ALLEGHENY COUNTY HEALTH DEPARTMENT
Air Quality Program

SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES ON THE PROPOSED ISSUANCE OF THE SPRINGDALE ENERGY, LLC –TITLE V OPERATING PERMIT NO. 0580-OP26

[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on April 24, 2025. The public comment period ended on June 2, 2025.]

1. **Comment:** Condition IV.21: The Acid Rain Appendix is missing.

   Response: The Department is attaching the Acid Rain Appendix to the final document.

2. **Comment:** Conditions IV.22-24: EPA's Cross State Air Pollution Rule (CSAPR) replaced CAIR starting January 1, 2015. The CSAPR NOx annual requirements applicable to the site are at 40 CFR 97 Subpart AAAAA 97.401-97.435. The SO_2 annual CSAPR requirements are in 40 CFR 97 Subpart CCCCC Group 1 Trading Program 97.601-97.635. The CSAPR NO_X ozone requirements applicable to the site are at 40 CFR 97 Subpart EEEEE 97.801-97.835.

   Response: The Department agrees and revised the permit language to include the applicable requirements of the following:
   - 40 CFR Part 97, Subpart AAAAA for NO_X annual trading;
   - 40 CFR Part 97, Subpart CCCCC for SO_2 Group 1 trading; and
   - 40 CFR Part 97, Subpart EEEEE for NO_X ozone season Group 2 trading.

3. **Comment:** Tables V-A-1, V-A-2, and V-A-3: Particulate Matter (PM) be (PM/PM_{10}) emissions limits should be similar to the current Title V.

   Response: The Department revised the permit as requested.

4. **Comment:** Condition V.A.2.i.: Request to add the following language to allow an alternate test method if approved by ACHD: "…Method 201 or Method 201A United States Environmental Protection Agency, 40 CFR 51 Appendix M, or other method as approved by the Department."

   Response: The Department revised the permit as requested.

5. **Comment:** Condition V.A.5.c.: Remove "Each report shall include the average steam or water to fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content when appropriate of the fuel during each excess emissions and the graphs or figures developed under V.A.4.a." as these elements are only required if complying with water or steam to fuel ratio monitoring. This language is included in 5.c.1)a.iii below.

   Response: The Department removed the above language as requested.

6. **Comment:** Condition V.A.1.g: Please add the following note: Per an EPA approval dated May 13, 2025, Springdale Units 1 and 2 are not required to correct the NO_X CEMS data to ISO conditions.

   Response: The Department added Condition V.A.1.h stating that the ISO correction shall be waived provided that the permittee keeps records of ambient conditions and provides them upon request.

7. **Comment:** Table V-B-1: Request to add the following language to footnote number 4 to allow an alternate test method if approved by ACHD: "or other method as approved by the Department."

   Response: The Department revised the permit as requested.

8. **Comment:** Condition V.B.2.c.: Remove "Emissions testing shall be performed to determine the PM_{10} and volatile organic compound emissions during cold, warm, and hot start up conditions. Emissions of nitrogen oxides and carbon monoxide during start up conditions shall be determined by the CEM." as this testing was part of the original IP and has already been completed.

   Response: The Department removed the above language as requested.

9. **Comment:** Condition V.B.3.k.: Remove "The permittee shall determine and record daily the sulfur content and nitrogen content of the fuel being fired in the turbine. The permittee may propose alternative monitoring procedures for approval by the Department." as this condition is covered in V.B.3.e above.

   Response: The Department removed the above language as requested.

10. **Comment:** Conditions V.B.5.e. and V.B.5.f.: Please remove as these are duplicates of V.B.5.b and c above.

    Response: The Department removed the conditions as requested.

11. **Comment:** Condition V.B.7.e: The Acid Rain Appendix is missing.

    Response: The Department is attaching the Acid Rain Appendix.

12. **Comment:** Condition V.D.1.a: Please remove "to -10".

    Response: The Department removed the wording as requested.

