B100, and GTL. Since GTL has almost no sulfur or aromatics and significantly reduces NOx, shouldn't it be the preferred fuel? And even then, its actual use must be confirmed with CEMS.

Page 10. Pa. Code §123.41 – Visible Emission Limitations. Let's not omit the cooling tower, a known generator of fugitive emissions. Tenaska provided information that it uses cooling tower “drift eliminators.” This is a misnomer and misrepresentation; it is well known and documented that cooling towers are sources of fugitive emissions that contain Dissolved Solids, Chlorides, Phosphates, Biocides, Minerals, and Metals. This is especially important in light of the recently reported asthma attacks, crop losses, and other community complaints. No drift eliminator manufacturer guarantees zero fugitive emissions. When cooling tower fans are at full speed, and as drift eliminators foul out, they are no longer effective. Local homeowners have reported that cooling tower fall-out lands on their homes, vehicles, roofs, and gardens. While the industrial snow is problematic for these people, it is the biologicals that cause legionella and other public health issues that they are worried about. Does Tenaska ignore cooling tower fugitive emissions? There are no public records or submittals could be found for cooling tower health monitoring, control, and certifications. The community should be presented, as a matter of public right to know, that Tenaska submit its cooling tower operations and maintenance records, test results, certifications, remediation procedures, water management plan, plume-vapor-fugitive emissions certification plans, and its legionella plan. No local resident could find a Tenaska Westmoreland Water Quality Management Plan. No Title V permit should be granted until the public can be certain that proper and safe health-conscious practices are in place.

A third-party community-approved group to perform a comprehensive O&M and Compliance Audit.

Page 11 of 58. Pa Code §127.12b(c). REPLACE with wording that clearly identifies the requirements of Chapter 139. For instance, The PA DEP Code § 127.12b(c) requires Certification of the plant's CEMS equipment through independent 3rd-party stack testing, using EPA and DEP approved methods for the initial performance tests shall include NO_x, SO₂, CO, H₂SO₄, NH₃, HCHO, VOC, PM, PM₁₀, PM_{2.5}, and HAPS; testing shall be done with and without duct burners. This independent 3rd-party CEMS certification testing shall be performed every two years. Any out-of-tolerance findings shall be reported, and the previous two years of CEMS shall be corrected. The purpose of this testing is to certify the CEMS accuracy, and therefore, all emissions parameters shall be tested, and none shall be excluded. The PA DEP and US EPA shall require separate testing of PM, PM₁₀, and PM_{2.5} for all tests and for all CEMS. Continuous monitoring will be required for all these parameters, and none shall be excluded. For all testing, including third-party and CEMS, all raw data shall be maintained for each and every parameter. If any of these conditions or parameters are found to be lacking, either the PA DEP or the US EPA can terminate operations and withdraw the Title V permit. The PA DEP, US EPA, and the

community all recognize that PM₁₀ and PM_{2.5} are not redundant measurements; they represent particle sizes with different health and regulatory significance. Apparently, this needs to be conveyed back to Tenaska, that is, Clarification (1) PM₁₀ and PM_{2.5} have different health impacts; it is well known that PM₁₀ drives upper respiratory system ailments, for the plant, this infers (nose, throat, bronchi), causing irritation, asthma, coughing, and cellular damage. While PM_{2.5} infiltrates deep into the lungs into the alveoli and bloodstream, causing cardiovascular diseases, heart attacks, and cancers. These behave differently because they are different pollutants from a health perspective. Clarification 2, PM₁₀ and PM_{2.5} come from differing sources, PM_{2.5} are from combustion by-products, chemical releases, exhaust fumes, while PM₁₀ comes from incomplete combustion (we see this when combustion burners degrade and fail) the plant can use this information for predictive maintenance, (being proactive), PM₁₀ is generated by dust, rust, corrosion by-products, in which the combustion process accelerates decomposition and degradation of its combustion and hot gas path parts. For example, Tenaska is down to perform what we are told is a \$59 million major maintenance overhaul of its hot gas path parts, these have to be replaced routinely, because the superalloys break down, incur spallation, and get eroded and corroded, not to mention routine mechanical wear. So YES, we want PM₁₀ measured separately and accounted for. This is good practice because a proactive community-friendly power plant management team would want to know when the Stacks, HRSGs, and Catalysts are breaking down, rusting, spalling, getting corroded and exhausting larger particulate into the atmosphere. These heavy metals are known carcinogens. Clarification 3, the EPA requires tracking of both PM₁₀ and PM_{2.5} separately. Clarification 4, PM₁₀ may include PM_{2.5}, depending on how it is sampled, but PM₁₀ is not equal to PM_{2.5}, this matters to the community and obviously to PA DEP and the US EPA because the coarse particles from equipment, combustion turbine, HRSG, catalysts, and stack deterioration are targeted separately, just as cooling tower drift minerals are measured and now all of this is traceable back to the Tenaska power plant. Clarification 5: It is not uncommon for a power plant to experience a mechanical breakdown; one can examine combustion turbine Equivalent Forced Outage Rates to see that over 10,000 failures occur per year. A short burst and CEMS capture of a PM_{2.5} event can identify the exact time of a failure in a root cause or loss-of-life event. It would be improbable for a human to capture a brief haze emitted from an exhaust stack, especially in the middle of the night, or on a hazy-cloudy day in the Pittsburgh area. Equally as important, PM₁₀ CEMS must be tracked and monitored because it causes property, crop loss, and vegetation damage.

Certifications and CEMS monitoring of PM₁₀ and PM_{2.5} shall never be comingled.

Page 14 of 58. Table 3 and elsewhere in the application, We should not comingle or combine PM₁₀ and PM_{2.5}; for Tenaska, the rest of the power industry would not allow this.

Page 19 of 58. Table 5 and the Selection paragraph below Table 5, should be reworded to include ammonia and ammonia slip as continuously measured by CEMS and certified every other year by a third-party CEMS certification firm.

Page 19 of 58, the last paragraph. Add "CO will be measured, monitored, and managed by the CEMS."

Page 21 of 58. Second paragraph. Tenaska provided to the DEP a non-working example from New Jersey, and desires a 2.4 ppmvd at 15% O₂ limitation. The community sees that Seminole, CPV Towanda, Portland Generating, and Clear Springs are all large combustion turbine power

plants are successfully operating with VOC 1.0000 ppmvd @15% O₂ permit limits. This much lower limit benefits the local communities.

Page 21 of 58. PM/PM₁₀BACT and PM_{2.5} BAT Analys – Powerblocks.

The first paragraph is incomplete and does not cover or address all the PM₁₀ particulate sources. The combustion turbine is comprised of hot gas path parts that burn themselves up, OEMs refer to these parts as Revenue Sharing Parts. The hotter and/or harder the turbine is fired, the faster these components degrade; however, this is done purposefully because firing the turbine hotter and harder increases revenues and cash flows. It is always about money. Power plants will over-fire and drive a turbine as hard as possible during peak periods, especially when power grid prices exceed \$100/MWh. A turbine can be driven harder by injecting steam, firing duct-burners to drive the steam turbine, etc. These are just examples that accelerate the degradation and release of PM₁₀ particles from the combustion parts, the duct burners themselves, the HRSG tubes, tube fins, HRSG walls, and the exhaust stack. This is why PM₁₀ must be monitored at the stack exit by CEMS. The operator's intent appears to be to employ "high operating temperatures, high exhaust flow rates, fine particulate distribution – so yes, the community would like PM₁₀, PM_{2.5}, and PM all separately monitored and controlled.

Page 25 of 58. BAT analysis for ammonia – powerblock. Tenaska may have suggested ease of control. Ammonia Slip BACT is not 5 ppmvd at 15% O₂, it has been 2 ppmvd at 15% O₂ and for F/J/H turbine technologies. CPV Towantic successfully operates at 2 ppmvd at 15% O₂. PA DEP set 2ppmvd for Renovo Energy Center and the EPA set 2ppmvd for RBLC for natural gas combined cycle plants. Tenaska shall met BAT at 2 ppmvd at 15% O₂. Tenaska Westmoreland employs J-technology.

Page 27 of 58. Internal Combustion engines. Tenaska requested that testing will not be required. CEMS are readily available for small internal combustion engines. We suggest that Tenaska use CEMS on their engines.

Page 28 of 58. CEMS are readily available for emergency diesel generator sets.

Page 28 of 58. Cooling Tower. Tenaska omits all the sources of particulate matter and fugitive emissions. On page 29 of 58, Tenaska proposed a rate of 0.0005% drift. BACT ultra high efficiency plum abatement and drift elimination is permitted and in use down to 0.0001%, five times cleaner. Furthermore, the Total Dissolved Solids level is no longer 2,000 ppm; it is now 1,000 ppm, half the original amount.

Page 29 of 58. Circuit Breakers. Tenaska previously stated that there is no effective substitute for the SF₆ (sulfur hexafluoride), for 500kV class dead-tank CBs. Since Tenaska has delayed getting its operating permit, it should be noted that Siemens and GE both have working 500kV Circuit Breakers, and after successful testing is completed, the operating permit should require that Tenaska install them because Tenaska opines that SF₆ breakers leak and must be refilled. The mentioned use of leak detection systems is nothing more than a passive system that tells the plant "low pressure" meaning that the toxic SF₆ has already leaked out into the atmosphere, and more gas must be added. Sulfur hexafluoride is much heavier than air and accumulates in low areas. Only a few deaths have been reported to be caused by SF₆ asphyxiation, but we are sure Tenaska has a plan in place to avoid any dangers and request that it be shared with Rep Davanzo.

Page 29 of 58. This can only be known by continuous emissions monitoring and public health monitoring.

Page 31 of 58. Sources, Control Devices, & Emissions. A lot of sources have been omitted from this permit, combustion turbine bearing vapors, steam turbine bearing vapors, deaerator exhaust, cooling tower evaporation/carry-over, generator bearings, etc. all these add up, even though they are small. Bearing housing, seals, and vents emit VOC and hydrocarbons (HAPS) – these are typically reduced by oil mist eliminator (a reduction means) but how do we know these will be maintained or if they exist? The cooling tower drift will have PM in the form of dissolved solids, phosphates, chlorides, and biocides – even if there are drift-“eliminators”. On Page 46 of 58, Tenaska provides some PM emissions from the cooling tower, PM 6.75 tpy, PM₁₀ 3.29 tpy, and PM_{2.5} 0.009 tpy all this needs to be tracked and monitored. Why so? It is not the normal emissions that are of great concern; it is excursions, trip events, and mechanical breakdowns that typically result in massive pollution and contamination releases, and the amount of pollutants should be measured.

Page 31, and other pages, Tenaska suggests combining all the PMs. And then on Page 32 of 58, Table 8 shows the PMs as 95.56, 92.26, and 88.98 tons per year. As demonstrated earlier and in other DEP and EPA sources, the PMs are not the same; so the cumulative PM particulate matter is 276.80 tons per year. Exceeding 100 tpy now requires additional monitoring and controls.

Page 33 of 58. Conclusions.

Tenaska provided information stating the “proposed facility” will not cause or contribute to air pollution in violation of the NAAQS. This cannot be known until the plant has been operated and monitored under tight BACT controls that are in use by other large combustion turbine power plants, and every single pollutant from all the sources is under CEMS, and that CEMS is third-party certified every two years.

The community has serious concerns and disagrees with the information Tenaska provided for this conclusion. We suspect that Tenaska’s inaccurate representations, errors, and omissions are unacceptable to the PA DEP and the US EPA. .

Special Conditions.

Page 34 of 58. Section 7. Where are the cooling tower PM, PM₁₀, and PM_{2.5} limits?

Page 37 of 58. Section 15. Needs to include ammonia and ammonia slip.

Page 37 of 58. Section 16(b). The malfunction notice needs to include all local emergency response agencies, including fire and ambulance companies, and to the community as immediately as possible, to reduce contamination, poisoning, health, safety, and to avoid death. Such a plan shall be made available to the surrounding communities.

Page 39 of 58. This plan approval is to allow construction and temporary operation of a combined-cycle, so this section must be updated. Why did it take Tenaska 8 years after the power plant was built to submit this application? In a real-life emergency situation, like the rupture of the ammonia storage tank, the community cannot trust Tenaska with their safety and long-term health.

Page 42 of 58. Section 42. What are the results of these stack tests? Please provide them to Rep. Davanzo.

Page 42 of 58. Section 44. Since a CEMS is required, and it measures CO₂. Is this section should strongly state that it is referring to an independent third-party certification testing at every 25,000 hours of operation? Wouldn't it be more representative to require a third-party CO₂ and other emissions testing prior to each combustor and hot gas path shutdown, as well as immediately after the combustor and hot gas path rebuild, to ensure true compliance? Such testing would help determine how much superalloy materials degraded and were emitted out through the turbine exhaust stacks.

Page 42 of 58. Section 45. This section must be rewritten to cover ALL of the pollutants and not just three.

Page 46 of 58. Section 69 through 74 on Page 47. What type of continuous measuring and monitoring system will be used to measure the cooling tower evaporation, emissions, and blow-down pollutants? These Sections need to define online continuous measurement instruments, such as conductivity probes, sampling rates of phosphorous, zinc, copper, etc. pH, temperatures, biocide feed rates and duty cycle monitoring, validation of drift carryover, biological aerosol measuring (Legionella) and TDS.

Page 48 of 58. Section 78(a). This section needs to be deleted so that only 78(b)(1) exists, and 78(b)(2) needs to be deleted.

Page 48 of 58. Section 79. The first sentence needs to be restated: "These are the minimum requirements for the CEMS that will be used."

On behalf of many local residents.

Thank you,
Rep. Eric Davanzo

Copied:
Walt, Alex, Mark, Kirk, Ralph, et al.

October 31, 2025

Mr. Nick Waryanka, P.E.
Pennsylvania Department of Environmental Protection
Southwest Regional Office – Air Quality Program
400 Waterfront Drive
Pittsburgh, PA 15222

Via Email (nwaryanka@pa.gov)

Re: Draft Title V Operating Permit Comments
TVOP# 65-00990
Tenaska Pennsylvania Partners, LLC | Tenaska Westmoreland Generating Station

Dear Nick:

Tenaska Pennsylvania Partners, LLC (“Tenaska”) herein provides comments on the draft Title V Operating Permit 65-00990C for the Tenaska Westmoreland Generating Station (“TWGS”) published in the Pennsylvania Bulletin on October 4, 2025, and the related Review Memo dated September 23, 2025.

Draft Title V Operating Permit

1. Section A, Site Inventory List, Source ID 104 (Emergency Fire Pump Engine)

Tenaska requests the throughput be revised to “19 gal/hr” to reflect the design fuel usage rate.

2. Section A, Site Inventory List, Source ID 109 (Aqueous Ammonia Storage Tank)

Tenaska requests the throughput be revised to “228 gal/hr” to reflect the design pump rate.

3. Section A, Site Inventory List, Source ID 110 (Circuit Breakers)

Tenaska requests the capacity be revised to “5598 lbs” to reflect the total SF6 capacity of the circuit breakers. A throughput rate is not applicable to these units.

4. Section B, Condition #028

Tenaska requests Condition #028 be removed, and Source ID 109 be moved to the Trivial Activities List in Section H, as the facility is not subject to Risk Management Plan (RMP) requirements. Per 40 CFR §68.10(a), a stationary source is subject to Chemical Accident Prevention Provisions if more than the threshold quantity of a regulated substance is used in a process, as determined by 40 CFR §68.115, which goes on to reference the threshold quantities

listed in 40 CFR §68.130. Further, 40 CFR §68.130 only includes a threshold quantity for aqueous ammonia with a concentration of 20% or more.

The aqueous ammonia used at TWGS has a concentration of less than 20% and is therefore not a regulated substance per 40 CFR §68.130 and as such, is not subject to Chemical Accident Prevention Provisions. Tenaska does not store or use anhydrous ammonia at the TWGS.

5. Section C, Condition #015

Tenaska requests this condition be removed as it appears to be duplicative of Section C, Condition #031.

6. Section D, Source ID 104 (Emergency Fire Pump Engine)

Per TVOP Comment #1, Tenaska requests the throughout be revised to “19 gal/hr.”

7. Section D, Source ID 109 (Aqueous Ammonia Storage Tank)

Per TVOP Comment #4, Tenaska requests this Section be removed and the Aqueous Ammonia Storage Tank moved to the Trivial Activities List in Section H.

8. Section D, Source ID 110 (Circuit Breakers)

Per TVOP Comment #3, Tenaska requests the capacity be revised to “5598 lbs.”

9. Section E, G001, Condition #006(i)(1)

Tenaska requests “@ 15% O₂” be added to the ppmvd limit for consistency with other limits in this Condition.

10. Section E, G001, Condition #010 and #011

In accordance with the application submitted July 11, 2024, Tenaska requests the testing frequency for VOC, formaldehyde, PM and CO₂ be reduced to once per permit term. As referenced in the application, test results have been consistently within permitted limits¹.

Ongoing compliance with VOC limits (and indirectly, formaldehyde, a component of total VOC), will be demonstrated via the Compliance Assurance Monitoring (CAM) Plan. The CAM program was established by EPA precisely for these situations, as a means for sources to monitor control devices and ensure they are operated in such a way to achieve emission limits as well as

¹ Since submittal of the application in July 2024, additional VOC, formaldehyde, PM and CO₂ testing was completed in October 2024 with results commensurate with prior tests and below permitted limits.

provide a method for practical enforceability for agencies to assess compliance.² In addition to testing once per permit term, practical enforceability would consist of verifying the catalyst is operated within the temperatures included in the CAM Plan.

