ENVIRONMENTAL HEALTH PROJECT
DEFENDING PUBLIC HEALTH SINCE 2012
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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.

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 year,[1] such as carbon dioxide, and around 300 tons of other toxic compounds,[2] all of which are harmful to human health. Below are the heath impacts of these air pollutants:[3]

- **Carbon Dioxide:** climate change-induced health impacts, such as insect borne diseases, heat-related illnesses, and injuries and deaths from storms and floods.[4]
- **Nitrogen Oxides:** respiratory irritation and infections; exacerbation of respiratory diseases, such as asthma.[5]
- **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).[6]
- **Ammonium:** abdominal pain, nausea, vomiting, skin blisters, burning feeling in the nose, throat, lungs, and eyes.[7]
- **Carbon Monoxide:** decreased exercise tolerance, decreased vigilance, and increased risk for cardiac ischemia in individuals with heart.[8]
- **Sulfur Oxides:** Breathing difficulties, particularly during exercise; aggravation of existing respiratory.[9]
- **Formaldehyde:** Nose and eye irritation, eczema, asthma, increased risk of nasal and throat.[10]
- **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 pr emature mortality in exposed populations.[11]
- **Volatile Organic Compounds:** varies by compound but most commonly headaches, fatigue, and irritation of the eyes, nose, and throat.[12]

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 population.[13]

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.

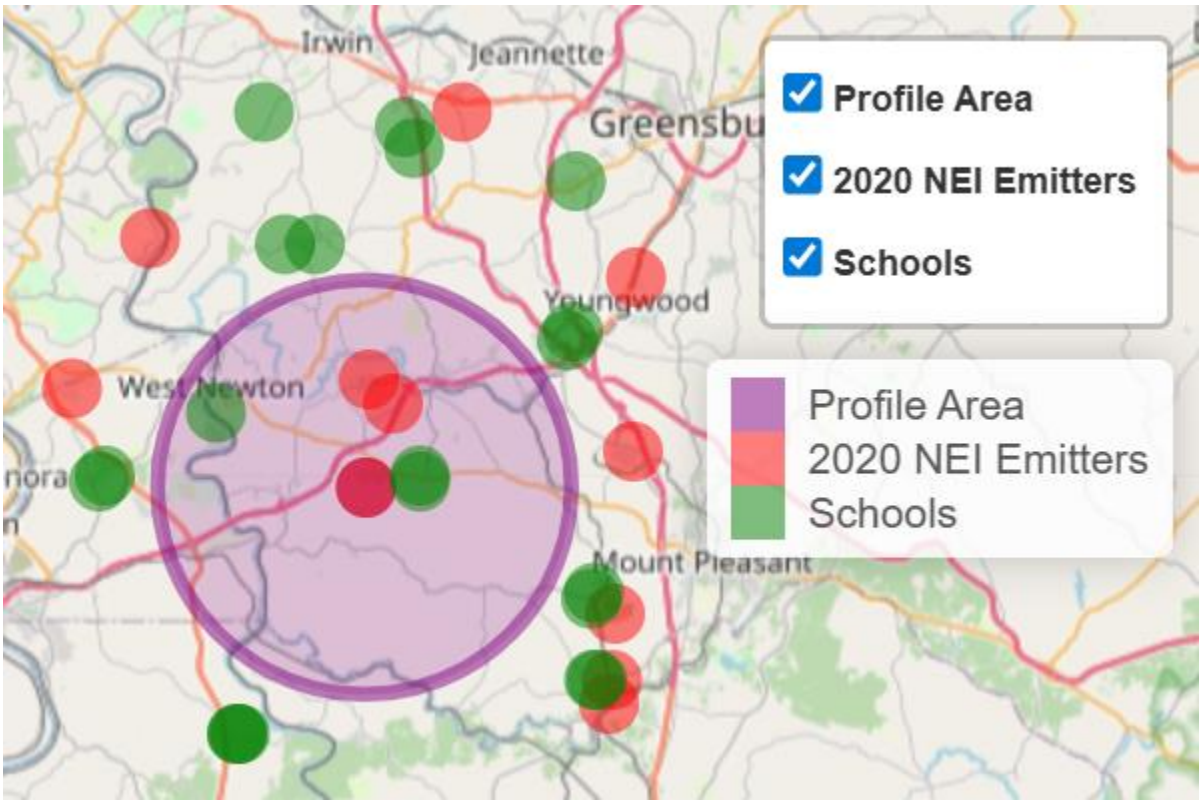

Figure 1. Schools, hospitals, and point source emitters within 5 miles of the Tenaska Westmoreland Generating Station. Map created by EHP.

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.