13. **Comment:** Condition VI.B.1.b: This condition is in the Monitoring Requirements below and can be removed.

    Response: The Department removed the condition as requested.

14. **Comment:** Table VIII-1: Please revise the PM/PM_{10} tons/year value to 187.49, the NO_X tons/year value to 320.5, and the ammonia tons/year value to 246.

Response: The Department revised the permit as requested for PM/PM_{10} and ammonia, but the NO_X value remains at 321.4 because emissions from G02 are included in the total NO_X emissions.

15. **Comment:** Technical Support Document Combined Cycle Combustion Turbine (Unit 3 and 4) - each Table footnote number 4: Remove "See conditions IV.22 & IV.23 of Installation Permit #0580-I005." as these conditions do not place restrictions on Units 3 and 4. Table V-B-1 in the Installation Permit includes the hourly limits.

    Response: The Department agrees that the Site Level conditions are not restrictions and have removed them, but the footnote will remain for reference purposes only. The referenced condition was updated to V.B.1.j and the footnote was updated to "The short-term limit of 20 lbs/hr effectively limits NO_X emissions to 87.6 tpy for each turbine, or 175.2 tpy total. See conditionV.B.1.j of Installation Permit #0580-I005. However, these restrictions do not take into account startup and shutdown emissions. All NO_X emissions are monitored by CEMs."

16. **Comment:** Technical Support Document Combined Emissions Table: Please revise the PM/PM_{10} tons/year value to 187.9, NO_X tons/year value to 320.5, and the ammonia tons/year value to 246.

    Response: The Department revised the permit as requested for PM/PM_{10} and ammonia, but the NO_X value remains at 321.4 because emissions from G02 are included in the total NO_X emissions.

17. **Comment:** Technical Support Document Combined Emissions Table: Please revise the PM/PM_{10} lb/hr value to 73.3, NO_X lb/hr value to 231.8, CO lb/hr value to 211.7, VOC lb/hr value to 18.4, Formaldehyde lb/hr value to 4.2, Sulfuric Acid Mist lb/hr value to 1.4, and the ammonia lb/hr value to 6.1.

    Response: The Department revised the values as requested.

18. **Comment:** ACHD should indicate whether or not the RACT II limits for all equipment that is subject to RACT II are being retained or superseded by the RACT III limits for the facility. If the RACT II limits are being superseded, please see EPA's additional comments below about additional analyses that may be required:
    a. ACHD is proposing changes to the facility's RACT emission limitations for Emission Units AE1 and AE2 from RACT II to RACT III. These changes include two different RACT III limits for each unit – one limit that applies during normal operations and another limit that applies under Startup/Shutdown, NERC reliability testing, and tuning. While EPA acknowledges that the RACT III limits during normal operations for Units AE1 and AE2 are lower than the presumptive RACT II limits, for the Startup/Shutdown RACT III limits, there are no numerical emission limits or other limits on the quantity of Startup/Shutdown events. Such changes to the RACT III limits may result in an increase in allowable emissions from RACT II. Explain and demonstrate how such changes to the emission limitation will not interfere with the NAAQS as required under CAA section 110(l).
    b. ACHD is proposing changes to the facility's RACT emission limitations for Emission Units AE3 and AE4 from RACT II to RACT III. These changes include two different RACT III limits for each unit – one limit that applies during normal operations and another limit that applies under Startup/Shutdown, NERC reliability testing, and tuning. Because the proposed NOx RACT III limits during normal operations include

a load definition that constitutes the normal operations condition, as well as an averaging period, EPA is unable to determine whether the RACT III limits are at least as stringent as the RACT II limits, which do not include load definitions or averaging periods. For the Startup/Shutdown RACT III limits, there are no numerical emission limits or other limits on the quantity of Startup/Shutdown events. Such changes to the RACT III limits may result in an increase in allowable emissions from RACT II. Explain and demonstrate how such changes to the emission limitation will not interfere with the NAAQS as required under CAA section 110(l).

