



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 Panther Creek Generating Plant
Inspection Date(s): June 8, 2022
Regulatory Program(s): SIP, Title V, NESHAP, NSPS
Company Name: Stronghold Digital Mining
Facility Name: Panther Creek Generating Plant
Facility Location: 4 Dennison Road
Nesquehoning, PA 18240
Latitude: 40.855556 **Longitude:** -75.877222
County/Parish: Carbon
AFS Number: PA000475620
Permit Number: 13-00003
NAICS Code: 221112 **SIC:** 4911
Unique Project #: 3EA22CA081A

Facility Representatives:	Point of Contact
Cliff Heistand, EHS Manager	☒
Phone: 610-741-3883 Contact: cheistand@panthercreekenergy.com	
Matt Cochran, Asset Manager	☐
Phone: 862-222-6525 Contact: matt.cochran@strongholddigitalmining.com	
Craig Lutz, Senator Argall's Office	☐
Phone: 454-332-3393 Contact: clutz@pasen.gov	

EPA Inspectors:
Bruce Augustine, Environmental Scientist, 3ED21
Phone: 215-814-2131 Contact: augustine.bruce@epa.gov

State/Local Inspectors:
Robert Mullin, Air Quality Specialist, PADEP NERO
Phone: 610-861-2152 Contact: rmullin@pa.gov

EPA Lead Inspector

Signature

Bruce Augustine

Date

Four Penn Center – 1600 John F Kennedy Blvd
(3ED21)
Philadelphia, PA 19103-2852

Supervisor

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 Panther Creek Generating Plant (Panther Creek 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 Cliff Heistand, 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 4 Dennison Road, Nesquehoning, PA 18240. The Facility was constructed and commenced operation in approximately 1992 and 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 Olympus Power in October 2021. Olympus Power remains a separate entity and is not affiliated with SDM, however, Olympus is contracted to operate the power generation portion of the site.

The Facility was constructed to generate electricity by reclaiming and combusting waste coal piles in the surrounding area. Panther Creek's operation has been driven by the cost of energy on the PJM grid. The Facility capacity factor is affected by energy costs and fuel costs, including natural gas. Panther Creek also receives a payment just for being available to operate and produce power for the grid. The capacity factor for the site had been lower in recent years but has increased since the acquisition by SDM. Due to power prices, the site has gone periods of time without operating but always maintained an operating permit from PADEP. SDM began operating the bitcoin mining data center in January 2022. Panther Creek has 34 full time employees and 16 additional employees that work in the data center portion of the Facility.

The Facility received the most recent Title V permit (13-00003) from PADEP issued on November 27, 2018.

Panther Creek is classified as major source for NO_x, 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 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 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 NO_x & SO_x Trading Program.

B. Inspection Opening Conference

At 8:35AM on June 8, 2022, EPA arrived at the Facility for a CAA Inspection and conducted an opening conference. Panther Creek was represented by Cliff Heistand, EHS Manager and Matt Cochran, Asset Manager. Craig Lutz, a representative from PA Senator Argall's office was present briefly for the opening conference. Also, PADEP inspector Robert Mullin was 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 Panther Creek's permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Panther Creek 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. The Facility was originally designed to operate as a cogen facility but was never operated in that manner. The site operates two fluidized bed boilers to combust waste coal and produce steam, which is sent to a turbine to make electricity. The boilers are identical and were constructed at the same time. They can produce 80 megawatts (MW) of power to the grid. Fluidized bed boilers are able to combust lower grade fuels, such as waste coal, and operate with a fluid bed of ash below the point of fuel injection. Air is also added to the boiler to aid in the combustion of the fuel.