Emissions of PM and CO₂ are largely dependent on fuel quality and heat input. Due to the consistent quality of pipeline natural gas, emissions rates are also consistent, as demonstrated by past testing. Therefore, monitoring fuel usage is sufficient for demonstrating ongoing compliance between testing events.

For these reasons, Tenaska believes reducing the test frequency is warranted and compliance will be demonstrated through testing, catalyst temperatures, and catalyst management program (all of which comprise the CAM plan).

11. Section E, G001, Condition #013

Tenaska requests Condition #13(a)-(d) be removed as they have already been completed as a condition of the Plan Approval(s).

12. Section E, G004, Condition #001

The last paragraph of this Condition references “plan approval” and should be updated to “operating permit.”

Review Memo

1. Background, pg. 1

The second paragraph indicates TWGS is a major source of NO_x, CO, VOC, and GHG. TWGS is also a major source of PM₁₀ and PM_{2.5}.

2. Background, pg. 3

The last paragraph indicates Source 109 is remaining a source in the TVOP due to RMP requirements. Per TVOP Comment #4, TWGS is not subject to RMP.

3. Additional Federal Requirements, 40 CFR Part 64, CAM Plan, pg. 14

The CAM Plan included with the application inadvertently stated oxidation catalyst outlet temperature would be monitored via thermocouples. The thermocouples are on the inlet to the

² Compliance assurance monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act (CAA) for large emission units that rely on pollution control device equipment to achieve compliance. Monitoring is conducted to determine that control measures, once installed or otherwise employed, are properly operated and maintained so that they continue to achieve a level of control that complies with applicable requirements. The CAM approach establishes monitoring for the purpose of: (1) documenting continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters, and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements; (2) indicating any excursions from these ranges; and (3) responding to the data so that the cause or causes of the excursions are corrected. [Source: USEPA CAM Guidance Document Aug 1998]

oxidation catalyst and therefore, inlet temperature will be monitored. The indicator range has also been updated to reflect the max design operating temperature of the oxidation catalyst (800°F). A revised CAM plan is attached to this letter.

4. Additional Federal Requirements, 40 CFR Part 68, pg. 15

Per TVOP Comment #4, TWGS is not subject to 40 CFR Part 68.

5. Non-Attainment New Source Review, 40 CFR §81.339, pg. 21

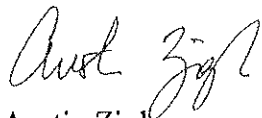
The Memo indicates Westmoreland County is classified as nonattainment for 8-hour ozone, annual PM_{2.5}, and 24-hr PM_{2.5} NAAQS; however, per 40 CFR §81.339, both annual PM_{2.5} and 24-hour PM_{2.5} are in attainment.

Tenaska appreciates your consideration of these comments. Please contact me at 402.758.6229 or azigler@tenaska.com should you have any questions or require additional information.

Sincerely,

TENASKA PENNSYLVANIA PARTNERS, LLC

By: Tenaska Pennsylvania I, LLC, Its Managing Member



Austin Zigler

Manager, Environmental Programs

Attachments

cc: Robert Mayfield, TWGS (via email)
John Robson, TWGS (via email)
Adam McCool, TWGS (via email)

Compliance Assurance Monitoring (CAM) Plan Combined Cycle Units #1 and #2 (Source ID 101 and 102)

1.0 Background

1.1 Emissions Unit

Description: Combined Cycle Combustion Turbine
Source Name: Combined Cycle Units #1 and #2
Source ID: 101 and 102

1.2 Applicable Regulation, Emission Limits, and Monitoring Requirements

Regulation No.: 25 Pa. Code 127.12b
25 Pa. Code 129.112(g)(2)(iii)(B), Presumptive RACT III
Permit Condition: PA 65-00990C, Section E, Group G001, Condition #002(c)
PA 65-00990C, Section E, Group G001, Condition #007
Pollutant: VOC
Emission Limit¹: 2.4 ppmvd @ 15% O₂ (with duct burners)
1.4 ppmvd @ 15% O₂ (without duct burners)
9.4 lb/hr
2 ppmvd @ 15% O₂, Presumptive RACT III
Monitoring Requirements: Periodic EPA-method compliance testing
Control Technology: Oxidation Catalyst (41-49% VOC control)

¹ VOC ppmvd limits are expressed as propane.

2.0 Monitoring Approach

The elements of the monitoring approach for VOC emission are presented below.

	Indicator No. 1	Indicator No. 2	Indicator No. 3
Indicator:	Oxidation Catalyst Average Inlet Temperature	Catalyst Management Program	VOC emissions
Measurement Approach:	The oxidation catalyst inlet temperature is measured via four thermocouples.	Routine inspection and sampling.	VOC concentration is measured via stack test.
Indicator Range:	500-800°F (does not apply during startup, shutdown, or tuning events)	N/A	See Emission Limits in Section 1.2
Performance Criteria:			
Data Representativeness:	The average oxidation catalyst inlet temperature is measured via four thermocouples installed in each HRSG, immediately downstream of the catalyst. The thermocouples are scaled 0-875°F and the standard tolerance is +/- 1°C or 0.75% (whichever is greater).	Routine inspection and sampling to verify catalyst integrity and activity.	Compliance stack tests are completed in accordance with EPA approved methods and the PADEP Source Testing Manual.
Verification of Operational Status:	The thermocouples are installed in accordance with manufacturer specifications and calibration checks are completed after failure or repair. Signal monitoring will be completed by the DCS to detect quality failure and reduce the occurrence of invalid data.	N/A	N/A
Quality Assurance and Control Practices:	Signal monitoring will be completed by the DCS to detect quality failure and reduce the occurrence of invalid data. Calibration checks are completed after failure or repair.	N/A	QA/QC is completed in accordance with the selected EPA-approved method.
Monitoring Frequency:	Inlet temperature is measured continuously.	Inspections and sampling completed on a routine basis in accordance with OEM recommendations.	Stack tests are completed once per permit term.
Data Collection Procedures:	Data is collected and recorded continuously by the DCS.	N/A	Data is collected via stack test vendor as prescribed in PADEP approved protocol.
Averaging Period:	3-hour rolling average	N/A	3-hour average of 3, 1-hour test runs

3.0 Monitoring Approach Justification

3.1 Background

The pollutant specific emissions units (PSEU) consist of two, natural gas-fired combined cycle combustion turbines (CCCT), each equipped with a heat recovery steam generator (HRSG) and supplemental natural gas-fired duct burners, collectively serving a single steam turbine generator.

Each CCCT is equipped with Dry Low-NOx (DLN) burners and emissions from each CCCT/HRSG are controlled by selective catalytic reduction (SCR) and oxidation catalysts prior to being released to the atmosphere. The SCRs control NOx emissions and the oxidation catalysts control CO and VOC emissions.

Combined Cycle Units #1 and #2 uncontrolled potential emissions exceed major source thresholds for NO_x, CO, and VOC. The units are also subject to emission limitations or standards for each of the pollutants identified via PA 65-00990C, NSPS Subpart KKKK, the Acid Rain Program, and the Cross-State Air Pollution Rule (CSAPR). Compliance with the emission limitations or standards is met via control by oxidation catalyst, for CO and VOC, and SCR, for NO_x.

However, per 40 CFR 64.2(b)(1)(i), (iii), (iv), and (vi), CAM requirements do not apply to emissions limitations or standards:

- Proposed after November 15, 1990 (i.e., Subpart KKKK),
- Associated with Acid Rain Program requirements
- That apply under an emissions trading program (i.e., CSAPR)
- For which a CEMS is installed to determine compliance (i.e., NO_x and CO)

Therefore, both NO_x and CO are exempt from CAM requirements.

3.2 Rationale for Selection of Performance Indicators

The control efficiency achieved by the oxidation catalyst is a function of temperature. A level of control efficiency can be expected by maintaining catalyst temperature within the manufacturer-specified range. Attachment 1 includes manufacturer data on temperature and expected VOC control efficiency.

Catalyst integrity and activity, via routine inspection and sampling, will be used to provide an indication of how much of the catalyst useful life remains.

Periodic compliance testing will also be continued to further demonstrate compliance with VOC limits.

3.3 Rationale for Selection of Indicator Range

3.3.1 Oxidation Catalyst Average Inlet Temperature

The selected indicator range for catalyst temperature was provided by the catalyst manufacturer to ensure design control efficiencies are met as well as ensure the catalyst is not damaged by high

temperatures. Aside from startup, shutdown and tuning events, the catalyst temperature is maintained within the specified range.

During the most recent stack tests in October 2022, which demonstrated compliance with VOC limits, catalyst temperatures were within the manufacturer specified range.

If the average catalyst inlet temperature is outside of the manufacturer specified range during normal operations, the cause will be investigated, and appropriate action taken.

3.3.2 Catalyst Management Program

Catalyst integrity and activity will be monitored via routine inspections and sampling. Results will be used to determine the remaining catalyst useful life and ensure compliance with permit limits.

3.3.3 VOC Concentration

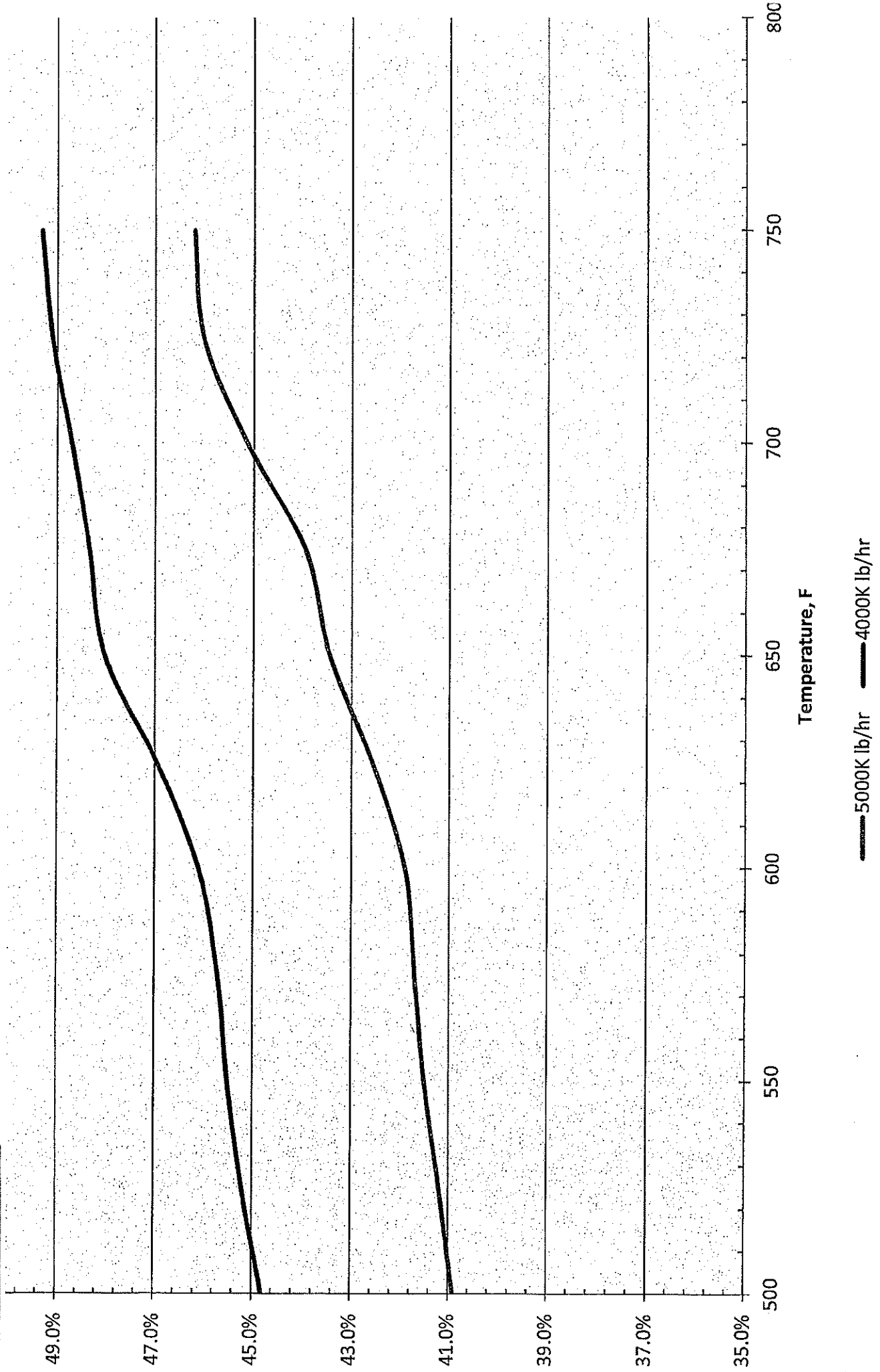
Compliance stack testing will be completed once per permit term, in accordance with EPA-approved methods, to demonstrate compliance with VOC emission limits.

Attachment 1

Oxidation Catalyst Manufacturer Data

VOC Conversion vs. Temperature

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524
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TO Alexander Sandy
Air Quality Engineering Specialist
Southwest Regional Office

FROM Darren Lauer, M.S.
Air Quality Specialist
Source Testing Section

THROUGH Charles J. Zadakis, P.E.
Environmental Program Manager
Division of Source Testing and Monitoring

Richard P. Szekeres, M.S.
Environmental Group Manager
Source Testing Section

DATE November 1, 2019

RE Source Test Audit Review
Tenaska PA Partners, LLC., Westmoreland Generating Station
Natural Gas-Fired Combustion Turbine Units 101 and 102, IDs 101 and 102
Selective Catalytic Reduction Units 101 and 102, IDs C101A and C102A
Oxidation Catalyst Units 101 and 102, IDs C101B and C102B
South Huntingdon Township, Westmoreland County
Plan Approval No. 65-00990C
eFACTS ID No. 2895478 PFID No. 716802
eFACTS Inspection Result: **PEND**

MESSAGE:

Tenaska PA Partners, LLC operates two, natural gas-fired, Mitsubishi Hitachi Power Systems (Model J Series) combustion turbines (CTs) and heat recovery steam generators (HRSGs), with associated duct burners, at its Westmoreland Generating Station. Each turbine and its associated duct burner have a nominal rated heat input of 3,147 and 400 MMBtu/hr, respectively. The effluent from each turbine is routed to individual selective catalytic reduction (SCR) units, then to individual oxidation catalyst (OC) units, prior to being discharged to the atmosphere through individual circular exhausts.

During January 8-13, 2019, CleanAir Engineering performed testing to determine the filterable particulate matter (FPM), condensable PM (CPM), sulfuric acid mist ($\text{H}_2\text{SO}_4/\text{SO}_3$, as H_2SO_4), sulfur dioxide (SO_2), ammonia (NH_3), formaldehyde (CH_2O), volatile organic compound (VOC), nitrogen oxides (NO_x), and carbon monoxide (CO) emissions from CT2 and CT6 during operations at various fuel, load, and cycle conditions. During testing, EPA Methods 1, 2, 3A, 4, 5, 7E, 10, 25A, 202, 320 (for methane, ethane, formaldehyde, and ammonia), and conditional test method 013 (CTM-013/NCASI Method 8A) were used.

The testing was conducted to satisfy the applicable New Source Performance Standards (NSPS) - 40 CFR 60, Subpart KKKK - and plan approval conditions and limits. The total hydrocarbon (THC) results, using EPA Method 25A (M25A), should not have been corrected for analyzer calibration error using the EPA Method 7E procedures. Since most of the corrected THC results had a positive bias (over-reporting), the reported results will be accepted. For all future test reports, if the M25A THC results are corrected for analyzer calibration error, the results will be rejected. The results shown in the tables are acceptable to the Department of Environmental Protection (DEP) as representative of emissions at operating conditions similar to those during testing and may be used for compliance determinations. Note that the formaldehyde results (in lbs/hr) that are **highlighted in red** in the tables below, exceed the permit limit.

Natural Gas Fired Combustion Turbine Unit 101 (ID 101) - no Duct Burners - Test Summary
(Test Date: 1/8/19)

Run Number	1	2	3	Avg.	Limit
CT Natural Gas (NG) Usage (kscf/hr)	2,873	2,842	2,837	2,851 ¹	
CT Heat Input (MMBtu/hr)	3,016	2,984	2,979	2,993 ¹	
CT Rated Heat Input (MMBtu/hr)	3,147				
% of CT Heat Input ¹	96	95	95	95	
F _d Factor (dscf/MMBtu)	8,710				
CH ₂ O (ppmdv)	0.5	0.6	0.5	0.5	
CH ₂ O (lbs/hr)	2.64	2.83	2.35	2.61	0.986
NMEHC (ppmdv, as propane, includes CH ₂ O)	0.2	0.4	0.2	0.3	
NMEHC (ppmdv, as propane, at 15 % O ₂ , includes CH ₂ O)	0.1	0.2	0.1	0.2	1.4
NMEHC (lbs/hr, as propane, includes CH ₂ O)	0.201	1.25	0.344	0.597	9.4

¹ Reviewer calculated or corrected values or averages based upon the reported data.