Response: In addition to citing RACT III limits in this permit, RACT II limits are being retained for Units 1 through 4. NO_X CEMS are continuously monitoring each unit and will be in operation to ensure that short term limits are not exceeded during startup and shutdown events. For Units 1 and 2, a combination of the startup time duration limit in Condition V.A.1.e.(4) and a VOC startup lb/event limit have been added to the permit. For Units 3 and 4, the manufacturer VOC data for each type of start (cold, warm and hot) along with the existing startup duration limits in the permit and a VOC startup lb/event limit have been added to the permit. The numerical emission limitations have been added to Conditions V.A.1.e and V.B.1.l – m for Units 1 and 2 and Units 3 and 4, respectively. ACHD has addressed CAA section 110(l) in Section VI.C.3 of this permit's RACT III technical support document. There has been no increase in annual emissions when implementing the startup/shutdown/NERC limitations under RACT III that were not previously implemented under RACT II and thus no revision to the SIP is required.

19. **Comment:** Condition V.A.1.e. contains the conditions that apply to AE1 and AE2 during startup, shutdown, tuning, blackstart testing and NERC reliability testing. ACHD has not established any short-term numerical emission limits or other operational restrictions for these types of events to ensure compliance with the annual emission limits in Table V-A-3 for these units. ACHD should include a numerical emission limit for startup, shutdown, tuning, blackstart testing and NERC reliability testing, as well as a limit on the number of these events that are allowed to occur on an annual compliance to ensure that the annual combined emission limits for AE1 and AE2 are enforceable as a practical matter. The short-term emission limit should be based on CEMS data when available or other data such as manufacturer's data where available.

    Response: The facility would like to maintain operational flexibility by taking a numerical short-term emission limit per event and by defining the event time rather than by limiting the number of events. Startup is the worst-case scenario and the Department is setting limits on these events. Please see the response to Comment #18 above.

20. **Comment:** Condition V.B.1. contains the conditions that apply to AE3 and AE4 during cold startups, warm startups, hot startups, and shutdown, as well as NERC reliability testing. ACHD has not established any short-term numerical emission limits or other operational restrictions for these types of events to ensure compliance with the annual emission limits in Table V-B-1 for these units. ACHD should include a numerical emission limit for the events identified in this condition, as well as a limit on the number of these events that are allowed to occur on an annual basis to ensure that the annual combined emission limits for AE3 and AE4 are enforceable as a practical matter.

    Response: See responses to comment #18 and comment #19.

21. **Comment:** For AE1 and AE2, TABLE V-A-3 in the permit should include the ppmvd limit as well as the lb/hr limit for both NO_X and VOC for both natural gas and fuel oil so that the RACT III limits are clearly identified in the permit.

    Response: The ppmvd limits for NO_X and VOC have been added to Tables V-A-1 and V-A-2.

22. **Comment:** For AE3 and AE4, TABLE V-B-1 in the permit should include the ppmvd limit as well as the lb/hr limit for both NO_X and VOC for both natural gas and fuel oil so that the RACT III limits are clearly identified in the permit.

    Response: Units 3 & 4 do not use fuel oil. The ppmvd limits for NO_X and VOC have been added to Table V-B-1 and are also defined in conditions V.B.1.d and e.

23. **Comment:** Because the Title V Operating Permit is being processed concurrently with IP 0580-I005 and has included the conditions from that permit into this draft installation permit, ACHD should ensure that those comments are addressed and any revisions to that permit as a result of EPA's comments should also be addressed as part of this permitting action.

    Response: The Department is addressing the Title V Operating Permit comments at the same time as the Installation Permit comments are addressed. All relevant comments and responses will be included with both permits.

24. **Comment:** The Technical Support Document (TSD) under the Regulatory Applicability section does not accurately reflect all of the RACT requirements at the facility. The TSD should accurately summarize all applicable RACT requirements for the facility. EPA notes that this section may change based on how ACHD addresses EPA comments on draft IP 0580-I005.

