UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title:	Clean Air Act Inspection of Scrubgrass Generating Plant
Inspection Date(s):	June 7, 2022
Regulatory Program(s):	SIP, Title V, NESHAP, NSPS
Company Name:	Stronghold Digital Mining
Facility Name:	Scrubgrass Generating Plant
Facility Location:	2151 Lisbon Road Kennerdell, PA 16374
Latitude:	41.269767 **Longitude:** -79.812764
County/Parish:	Venango
AFS Number:	PA000249192
Permit Number:	61-00181
NAICS Code:	221112 **SIC:** 4911
Unique Project #:	3EA22CA080A

Facility Representatives: **Point of Contact**

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EPA Inspectors:

Bruce Augustine, Environmental Scientist, 3ED21
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State/Local Inspectors:

H. Thomas Flaherty, Air Quality Engineer, PADEP NWRO
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EPA Lead Inspector BRUCE AUGUSTINE Digitally signed by BRUCE AUGUSTINE Date: 2022.07.13 15:43:12 -04'00'
Signature **Bruce Augustine** **Date**
Four Penn Center – 1600 John F Kennedy Blvd
(3ED21)
Philadelphia, PA 19103-2852

Supervisor KRISTEN HALL Digitally signed by KRISTEN HALL Date: 2022.07.13 14:32:55 -04'00'
Signature **Kristen Hall** **Date**

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Stronghold Digital Mining's Scrubgrass Generating Plant (Scrubgrass or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on May 12, 2022, via email. On June 2, 2022, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Dave Gates, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

A. Summary of the Facility

The Facility is located at 2151 Lisbon Road, Kennerdell, PA 16374. The Facility was constructed and commenced operation in approximately 1992. The Facility was originally owned and operated by Pacific Gas & Electric (PG&E). The Facility was eventually divested and became an asset as part of portfolios for several investment groups. The Facility was purchased by Stronghold Digital Mining (SDM) from Q power in Spring 2021. Olympus Power is contracted to operate the power generation portion of the site.

The Facility was constructed to generate electricity by reclaiming waste coal piles in the area. The site was paid a certain amount for each megawatt (MW) generated until 2013, when they began selling power on the wholesale market. The Facility began operating fewer hours as power prices declined and natural gas became more prevalent in the market. Scrubgrass never ceased operation or shutdown. Due to power prices, the site has gone periods of time without operating but always maintained an operating permit from PADEP. The site has about 60 full time employees with another 20-25 employees at the data center.

The Facility received the most recent Title V permit (61-00181) from PADEP issued on July 9, 2018.

Scrubgrass is classified as major source for NOx, SO2, and CO. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 C.F.R. Part 60 Subpart Da: Standards of Performance for Electric Utility Steam Generating Units (NSPS Da);
- 40 C.F.R. Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS Dc);
- 40 C.F.R. Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT 4Z);
- 40 C.F.R. Part 63, Subpart DDDDD: National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (MACT 5D);
- 40 C.F.R. Part 63, Subpart UUUUU: National Emission Standards for Hazardous Air Pollutants: Coal and oil Fired Electric Utility Steam Generating Units (MACT 5U);
- 40 C.F.R. Part 75, Subparts A-H (Acid Rain Program);

- 40 C.F.R. Part 97, Subparts AAAAA, CCCCC, EEEEE: CSAPR Nox & SOx Trading Program.

B. Inspection Opening Conference

At 8:59AM on June 7, 2022, EPA arrived at the Facility for a CAA Inspection and conducted an opening conference. Scrubgrass was represented by Shawn Smith, Plant Manager; R.J. Shaffer, Asset Manager; and Jeff Campbell, Engineering Manager. Also, PADEP inspectors Tom Flaherty and Dan Brophy were present. EPA inspector, Bruce Augustine presented his credentials and explained the purpose of the visit was to conduct a Clean Air Act inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Scrubgrass representatives did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

As mentioned earlier, the Facility was constructed in 1992 to reclaim and burn waste coal piles to produce electricity. Due to the large amount of coal mining that existed in this part of Pennsylvania, large piles of "waste" coal were created. This type of coal typically has a much lower heating value than bituminous coal (3000-7500Btu compared to 12,000Btu for bituminous coal). The coal is reclaimed through contracts with Pennsylvania and local watershed groups and 85-90% of the coal is acquired from the Scrubgrass Reclamation Company. All of the coal is reclaimed from sites within 100 miles of the facility.

The Facility was originally designed to operates as a cogen facility but was never operated in that manner. Scrubgrass mostly operated when the cost of power made it financially profitable to send electricity to the PJM grid. The site mostly operated during the day, as the price of power at night was too low. In addition, the site operated when they were called by PJM to produce electricity for the grid. Typically, if the units were cold, it would take 12-16 hours before they were able to produce energy for the grid.

The site operates two fluidized bed boilers to combust waste coal and produce steam, which is sent to a turbine to make electricity. Each boiler was constructed by Tampella Power and is rated at 600MMbtu/hr (40MW) and burns #2 fuel oil at startup until coal is introduced into the fluidized bed.

Approximately 75-80 trucks per day bring the waste coal into the facility while an additional 15 trucks per day of limestone are brought in. The limestone is used for SO_2 emission control. No coal or limestone arrives by rail at the site. The sites were the coal is obtained are sampled frequently for heat content, sulfur content, etc. Coal that arrives is dumped into hoppers were it seperated by size before being sent to intermediate dry storage. Coal is transferred via a conveyor to a crusher for sizing prior to being sent to a day bin before entering the boiler. Facility representatives indicated that the boilers combust 70-80 ton/hr of coal and can combust 100

ton/hr if the coal quality is poor. The fluidized bed typically operates at about 1600ºF and has a coal ash recirculation rate of 500 ton/hr. Scrubgrass injects pulverized limestone in the boiler for SO_2 emission control. The limestone is injected in the combustion zone. Scrubgrass also injects 19% aqueous ammonia between the boiler and cyclone to control NOx emissions. Facility representatives stated that Scrubgrass does not constantly monitor the excess ammonia in the fuel gas stream. The excess ammonia is calculated weekly and day to tuning of the injection system is done by monitoring emissions using the continuous emission monitoring system (CEMS). At the back end of the boiler, Scrubgrass uses a reverse air pulse jet baghouse to control particulate matter emissions. Each of the boilers is equipped with CEMS to instantaneously monitor SO_2, NOX, CO and opacity.