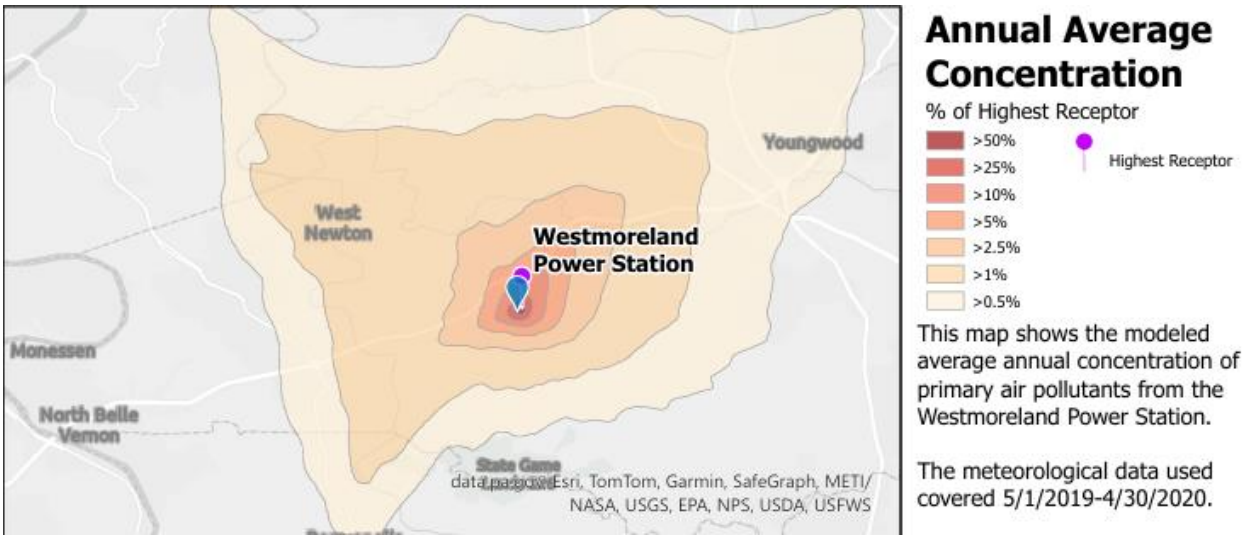

Figure 2. Modeled relative annual average airborne pollutant levels from the Tenaska Westmoreland Generating Station. Modeling conducted by EHP.

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 communities.[14]

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.

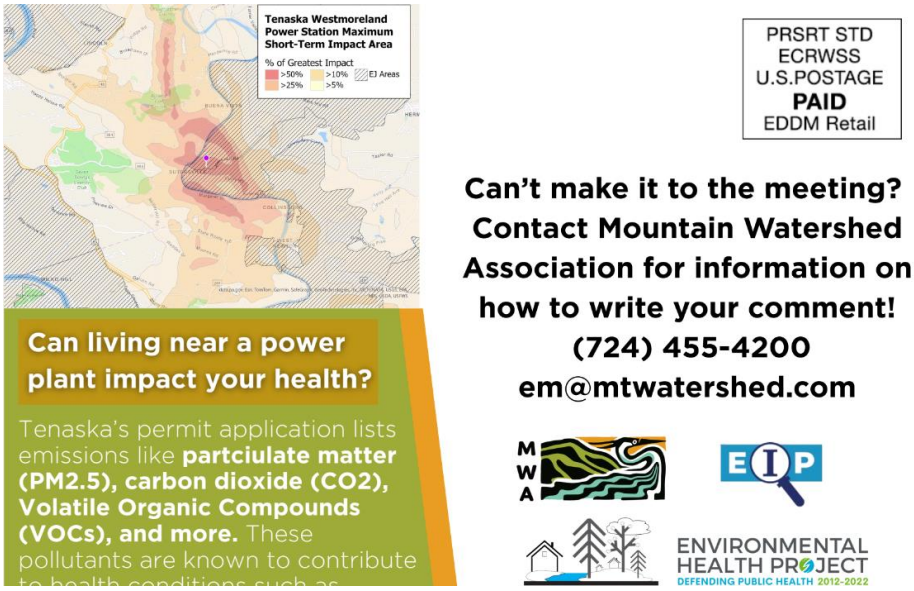

Figure 3. October 2025 mailer that included a zoomed in version of an EHP dispersion map. This map shows the modeled relative 2-year maximum airborne pollutant levels from the Tenaska Westmoreland Generating Station.

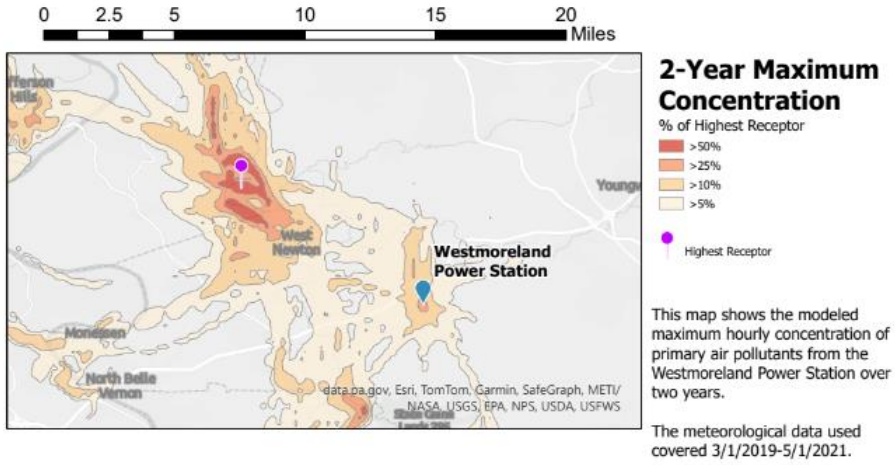

Figure 4. Full size version of the 2-year maximum concentration map included in the October 2025 mailer. The location of the Tenaska Westmoreland Generating Station is accurately labeled.

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, H_2SO_4, sulfur oxides, and greenhouse gases, as well as a regular schedule and format for the reporting of monitoring data
- 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.

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