Natural Gas Fired Combustion Turbine Unit 101 (ID 101) – with Duct Burners - Test Summary
(Test Date: 1/9 & 10/19)

Run Number	2 *	3	4	Avg.	Limit
CT Natural Gas (NG) Usage (kscf/hr)	2,881	3,164	3,166	3,070 ¹	
Duct Burner (DB) NG Usage (kscf/hr)	293	343	344	327 ¹	
Total CT and DB Heat Input (MMBtu/hr)	3,165	3,683	3,685	3,511 ¹	
Total CT and DB Rated Heat Input (MMBtu/hr)	3,547				
% of Total CT and DB Heat Input ¹	89	104	104	99	
F _d Factor (dscf/MMBtu)	8,710				
FPM (gr/dscf)	0.0002	0.0003	0.0001	0.0002	
FPM (lbs/hr)	2.08	2.38	1.03	1.83	
FPM (lbs/MMBtu)	0.0006	0.0007	0.0003	0.0005	
CPM (gr/dscf)	0.0001	0.0002	0.0002	0.0002	
CPM (lbs/hr)	1.09	1.83	1.57	1.50	
CPM (lbs/MMBtu)	0.0003	0.0005	0.0004	0.0004	
Total PM (gr/dscf)	0.0003	0.0004	0.0003	0.0004	
Total PM (lbs/hr)	3.17	4.22	2.59	3.33	11.8
Total PM (lbs/MMBtu)	0.0009	0.0012	0.0007	0.0009	0.0039
Total Sulfur – Fuel Analysis Based (ppmdw, as SO ₂)	< 1.0	< 1.0	< 1.0	< 1.0	
Total Sulfur – Fuel Analysis Based (grains/100 scf)	< 0.032	< 0.032	< 0.032	< 0.032	0.25
Total Sulfur – Fuel Analysis Based (lbs/hr, as SO ₂)	< 0.304	< 0.307	< 0.307	< 0.306	2.7
Total Sulfur – Fuel Analysis Based (lbs/MMBtu, as SO ₂)	< 0.0001	< 0.0001	< 0.0001	< 0.0001	0.060
H ₂ SO ₄ / SO ₃ Mist (ppmdv)	0.011	0.004	0.231	0.082	
H ₂ SO ₄ / SO ₃ Mist (ppmdv, at 15 % O ₂)	0.007	0.003	0.138	0.049	
H ₂ SO ₄ / SO ₃ Mist (lbs/hr)	0.147	0.060	3.32.	1.18	1.8
H ₂ SO ₄ / SO ₃ Mist (lbs/MMBtu)	0.00004	0.00002	0.00088	0.00031	0.00057

¹ Reviewer calculated or corrected values or averages based upon the reported data.

* Run 1 is invalid due to broken sampling train components and was repeated (Run 2).

Natural Gas Fired Combustion Turbine Unit 101 (ID 101) – with Duct Burners - Test Summary
(Test Date: 1/9 & 10/19)

Run Number	1	2	3	Avg.	Limit
CT Natural Gas (NG) Usage (kscf/hr)	3,125	3,163	3,166	3,151 ¹	
Duct Burner (DB) NG Usage (kscf/hr)	338	343	344	342 ¹	
Total CT and DB Heat Input (MMBtu/hr)	3,636	3,682	3,685	3,668 ¹	
Total CT and DB Rated Heat Input (MMBtu/hr)	3,547				
% of Total CT and DB Heat Input ¹	103	104	104	104	
F _d Factor (dscf/MMBtu)	8,710				
H ₂ SO ₄ / SO ₃ Mist (ppmdv)	0.011	0.004	0.231	0.082	
H ₂ SO ₄ / SO ₃ Mist (ppmdv, at 15 % O ₂)	0.007	0.003	0.138	0.049	
H ₂ SO ₄ / SO ₃ Mist (lbs/hr)	0.147	0.060	3.32.	1.18	1.8
H ₂ SO ₄ / SO ₃ Mist (lbs/MMBtu)	0.00004	0.00002	0.00088	0.00031	0.00057

¹ Reviewer calculated or corrected values or averages based upon the reported data.

Natural Gas Fired Combustion Turbine Unit 101 (ID 101) - with Duct Burners - Test Summary
(Test Date: 1/10/19)

Run Number	1	2	3	Avg.	Limit
CT Natural Gas (NG) Usage (kscf/hr)	3,167	3,167	3,164	3,166 ¹	
Duct Burner (DB) NG Usage (kscf/hr)	344	344	343	344 ¹	
Total CT and DB Heat Input (MMBtu/hr)	3,686	3,686	3,683	3,685 ¹	
Total CT and DB Rated Heat Input (MMBtu/hr)	3,547				
% of Total CT and DB Heat Input ¹	104	104	104	104	
F _d Factor (dscf/MMBtu)	8,710				
NO _x (ppmdv)	1.9	1.7	1.7	1.8	
NO _x (ppmdv, at 15 % O ₂)	1.1	1.0	1.0	1.1	2.0
NO _x (lbs/hr)	15.6	14.3	13.7	14.5	26.5
CO (ppmdv)	< 0.1	< 0.1	< 0.1	< 0.1	
CO (ppmdv, at 15 % O ₂)	< 0.1	< 0.1	< 0.1	< 0.1	2.0
CO (lbs/hr)	< 0.49	< 0.49	< 0.49	< 0.49	15.9
NH ₃ (ppmdv)	1.1	1.1	0.9	1.0	
NH ₃ (ppmdv, at 15 % O ₂)	0.6	0.6	0.5	0.6	5.0
NH ₃ (lbs/hr)	3.30	3.21	2.75	3.09	22.9
CH ₂ O (ppmdv)	0.5	0.6	0.7	0.6	
CH ₂ O (lbs/hr)	2.75	3.09	3.77	3.20	0.986
NMEHC (ppmdv, as propane, includes CH ₂ O) ~	0.9	0.8	0.9	0.8	
NMEHC (ppmdv, as propane, at 15 % O ₂ , includes CH ₂ O) ~	0.5	0.5	0.5	0.5	2.4
NMEHC (lbs/hr, as propane, includes CH ₂ O)	5.60	4.99	4.97	5.19	9.4

¹ Reviewer calculated or corrected values or averages based upon the reported data.

~ Based on corrected ppm data provided by the company, the lbs/hr results were correctly reported in the test report without the corrected ppm being applicable.

**Natural Gas Fired Combustion Turbine Unit 102 (ID 102) – with Duct Burners - Test Summary
(Test Date: 1/11 & 13/19)**

Run Number	1	2	3	4	1-3/1,2,4 Aves.	Limit
Test Dates	1/11/19	1/11/19	1/11/19	1/13/19		
CT Natural Gas (NG) Usage (kscf/hr)	3,177	3,147	3,174	3,107	3,166 /3,143 ¹	
Duct Burner (DB) NG Usage (kscf/hr)	346	346	343	346	345/346 ¹	
Total CT and DB Heat Input (MMBtu/hr)	3,699	3,668	3,693	3,625	3,166 /3,143 ¹	
Total CT and DB Rated Heat Input (MMBtu/hr)	3,547					
% of Total CT and DB Heat Input ¹	104	103	104	102	104/103	
F _d Factor (dscf/MMBtu)	8,710					
FPM (gr/dscf)	0.00024	0.00068	*	0.00060	0.00051	
FPM (lbs/hr)	2.33	6.52	*	5.74	4.86	
FPM (lbs/MMBtu)	0.00064	0.00176	*	0.00159	0.00133	
CPM (gr/dscf)	0.00010	0.00021	*	0.00011	0.00014	
CPM (lbs/hr)	1.02	2.05	*	1.02	1.36	
CPM (lbs/MMBtu)	0.00028	0.00055	*	0.00028	0.00037	
Total PM (gr/dscf)	0.00034	0.00089	*	0.00071	0.00065	
Total PM (lbs/hr)	3.35	8.57	*	6.76	6.22	11.8
Total PM (lbs/MMBtu)	0.00091	0.00232		0.00187	0.00170	0.0039
Total Sulfur – Fuel Analysis Based (ppm, as SO ₂)	< 1.0	< 1.0	*	< 1.0	< 1.0	
Total Sulfur – Fuel Analysis Based (grains/100 scf)	< 0.032	< 0.032	*	< 0.032	< 0.032	0.25
Total Sulfur – Fuel Analysis Based (lbs/hr, as SO ₂)	< 0.305	< 0.306	*	< 0.300	< 0.304	2.7
Total Sulfur – Fuel Analysis Based (lbs/MMBtu, as SO ₂)	< 0.0001	< 0.0001	*	< 0.0001	< 0.0001	0.060
H ₂ SO ₄ / SO ₃ Mist (ppmdv)	0.0096	< 0.0013	0.0036	N/A	< 0.0048	
H ₂ SO ₄ / SO ₃ Mist (ppmdv, at 15 % O ₂)	0.0057	< 0.0007	0.0021	N/A	< 0.0029	
H ₂ SO ₄ / SO ₃ Mist (lbs/hr)	0.136	< 0.0179	0.0498	N/A	< 0.0680	1.8
H ₂ SO ₄ / SO ₃ Mist (lbs/MMBtu)	0.00004	< 0.00001	0.00001	N/A	< 0.00002	0.00057

¹ Reviewer calculated or corrected values or averages based upon the reported data.

* TPM/TS Run 3 was invalidated and repeated (as Run 4).

Natural Gas Fired Combustion Turbine Unit 102 (ID 102) – with Duct Burners - Test Summary
(Test Date: 1/11/19)

Run Number	1	2	3	Avg.	Limit
CT Natural Gas (NG) Usage (kscf/hr)	3,171	3,177	3,178	3,175 ¹	
Duct Burner (DB) NG Usage (kscf/hr)	343	343	343	343 ¹	
Total CT and DB Heat Input (MMBtu/hr)	3,689	3,697	3,697	3,694 ¹	
Total CT and DB Rated Heat Input (MMBtu/hr)	3,547				
% of Total CT and DB Heat Input ¹	104	104	104	104	
F _d Factor (dscf/MMBtu)	8,710				
NO _x (ppmdv)	1.8	1.8	1.8	1.8	
NO _x (ppmdv, at 15 % O ₂)	1.1	1.1	1.1	1.1	2.0
NO _x (lbs/hr)	14.7	14.8	14.8	14.8	26.5
CO (ppmdv)	< 0.1	< 0.1	< 0.1	< 0.1	
CO (ppmdv, at 15 % O ₂)	< 0.1	< 0.1	< 0.1	< 0.1	2.0
CO (lbs/hr)	< 0.49	< 0.49	< 0.49	< 0.49	15.9
NH ₃ (ppmdv)	1.4	1.1	0.9	1.2	
NH ₃ (ppmdv, at 15 % O ₂)	0.9	0.7	0.5	0.7	5.0
NH ₃ (lbs/hr)	4.28	3.40	2.65	3.44	22.9
CH ₂ O (ppmdv)	0.7	0.7	0.7	0.7	
CH ₂ O (lbs/hr)	3.87	3.60	3.52	3.66	0.986
NMEHC (ppmdv, as propane, includes CH ₂ O)	1.7	1.1	0.8	1.2	
NMEHC (ppmdv, as propane, at 15 % O ₂ , includes CH ₂ O)	1.0	0.7	0.5	0.7	2.4
NMEHC (lbs/hr, as propane, includes CH ₂ O)	11.3	6.86	4.37	7.50	9.4

¹ Reviewer calculated or corrected values or averages based upon the reported data.

Natural Gas Fired Combustion Turbine Unit 102 (ID 102) – no Duct Burners - Test Summary
(Test Date: 1/13/19)

Run Number	1	2	3	Avg.	Limit
CT Natural Gas (NG) Usage (kscf/hr)	3,103	3,118	3,127	3,116 ¹	
CT Heat Input (MMBtu/hr)	3,258	3,273	3,283	3,271 ¹	
CT Rated Heat Input (MMBtu/hr)	3,147				
% of CT Heat Input ¹	104	104	104	104	
F _d Factor (dscf/MMBtu)	8,710				
CH ₂ O (ppmdv)	0.7	0.7	0.8	0.7	
CH ₂ O (lbs/hr)	3.42	3.80	4.16	3.79	0.986
NMEHC (ppmdv, as propane, includes CH ₂ O)	0.9	0.7	0.5	0.7	
NMEHC (ppmdv, as propane, at 15 % O ₂ , includes CH ₂ O)	0.6	0.5	0.3	0.5	1.4
NMEHC (lbs/hr, as propane, includes CH ₂ O)	4.92	3.36	1.88	3.39	9.4

¹ Reviewer calculated or corrected values or averages based upon the reported data.

cc: EPA/AKB
Reading File, Source Testing Section

TO Thomas Norris
Air Quality District Supervisor
New Stanton District Office

FROM Darren Lauer, M.S.
Air Quality Specialist
Source Testing Section

THROUGH Charles J. Zadakis, P.E.
Environmental Program Manager
Division of Source Testing and Monitoring

Richard P. Szekeres, M.S.
Environmental Group Manager
Source Testing Section

DATE September 28, 2023

RE Source Test Audit Review
Tenaska PA Partners, LLC., Westmoreland Generating Station
Natural Gas-Fired Combustion Turbine Unit No. 2, ID 102
Selective Catalytic Reduction 102, ID C102A
Oxidation Catalyst 102, ID C102B
South Huntingdon Township, Westmoreland County
Plan Approval No. 65-00990C
eFACTS ID No. 3493820 PFID No. 716802
eFACTS Inspection Result: NOVIO

MESSAGE:

Tenaska PA Partners, LLC operates two, natural gas (NG)-fired, Mitsubishi Hitachi Power Systems (Model 501J) combustion turbines (CTs) and heat recovery steam generators (HRSGs), with associated duct burners, at its Westmoreland Generating Station. Each turbine and its associated duct burner have a nominal rated heat input of 3,147 and 400 MMBtu/hr, respectively. The effluent from each turbine is routed to individual selective catalytic reduction (SCR) units, then to individual oxidation catalyst (OC) units prior to being discharged to the atmosphere through individual circular exhausts.

On March 19-20, 2019, Air Hygiene International, Inc. (Air Hygiene) performed retesting to determine the total hydrocarbons (THC), formaldehyde (CH₂O), and volatile organic compounds (VOC) emissions from CT Unit No. 2. The previous test results (January 2019), which exceeded the limit, were challenged by Tenaska, claiming they were invalid. Note that CT Unit No. 1 testing was not conducted, during the March 20, 2019 CT Unit No. 2 retesting, because of the reported unavailability of CT Unit No. 1. This revised test report was submitted to address the original test report deficiencies, noted in this reviewer's April 8, 2022 memo. The testing was performed under two operating conditions: duct

burners on and duct burners off. EPA Methods 1, 2, 3A, 4, 25A, and 320 (for formaldehyde, methane, and ethane) were used during testing to satisfy the applicable plan approval conditions and limits for the retest. The results shown in the tables are acceptable to the Department of Environmental Protection (DEP) as representative of emissions at the operating conditions during testing and may be used for compliance determinations.

Combined Cycle Combustion Turbine No. 2 (ID 102) - Duct Burner Off - Test Summary
(Test Date: 3/20/2019)

Run Number	1	2	3	Avg.	Limit
CT Power Output (MW)	336	317	316	323	
CT NG Usage (ksf/hr) ¹	3,057	2,912	2,907	2,959	
Duct Burner NG Usage (ksf/hr)	off	off	off	off	
Heat Input (MMBtu/hr)	3,202	3,062	3,054	3,044 ¹	
Nominal Rated Heat Input (MMBtu/hr)	3,147				
% of Nominal Rated Heat Input ¹	101.7	97.3	97.0	98.7	
Formaldehyde (ppmdv)	0.06	0.06	0.04	0.05	
Formaldehyde (lbs/hr)	0.27	0.29	0.19	0.25	0.986
NMHC (ppmdv as propane) *	0.2	0.1	0.1	0.2	
NMHC (ppmdv as propane at 15 % O ₂) *	0.2	0.08	0.07	0.1	1.4
NMHC (lbs/hr as propane) *	1.65	0.80	0.69	1.05	9.4
NMHC (lbs/hr as propane) **	1.92	1.09	0.89	1.30	9.4

¹ Reviewer calculated averages based on the reported data.

* Excluding formaldehyde results.

** Including formaldehyde results (reported as formaldehyde, not propane).

Combined Cycle Combustion Turbine No. 2 (ID 102) - Duct Burner On - Test Summary
(Test Date: 3/20/2019)

Run Number	1	2	3	Avg.	Limit
CT Power Output (MW)	324	320	318	321	
CT NG Usage (ksf/hr) ¹	2,974	2,956	2,925	2,952	
Duct Burner NG Usage (ksf/hr) ¹	343	347	326	339	
Total Heat Input (MMBtu/hr) – CT & DB	3,483	3,468	3,445	3,465 ¹	
Total Nominal Rated Heat Input (MMBtu/hr)	3,547				
% of Total Nominal Rated Heat Input ¹	98.2	97.8	97.1	97.7	
Formaldehyde (ppmdv)	0.05	0.05	0.05	0.05	
Formaldehyde (lbs/hr)	0.24	0.25	0.25	0.25	0.986
NMHC (ppmdv as propane) *	0.1	0.2	0.1	0.2	
NMHC (ppmdv as propane at 15 % O ₂) *	0.07	0.1	0.08	0.1	2.4
NMHC (lbs/hr as propane) *	0.84	1.57	0.99	1.13	9.4
NMHC (lbs/hr as propane) **	1.08	1.82	1.24	1.38	9.4

¹ Reviewer calculated averages based on the reported data.