Scrubgrass operates a 12MMBtu/hr auxiliary boiler to provide backup heat if the boilers are out of service. The boiler combusts #2 fuel oil and Facility representatives stated the boiler hasn't operated in at least six months. There is also a diesel fire pump, which is used in emergencies for fire control. The fire pump combusts #2 fuel oil and was recently overhauled.

In June 2020, Scrubgrass began operation of the data center at the Facility. The data center utilizes approximately 12,000 computers for the purpose of data mining for bitcoin. The data center utilizes 40-45MW of power from the power generation side of the Facility to provide electricity to the data center. Scrubgrass constructed two 40MW breakers and new bus ducting and switchgears to safely step the power down to the computer banks. Bitcoin mining involves computers working on algorithms to unlock encrypted codes. If the code is unlocked, the owner will receive an amount of bitcoin. The construction of the data center and the installation of the switch allows the Facility to switch very quickly between sending power to the energy grid or the data center. Which source receives the power can depend on the price on the market for power and bitcoin. As stated earlier, the data center can take 40-45MW of power with any remaining power being sent to the grid. This method of operation allows Scrubgrass to have much greater operational flexibility and not have to idle the boilers and reduce the time it takes to bring the boilers up to temperature and able to send power to the grid. Facility representatives stated that the capacity of the boilers or the Facility did not change through the construction of the data center.

The opening conference concluded at 11:15AM

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 11:26AM by Shawn Smith of Scrubgrass and PADEP inspectors Tom Flaherty and Dan Brophy were also present for the walkthrough. EPA noted photos would be taken during the Facility walkthrough (Attachment 2). Weather during the walkthrough was overcast with temperatures approximately 65º. There was intermittent precipitation during the entire inspection.

The first area observed was the intermediate coal storage building and coal piles. Mr. Smith stated that there is about 3-3.5 days of coal storage in the building. Other than being placed into the building, there is no additional drying of the coal to remove moisture prior to combustion. The coal is transferred from the storage building via conveyor for crushing. The crusher building is equipped with two hammer crushers to size the coal before conveying it to the top of the boilers. Two limestone crushers were also observed in this area. Neither of these sources were operating at the time of the inspection. The limestone pulverizers are fired with #2 oil and pulverize the limestone into a fine powder for injection into the boiler. The limestone is also air dried to remove moisture using a #2 oil fired hot air generator.

The auxiliary boiler is located in a separate building and was observed to be partially dismantled. It was clear that the source cannot operate without extensive maintenance and Mr. Smith indicated that the Facility might decommission the boiler. Two fire pumps were also observed at the site: one electric and one diesel. The diesel fire pump was not operating and the hour meter was observed at 85.2 hours.

The two fluidized bed boilers are identical and were constructed at the same time. Each boiler is equipped with four oil burners for periods of startup prior to the injection of coal. There are also four injection locations for coal and limestone. Both boilers were operating at the time of the inspection. The inspection team entered the boiler control room and spoke to the boiler operators. At the time of the inspection, Scrubgrass was sending 45.1MW of power to the data center and 3.7MW to the energy grid. The following boiler operating parameters were observed in the control room during the inspection:

TABLE 1		
	Boiler 1	**Boiler 2**
Coal Injection Rate	55.9 klb/hr	88.4 klb/hr
Boiler Air	86.4 kcfm	90.6 kcfm
Temperature	1323ºF	1588ºF
Limestone	12.28 lb/hr	12.69 lb/hr

The following emissions rates were also observed on screens in the control room at the time of the inspection:

TABLE 2				
	Boiler 1		Boiler 2	
	Observed	Permit Limit	Observed	Permit Limit
SO2 % Reduction	96.04	95	96.13	95
SO2 24 hr avg. (lb/MMbtu)	0.240	0.45	0.256	0.45
SO2 24 hr avg (lb/hr)	75.150	270	107.318	270
NOx 24 hr avg (lb/MMBtu)	0.081	0.3	0.050	0.3
NOx 24 hr avg (lb/hr)	24.9	175	20.5	180
NOx 30 day avg (lb/MMbtu)	0.057	0.16	0.065	0.16
NOx 30 day avg (lb/hr)	26.8	96	28.9	96

Several photographs were taken of the screens in the control room and are included in Attachment 1.

The boilerplates were observed on both boilers and the inspection team climbed the boiler levels. The ammonia injection ports were also observed at the boilers. An ammonia injection rate of 12.5 gal/hr was observed for Boiler 2. In addition, each of the boilers was observed to include two cyclones.

The inspection team went to the top of the baghouse for Boiler 1. Each baghouse is equipped with ten compartments, each containing 250-280 bags. The magnehelic gauges were observed with pressure drops between 4-7psig.

After inspecting the baghouse, the inspection team proceeded to the data center. The data center is comprised of a combination of multiple trailer boxes and newer constructed boxes. Each of these containers houses multiple individual computers which are used for bitcoin mining. The older storage containers have been retrofitted to house the computers while the newer design appears to have been designed to equip the computers. Older containers are not equipped with fans to control computer temperature while some containers are equipped with fans. The entire data center is operated using electricity generated by the boilers at the site. No combustion or emission sources were observed at the data center.