    Response: The Department issues a separate TSD for RACT permits. Please see the comprehensive RACT III TSD issued with IP #580-I005 for all applicable regulations and the case-by-case RACT III analysis for Springdale Energy.

25. **Comment:** ACHD should modify the definition of a "shutdown" in the Draft Permit to close a loophole that could potentially allow the Facility to circumvent short-term emissions limits by operating below 70% of full load for extended periods of time.

    Response: ACHD redefined shutdown as follows: "A shutdown shall be defined as the period after the load is reduced below 50% of full load." See condition V.B.1.i of the permit. Note that the shutdown threshold is 50%, not 70%.

26. **Comment:** Continuous emissions monitoring systems ("CEMS") would better assure Springdale's compliance with hourly and rolling annual limits for particulate matter ("PM") and volatile organic compounds ("VOC").

    Response: The Department added an Appendix C to the Technical Support Document that shows the Five Factor "CITGO" Analysis that shows that CEMS are not needed.

Additionally, conditions V.A.4.j.1 & 2 have been added so that monthly emissions for particulate matter, sulfur oxides, nitrogen oxides, carbon monoxide, and volatile organic compounds may be calculated from hourly fuel consumption for Units 1 and 2. Condition V.A.5.a has been added to make monthly fuel usage a requirement in the semi-annual report. These conditions already exist in the permit for Units 3 and 4. The Department believes that the frequency of fuel monitoring and recording is "reasonably related to determine compliance with permit limits and does not see the practicality of requiring CEMS for PM and VOC. EPA states, *"CEMS are not necessarily required in every situation, and in fact would not be practical in every situation"*. Additionally, the recordkeeping and reporting requirements are adequate to demonstrate compliance.

27. **Comment:** ACHD should generate or require Springdale to generate more reliable emissions factors based on site-specific data instead of continuing to use lower quality AP-42 emissions factors that EPA disfavors.

    Response: The only emissions limits based on AP-42 factors are SO_2 and formaldehyde for Units 1 & 2 and formaldehyde for Units 3 & 4. As the estimated potential emissions are low, the Department does not agree that new factors need to be developed. AP-42 factors continue to be the permit emissions factors used for SO_2 and formaldehyde emissions.

28. **Comment:** ACHD should adjust the ammonia slip limit based on site-specific testing data.

    Response: The ammonia slip limit of 10 ppm represents the manufacturer's design value at the end of the guaranteed catalyst life. Some ammonia slip from the HRSG stack is unavoidable due to the imperfect distribution of the reagent and catalyst deactivation. Ammonia slip emissions from an SCR system is a design consideration that forms catalyst life expectancy. Therefore, lower ammonia slip requirements ultimately limit catalyst life and dictate associated catalyst replacement

29. **Comment:** ACHD needs to justify its use of pounds of pollutant emitted per hour limits from earlier permits as Potential-to-Emit ("PTE") emission factors for several of Springdale's major pollutants, or, alternatively, use emission factors generated from site-specific testing data.

    Response: See responses to comments #19 and #27 above.

30. **Comment:** ACHD created or allowed multiple barriers to public participation, including a complete lack of transparency regarding the proposed Title V Operating Permit apparently replacing an earlier version of the same permit that ACHD never formally withdrew, and impermissibly limiting the scope of public comments it is accepting for the proposed permit. ACHD impeded public participation by failing to explain the material changes between the July 2024 and the July 2025 versions of Title V Operating Permit No. 0580-OP26, or even notifying the public that it was withdrawing the former version of the permit. ACHD should not have limited the scope of the public comments it would accept regarding changes to the proposed.

    Response: The changes in the draft (outside of the specific conditions listed in the public notice) were in response to the first public comment period from July 25 – August 27, 2024, and are why subsequent public comment notices were restricted to just the CSAPR conditions. The original permit draft was not withdrawn, except for the noted conditions. As stated in the notice, all comments received during the original public comment period have been addressed.