* Excluding formaldehyde results.

** Including formaldehyde results (reported as formaldehyde, not propane).

TO Thomas Norris
Air Quality District Supervisor
New Stanton District Office

FROM Darren Lauer, M.S.
Air Quality Specialist
Source Testing Section

THROUGH Charles J. Zadakis, P.E.
Environmental Program Manager
Division of Source Testing and Monitoring

Richard P. Szekeres, M.S.
Environmental Group Manager
Source Testing Section

DATE September 28, 2023

RE Source Test Audit Review
Tenaska PA Partners, LLC., Westmoreland Generating Station
Natural Gas-Fired Combustion Turbine Unit No. 1, ID 101
Selective Catalytic Reduction 101, ID C101A
Oxidation Catalyst 101, ID C101B
South Huntingdon Township, Westmoreland County
Plan Approval No. 65-00990C
eFACTS ID No. 3493837 PFID No. 716802
eFACTS Inspection Result: NOVIO

MESSAGE:

Tenaska PA Partners, LLC operates two, natural gas (NG)-fired, Mitsubishi Hitachi Power Systems (Model 501J) combustion turbines (CTs) and heat recovery steam generators (HRSGs), with associated duct burners, at its Westmoreland Generating Station. Each turbine and its associated duct burner have a nominal rated heat input of 3,147 and 400 MMBtu/hr, respectively. The effluent from each turbine is routed to individual selective catalytic reduction (SCR) units, then to individual oxidation catalyst (OC) units prior to being discharged to the atmosphere through individual circular exhausts.

On May 22-23, 2019, Air Hygiene International, Inc. (Air Hygiene) performed retesting to determine the total hydrocarbons (THC), formaldehyde (CH₂O), and volatile organic compounds (VOC) emissions from CT Unit No. 1. The previous test results (January 2019), which exceeded the limit, were challenged by Tenaska, claiming they were invalid. Note that CT Unit No. 2 retesting was conducted on March 20, 2019. This revised test report was submitted to address the original test report deficiencies per the previous memo dated April 8, 2022. The testing was performed under two operating conditions: duct burners on and duct burners off. EPA Methods 1, 2, 3A, 4, 25A, and 320 (for formaldehyde,

methane, and ethane) were used during testing to satisfy the applicable plan approval conditions and limits for the retest. The results shown in the tables are acceptable to the Department of Environmental Protection (DEP) as representative of emissions at the operating conditions during testing and may be used for compliance determinations.

Combined Cycle Combustion Turbine No. 1 (ID 101) - Duct Burner Off - Test Summary
(Test Date: 5/23/2019)

Run Number	1	2	3	Avg.	Limit
CT Power Output (MW)	287	286	286	286	
CT NG Usage (kscf/hr) ¹	2,721	2,704	2,707	2,711	
Duct Burner NG Usage (kscf/hr)	off	off	off	off	
Heat Input (MMBtu/hr)	2,857	2,903	2,843	2,868 ¹	
Nominal Rated Heat Input (MMBtu/hr)	3,147				
% of Nominal Rated Heat Input ¹	90.8	92.2	90.3	91.1	
Formaldehyde (ppmdv)	0.06	0.07	0.07	0.07	
Formaldehyde (lbs/hr)	0.293	0.352	0.315	0.320	0.986
NMHC (ppmdv as propane) *	0.001	0.001	0.001	0.001	
NMHC (ppmdv as propane at 15 % O ₂) *	0.001	0.001	0.001	0.001	1.4
NMHC (lbs/hr as propane) *	0.0080	0.0073	0.0071	0.0074	9.4
NMHC (lbs/hr as propane) **	0.301	0.359	0.323	0.328	9.4

¹ Reviewer calculated averages based on the reported data.

* Excluding formaldehyde results.

** Including formaldehyde results (reported as formaldehyde, not propane).

Combined Cycle Combustion Turbine No. 1 (ID 101) - Duct Burner On - Test Summary
(Test Date: 5/23/2019)

Run Number	1	2	3	Avg.	Limit
CT Power Output (MW)	286	286	286	286	
CT NG Usage (kscf/hr) ¹	2,706	2,707	2,701	2,705	
Duct Burner NG Usage (kscf/hr) ¹	338	338	339	338	
Total Heat Input (MMBtu/hr) – CT & DB	3,197	3,197	3,192	3,195 ¹	
Total Nominal Rated Heat Input (MMBtu/hr)	3,547				
% of Total Nominal Rated Heat Input ¹	90.1	90.1	90.0	90.1	
Formaldehyde (ppmdv)	0.07	0.05	0.08	0.07	
Formaldehyde (lbs/hr)	0.334	0.226	0.368	0.309	0.986
NMHC (ppmdv as propane) *	0.001	0.001	0.001	0.001	
NMHC (ppmdv as propane at 15 % O ₂) *	0.001	0.001	0.001	0.001	2.4
NMHC (lbs/hr as propane) *	0.0087	0.0092	0.0081	0.0085	9.4
NMHC (lbs/hr as propane) **	0.343	0.236	0.376	0.318	9.4

¹ Reviewer calculated averages based on the reported data.

* Excluding formaldehyde results.

** Including formaldehyde results (reported as formaldehyde, not propane).

2700-FM-AQ0023 		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program		
Date(s) of Inspection: 3-5-26	TV ☐ SM ☐ NM ☐	PA ☒ GP ☐ MEGA ☐	Permit #(s): 65-00990	Expiration Date: 11-28-25	Case #: 65-990	PF ID #: 716802
Company Name: Tenaska Pa. Partners			Municipality: South Huntington Township		County: Westmoreland	
Plant Name: Westmoreland Generating Station			Physical Location: 446 Smithton Pike, Smithton, Pa.		Federal ID — Plant Code #: 26-4286063-1446	
Responsible Official: Buck Hunt				Mailing Address: 14302 FNB PKWY, OMAHA, Ne., 68154-5212		
Title: Vice President				Permit Contact: Larry Carlson, V.P. Env. Affairs, 402-938-1661, lcarlson@tenaska.com		
Contact(s): 402-691-9500, bhunt@tenaska.com				Inspection Contact: Ryan Jobe, Plant Engineer, 724-405-6324, rjobe@tenaska.com		
Mark (X) All Inspection Types That Apply To This Inspection:						
☐ Full Compliance Evaluation (FCE)	☐ Plan Approval Inspection		☐ File Review (FR)			
☐ Operating Permit Inspection (PI)	☐ Initial Permit Inspection (IPI)		☐ Complaint Inspection (CI)			
☐ Routine/Partial (RTPT)	☐ Follow-Up Inspection (Ref. Date: _____)		☐ Sample Collection (SC)			
☐ Minor Source(s) Inspection (RFD)	☐ Stack Test Observation		☐ Multi-Media Inspection (MM)			
☒ Other: VEOB	☐ Announced					
Annual Compliance Certification Received: ☐ YES ☐ NO ☒ N/A				Date Received:		
AIMS Report Received: ☐ YES ☐ NO ☒ N/A				Date Received:		
Mark (X) All Activities That Apply:				EPA Class: A		
☒ File Review	☒ Pre-Inspection Briefing		☒ Exit Interview/Briefing			
☒ Pre-Inspection Observations	☒ Check For New/Unreported Sources		☐ Sample(s) Collected			
☒ Visible Emissions Observations	☐ Verify Operation of CEMS		☐ Other			
Comments/Recommendations: Enforcement since last FCE ☒ Yes ☐ No (If yes, attach summary)						
On 3-5-26, D.E.P. Cody Frick conducted an unannounced Method 9 Visible Emission Observation (VEOB). This particular type of inspection was instigated by citizen concerns regarding smoke emanating from the equipment. The Method 9 VEOB inspection is designed to confirm adherence to Section E, Group Combined Cycle Turbines (Sources 101 and 102), Condition # 005, which prohibits: Visible emissions in excess of either of the following limitations: i. Equal to or greater than 10% for a period or periods aggregating more than three minutes in any hour; ii. Equal to or greater than 30% at any time This inspection was for Source 101, Combined Cycle Unit 1.						
Compliance Status: ☒ In ☐ Out ☐ Pending ☐ Awaiting Co. Report				Needs a Follow-Up Inspection? ☐ Yes ☒ No		
Company Representative: <i>Philip Allen</i>		Title: <i>Lead Control Room Operator</i>		Signature: <i>Philip Allen</i>		Date: <i>3-20-26</i>
DEP Representative: Cody Frick		Title: <i>Air Quality Specialist</i>		Signature: <i>Cody D. Frick</i>		Date/Time: <i>3-5-26</i>
This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.						
eFacts Inspection ID#: 4154035				Date: 3-5-26 Reviewed By: Thomas Norris/TON		

2700-FM-AQ0023  Pennsylvania Department of Environmental Protection	INSPECTION REPORT Continued	Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program
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I met with Phil Allen (Lead Control Room Operator), John Robson (Plant Manager), Adam McCool (Operations Manager), and Ryan Jobe (Plant Engineer). I made them aware of the anonymous complaints regarding smoke and odors (CTS 394891 and 395280). I noted that I had not observed any odors offsite, reviewed some of the daily log observations for fugitive emissions, visible emissions, and malodors (including for the February 18-19 time period (attached); no issues were noted and the facility reported no abnormal operation for that time period). While onsite, I did not observe any fugitive emissions or malodors.

The Method 9 Visible Emission Observation Sheet is attached at the end of this report. During the observation, only steam was primarily noted, as detailed in the report. Additional observations were also conducted on Source 102 (CCU 2) and Source 105 (Cooling Tower). Those inspections (eFACTS inspection id's 4154050 and 4156579) have been linked in the eFACTS database.

In addition, I conducted a file review of relevant records.

Per Section C, Condition # 012 of the Plan Approval, the facility is required to conduct annual sulfur content analyses of the utilized natural gas. However, the facility conducts this on a monthly basis. Representative samples of recent monthly natural gas sulfur content analyses are attached. Per Section E, Group G001, Condition # 006: Average fuel sulfur content shall not exceed 0.25 gr/100 scf natural gas on a monthly basis. Review of monthly measurement data since the last F.C.E. (August 2025) shows that the highest measured amount was 0.046 gr./100 cu. ft. This was for the measurement which was taken on November 21, 2025.

Regarding the Cooling Tower, (Source 105), the facility is limited by Plan Approval, Section D, Source 105, Conditions 001-003. These limitations are as follows:

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The emissions from the cooling tower shall not exceed the following:

- (a) Total PM: 1.5 lb/hr and 6.57 tpy on a 12-month rolling basis.
- (b) Total PM10: 0.75 lb/hr and 3.29 tpy on a 12-month rolling basis.
- (c) Total PM2.5: 0.002 lb/hr and 0.009 tpy on a 12-month rolling basis.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Total dissolved solids (TDS) of the cooling tower water shall not exceed 2,000 ppm.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall sample, analyze, and record the circulating water TDS content on a monthly basis.

Records since the last F.C.E. (August 2025) of these items are attached.

Total PM has a limit of 1.5 lb./hr. and 6.57 tpy. The highest values noted are 0.73 lbs./hr. for the 12-month period ending February 2026 (March 2025 through February 2026) and 2.52 tons for the 12-month period ending August 2025.



INSPECTION REPORT

Continued

Total PM₁₀ has a limit of 0.75 lb./hr. and 3.29 tpy. The highest values noted are 0.36 lbs./hr. for the 12-month period ending February 2026 (March 2025 through February 2026) and 1.26 tons for the 12-month period ending August 2025.

Total PM_{2.5} has a limit of 0.002 lbs./hr. and 0.009 tpy. The highest values noted are 0.0011 lbs./hr. for multiple 12-month periods, and less than 0.00 tons for multiple 12-month periods.

TDS also has a limitation of 2,000 p.p.m. Per the attached records, the highest value noted was for 1,407.36 p.p.m., as measured in February 2026.

The combined cycle units also undergo routine performance testing. As per Section E, Group G001, Condition # 002 of the Plan Approval:

During normal operation, emissions from each combined cycle combustion turbine, Source IDs 101 and 102, shall not exceed:

(a) Nitrogen Oxides (NO_x):

(1) 2.0 ppmvd @ 15% O₂

(2) 26.5 lb./hr.

- NO_x has CEMS. Initial performance testing for Source 101 in January 2019 yielded 1.0 ppmvd @ 15% O₂, and 14.5 lb. / hr. Source 102 at 1.0 ppmvd @ 15% O₂ and 14.8 lb. / hr. Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(b) Carbon Monoxide (CO):

(1) 2.0 ppmvd @ 15% O₂

(2) 15.9 lb./hr.

- CO has CEMS. Initial performance testing for Source 101 in January 2019 yielded < 0.1 ppmvd @ 15% O₂, and < 0.5 lb. / hr. Source 102 at the same levels." Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(c) Volatile Organic Compounds (VOC):

(1) 2.4 ppmvd @ 15% O₂ with duct burners

(2) 1.4 ppmvd @ 15% O₂ without duct burners

(3) 9.4 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0 ppmvd @ 15% O₂ with duct burners, 0.0 ppmvd @ 15% O₂ without duct burners, and 0.0 lb. / hr. Source 102 at 0.0 ppmvd @ 15 % O₂ both with and without duct burners, and 0.0 lb. / hr.

(d) Total Particulate Matter (PM):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(e) Total Particulate Matter with an aerodynamic diameter less than 10 microns (PM₁₀):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

2700-FM-AQ0023  Pennsylvania Department of Environmental Protection	INSPECTION REPORT Continued	Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program
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- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(f) Total Particulate Matter with an aerodynamic diameter less than 2.5 microns (PM_{2.5}):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(g) Sulfuric Acid Mist (H₂SO₄):

(1) 5.74E-04 lb./MMBtu

(2) 1.8 lb./hr.

- Initial testing in January 2019 for Source 101 yielded 0.00031 lb. / MMBtu and 1.2 lb. / hr. Source 102 yielded < 0.00018 lb. / MMBtu and < 0.07 lb. / hr. ... Only initial testing was required. Continued compliance with emissions limitations are met by verifying sulfur content in the fuel by analysis.

(h) Sulfur Dioxide (SO₂):

(1) 2.7 lb./hr.

- Initial testing in January 2019 for Source 101 yielded <0.31 lb. / hr. Source 102 yielded the same level...Only initial testing was required. Continued compliance with emissions limitations are met by verifying sulfur content in the fuel by analysis.

(i) Ammonia Slip (NH₃):

(1) 5.0 ppmvd

(2) 22.9 lb./hr.

- NH₃ has CEMS. Initial testing for Source 101 in January 2019 yielded 0.6 ppmvd @ 15% O₂, and 3.1 lb. / hr. Source 102 at 0.7 ppmvd @ 15% O₂ and 3.4 lb. / hr. Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(j) Formaldehyde (HCHO):

(1) 0.986 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.235 lb. / hr. (without duct burners). Source 102 at 0.157 lb. / hr. (without duct burners).

(k) Carbon Dioxide (CO₂):

(1) 1,000 lbs. CO₂/MWh (gross) on a 12-month annual average basis.

- Per the testing conducted in October 2024, Source 101 at 837 lb. / MW*hr. (with duct burners) and Source 102 at 800 lb. / MW*hr. (with duct burners).

ppmdv = parts per million volume on a dry gas basis, corrected to 15 percent O₂.

ppmdv and lb./MMBtu limits based upon a 3-hour averaging time.

In addition, the combined cycle units are equipped with CEMS (Continuous Emission Monitoring System) for NOx, CO, and NH3. Compliance with the requisite limitations are monitored via the CEMS Group in Harrisburg.

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Enforcement since previous F.C.E.:

Admin Inspection ID 4143038, dated 10-14-25, details the following violations:

- 4th Qtr. 2022 CO ppm exceedance Unit 2
- 4th Qtr. 2022 CO lb./hr. exceedance Unit 2
- 2nd Qtr. 2023 CO ppm exceedance Unit 2
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 2
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 1
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 1
- 3rd QTR 2024 CO ppm exceedance Unit 1
- 3rd Qtr. 2024 CO lb./hr. exceedance Unit 1
- 3rd Qtr. 2024 CO lb./hr. exceedance Unit 2
- 1st Qtr. 2025 CO lb./hr. exceedance Unit 2
- The compliance case remains pending.

Facility Contact Information:

Responsible Official:
Buck Hunt, Vice President, 402-691-9500, bhunt@tenaska.com

Permit Contact, Firm Plant Contact, Mailing Address:
Larry Carlson, V.P. Env. Affairs, 402-938-1661, lcarlson@tenaska.com

Inspection Contact:
Ryan Jobe, Plant Engineer, 724-405-6324, rjobe@tenaska.com

Fee Administrator(s):
Lane Cummings, Plant Controller, 724-405-6307, lcummings@tenaska.com
- The facility requested that I assign this role to Kim Murtland. The requisite adjustments have been made in the eFACTS database.