The walkthrough concluded at 1:55PM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 2:00PM. PADEP was not present for the records review. EPA discussed the documents that were requested in the

document forwarded in the June 2, 2022, email to Dave Gates (see Attachment 1). The request that was attached is included as Attachment 3. Records were provided at the time of the inspection by R.J. Shaffer and Jeff Campbell. Dave Gates was not present during the inspection but was able to provide some of the records via a file sharing site both prior to and after the inspection. The following is a summary of the records discussion while onsite.

1. EPA requested copies of emissions calculations for criteria pollutants and HAP for 2019-May 2022. Scrubgrass provided CEMS monitoring data for NOx and SO2 for that time period and the facility monitoring plan for 2022. Mr. Gates provided copies of the AIMS emission reports submitted to PADEP for 2019-2021.

2. EPA requested CEMS data for each pollutant from January 2019-May 2022. Prior to the inspection, Mr. Gates provided CEMs data for NOx and SO2 for Boilers 1 & 2 from January 2019 through March 2022. This information is currently under review.

3. EPA requested emission statements for 2019-2021. Mr. Gates submitted copies of the AIMS reports submitted to PADEP for 2019-2021.

4. EPA requested information specific to the combustion units onsite. Conversations with Scrubgrass representatives during the inspection provided a partial response to this request.

5. EPA requested the hours of operation (monthly) for each combustion unit from January 2019-May 2022. After the inspection, Mr. Gates provided the monthly hours and amount of each fuel combusted in each boiler and the diesel fire pump for 2019-through 2021.

6. EPA requested the amount of each fuel combusted on a monthly basis. Mr. Gates response to the previous question included the amount of fuel combusted in the boilers.

7. EPA requested the date of each air permit application submitted to PADEP since January 2017. Scrubgrass stated that it is possible that a plan approval application was submitted within that timeframe for MACT UUUUU. However, they are unaware of any additional permit applications. It was indicated that Mr. Gates would follow up on this request.

8. EPA requested a copy of each permit issued to SDM or the Facility since January 2017. Facility representatives were not aware of any permits issued by PADEP.

9. EPA requested for review during the inspection copies of any performance tests that may have been conducted to determine emission rates or compliance with emission limits since January 2017. EPA was directed to a file cabinet that contained multiple stack tests that had been conducted on the boilers for compliance with the Title V permit and applicable regulations. Also included in this file cabinet were copies of Relative Accuracy Test Audits (RATA) conducted on the CEMS. EPA reviewed copies of the following tests:

a. May 2-June 7, 2016, Mercury test of Boiler 1 indicated a Hg emission rate of 0.0181 lb/MMbtu and $9.29x10^{-6}$ lb/hr.

b. May 13-July 13, 2016, mercury test of Boiler 2 for MACT UUUUU with a Hg emission rate of 0.0350 lb/MMbtu.

c. Hydrogen chloride (HCl) test conducted on Boilers 1 & 2 on March 15, 2012. Average HCl concentration during the test was 41.1ppm and 59.692 lb/hr.

d. Ammonia (NH3) test conducted on Boilers 1 & 2 with an average emission rate of 0.609 lb/hr and 0.97ppm. This test was conducted on September 24, 2009.

After the inspection, EPA requested that Mr. Gates provided the dates of each test conducted and for which pollutant(s) the test was conducted. EPA is awaiting a response from Scrubgrass.

10. EPA requested fluidized bed temperatures for Boilers 1 & 2 from January 2021-May 2022. On June 16, 2022. Scrubgrass provided copies of these records from January 2021-May 2022.

11. EPA requested for review copies of onsite visual opacity monitoring, pressure differential monitoring, records of fuel sampling, and maintenance performed on the combustion units. EPA reviewed records of weekly 2021 fuel sampling, 2022 weekly operator logs recording various facility operating parameters, May 22 daily limestone mill logs. EPA requested and was provided a copy of the 2019 tune-up information for Boilers 1 & 2. During the inspection, EPA was also provided with a copy of the fuel analysis for March 2022.

12. EPA requested copies of initial notifications, notifications of compliance status, or periodic reports that were submitted to either EPA or PADEP for several regulations. Scrubgrass has yet to provide any of these records to EPA.

This completed the record review.

V. Closing Conference

After the records review, EPA and Scrubgrass representatives had a brief closing conference to ask additional questions and discuss observations. The EPA inspector noted that the investigation is on-going, and any areas of concern identified in the final reports do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 3:42PM.

The following have been identified as *potential* issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by [Name].

- Scrubgrass is required to keep records of daily pressure drop across several magnehelic gauges (baghouse compartments, limestone pulverizers, fabric collectors, etc.). Scrubgrass also keeps daily operator logs of various other monitored plant conditions. A review of daily operator logs while onsite indicate sporadic and inconsistent recordkeeping of requirements required to be monitored and recorded.
- A review of the emission data (CEMS and calculations) is underway to determine if Scrubgrass is in compliance with the various long and short term NOx and SO2 limits in the Title V permit. The two waste coal fired boilers both have multiple NOx and SO2 limits based on state and federal regulations.
- In addition, EPA is in the process of determining if Scrubgrass has complied with the annual NOx and SO2 budget trading program emissions allowances and the annual NOx ozone season allowable emissions. This will be accomplished through the review of CEMS data submitted to EPA for 2019-2022.
- It is not clear from the inspection that Scrubgrass has submitted to either PADEP or EPA initial notification, notifications of compliance status, or periodic reports for any federal regulations under 40 C.F.R. Part 60, 63, or 97. These were requested prior to the inspection and post inspection. Scrubgrass has not provided these records.