31. **Comment:** Pollution is Corruption. Clean Air is a Constitutional Right. Thank you for holding this important hearing on Springdale Energy revision to PA SIP on Reasonable Available Control Technology (RACT III) related to NO_X and VOCs. For the record, Natural Gas from Pennsylvania has been the main driver in a reduction of carbon over the last 20 years. It has also responsible for the release of other deadly poisons. This hearing is really about Springdale Energy's four natural gas turbines utilized to generate 500+ MW of electricity. This facility is also one of many Title V MSP in our County. For the record, I hope there is at least a 3-mile radius from the facility for all people of Springdale-Tarentum. I wish this meeting was better noticed. I did not observe ANY real revisions in the public notice. One example was the present of 265 bhp emergency fire pump engine and then the 25 PA Code 129.112 requirements, which I assume the applicant has met. This permit will be granted. It shouldn't be. My concern remains as previously entered into the record: ALL Major Source Polluters in Allegheny should be denied renewals. As individual facilities, they may be very well in compliance, but when added all together, we get a dangerous level of pollution that has adverse health impacts and contributes to climate change. This facility per your own notice is a major source of Particulate Matter (10 & 2.5), Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compounds. Add Sunlight daily and you have a concoction of Tropospheric Ozone, and the base ingredients for acid rain and poisonous smog. I would like to remind you that this region continues to receive a "F" rating on air quality due to the prevalence of Particulate Matter. This firm adds more. Who is Springdale Energy? Or Are they Aspen Generating Corporation? Or are they LS Power Group? Why the deception? This contributes to a lack of public trust in our institutions. LS Power Group is owned by the two Mikes, Mike Siegal and Michael Liebelson. They claim to be involved in nearly 50,000 MW of electrical generation and over $60 Billion in investment in our infrastructure. They sure present themselves as Green. What is the plan for Thermal Fatigue at this facility? What are they doing on methane mitigation during transport and transmission? What are they doing to cap abandoned wells? How many must suffer? What we do here in Allegheny has impacts globally. Our pollution is not localized. Today I read a headline that said, "Heat killed a record amount of people in the US last year". WHO says about 500,000 globally per year. We helped do that. It is known that air pollution, particularly $PM_{2.5}$ reduces life expectancy. We must recognize externalities like the additional health impacts of wildfire smoke and mosquito spread virus when combined with our own pollution. This is critical for area due to the prevalence of respiratory ailments. With this permit we are increasing the Asthma, COPD, Cancer, Alzheimer's, Cardiovascular Disease and Stroke in Allegheny. We are making the problem worse. I am concerned that the true amount of pollution is undercounted. I don't trust the corporations or the government. I am concerned that we are creating more extreme weather events. With this permit, we are increasing the likelihood of major floods, sustained drought, landslides, tornadoes, hurricanes, hailstorms, waterspouts, downspouts and wildfires. Perhaps the real applicant, LS Power Group should build one of their waste-to-energy plants here instead. May God Bless Allegheny County and all who call her home.

    Response: The commenter did not address any specific permit conditions, therefore the Department cannot respond and thanks the commenter for the comment.

32. **Comment/Response:** Additional comments were received during the April 24 – June 2, 2025 and July 24 – August 25, 2025 public comment periods that were outside of the scope of those public notices. Although each comment was previously addressed, those comments were not addressed during those public comment periods and the Department thanks the commenters.

Bernadette Lipari
Air Quality Engineer
May 13, 2026

List of Commenters

Name	Affiliation
	ACHD
Scott Weis	Springdale Energy LLC
Gwendolyn Supplee	US EPA
Alexander Bomstein	Clean Air Council
Lawrence Hafetz	Clean Air Council

Citizen Commenters
Benjamin Chiszar, MPA, MS, Veteran-US Army-MI Corps