Requests for Determination (RFDs) Since Previous FCE

Date of Determination	Project/Equipment	Determination	Status
N/A			



INSPECTION REPORT Continued

Source ID	Source Name	Comments
031	Auxiliary Boiler (245 MMBtu./Hr.)	<i>Present</i>
101	Combined Cycle Unit #1 (3,147 MMBtu./Hr.)	<i>Operating</i>
102	Combined Cycle Unit #2 (3,147 MMBtu./Hr.)	<i>Operating</i>
104	Emergency Fire Pump Engine (351 Bhp)	<i>Present</i>
105	Cooling Tower	<i>Operating</i>
107	Fire Pump Diesel Storage Tank (572 Gal)	<i>Present</i>
108	Turbine Lube Oil Storage Tanks (6,500, 2 @ 7,200 Gal)	<i>Present</i>
109	Aqueous Ammonia Storage Tank	<i>Ammonia is utilized for the SCR, tank is 30,000 gallons</i>
110	Circuit Breakers	<i>There are six in total, 2 in the CT building, 4 in the switch yard.</i>
C101A	SCR 101	<i>Present</i>
C101B	Oxidation Catalyst 101	<i>Present</i>
C102A	SCR 102	<i>Present</i>
C102B	Oxidation Catalyst 102	<i>Present</i>
S031	Auxiliary Boiler Stack	
S101	Combined Cycle Unit #1 Stack	
S102	Combined Cycle Unit #2 Stack	
S104	Fire Pump Eng. Stack	
Z001	Fugitive Emissions	
Z105	Fugitive Emissions (Cooling Tower)	
Z107	Fugitive Emissions (Fire Pump Diesel Tank)	
Z108	Fugitive Emissions (Lube Oil Tank)	
Z109	Fugitive Emissions (Ammonia Tank)	
Z110	Fugitive Emissions (Circuit Breakers)	
NEW / Removed ?	N/A	



INSPECTION REPORT

Continued



Task Summary

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Page 1 of 2

ID RECURRING Task #30162 **Initiated by System User on 02/17/2026 00:01:55**
Name OPACITY, FUGITIVE EMISSIONS, MALODOR MONITORING INSPECTION
Description
Type OPS ROUNDS **Status** COMPLETE
Priority **Scheduled Date** 02/18/2026
Category **Due Date** 02/18/2026
Owner Group OPERATIONS **Start Date** 02/18/2026
Assigned Group(s) OPERATIONS **Completion Date** 02/18/2026 08:31:39
Assigned Person(s)
Location/Asset

Notes

Jeremy Hough on 02/18/2026 08:32 AM (COMPLETE)

Task Responses

OPACITY MONITORING

OPACITY MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
CT1 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT1: ARE THERE ANY VISABLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: = YES		NORMAL
CT2 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT2: ARE THERE ANY VISABLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: = YES		NORMAL
COOLING TOWER SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
COOLING TOWER: ARE THERE ANY VISABLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: = YES		NORMAL
AUX BOILER SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL
DIESEL FIRE PUMP SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL



INSPECTION REPORT

Continued



Task Summary

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FUGITIVE EMISSIONS MONITORING

FUGITIVE EMISSIONS MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY FUGITIVE EMISSIONS PRESENT?	NO	LO: = YES		NORMAL
ARE THE EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

MALODOR MONITORING

MALODOR MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY MALODORS PRESENT?	NO	LO: = YES		NORMAL
ARE THE MALODOR EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

Images

No Images Attached

Documents

No Documents Attached



INSPECTION REPORT

Continued



Task Summary

3/5/2026 11:04:24 AM
Page 1 of 2

ID RECURRING Task #30167 **Initiated by** System User on 02/18/2026 00:01:38
Name OPACITY, FUGITIVE EMISSIONS, MALODOR MONITORING INSPECTION
Description
Type OPS ROUNDS **Status** COMPLETE
Priority **Scheduled Date** 02/19/2026
Category **Due Date** 02/19/2026
Owner Group OPERATIONS **Start Date** 02/19/2026
Assigned Group(s) OPERATIONS **Completion Date** 02/19/2026 08:26:45
Assigned Person(s)
Location/Asset

Notes

Jeremy Hough on 02/19/2026 08:26 AM (COMPLETE)

Task Responses

OPACITY MONITORING

OPACITY MONITORING

Pairs	Value / Units	Alarm Limits	Comments	Condition
CT1 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT1: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: - YES		NORMAL
CT2 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT2: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: - YES		NORMAL
COOLING TOWER SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
COOLING TOWER: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: - YES		NORMAL
AUX BOILER SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL
DIESEL FIRE PUMP SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL



INSPECTION REPORT

Continued



Task Summary

3/5/2026 11:04:24 AM
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FUGITIVE EMISSIONS MONITORING

FUGITIVE EMISSIONS MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY FUGITIVE EMISSIONS PRESENT?	NO	LO: = YES		NORMAL
ARE THE EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

MALODOR MONITORING

MALODOR MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY MALODORS PRESENT?	NO	LO: = YES		NORMAL
ARE THE MALODOR EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

Images

No Images Attached

Documents

No Documents Attached



INSPECTION REPORT

Continued

Section C, Condition 12: Natural Gas Sulfur Analyses



Critical Control Energy Services

Bossier City, Louisiana

Total Sulfur Analysis Report

Report Date: 9/9/2025 4:44:49PM

Client:	TENASKA PENNSYLVANIA PARTNERS LLC	Date Sampled:	Aug 26, 2025
Client Code:	2565	Analysis Date:	Sep 4, 2025
Site:	WESTMORELAND GENERATING STATION	Collected By:	ED PLOWCHA
Field:	160 - CHARLESTON	Date Effective:	Sep 1, 2025
Meter:	0001-3	Source Pressure (PSI):	683.00
Source Laboratory:	Bossier City, LA	Source Temp (P):	60.00
Lab File No:	25651600001-3_BAG1		
Cylinder No:	Tedlar Bag		
Analysts Status:	good		
Sample Type:	Spot		
Measurement Analyst:	<i>Ashted Free</i>		

Method: GPA-2199

Total Sulfur

0.2 PPMV S

0.012 Grains/100 cu.ft

Source	Date	Notes
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INSPECTION REPORT

Continued


**CRITICAL
CONTROL**
Energy Services

Critical Control Energy Services

 South Charleston, West Virginia
 1740 Union Carbide Drive
 South Charleston, WV 25303

Total Sulfur Analysis Report
Report Date: Jan 13, 2026 12:25p

Client:	TENASKA PENNSYLVANIA PARTNERS LLC	Date Sampled:	Dec 22, 2025
Client Code:	2565	Analysis Date:	Jan 8, 2025
Site:	SAMPLE POINT 00013	Collected By:	
Field:	160 - CHARLESTON	Date Effective:	Dec 22, 2025 12:00a
Meter:	0001-3	Source Pressure (PSI):	688.0
Source Laboratory:	Charleston, WV	Source Temp (P):	
Lab File No:	SS4697		
Cylinder No:	BAG		
Analysis Status:	good		
Sample Type:	Spot		
Measurement Analyst:			

Method: GPA-2199

Total Sulfur

0.4 PPMV S

0.025 Grains/100 cu.ft

Source	Date	Notes
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INSPECTION REPORT

Continued

Section D, Source 105, Conditions 001 to 002; Emissions and TDS; beginning with the 12-month period ending August 2025

Cooling tower 12-month rolling totals

12 Month Rolling totals	lb/hr MAX	TPY	
PM Total	0.70	2.52	
PM₁₀ Emissions	0.35	1.26	0.01
PM_{2.5} Emissions	0.0011	0.00	0.01

	Conductivity	TDS	Operating Hours	PM Total		PM ₁₀ Emissions		PM _{2.5} Emissions	
				LB/HR	TPM	LB/HR	TPM	(lb/hr)	(tpm)
September	1814	1160.96	720	0.598373	0.215414	0.299186	0.107707	0.000898	0.000323
October	1903	1217.92	548.81	0.627731	0.172252	0.313865	0.086126	0.000942	0.000258
November	2130	1363.2	720	0.70261	0.252939	0.351305	0.12647	0.001054	0.000379
December	1880	1203.2	744	0.620144	0.230693	0.310072	0.115347	0.00093	0.000346
January	1811	1159.04	744	0.597383	0.222227	0.298692	0.111113	0.000896	0.000333
February	1787	1143.68	672	0.589466	0.198061	0.294733	0.09903	0.000884	0.000297
March	1709	1093.76	744.03	0.563737	0.209719	0.281869	0.104859	0.000846	0.000315
April	1679	1074.56	377.2	0.553841	0.104454	0.276921	0.052227	0.000831	0.000157
May	1770	1132.8	744.01	0.583859	0.217198	0.291929	0.108599	0.000876	0.000328
June	1943	1243.52	720.01	0.640925	0.230736	0.320463	0.115368	0.000961	0.000346
July	1837	1175.68	744	0.60596	0.225417	0.30298	0.112708	0.000909	0.000338
August	1964	1256.96	744.01	0.647852	0.241004	0.323926	0.120502	0.000972	0.000362



INSPECTION REPORT

Continued

Cooling tower 12-month rolling totals

12 Month Rolling totals	lb/hr MAX	TPY
PM Total	0.70	2.39
PM ₁₀ Emissions	0.35	1.20
PM _{2.5} Emissions	0.0011	0.00

0.01

0.01

	Conductivity	TDS	Operating Hours	PM Total		PM ₁₀ Emissions		PM _{2.5} Emissions	
				LB/HR	TPM	LB/HR	TPM	(lb/hr)	(tpm)
October	1903	1217.92	548.81	0.627731	0.172252	0.313865	0.086126	0.000942	0.000258
November	2130	1363.2	720	0.70261	0.252939	0.351305	0.12647	0.001054	0.000379
December	1880	1203.2	744	0.620144	0.230693	0.310072	0.115347	0.00093	0.000346
January	1811	1159.04	744	0.597383	0.222227	0.298692	0.111113	0.000896	0.000333
February	1787	1143.68	672	0.589466	0.198061	0.294733	0.09903	0.000884	0.000297
March	1709	1093.76	744.03	0.563737	0.209719	0.281869	0.104859	0.000846	0.000315
April	1679	1074.56	377.2	0.553841	0.104454	0.276921	0.052227	0.000831	0.000157
May	1770	1132.8	744.01	0.583859	0.217198	0.291929	0.108599	0.000876	0.000326
June	1943	1243.52	720.01	0.640925	0.230736	0.320463	0.115368	0.000961	0.000346
July	1837	1175.68	744	0.60596	0.225417	0.30298	0.112708	0.000909	0.000338
August	1964	1256.96	744.01	0.647852	0.241004	0.323926	0.120502	0.000972	0.000362
September	1814	1160.96	296.05	0.598373	0.088574	0.299186	0.044287	0.000898	0.000133



INSPECTION REPORT

Continued

Cooling tower 12-month rolling totals

12 Month Rolling totals	lb/hr MAX	TPY
PM Total	0.70	2.26
PM ₁₀ Emissions	0.35	1.13
PM _{2.5} Emissions	0.0011	0.00

0.01

0.01

	Conductivity	TDS	Operating Hours	PM Total		PM ₁₀ Emissions		PM _{2.5} Emissions	
				LB/HR	TPM	LB/HR	TPM	(lb/hr)	(tpm)
November	2130	1363.2	720	0.70261	0.252939	0.351305	0.12647	0.001054	0.000379
December	1880	1203.2	744	0.620144	0.230693	0.310072	0.115347	0.00093	0.000346
January	1811	1159.04	744	0.597383	0.222227	0.298692	0.111113	0.000896	0.000333
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April	1679	1074.56	377.2	0.553841	0.104454	0.276921	0.052227	0.000831	0.000157
May	1770	1132.8	744.01	0.583859	0.217198	0.291929	0.108599	0.000876	0.000326
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July	1837	1175.68	744	0.60596	0.225417	0.30298	0.112708	0.000909	0.000338
August	1964	1256.96	744.01	0.647852	0.241004	0.323926	0.120502	0.000972	0.000362
September	1814	1160.96	296.05	0.598373	0.088574	0.299186	0.044287	0.000898	0.000133
October	1903	1217.92	125.98	0.627731	0.039541	0.313865	0.01977	0.000942	0.000059



INSPECTION REPORT

Continued

Cooling tower 12-month rolling totals

12 Month Rolling totals	lb/hr MAX	TPY
PM Total	0.70	2.26
PM ₁₀ Emissions	0.35	1.13
PM _{2.5} Emissions	0.0011	0.00

0.01

0.01

	Conductivity	TDS	Operating Hours	PM Total		PM ₁₀ Emissions		PM _{2.5} Emissions	
				LB/HR	TPM	LB/HR	TPM	(lb/hr)	(tpm)
December	1880	1203.2	744	0.620144	0.230693	0.310072	0.115347	0.00093	0.000346
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March	1709	1093.76	744.03	0.563737	0.209719	0.281869	0.104859	0.000846	0.000315
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May	1770	1132.8	744.01	0.583859	0.217198	0.291929	0.108599	0.000876	0.000326
June	1943	1243.52	720.01	0.640925	0.230736	0.320463	0.115368	0.000961	0.000346
July	1837	1175.68	744	0.60596	0.225417	0.30298	0.112708	0.000909	0.000338
August	1964	1256.96	744.01	0.647852	0.241004	0.323926	0.120502	0.000972	0.000362
September	1814	1160.96	296.05	0.598373	0.088574	0.299186	0.044287	0.000898	0.000133
October	1903	1217.92	125.98	0.627731	0.039541	0.313865	0.01977	0.000942	0.000059
November	2130	1363.2	720.99	0.70261	0.253287	0.351305	0.126644	0.001054	0.000380



INSPECTION REPORT

Continued

Cooling tower 12-month rolling totals

12 Month Rolling totals	lb/hr MAX	TPY
PM Total	0.70	2.26
PM ₁₀ Emissions	0.35	1.13
PM _{2.5} Emissions	0.0011	0.00

0.01

0.01

					PM Total		PM ₁₀ Emissions		PM _{2.5} Emissions	
	Conductivity	TDS	Operating Hours		LB/HR	TPM	LB/HR	TPM	(lb/hr)	(tpm)
January	1811	1159.04	744		0.597383	0.222227	0.298692	0.111113	0.000896	0.000333
February	1787	1143.68	672		0.589466	0.198061	0.294733	0.09903	0.000884	0.000297
March	1709	1093.76	744.03		0.563737	0.209719	0.281869	0.104859	0.000846	0.000315
April	1679	1074.56	377.2		0.553841	0.104454	0.276921	0.052227	0.000831	0.000157
May	1770	1132.8	744.01		0.583859	0.217198	0.291929	0.108599	0.000876	0.000326
June	1943	1243.52	720.01		0.640925	0.230736	0.320463	0.115368	0.000961	0.000346
July	1837	1175.68	744		0.60596	0.225417	0.30298	0.112708	0.000909	0.000338
August	1964	1256.96	744.01		0.647852	0.241004	0.323926	0.120502	0.000972	0.000362
September	1814	1160.96	296.05		0.598373	0.088574	0.299186	0.044287	0.000898	0.000133
October	1903	1217.92	125.98		0.627731	0.039541	0.313865	0.01977	0.000942	0.000059
November	2130	1363.2	720.99		0.70261	0.253287	0.351305	0.126644	0.001054	0.000380
December	1880	1203.2	744		0.620144	0.230693	0.310072	0.115347	0.00093	0.000346



INSPECTION REPORT

Continued

Cooling tower 12-month rolling totals

12 Month Rolling totals	lb/hr MAX	TPY
PM Total	0.70	2.23
PM ₁₀ Emissions	0.35	1.11
PM _{2.5} Emissions	0.0011	0.00

0.01

0.01

	Conductivity	TDS	Operating Hours	PM Total		PM ₁₀ Emissions		PM _{2.5} Emissions	
				LB/HR	TPM	LB/HR	TPM	(lb/hr)	(tpm)
February	1787	1143.68	672	0.589466	0.198061	0.294733	0.09903	0.000884	0.000297
March	1709	1093.76	744.03	0.563737	0.209719	0.281869	0.104859	0.000846	0.000315
April	1679	1074.56	377.2	0.553841	0.104454	0.276921	0.052227	0.000831	0.000157
May	1770	1132.8	744.01	0.583859	0.217198	0.291929	0.108599	0.000876	0.000326
June	1943	1243.52	720.01	0.640925	0.230736	0.320463	0.115368	0.000961	0.000346
July	1837	1175.68	744	0.60596	0.225417	0.30298	0.112708	0.000909	0.000338
August	1964	1256.96	744.01	0.647852	0.241004	0.323926	0.120502	0.000972	0.000362
September	1814	1160.96	296.05	0.598373	0.088574	0.299186	0.044287	0.000898	0.000133
October	1903	1217.92	125.98	0.627731	0.039541	0.313865	0.01977	0.000942	0.000059
November	2130	1363.2	720.99	0.70261	0.253287	0.351305	0.126644	0.001054	0.000380
December	1880	1203.2	744	0.620144	0.230693	0.310072	0.115347	0.00093	0.000346
January	1549	991.36	744	0.510959	0.190077	0.255479	0.095038	0.000766	0.000285