VI. List of Attachments

Attachment 1:	June 2, 2022 email correspondence to Dave Gates confirming EPA inspection and attached records request
Attachment 2:	Photo Log
Attachment 3:	Pre-inspection Records Request

Attachment 1

From: Augustine, Bruce
To: dave.gates@scrubgrass.com
Cc: hflaherty@pa.gov; Brophy, Daniel
Subject: EPA Inspection of Scrubgrass Generating Station
Date: Thursday, June 02, 2022 4:37:00 PM
Attachments: EPA Record Request Scrubgrass.docx

Dave,

Per our conversation this afternoon, EPA is planning to conduct an onsite inspection of the Scrubgrass Station on Tuesday June 7, 2022. The inspection will focus on the Title V permit. I plan to arrive at the facility at 9:00AM and the inspection will include an opening conference to discuss the current operations, a walkthrough of the facility, and a record review. The walkthrough will also involve taking photographs, you are welcome to take side by side photos or they will be included in the inspection report. PADEP will have two inspectors at the inspection with me and I anticipate the inspection will take most of the day. You indicated that the required PPE includes a hard hat and safety glasses. Please let me know if there is any other PPE I need while onsite.

Attached is a list of records I would like to review onsite. You may not be able to pull together all of the records prior to the inspection but please have what you can available on Tuesday. I will send a separate email with a link for you to upload records rather than make all paper copies. Let me know ASAP if you have any questions regarding the records requested. Also, please mark any records that Scrubgrass provides and would like to claim confidential as “Confidential Business Information” or “CBI”. We can discuss this more during the inspection. This goes for the onsite photographs as well.

Bruce J. Augustine
Environmental Scientist
Enforcement & Compliance Assurance Division
Air Section
USEPA Region III
1650 Arch Street
Mailcode: 3ED21
Philadelphia, PA 19103
(215) 814-2131

Attachment 2

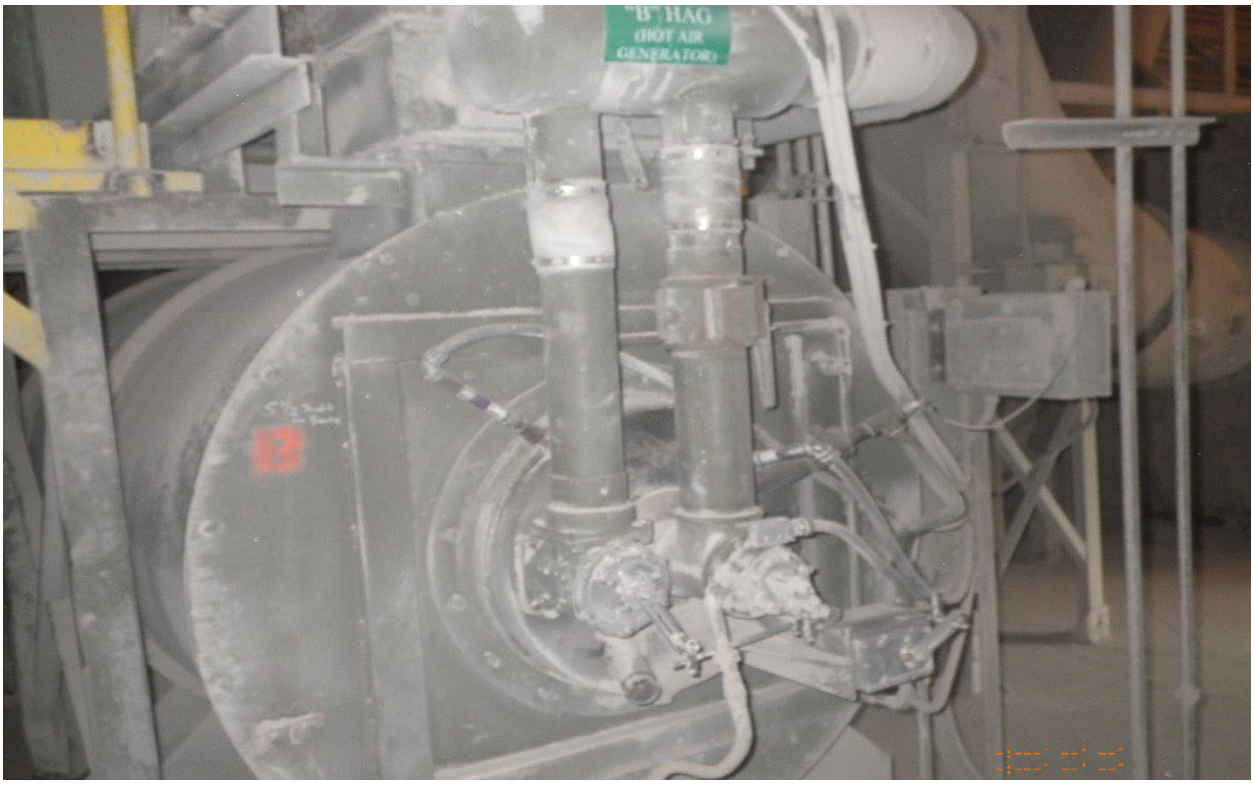
1. Waste Coal Pile & Covered Conveyor – Scrubgrass Generating – 6/7/22