INSPECTION REPORT

Continued

Cooling tower 12-month rolling totals

12 Month Rolling totals	lb/hr MAX	TPY
PM Total	0.73	2.27
PM ₁₀ Emissions	0.36	1.14
PM _{2.5} Emissions	0.0011	0.00

0.01

0.01

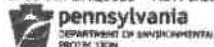
	Conductivity	TDS	Operating Hours	PM Total		PM ₁₀ Emissions		PM _{2.5} Emissions	
				LB/HR	TPM	LB/HR	TPM	(lb/hr)	(tpm)
March	1709	1093.76	744.03	0.563737	0.209719	0.281869	0.104859	0.000846	0.000315
April	1679	1074.56	377.2	0.553841	0.104454	0.276921	0.052227	0.000831	0.000157
May	1770	1132.8	744.01	0.583859	0.217198	0.291929	0.108599	0.000876	0.000326
June	1943	1243.52	720.01	0.640925	0.230736	0.320463	0.115368	0.000961	0.000346
July	1837	1175.68	744	0.60596	0.225417	0.30298	0.112708	0.000909	0.000338
August	1964	1256.96	744.01	0.647852	0.241004	0.323926	0.120502	0.000972	0.000362
September	1814	1160.96	296.05	0.598373	0.088574	0.299186	0.044287	0.000898	0.000133
October	1903	1217.92	125.98	0.627731	0.039541	0.313865	0.01977	0.000942	0.000059
November	2130	1363.2	720.99	0.70261	0.253287	0.351305	0.126644	0.001054	0.000380
December	1880	1203.2	744	0.620144	0.230693	0.310072	0.115347	0.00093	0.000346
January	1549	991.36	744	0.510959	0.190077	0.255479	0.095038	0.000766	0.000285
February	2199	1407.36	672	0.72537	0.243724	0.362685	0.121862	0.001088	0.000366



INSPECTION REPORT

Continued

2700-FM-AQ0039 Rev. 3/2018

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

File ID:

VISIBLE EMISSION OBSERVATION RECORD

Description of Source: *Source 101 Combined Unit*
 Owner of Source: *tenaska*
 Location of Source: *with saturation pipe*

Observers Name: *COOK FRICK*Title: *AQS*Date: *3-5-26*Time Interval: from *11:11* to *12:11*

PART OF MINUTES

0 % 1/4 1/2 3/4				0 % 1/4 1/2 3/4				0 % 1/4 1/2 3/4				Distance to Source: <i>570 feet</i>			
0	0	0	0	20	0	0	0	40	0	0	0	Wind Speed and Direction: <i>0-5 mph S</i>			
1	0	0	0	21	0	0	0	41	0	0	0	Sky Conditions: <i>overcast</i>			
2	0	0	0	22	0	0	0	42	0	0	0	Plume Color: <i>white</i>			
3	0	0	0	23	0	0	0	43	0	0	0	Plume Background: <i>dark greyish blue</i>			
4	0	0	0	24	0	0	0	44	0	0	0	Sketch with source, observer, and north indicated:			
5	0	0	0	25	0	0	0	45	0	0	0				
6	0	0	0	26	0	0	0	46	0	0	0				
7	0	0	0	27	0	0	0	47	0	0	0				
8	0	0	0	28	0	0	0	48	0	0	0				
9	0	0	0	29	0	0	0	49	0	0	0				
10	0	0	0	30	0	0	0	50	0	0	0				
11	0	0	0	31	0	0	0	51	0	0	0				
12	0	0	0	32	0	0	0	52	0	0	0				
13	0	0	0	33	0	0	0	53	0	0	0				
14	0	0	0	34	0	0	5	54	0	0	0				
15	0	0	0	35	0	0	0	55	0	0	0	☐ Opacity ☐ No. of Readings ☐ Total Time Minutes			
16	0	0	0	36	0	0	0	56	0	0	0	☐ <20% <i>240</i> <i>60</i>			
17	0	0	0	37	0	0	0	57	0	0	0	☐ ≤20%			
18	0	0	0	38	0	0	0	58	0	0	0	☐ ≥60%			
19	0	0	0	39	0	0	0	59	0	0	0				

Other Comments:

☐ White - Region☐ Yellow - Site☐ Pink - District Office

###

2700-FM-AQ0023 		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program		
Date(s) of Inspection: 3-5-26	TV ☐ SM ☐ NM ☐	PA ☒ GP ☐ MEGA ☐	Permit #(s): 65-00990	Expiration Date: 11-28-25	Case #: 65-990	PF ID #: 716802
Company Name: Tenaska Pa. Partners			Municipality: South Huntington Township		County: Westmoreland	
Plant Name: Westmoreland Generating Station			Physical Location: 446 Smithton Pike, Smithton, Pa.		Federal ID — Plant Code #: 26-4286063-1446	
Responsible Official: Buck Hunt				Mailing Address: 14302 FNB PKWY, OMAHA, Ne., 68154-5212		
Title: Vice President				Permit Contact: Larry Carlson, V.P. Env. Affairs, 402-938-1661, lcarlson@tenaska.com		
Contact(s): 402-691-9500, bhunt@tenaska.com				Inspection Contact: Ryan Jobe, Plant Engineer, 724-405-6324, rjobe@tenaska.com		
Mark (X) All Inspection Types That Apply To This Inspection:						
☐ Full Compliance Evaluation (FCE)	☐ Plan Approval Inspection		☐ File Review (FR)			
☐ Operating Permit Inspection (PI)	☐ Initial Permit Inspection (IPI)		☐ Complaint Inspection (CI)			
☐ Routine/Partial (RTPT)	☐ Follow-Up Inspection (Ref. Date: _____)		☐ Sample Collection (SC)			
☐ Minor Source(s) Inspection (RFD)	☐ Stack Test Observation		☐ Multi-Media Inspection (MM)			
☒ Other: VEOB	☐ Announced					
Annual Compliance Certification Received: ☐ YES ☐ NO ☒ N/A				Date Received:		
AIMS Report Received: ☐ YES ☐ NO ☒ N/A				Date Received:		
Mark (X) All Activities That Apply:				EPA Class: A		
☒ File Review	☒ Pre-Inspection Briefing		☒ Exit Interview/Briefing			
☒ Pre-Inspection Observations	☒ Check For New/Unreported Sources		☐ Sample(s) Collected			
☒ Visible Emissions Observations	☐ Verify Operation of CEMS		☐ Other			
Comments/Recommendations: Enforcement since last FCE ☒ Yes ☐ No (If yes, attach summary)						
On 3-5-26, D.E.P. Cody Frick conducted an unannounced Method 9 Visible Emission Observation (VEOB). This particular type of inspection was instigated by citizen concerns regarding smoke emanating from the equipment. The Method 9 VEOB inspection is designed to confirm adherence to Section E, Group Combined Cycle Turbines (Sources 101 and 102), Condition # 005, which prohibits: Visible emissions in excess of either of the following limitations: i. Equal to or greater than 10% for a period or periods aggregating more than three minutes in any hour; ii. Equal to or greater than 30% at any time This inspection was for Source 102, Combined Cycle Unit 2.						
Compliance Status: ☒ In ☐ Out ☐ Pending ☐ Awaiting Co. Report				Needs a Follow-Up Inspection? ☐ Yes ☒ No		
Company Representative: <i>Philip Allen</i>		Title: <i>Lead Control Room Operator</i>		Signature: <i>Philip Allen</i>		Date: <i>3-20-26</i>
DEP Representative: Cody Frick		Title: Air Quality Specialist		Signature: <i>Cody D. Frick</i>		Date/Time: 3-5-26
This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.						
eFacts Inspection ID#: 4154050				Date: 3-5-26 Reviewed By: Thomas Norris/TON		



INSPECTION REPORT

Continued

I met with Phil Allen (Lead Control Room Operator), John Robson (Plant Manager), Adam McCool (Operations Manager), and Ryan Jobe (Plant Engineer). I made them aware of the anonymous complaints regarding smoke and odors (CTS 394891 and 395280). I noted that I had not observed any odors offsite, reviewed some of the daily log observations for fugitive emissions, visible emissions, and malodors (including for the February 18-19 time period (attached); no issues were noted and the facility reported no abnormal operation for that time period. While onsite, I did not observe any fugitive emissions or malodors.

The Method 9 Visible Emission Observation Sheet is attached at the end of this report. During the observation, only steam was primarily noted, as detailed in the report. Additional observations were also conducted on Source 101 (CCU 1) and Source 105 (Cooling Tower). Those inspections (eFACTS inspection id's 4154035 and 4156579) have been linked in the eFACTS database.

The VEOB inspection report for Source 101 (CCU 1) also contains an in-depth record review regarding Sources 101 (CCU 1), 102 (CCU 2) and 105 (Cooling Tower) for the period since the most recent Full Compliance Evaluation (August 2025).

Enforcement since previous F.C.E.:

Admin Inspection ID 4143038, dated 10-14-25, details the following violations:

- 4th Qtr. 2022 CO ppm exceedance Unit 2
- 4th Qtr. 2022 CO lb./hr. exceedance Unit 2
- 2nd Qtr. 2023 CO ppm exceedance Unit 2
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 2
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 1
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 1
- 3rd QTR 2024 CO ppm exceedance Unit 1
- 3rd Qtr. 2024 CO lb./hr. exceedance Unit 1
- 3rd Qtr. 2024 CO lb./hr. exceedance Unit 2
- 1st Qtr. 2025 CO lb./hr. exceedance Unit 2
- The compliance case remains pending.

Facility Contact Information:

Responsible Official:

Buck Hunt, Vice President, 402-691-9500, bhunt@tenaska.com



INSPECTION REPORT

Continued

Permit Contact, Firm Plant Contact, Mailing Address:

Larry Carlson, V.P. Env. Affairs, 402-938-1661, lcarlson@tenaska.com

Inspection Contact:

Ryan Jobe, Plant Engineer, 724-405-6324, rjobe@tenaska.com

Fee Administrator(s):

Lane Cummings, Plant Controller, 724-405-6307, lcummings@tenaska.com

- The facility requested that I assign this role to Kim Murtland. The requisite adjustments have been made in the eFACTS database.

Requests for Determination (RFDs) Since Previous FCE

Date of Determination	Project/Equipment	Determination	Status
N/A			

Source ID	Source Name	Comments
031	Auxiliary Boiler (245 MMBtu./Hr.)	<i>Present</i>
101	Combined Cycle Unit #1 (3,147 MMBtu./Hr.)	<i>Operating</i>
102	Combined Cycle Unit #2 (3,147 MMBtu./Hr.)	<i>Operating</i>
104	Emergency Fire Pump Engine (351 Bhp)	<i>Present</i>
105	Cooling Tower	<i>Operating</i>
107	Fire Pump Diesel Storage Tank (572 Gal)	<i>Present</i>
108	Turbine Lube Oil Storage Tanks (6,500, 2 @ 7,200 Gal)	<i>Present</i>
109	Aqueous Ammonia Storage Tank	<i>Ammonia is utilized for the SCR, tank is 30,000 gallons</i>
110	Circuit Breakers	<i>There are six in total, 2 in the CT building, 4 in the switch yard.</i>
C101A	SCR 101	<i>Present</i>
C101B	Oxidation Catalyst 101	<i>Present</i>
C102A	SCR 102	<i>Present</i>
C102B	Oxidation Catalyst 102	<i>Present</i>
S031	Auxiliary Boiler Stack	
S101	Combined Cycle Unit #1 Stack	
S102	Combined Cycle Unit #2 Stack	
S104	Fire Pump Eng. Stack	
Z001	Fugitive Emissions	
Z105	Fugitive Emissions (Cooling Tower)	



INSPECTION REPORT

Continued

Z107	Fugitive Emissions (Fire Pump Diesel Tank)	
Z108	Fugitive Emissions (Lube Oil Tank)	
Z109	Fugitive Emissions (Ammonia Tank)	
Z110	Fugitive Emissions (Circuit Breakers)	
NEW / Removed ?	N/A	



INSPECTION REPORT

Continued



Task Summary

3/5/2026 11:03:49 AM

Page 1 of 2

ID RECURRING Task #30162 **Initiated by System User on 02/17/2026 00:01:55**
Name OPACITY, FUGITIVE EMISSIONS, MALODOR MONITORING INSPECTION
Description
Type OPS ROUNDS **Status** COMPLETE
Priority **Scheduled Date** 02/18/2026
Category **Due Date** 02/18/2026
Owner Group OPERATIONS **Start Date** 02/18/2026
Assigned Group(s) OPERATIONS **Completion Date** 02/18/2026 08:31:39
Assigned Person(s)
Location/Asset

Notes

Jeremy Hough on 02/18/2026 08:32 AM (COMPLETE)

Task Responses

OPACITY MONITORING

OPACITY MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
CT1 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT1: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: - YES		NORMAL
CT2 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT2: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: - YES		NORMAL
COOLING TOWER SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
COOLING TOWER: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: - YES		NORMAL
AUX BOILER SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL
DIESEL FIRE PUMP SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL



INSPECTION REPORT

Continued



Task Summary

3/5/2026 11:03:49 AM
Page 2 of 2

FUGITIVE EMISSIONS MONITORING

FUGITIVE EMISSIONS MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY FUGITIVE EMISSIONS PRESENT?	NO	LO: = YES		NORMAL
ARE THE EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

MALODOR MONITORING

MALODOR MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY MALODORS PRESENT?	NO	LO: = YES		NORMAL
ARE THE MALODOR EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

Images

No Images Attached

Documents

No Documents Attached



INSPECTION REPORT

Continued



Task Summary

3/5/2026 11:04:24 AM
Page 1 of 2

ID RECURRING Task #30167 **Initiated by** System User on 02/18/2026 00:01:38
Name OPACITY, FUGITIVE EMISSIONS, MALODOR MONITORING INSPECTION
Description
Type OPS ROUNDS **Status** COMPLETE
Priority **Scheduled Date** 02/19/2026
Category **Due Date** 02/19/2026
Owner Group OPERATIONS **Start Date** 02/19/2026
Assigned Group(s) OPERATIONS **Completion Date** 02/19/2026 08:26:45
Assigned Person(s)
Location/Asset

Notes

Jeremy Hough on 02/19/2026 08:26 AM (COMPLETE)

Task Responses

OPACITY MONITORING

OPACITY MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
CT1 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT1: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: = YES		NORMAL
CT2 SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
CT2: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: = YES		NORMAL
COOLING TOWER SOURCE EMITTING UNIT IN OPERATION?	YES			NORMAL
COOLING TOWER: ARE THERE ANY VISIBLE STACK EMISSIONS? (IF QUESTION IS ANSWERED YES, A METHOD 9 CERTIFIED OBSERVER MUST ACCESS THE OPACITY LEVEL AND ANNOTATE THE OBSERVATION IN THE COMMENTS SECTION)	NO	LO: = YES		NORMAL
AUX BOILER SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL
DIESEL FIRE PUMP SOURCE EMITTING UNIT IN OPERATION?	NO			NORMAL



INSPECTION REPORT

Continued



Task Summary

 3/5/2026 11:04:24 AM
 Page 2 of 2

FUGITIVE EMISSIONS MONITORING

FUGITIVE EMISSIONS MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY FUGITIVE EMISSIONS PRESENT?	NO	LO: = YES		NORMAL
ARE THE EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

MALODOR MONITORING

MALODOR MONITORING

Point	Value / Units	Alarm Limits	Comments	Condition
ARE THERE ANY MALODORS PRESENT?	NO	LO: = YES		NORMAL
ARE THE MALODOR EMISSIONS LEAVING THE STATION PROPERTY?	N/A	LO: = YES		NORMAL

Images

No Images Attached

Documents

No Documents Attached



INSPECTION REPORT

Continued

2700-FM-AQ0023 Rev. 3/2016

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

File ID:

VISIBLE EMISSION OBSERVATION RECORD

Description of Source: Source 102
Combined cycle
 Owner of Source: Tenaska
 Location of Source: 446 Smithton Pike

Observers Name: Cody FrickTitle: ADSDate: 3-5-26Time interval: from 12:24 to 1:24

PART OF MINUTES

	0	1/4	1/2	3/4		0	1/4	1/2	3/4		0	1/4	1/2	3/4		Distance to Source: <u>570 feet</u>
0	0	0	0	0	20	0	0	0	0	40	0	0	0	0	Wind Speed and Direction: <u>0-5 mph S</u>	
1	0	0	0	0	21	0	0	0	0	41	0	0	0	0	Sky Conditions: <u>overcast</u>	
2	0	5	0	0	22	0	0	0	0	42	0	0	0	0	Plume Color: <u>white</u>	
3	0	0	0	0	23	0	0	0	0	43	0	0	0	0	Plume Background: <u>Gray (darker)</u>	
4	0	0	0	0	24	0	0	0	0	44	0	0	0	0	Sketch with source, observer, and north indicated	
5	0	0	0	0	25	0	0	0	0	45	0	0	0	0		
6	0	0	0	0	26	0	0	0	0	46	0	0	0	0		
7	0	0	0	5	27	0	0	0	0	47	0	0	0	0		
8	0	0	0	0	28	0	0	0	0	48	0	0	0	0		
9	0	0	0	0	29	0	0	0	0	49	0	0	0	0		
10	0	0	0	0	30	0	0	0	0	50	0	0	0	0		
11	0	0	0	0	31	0	0	0	0	51	0	0	0	0		
12	0	0	0	0	32	0	0	0	0	52	0	0	0	0		
13	0	0	0	0	33	0	0	0	0	53	0	0	0	5		
14	0	0	0	0	34	0	0	0	0	54	0	0	0	0		
15	0	0	0	0	35	0	0	0	0	55	0	0	0	0		
16	0	0	0	0	36	0	0	0	0	56	0	0	0	0	Opacity	
17	0	0	0	0	37	0	0	0	0	57	0	0	0	0	No. of Readings	
18	0	0	0	0	38	0	0	0	0	58	0	0	0	0	Total Time Minutes	
19	0	0	0	0	39	0	0	0	0	59	0	0	0	0		

Other Comments:

One missed reading

☐ White - Region☐ Yellow - Site☐ Pink - District Office

###

2700-FM-AQ0023 		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program	
Date(s) of Inspection: 3-9-26	TV ☐ PA ☒ SM ☐ GP ☐ NM ☐ MEGA ☐	Permit #(s): 65-00990	Expiration Date: 11-28-25	Case #: 65-990	PF ID #: 716802
Company Name: Tenaska Pa. Partners		Municipality: South Huntington Township		County: Westmoreland	
Plant Name: Westmoreland Generating Station		Physical Location: 446 Smithton Pike, Smithton, Pa.		Federal ID — Plant Code #: 26-4286063-1446	
Responsible Official: Buck Hunt			Mailing Address: 14302 FNB PKWY, OMAHA, Ne., 68154-5212		
Title: Vice President			Permit Contact: Larry Carlson, V.P. Env. Affairs, 402-938-1661, lcarlson@tenaska.com		
Contact(s): 402-691-9500, bhunt@tenaska.com			Inspection Contact: Ryan Jobe, Plant Engineer, 724-405-6324, rjobe@tenaska.com		
Mark (X) All Inspection Types That Apply To This Inspection:					
☐ Full Compliance Evaluation (FCE)	☐ Plan Approval Inspection	☐ File Review (FR)			
☐ Operating Permit Inspection (PI)	☐ Initial Permit Inspection (IPI)	☐ Complaint Inspection (CI)			
☐ Routine/Partial (RTPT)	☐ Follow-Up Inspection (Ref. Date: _____)	☐ Sample Collection (SC)			
☐ Minor Source(s) Inspection (RFD)	☐ Stack Test Observation	☐ Multi-Media Inspection (MM)			
☒ Other: VEOB	☐ Announced				
Annual Compliance Certification Received: ☐ YES ☐ NO ☒ N/A			Date Received:		
AIMS Report Received: ☐ YES ☐ NO ☒ N/A			Date Received:		
Mark (X) All Activities That Apply:			EPA Class: A		
☒ File Review	☒ Pre-Inspection Briefing	☒ Exit Interview/Briefing			
☒ Pre-Inspection Observations	☒ Check For New/Unreported Sources	☐ Sample(s) Collected			
☒ Visible Emissions Observations	☐ Verify Operation of CEMS	☐ Other			
Comments/Recommendations: Enforcement since last FCE ☒ Yes ☐ No (If yes, attach summary)					
On 3-9-26, D.E.P. Cody Frick conducted an unannounced Method 9 Visible Emission Observation (VEOB). This particular type of inspection was instigated by citizen concerns regarding smoke emanating from the equipment. The Method 9 VEOB inspection is designed to confirm compliance with Section C, Condition # 005, which prohibits opacity of the cooling tower (Source 105) such that the opacity of the emission is not : Equal to or greater than 20% for a period(s) aggregating more than three minutes/hour Equal to or greater than 60% at any time					
Compliance Status: ☒ In ☐ Out ☐ Pending ☐ Awaiting Co. Report			Needs a Follow-Up Inspection? ☐ Yes ☒ No		
Company Representative: <i>Philip Allen</i>		Title: <i>Lead Control Room Operator</i>		Signature: <i>Philip Allen</i>	
DEP Representative: Cody Frick		Title: Air Quality Specialist		Signature: <i>Cody D. Frick</i>	
				Date: <i>3-20-26</i>	
				Date/Time: 3-9-26	
This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.					
eFacts Inspection ID#: 4156579			Date: 3-10-26 Reviewed By: Thomas Norris/TON		



INSPECTION REPORT

Continued

I met with Phil Allen (Lead Control Room Operator).

While onsite, I did not observe any fugitive emissions, visible emissions, or malodors.

The Method 9 Visible Emission Observation Sheet is attached at the end of this report. During the observation, only steam was noted, as detailed in the report. Additional observations were also conducted on Source 101 (CCU 1) and Source 102 (CCU 2). Those inspections (eFACTS inspection id's 4154035 and 4154050) have been linked in the eFACTS database.

The VEOB inspection report for Source 101 (CCU 1) also contains an in-depth record review regarding Sources 101 (CCU 1), 102 (CCU 2) and 105 (Cooling Tower) for the period since the most recent Full Compliance Evaluation (August 2025).

Enforcement since previous F.C.E.:

Admin Inspection ID 4143038, dated 10-14-25, details the following violations:

- 4th Qtr. 2022 CO ppm exceedance Unit 2
- 4th Qtr. 2022 CO lb./hr. exceedance Unit 2
- 2nd Qtr. 2023 CO ppm exceedance Unit 2
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 2
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 1
- 2nd Qtr. 2023 CO lb./hr. exceedance Unit 1
- 3rd QTR 2024 CO ppm exceedance Unit 1
- 3rd Qtr. 2024 CO lb./hr. exceedance Unit 1
- 3rd Qtr. 2024 CO lb./hr. exceedance Unit 2
- 1st Qtr. 2025 CO lb./hr. exceedance Unit 2
- The compliance case remains pending.

Facility Contact Information:

Responsible Official:

Buck Hunt, Vice President, 402-691-9500, bhunt@tenaska.com

Permit Contact, Firm Plant Contact, Mailing Address:

Larry Carlson, V.P. Env. Affairs, 402-938-1661, lcarlson@tenaska.com

Inspection Contact:

Ryan Jobe, Plant Engineer, 724-405-6324, rjobe@tenaska.com



INSPECTION REPORT

Continued

Fee Administrator(s):

Kim Murtland, Plant Controller, 724-405-6307, kmurtland@tenaska.com

Requests for Determination (RFDs) Since Previous FCE

Date of Determination	Project/Equipment	Determination	Status
N/A			

Source ID	Source Name	Comments
031	Auxiliary Boiler (245 MMBtu./Hr.)	<i>Present</i>
101	Combined Cycle Unit #1 (3,147 MMBtu./Hr.)	<i>Operating</i>
102	Combined Cycle Unit #2 (3,147 MMBtu./Hr.)	<i>Operating</i>
104	Emergency Fire Pump Engine (351 Bhp)	<i>Present</i>
105	Cooling Tower	<i>Operating</i>
107	Fire Pump Diesel Storage Tank (572 Gal)	<i>Present</i>
108	Turbine Lube Oil Storage Tanks (6,500, 2 @ 7,200 Gal)	<i>Present</i>
109	Aqueous Ammonia Storage Tank	<i>Ammonia is utilized for the SCR, tank is 30,000 gallons</i>
110	Circuit Breakers	<i>There are six in total, 2 in the CT building, 4 in the switch yard.</i>
C101A	SCR 101	<i>Present</i>
C101B	Oxidation Catalyst 101	<i>Present</i>
C102A	SCR 102	<i>Present</i>
C102B	Oxidation Catalyst 102	<i>Present</i>
S031	Auxiliary Boiler Stack	
S101	Combined Cycle Unit #1 Stack	
S102	Combined Cycle Unit #2 Stack	
S104	Fire Pump Eng. Stack	
Z001	Fugitive Emissions	
Z105	Fugitive Emissions (Cooling Tower)	
Z107	Fugitive Emissions (Fire Pump Diesel Tank)	
Z108	Fugitive Emissions (Lube Oil Tank)	

Z109	Fugitive Emissions (Ammonia Tank)	
Z110	Fugitive Emissions (Circuit Breakers)	
NEW / Removed ?	N/A	



INSPECTION REPORT

Continued

2700-FM-AQ0023 Rev. 2/2018

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

File ID:

VISIBLE EMISSION OBSERVATION RECORD

Description of Source: Source 105 Cooling Towers
 Owner of Source: TENASKA
 Location of Source: 446 SMITHSON PIKE

Observers Name: Cody Frick
 Title: AQS
 Date: 3/19/26
 Time interval: from 11:23 to 12:23

shadow →

↑ pencil

PART OF MINUTES

0	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9
0	0	0	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0	0	0	40	0	0	0	0	0	0	0	0	
1	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0	0	0	41	0	0	0	0	0	0	0	0	
2	0	0	0	0	0	0	0	0	0	22	0	0	0	0	0	0	0	0	0	42	0	0	0	0	0	0	0	0	
3	0	0	0	0	0	0	0	0	0	23	0	0	0	0	0	0	0	0	0	43	0	0	0	0	0	0	0	0	
4	0	0	0	0	0	0	0	0	0	24	0	0	0	0	0	0	0	0	0	44	0	0	0	0	0	0	0	0	
5	0	0	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	0	45	0	0	0	0	0	0	0	0	
6	0	0	0	0	0	0	0	0	0	26	0	0	0	0	0	0	0	0	0	46	0	0	0	0	0	0	0	0	
7	0	0	0	0	0	0	0	0	0	27	0	0	0	0	0	0	0	0	0	47	0	0	0	0	0	0	0	0	
8	0	0	0	0	0	0	0	0	0	28	0	0	0	0	0	0	0	0	0	48	0	0	0	0	0	0	0	0	
9	0	0	0	0	0	0	0	0	0	29	0	0	0	0	0	0	0	0	0	49	0	0	0	0	0	0	0	0	
10	0	0	0	0	0	0	0	0	0	30	0	0	0	0	0	0	0	0	0	50	0	0	0	0	0	0	0	0	
11	0	0	0	0	0	0	0	0	0	31	0	0	0	0	0	0	0	0	0	51	0	0	0	0	0	0	0	0	
12	0	0	0	0	0	0	0	0	0	32	0	0	0	0	0	0	0	0	0	52	0	0	0	0	0	0	0	0	
13	0	0	0	0	0	0	0	0	0	33	0	0	0	0	0	0	0	0	0	53	0	0	0	0	0	0	0	0	
14	0	0	0	0	0	0	0	0	0	34	0	0	0	0	0	0	0	0	0	54	0	0	0	0	0	0	0	0	
15	0	0	0	0	0	0	0	0	0	35	0	0	0	0	0	0	0	0	0	55	0	0	0	0	0	0	0	0	
16	0	0	0	0	0	0	0	0	0	36	0	0	0	0	0	0	0	0	0	56	0	0	0	0	0	0	0	0	
17	0	0	0	0	0	0	0	0	0	37	0	0	0	0	0	0	0	0	0	57	0	0	0	0	0	0	0	0	
18	0	0	0	0	0	0	0	0	0	38	0	0	0	0	0	0	0	0	0	58	0	0	0	0	0	0	0	0	
19	0	0	0	0	0	0	0	0	0	39	0	0	0	0	0	0	0	0	0	59	0	0	0	0	0	0	0	0	

Distance to Source: 40 Feet
 Wind Speed and Direction: 5-10 mph, variable
 Sky Conditions: Sunny
 Plume Color: N/A
 Plume Background: blue
 Sketch with source, observer, and north indicated:

↑ N

↑ Cooling towers

Opacity

Opacity	No. of Readings	Total Time Minutes
<20%	240	60
≥20%		
≥80%		

Other Comments:

☐ White - Region ☐ Yellow - Site ☐ Pink - District Office

###

Complaint Information**4500 - EP SW Rgnl Off Pittsburgh****Complaint Id:** 394891**County:** Westmoreland**Entered By:** TARA PIRRO**Source:** Email**Date Received:** 01/30/2026**Abbreviated Description:** Tenaska power plant**Long Description:** See attached letter.**Site Location:****Related Complaint Id:****Municipality:** South Huntingdon Township**After Hours (Y/N):** Y**ER Related (Y/N):** N**Date Acknowledged:****Complainant Information****Name:** LANE & GERI RUPERT**Seq #:** 1**Company:****Home Phone:****Confidential (Y/N):****Work Phone:****Ext:****Email:** gerirupert@gmail.com**Mobile Phone:****Email Response (Y/N):** N**Address:** 400 NICHOLS ROAD
RUFFS DALE, PA 15679**Date/Time Received:** 01/30/2026 06:25 PM**Health Impacts:** N**Contact DOH:** N**Responsible Party Information****Name:****Home Phone:****Company:** TENASKA**Work Phone:****Ext:****Alternate
Phone :****Ext:****Permit #:****Mobile Phone:****County:****Municipality:****Address:** RUFFS DALE, PA 15679**Primary:** N**Response Information****Priority:** 3**# of Documents:** 3**Program:** Air Quality**Complaint Type:** Air Contamination**Date Referred:****Date Response Assigned:** 02/02/2026**Referred To:****Date Response Due:** 03/16/2026**Date Resolved:** 04/23/2026**Date First Response:** 02/05/2026**Inspector:** CODY FRICK**Supervisor:** THOMAS O NORRIS**Comments:****Investigation Information****Date Assigned:** 02/02/2026**Date Investigated:** 02/05/2026**Type:** Site Visit**Inspector:** CODY FRICK**Violation (Y/N):** N**eFACTS Inspection Id:****Investigation Id:** 470472**Investigation Description:** I conducted an offsite odor observation from near the Rustique Antiques store, neat the residence of the complainant, commencing at approx. 10:00 A.M. No odors were noted.**Date Assigned:** 02/02/2026**Date Investigated:** 02/13/2026**Type:** Other**Inspector:** CODY FRICK**Violation (Y/N):** N**eFACTS Inspection Id:****Investigation Id:** 470774

Investigation Description: As the complaint did not list any telephone numbers, the below was sent to the email address provided by the complainant:

Hello,

The Department is in receipt of your air quality complaint concerning the Tenaska facility in South Huntingdon Township, and has commenced an investigation into the matter. I have been tasked with conducting odor, fugitive emission, and opacity observations, as well as reviewing pertinent records relevant to your complaint. I will provide you a summarization of these items once they are complete.

In addition, I believe that upper management in air quality will be providing you a more comprehensive response to the items listed in your complaint. That response should be forthcoming.

Date Assigned: 02/02/2026

Date Investigated: 02/20/2026

Type: Site Visit

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 470968

Investigation Description: I conducted offsite odor observations from both Albright Road, as well as near the entrance to the facility, commencing at approx. 7:40 A.M. No odors were noted.

Date Assigned: 02/02/2026

Date Investigated: 03/02/2026

Type: Site Visit

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471289

Investigation Description: I conducted an offsite odor observation, commencing at approx. 10:10 A.M., at the Bible Alliance Church, near where a recent odor complaint had been alleged. Wx. conditions were overcast, with light winds. Odors were not noted.

Date Assigned: 02/02/2026

Date Investigated: 03/05/2026

Type: Site Visit

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471513

Investigation Description: I went onsite to the facility and met with Phil Allen (Lead Control Room Operator), John Robson (Plant Manager), Adam McCool (Operations Manager), and Ryan Jobe (Plant Engineer). I made them aware of the anonymous complaints, and stated that I would be conducting some VEOB's. I conducted onsite VEOB's of Source 101 (CCU 1) and Source 102 (CCU 2). Those reports are attached. While onsite, I also reviewed the daily observations, including those for February 18 and 19, as per an associated complaint. No issues were noted, and the facility stated that they did not have any abnormal operation during that timeframe. No odors or fugitive emissions were noted. Some visible emissions, which did not exceed the regulatory limit, were noted. I noted that I would also be sending a record request.

Date Assigned: 02/02/2026

Date Investigated: 03/09/2026

Type: Site Visit

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471754

Investigation Description: I conducted a VEOB of the Cooling Tower (attached). No onsite violations were noted.

Date Assigned: 02/02/2026

Date Investigated: 03/20/2026

Type: Other

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 472345

Investigation Description: The below was sent to the complainant, delivery receipt is attached:

I just wanted to provide an update on the status of your complaint:

1. I have conducted offsite odor and fugitive emission observations, but have not yet noted any issues of non-compliance.
2. I have conducted multiple unannounced inspections, and have not noted any issues.
3. During the first unannounced inspection, I made the facility aware of the anonymous complaint. They did not report any abnormal operations during the complaint time period.
4. Inspections included opacity observations on each of the combined cycle units, as well as the cooling tower. These observations indicated compliance with the requisite limitations detailed in the Plan Approval.
5. I have also conducted an in-depth record review. Those findings are detailed at the bottom of this email.
6. The facility is regulated by the Department and has received, and will continue to receive, inspections, both announced and unannounced, for compliance with the regulatory requirements.

Per Section C, Condition # 012 of the Plan Approval, the facility is required to conduct annual sulfur content analyses of the utilized natural gas. However, the facility conducts this on a monthly basis. Representative samples of recent monthly natural gas sulfur content analyses are attached. Per Section E, Group G001, Condition # 006: Average fuel sulfur content shall not exceed 0.25 gr/100 scf natural gas on a monthly basis.

Review of monthly measurement data since the last F.C.E. (August 2025) shows that the highest measured amount was 0.046 gr./100 cu. ft. This was for the measurement which was taken on November 21, 2025.