2. Conveyor & Coal Drop Building for Coal Delivery – Scrubgrass Generating – 6/7/22

3. Boiler 1 & 2 Combined Stack – Scrubgrass Generating – 6/7/22

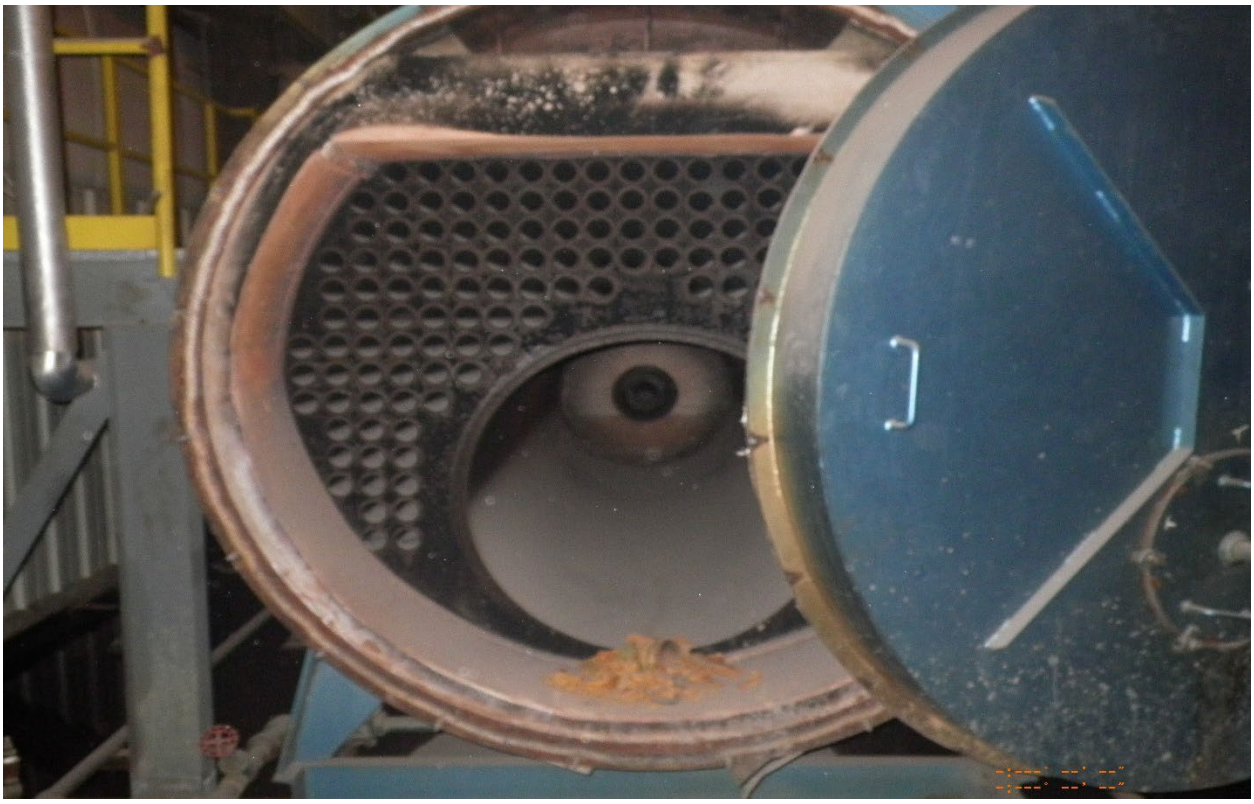
4. Ash Silo – Scrubgrass Generating – 6/7/22