Regarding the Cooling Tower, (Source 105), the facility is limited by Plan Approval, Section D, Source 105, Conditions 001-003. These limitations are as follows:

Records since the last F.C.E. (August 2025) of these items are attached.

Total PM has a limit of 1.5 lb./hr. and 6.57 tpy. The highest values noted are 0.73 lbs./hr. for the 12-month period ending February 2026 (March 2025 through February 2026) and 2.52 tons for the 12-month period ending August 2025.

Total PM10 has a limit of 0.75 lb./hr. and 3.29 tpy. The highest values noted are 0.36 lbs./hr. for the 12-month period ending February 2026 (March 2025 through February 2026) and 1.26 tons for the 12-month period ending August 2025.

Total PM2.5 has a limit of 0.002 lbs./hr. and 0.009 tpy. The highest values noted are 0.0011 lbs./hr. for multiple 12-month periods, and less than 0.00 tons for multiple 12-month periods.

TDS also has a limitation of 2,000 p.p.m. Per the attached records, the highest value noted was for 1,407.36 p.p.m., as measured in February 2026.

The combined cycle units also undergo routine performance testing. As per Section E, Group G001, Condition # 002 of the Plan Approval:

During normal operation, emissions from each combined cycle combustion turbine, Source IDs 101 and 102, shall not exceed:

(a) Nitrogen Oxides (NOx):

(1) 2.0 ppmvd @ 15% O₂

(2) 26.5 lb./hr.

- NOx has CEMS. Initial performance testing for Source 101 in January 2019 yielded 1.0 ppmvd @ 15% O₂, and 14.5 lb. / hr. Source 102 at 1.0 ppmvd @ 15% O₂ and 14.8 lb. / hr. Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(b) Carbon Monoxide (CO):

(1) 2.0 ppmvd @ 15% O₂

(2) 15.9 lb./hr.

- CO has CEMS. Initial performance testing for Source 101 in January 2019 yielded < 0.1 ppmvd @ 15% O₂, and < 0.5 lb. / hr. Source 102 at the same levels." Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(c) Volatile Organic Compounds (VOC):

(1) 2.4 ppmvd @ 15% O₂ with duct burners

(2) 1.4 ppmvd @ 15% O₂ without duct burners

(3) 9.4 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0 ppmvd @ 15% O₂ with duct burners, 0.0 ppmvd @ 15% O₂ without duct burners, and 0.0 lb. / hr. Source 102 at 0.0 ppmvd @ 15 % O₂ both with and without duct burners, and 0.0 lb. / hr.

(d) Total Particulate Matter (PM):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(e) Total Particulate Matter with an aerodynamic diameter less than 10 microns (PM10):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(f) Total Particulate Matter with an aerodynamic diameter less than 2.5 microns (PM2.5):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(g) Sulfuric Acid Mist (H₂SO₄):

(1) 5.74E-04 lb./MMBtu

(2) 1.8 lb./hr.

- Initial testing in January 2019 for Source 101 yielded 0.00031 lb. / MMBtu and 1.2 lb. / hr. Source 102 yielded < 0.000018 lb. / MMBtu and < 0.07 lb. / hr.... Only initial testing was required. Continued compliance with emissions limitations are met by verifying sulfur content in the fuel by analysis.

(h) Sulfur Dioxide (SO₂):

(1) 2.7 lb./hr.

- Initial testing in January 2019 for Source 101 yielded <0.31 lb. / hr. Source 102 yielded the same level...Only initial testing was required. Continued compliance with emissions limitations are met by verifying sulfur content in the fuel by analysis.

(i) Ammonia Slip (NH₃):

(1) 5.0 ppmvd

(2) 22.9 lb./hr.

- NH₃ has CEMS. Initial testing for Source 101 in January 2019 yielded 0.6 ppmvd @ 15% O₂, and 3.1 lb. / hr. Source 102 at 0.7 ppmvd @ 15% O₂ and 3.4 lb. / hr. Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(j) Formaldehyde (HCHO):

(1) 0.986 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.235 lb. / hr. (without duct burners). Source 102 at 0.157 lb. / hr. (without duct burners).

(k) Carbon Dioxide (CO₂):

(1) 1,000 lbs. CO₂/MWh (gross) on a 12-month annual average basis.

- Per the testing conducted in October 2024, Source 101 at 837 lb. / MW*hr. (with duct burners) and Source 102 at 800 lb. / MW*hr. (with duct burners).

ppmvd = parts per million volume on a dry gas basis, corrected to 15 percent O₂.

ppmvd and lb./MMBtu limits based upon a 3-hour averaging time.

In addition, the combined cycle units are equipped with CEMS (Continuous Emission Monitoring System) for NO_x, CO, and NH₃. Compliance with the requisite limitations are monitored via the CEMS Group in Harrisburg.

Date Assigned: 02/02/2026

Date Investigated: 04/21/2026

Type: Other

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 473848

Investigation Description: Final responses to both the complainant and U.S. E.P.A. will be addressed as part of the permitting comment and response process.

Complaint Information**4500 - EP SW Rgnl Off Pittsburgh****Complaint Id:** 395280**County:** Westmoreland**Entered By:** TARA PIRRO**Source:** Web Page**Date Received:** 02/19/2026**Abbreviated Description:** Odor**Long Description:****Site Location:****Related Complaint Id:****Municipality:** South Huntingdon Township**After Hours (Y/N):** N**ER Related (Y/N):** N**Date Acknowledged:****Complainant Information****Name:** ERIC HARDER**Company:** MOUNTAIN WATERSHED ASSOCIATION**Confidential (Y/N):****Email:** eric@mtwatershed.com**Email Response (Y/N):** N**Address:** 1414B INDIAN CREEK VALLEY RD
MELCROFT, PA 15462-**Health Impacts:** N**Seq #:** 1**Home Phone:** 262-716-7151**Work Phone:****Ext:****Mobile Phone:****Date/Time Received:** 02/19/2026 03:07 PM**Contact DOH:** N

Call Log Received	Source	After Hours	Comments
02/19/2026 03:07 PM	Web Page	N	I pulled into the south huntington twp building and a large hydrogen sulfide odor was in the air. There are currently north east winds so I suspected issues at Tenaska may be contributing to poor air quality.

Name: CATHERINE ANDERSON**Company:****Confidential (Y/N):****Email:** cathjanderson@verizon.net**Email Response (Y/N):** N**Address:** 2900 SCHWIRIAN DRIVE
ELIZABETH, PA 15037-9550**Health Impacts:** N**Seq #:** 2**Home Phone:** 412-302-7014**Work Phone:****Ext:****Mobile Phone:****Date/Time Received:** 02/19/2026 03:18 PM**Contact DOH:** N

Call Log Received	Source	After Hours	Comments
02/19/2026 03:18 PM	Web Page	N	Noticed very strong chemical odors last night and this morning. I live about 6.5 miles from Tenaska generating station and am concerned there could be an issue there.

Responsible Party Information**Name:****Company:****Permit #:****County:****Address:****Home Phone:****Work Phone:****Ext:****Alternate
Phone :****Ext:****Mobile Phone:****Municipality:****Primary:****Response Information****Priority:** 3**Program:** Air Quality**Complaint Type:** Odor**Date Response Assigned:** 02/20/2026**Date Response Due:** 04/03/2026**Date First Response:** 02/20/2026**# of Documents:** 3**Date Referred:****Referred To:****Date Resolved:** 04/23/2026

Inspector: CODY FRICK

Supervisor: THOMAS O NORRIS

Comments:

Investigation Information

Date Assigned: 02/20/2026

Date Investigated: 02/20/2026

Type: Site Visit

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 470969

Investigation Description: I conducted offsite odor observations from both Albright Road, as well as near the entrance to the facility, commencing at approx. 7:40 A.M. No odors were noted.

Date Assigned: 02/20/2026

Date Investigated: 02/24/2026

Type: Other

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471084

Investigation Description: The below was sent to Complainant # 1:

The Department is in receipt of your complaint, and has commenced an investigation into this matter. An update will be provided to you when one is available.

Date Assigned: 02/20/2026

Date Investigated: 02/24/2026

Type: Other

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471087

Investigation Description: The below was sent to complainant # 2:

The Department is in receipt of your complaint, and has commenced an investigation into this matter. An update will be provided to you once one becomes available.

Date Assigned: 02/20/2026

Date Investigated: 02/24/2026

Type: Other

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471094

Investigation Description: Review of annual emissions reports for the facility shows that while they are not emitting hydrogen sulfide, as described in the complaint, the facility does have sulfuric acid emissions.

Date Assigned: 02/20/2026

Date Investigated: 03/02/2026

Type: Site Visit

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471291

Investigation Description: I conducted an offsite odor observation, commencing at approx. 10:10 A.M., at the Bible Alliance Church, near where Complainant 1 alleged an odor. Wx. conditions were overcast, with light winds. Odors were not noted.

Date Assigned: 02/20/2026

Date Investigated: 03/05/2026

Type: Site Visit

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471514

Investigation Description: I went onsite to the facility and met with Phil Allen (Lead Control Room Operator), John Robson (Plant Manager), Adam McCool (Operations Manager), and Ryan Jobe (Plant Engineer). I made them aware of the anonymous complaints, and stated that I would be conducting some VEOB's. I conducted onsite VEOB's of Source 101 (CCU 1) and Source 102 (CCU 2). Those reports are attached. While onsite, I also reviewed the daily observations, including those for February 18 and 19. No issues were noted, and the facility stated that they did not have any abnormal operation during that timeframe. No odors or fugitive emissions were noted. Some visible emissions, which did not exceed the regulatory limit, were noted. I noted that I would also be sending a record request.

Date Assigned: 02/20/2026

Date Investigated: 03/09/2026

Type: Other

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471662

Investigation Description: I received the following from Complainant 1:

Hi Cody,
Any update regarding the complaint?

Date Assigned: 02/20/2026

Date Investigated: 03/09/2026

Type: Other

Inspector: CODY FRICK

Violation (Y/N): N

eFACTS Inspection Id:

Investigation Id: 471666

Investigation Description: The below was sent to Complainant 1:

The complaint investigation remains ongoing, but here is what has occurred thus far:

1. I have conducted offsite odor observations, but have been unable to replicate the odor which you alleged.
2. I have conducted multiple unannounced inspections, and have not noted any issues.
3. During the first unannounced inspection, I made the facility aware of the anonymous complaint. They did not report any abnormal operations during the complaint time period.

As noted above, the complaint investigation remains ongoing, and I am also in the midst of a record review.

When that is completed, and I have an additional update to provide, I will reach out.

Date Assigned: 02/20/2026	Date Investigated: 03/09/2026	Type: Site Visit
Inspector: CODY FRICK	Violation (Y/N): N	
eFACTS Inspection Id:	Investigation Id: 471753	
Investigation Description: I conducted a VEOB of the cooling tower (attached). No onsite violations were noted.		

Date Assigned: 02/20/2026	Date Investigated: 03/20/2026	Type: Other
Inspector: CODY FRICK	Violation (Y/N): N	
eFACTS Inspection Id:	Investigation Id: 472348	
Investigation Description: The below was sent to both Complainant # 1 and Complainant # 2, delivery receipts are attached:		

I just wanted to provide an update on the status of your complaint:

1. I have conducted offsite odor observations, but have been unable to replicate the odor which you alleged.
2. I have conducted multiple unannounced inspections, and have not noted any issues.
3. During the first unannounced inspection, I made the facility aware of the anonymous complaint. They did not report any abnormal operations during the complaint time period.
4. Inspections included opacity observations on each of the combined cycle units, as well as the cooling tower. These observations indicated compliance with the requisite limitations detailed in the Plan Approval.
5. I have also conducted an in-depth record review. Those findings are detailed at the bottom of this email.
6. The facility is regulated by the Department and has received, and will continue to receive, inspections, both announced and unannounced, for compliance with the regulatory requirements.

Per Section C, Condition # 012 of the Plan Approval, the facility is required to conduct annual sulfur content analyses of the utilized natural gas. However, the facility conducts this on a monthly basis. Representative samples of recent monthly natural gas sulfur content analyses are attached. Per Section E, Group G001, Condition # 006: Average fuel sulfur content shall not exceed 0.25 gr/100 scf natural gas on a monthly basis. Review of monthly measurement data since the last F.C.E. (August 2025) shows that the highest measured amount was 0.046 gr./100 cu. ft. This was for the measurement which was taken on November 21, 2025.

Regarding the Cooling Tower, (Source 105), the facility is limited by Plan Approval, Section D, Source 105, Conditions 001-003. These limitations are as follows:

Records since the last F.C.E. (August 2025) of these items are attached.

Total PM has a limit of 1.5 lb./hr. and 6.57 tpy. The highest values noted are 0.73 lbs./hr. for the 12-month period ending February 2026 (March 2025 through February 2026) and 2.52 tons for the 12-month period ending August 2025.

Total PM10 has a limit of 0.75 lb./hr. and 3.29 tpy. The highest values noted are 0.36 lbs./hr. for the 12-month period ending February 2026 (March 2025 through February 2026) and 1.26 tons for the 12-month period ending August 2025.

Total PM2.5 has a limit of 0.002 lbs./hr. and 0.009 tpy. The highest values noted are 0.0011 lbs./hr. for multiple 12-month periods, and less than 0.00 tons for multiple 12-month periods.

TDS also has a limitation of 2,000 p.p.m. Per the attached records, the highest value noted was for 1,407.36 p.p.m., as measured in February 2026.

The combined cycle units also undergo routine performance testing. As per Section E, Group G001, Condition # 002 of the Plan Approval:

During normal operation, emissions from each combined cycle combustion turbine, Source IDs 101 and 102, shall not exceed:

(a) Nitrogen Oxides (NO_x):

(1) 2.0 ppmvd @ 15% O₂

(2) 26.5 lb./hr.

- NO_x has CEMS. Initial performance testing for Source 101 in January 2019 yielded 1.0 ppmvd @ 15% O₂, and 14.5 lb. / hr. Source 102 at 1.0 ppmvd @ 15% O₂ and 14.8 lb. / hr. Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(b) Carbon Monoxide (CO):

(1) 2.0 ppmvd @ 15% O₂

(2) 15.9 lb./hr.

- CO has CEMS. Initial performance testing for Source 101 in January 2019 yielded < 0.1 ppmvd @ 15% O₂, and < 0.5 lb. / hr. Source 102 at the same levels." Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(c) Volatile Organic Compounds (VOC):

(1) 2.4 ppmvd @ 15% O₂ with duct burners

(2) 1.4 ppmvd @ 15% O₂ without duct burners

(3) 9.4 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0 ppmvd @ 15% O₂ with duct burners, 0.0 ppmvd @ 15% O₂ without duct burners, and 0.0 lb. / hr. Source 102 at 0.0 ppmvd @ 15 % O₂ both with and without duct burners, and 0.0 lb. / hr.

(d) Total Particulate Matter (PM):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(e) Total Particulate Matter with an aerodynamic diameter less than 10 microns (PM₁₀):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(f) Total Particulate Matter with an aerodynamic diameter less than 2.5 microns (PM_{2.5}):

(1) 0.0039 lb./MMBtu

(2) 11.8 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.0029 lb. / MMBtu and 9.1 lb. / hr. Source 102 at 0.0029 lb. / MMBtu and 8.8 lb. / hr.

(g) Sulfuric Acid Mist (H₂SO₄):

(1) 5.74E-04 lb./MMBtu

(2) 1.8 lb./hr.

- Initial testing in January 2019 for Source 101 yielded 0.00031 lb. / MMBtu and 1.2 lb. / hr. Source 102 yielded < 0.000018 lb. / MMBtu and < 0.07 lb. / hr.... Only initial testing was required. Continued compliance with emissions limitations are met by verifying sulfur content in the fuel by analysis.

(h) Sulfur Dioxide (SO₂):

(1) 2.7 lb./hr.

- Initial testing in January 2019 for Source 101 yielded <0.31 lb. / hr. Source 102 yielded the same level...Only initial testing was required. Continued compliance with emissions limitations are met by verifying sulfur content in the fuel by analysis.

(i) Ammonia Slip (NH₃):

(1) 5.0 ppmvd

(2) 22.9 lb./hr.

- NH₃ has CEMS. Initial testing for Source 101 in January 2019 yielded 0.6 ppmvd @ 15% O₂, and 3.1 lb. / hr. Source 102 at 0.7 ppmvd @ 15% O₂ and 3.4 lb. / hr. Continued compliance with these parameters is determined by the CEMS group for both ppmvd and lb./hr.

(j) Formaldehyde (HCHO):

(1) 0.986 lb./hr.

- Per the performance test in October 2024, Source 101 at 0.235 lb. / hr. (without duct burners). Source 102 at 0.157 lb. / hr. (without duct burners).

(k) Carbon Dioxide (CO₂):

(1) 1,000 lbs. CO₂/MWh (gross) on a 12-month annual average basis.

- Per the testing conducted in October 2024, Source 101 at 837 lb. / MW*hr. (with duct burners) and Source 102 at 800 lb. / MW*hr. (with duct burners).

ppmdv = parts per million volume on a dry gas basis, corrected to 15 percent O₂.

ppmdv and lb./MMBtu limits based upon a 3-hour averaging time.

In addition, the combined cycle units are equipped with CEMS (Continuous Emission Monitoring System) for NO_x, CO, and NH₃. Compliance with the requisite limitations are monitored via the CEMS Group in Harrisburg.