5. Hopper outside of Crusher Building – Scrubgrass Generating – 6/7/22



6. Hot Air Generator for Limestone Drying – Scrubgrass Generating – 6/7/22

7. Limestone Crusher – Scrubgrass Generating – 6/7/22

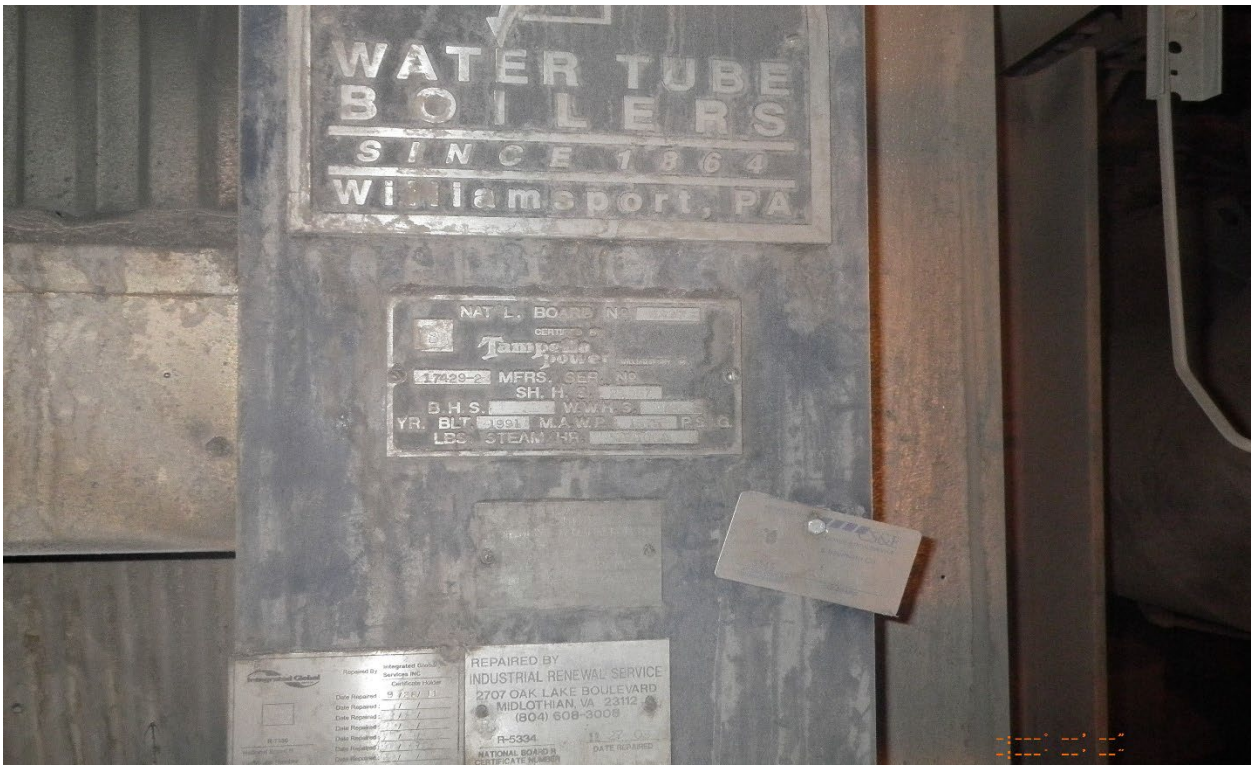


8. Auxiliary Boiler (Out of Service) – Scrubgrass Generating – 6/7/22

9. Auxiliary Boiler Nameplate – Scrubgrass Generating – 6/7/22

10. Diesel Fire Pump – Scrubgrass Generating – 6/7/22

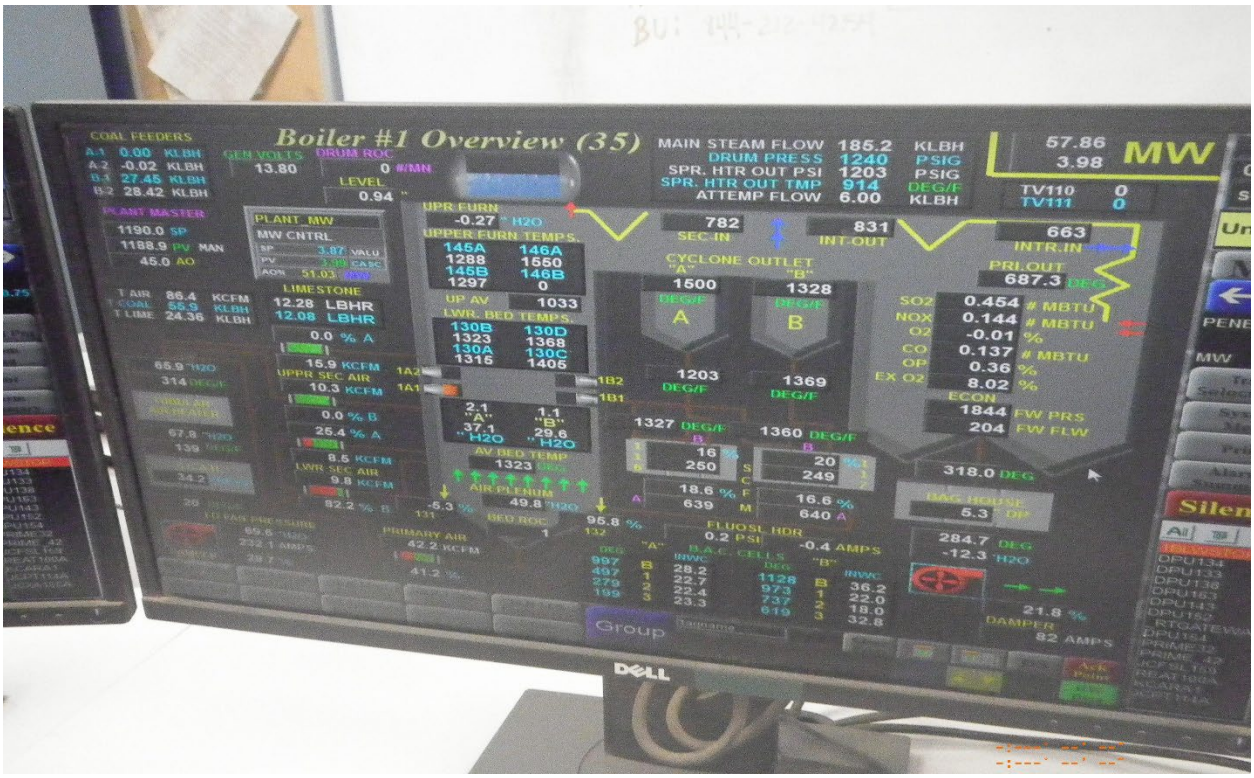
11. Coal and Limestone Injection Points Boiler 2 – Scrubgrass Generating – 6/7/22



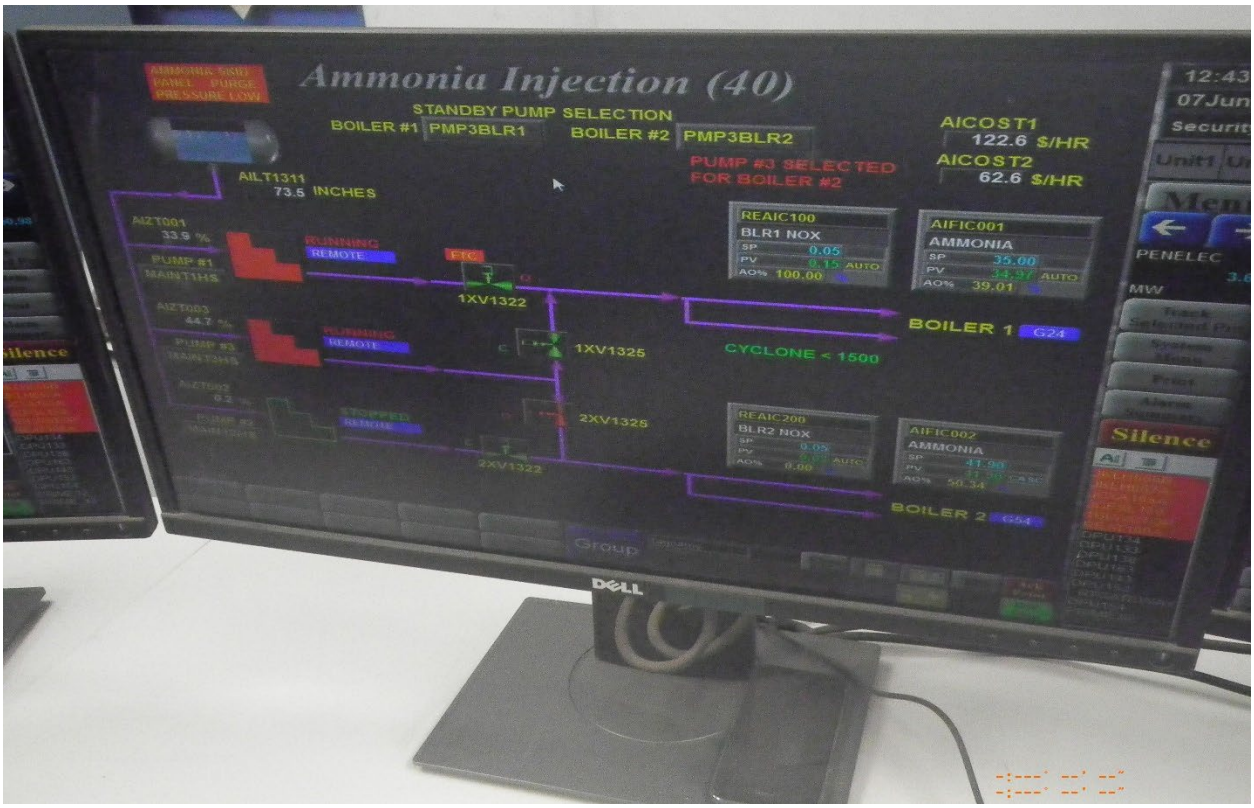
12. Coal Fired Boiler 2 Nameplate – Scrubgrass Generating – 6/7/22

13. Boiler 2 Control Room Overview – Scrubgrass Generating – 6/7/22

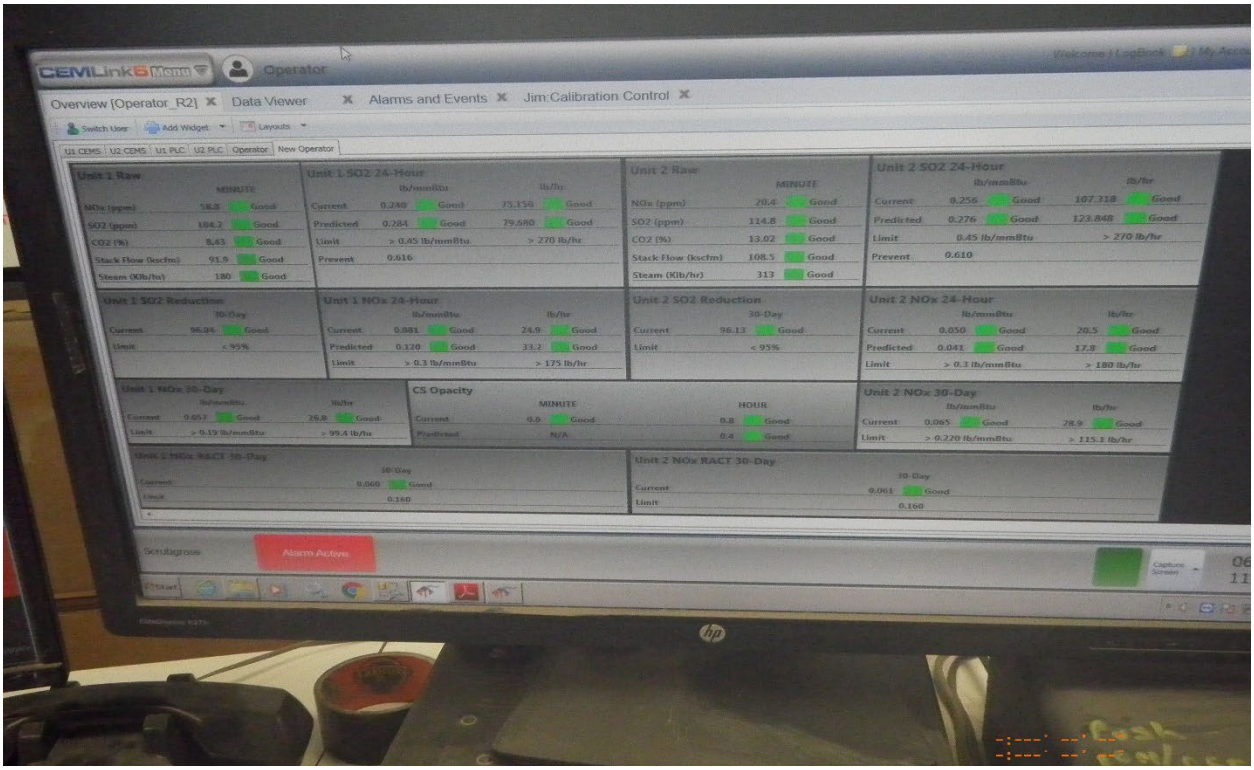
14. Boiler 2 Control Room Overview – Scrubgrass Generating – 6/7/22



15. Boiler 1 Control Room Overview – Scrubgrass Generating – 6/7/22

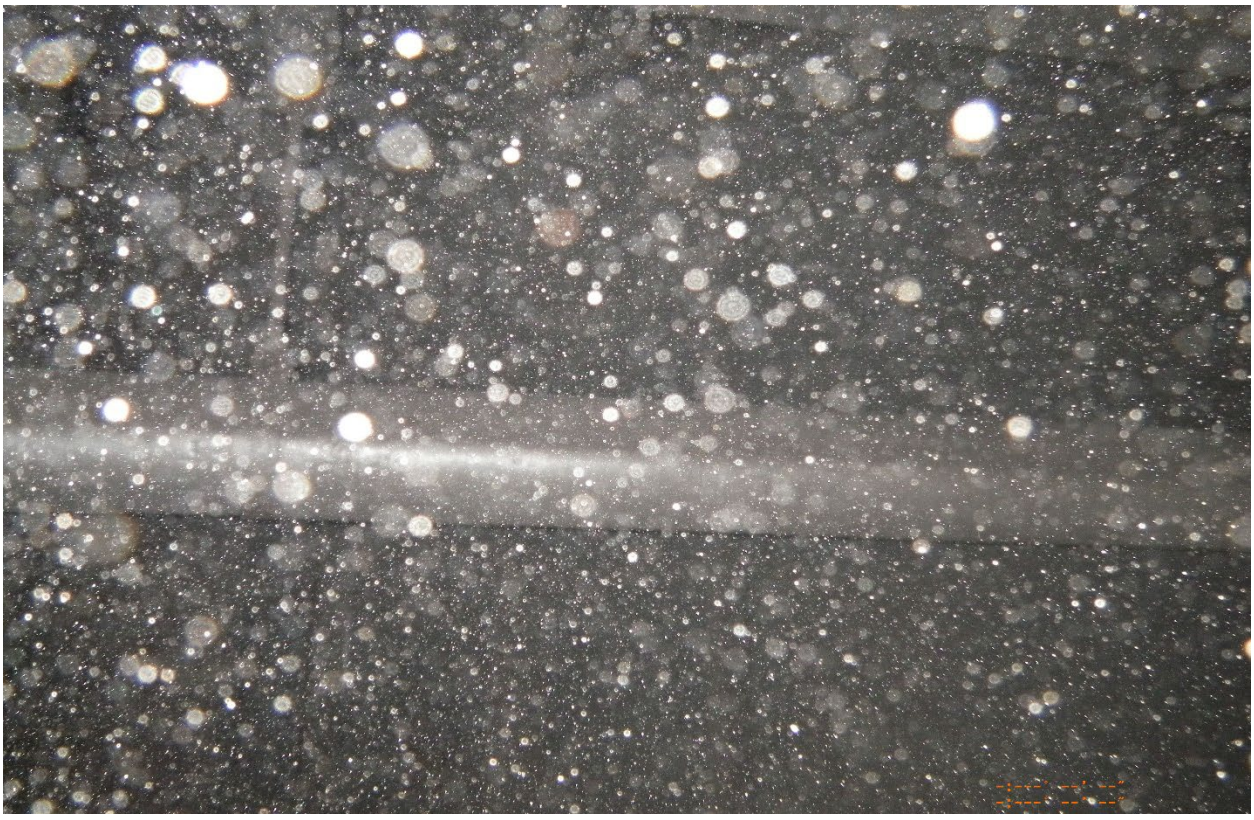


16. Boiler 1 & 2 Ammonia Injection Control Room Overview – Scrubgrass Generating – 6/7/22



17. Boiler 1 & 2 Control Room CEMS Overview – Scrubgrass Generating – 6/7/22

18. Boiler 1 Nameplate – Scrubgrass Generating – 6/7/22



19. Boiler 2 Ammonia Injection Ports – Scrubgrass Generating – 6/7/22

20. Ammonia Injection Piping and Flow Meter – Scrubgrass Generating – 6/7/22

21. Top of Boiler 1 Baghouse –Scrubgrass Generating – 6/7/22

22. Coal Storage Building & Coal Pile – Scrubgrass Generating – 6/7/22

23. Data Center Storage Container with Computers – Scrubgrass Generating – 6/7/22

24. Computers Inside Storage Container in Data Center – Scrubgrass Generating – 6/7/22

25. New Design Computer Containers at Data Center – Scrubgrass Generating – 6/7/22

Attachment 3

Records Requested by EPA

Scrubgrass Station

June 8, 2022

Please provide all records electronically, unless otherwise specified. Any records that are being claimed CBI should be clearly marked as such. EPA will provide a link for Stronghold to upload requested records.

1. Provide copies of monthly emission calculations (lb/MMBtu or lb/hr) for each criteria pollutant (NOx, SOX, CO, PM, VOC) and hazardous air pollutant (HAP) for the period January 2019-May 2022. For pollutants where CEMS are used to monitor emissions see Question 2.
2. Provide CEMS data for each pollutant in the units of the appropriate emission limit for each combustion unit. Provide CEMS data for From January 2019 through May 2022. Also, identify any periods of CEMS downtime other than RATA testing or daily calibrations.
3. Provide copies of annual emission statements/certifications sent to PADEP for the years 2019-2021.
4. Provide a list of each combustion unit that is currently onsite. For each unit provide:
    a. Make and model;
    b. Capacity (MMBtu/hr, kW/hr, lb/hr, etc.);
    c. Date of construction;
    d. Date unit commenced operation.
5. Monthly hours of operation for each combustion unit from January 2019-May 2022.
6. Type and quantity (gallons, tons, etc.) of each fuel combusted in each combustion unit monthly from January 2019-May 2022.
7. List the date of each air permit application submitted to PADEP and the type of permit application submitted (i.e., plan approval, Title V, New Source Review, etc.) since January 2017.
8. Provide a list of each air permit issued to Stronghold Mining or the Srubgrass Station by PADEP since January 2017.
9. Provide a hardcopy for review during the inspection of each performance test conducted at the Scrubgrass Station for any pollutant since January 2017. This includes tests which were started but not completed, tests conducted to determine an emission rate or control efficiency, tests conducted to determine compliance with any emission rate or limit.
10. Provide records of fluidized bed temperature monitoring for January 2021-May 2022.
11. Provide hardcopies for review during the inspection:
    a. Records of visual/opacity monitoring of any sources at the facility;
    b. Records of pressure differential monitoring at any sources at the facility;
    c. Records of fuel sampling analyses conducted;
    d. Maintenance performed on the diesel fire pump, auxiliary boiler, and two CFB boilers (i.e., oil changes, tune-ups, etc.)
12. Provide copies of any Initial Notifications, Notifications of Compliance Status, or Periodic Reports (semiannual or annual since 2019) that were sent to either PADEP or EPA for the following regulations:
    a. 40 C.F.R. Part 60, Subpart Da;
    b. 40 C.F.R. Part Subpart Dc;
    c. 40 C.F.R. Part 63, Subpart ZZZZ

d. 40 C.F.R. Part 63, Subpart UUUUU.
e. 40 C.F.R. Part 75 – Acid Rain Program
f. 40 C.F.R. Part 97 – CASPR