The boilers combust anthracite waste coal that has been reclaimed from sites within 100 miles of the Facility. This type of anthracite coal, or culm, has a lower heating value than typical coal, only 4500-7000 Btu. Therefore, Panther Creek supplements the coal by also combusting tire derived fuel (TDF). The TDF is blended with the coal in a hopper prior to being introduced into the boiler. TDF usually makes up less than 5% of the fuel sent to the boilers. Coal is brought to the facility via trucks (approximately 85 trucks/day) and 1500 ton/day of coal/TDF are combusted in the units daily. Once it arrives at the site, coal is placed into a pile before being moved to intermediate storage and crushing. The coal and TDF are not dried prior to being fired in the boilers and typical water content is 15%. Bottom ash from the boilers is collected and stored in a silo before being trucked offsite. The ash can be used in other applications and is not typically landfilled.

Panther Creek also receives fine dry limestone that is injected in the boiler along with the coal/TDF mixture to reduce SO₂ emissions. The limestone is not pulverized or dried mechanically at this site before being added to the boilers. The Facility also injects anhydrous ammonia at the inlets to the boiler cyclones for NO_x emission control. Finally, the flue gas from each boiler is routed to a baghouse to reduce particulate matter (PM) emissions.

The bitcoin mining data center was constructed in early 2022 and consists of 15,000 computers used to calculate an algorithm to generate (“mine”) bitcoin. Bitcoin can be used as currency in certain transactions. The data center is still under construction; however, it is online and operating. The data center portion of the Facility operates using power generated by the boilers and turbine. As currently configured, the data center can receive 56MW of power to operate the computers. Panther Creek has the ability to switch power generated between the data center and sending it to the grid. Where the power is sent depends on the price of power and the demand.

Panther Creek operates a fire pump rated at 2.1MMbtu/hr for fire control. The fire pump operates using diesel fuel and is only operated for routine testing or in emergency situations. The Facility also operates a Caterpillar (Model 3406) generator. The generator combusts diesel fuel and, according to facility representatives, only operates in emergency situations. The generator is rated at 365kW. The generator does not appear to be listed as a source in the facility’s Title V permit.

The opening conference concluded at 10:47AM

III. Observations

EPA was led on a walkthrough of the Facility at 10:54AM by Cliff Heistand of Panther Creek and PADEP inspector Robert Mullin was also present for the walkthrough. EPA noted photos would be taken during the Facility walkthrough (Attachment 2). Weather during the walkthrough was clear with temperatures around 80°F. Mr. Heistand indicated during the opening conference that the Facility was not operating because a power line that takes power from the Facility had been damaged the night before during a storm. Neither of the boilers were operating during the inspection.

The first area observed was a coal storage pile located outside. Coal that is delivered via truck is either deposited here or moved here using loaders. Coal blending can be achieved by depositing different deliveries in different piles. The inspection team then observed small TDF pile. Mr. Heistand indicated that TDF is acquired from several vendors and consists of shredded tires. Coal from the coal pile is transferred via conveyor to a crusher and screener that is located inside a structure. The crusher reduces the size of large pieces of coal that might be present and the screener removes them. Large pieces of coal can damage parts further in the process. From a distance, the ash silo, combined boiler stack, and clarifier were observed. No emissions were observed at the stack.

The inspection team proceeded into the boiler building where the primary and secondary air fans were observed. These provide combustion air to the boilers. The ammonia injection ports at the entry to the cyclones were also observed. Ammonia is injected at this point in the process because the temperature is favorable for the reaction to take place between the ammonia and flue gas to reduce NOx. EPA and PADEP observed fugitive dust being emitted from a point on a bucket elevator to the ash silo. Mr. Heistand indicated that the Facility would take corrective

action and he placed a call to the maintenance group. Panther Creek utilizes two dust collectors to control PM emissions from the limestone bins. The limestone bins provide fine limestone to the boilers for SO₂ control. One of the dust collectors was operating during the inspection and both are equipped with magnehelic gauges to monitor pressure drop. The operating dust collector had a pressure drop of 3.5"WC. Mr. Heistand was unsure if the dust collectors are monitored on a daily basis. EPA observed the injection point in the boiler for the lime and coal injection. They are injected very close to each other in the boiler above the fluidized bed.

The top of the baghouse for Boiler 2 was inspected. The boiler and baghouse were not operating at the time of the inspection. The baghouse is comprised of ten compartments each containing several hundred bags to control PM emissions to the atmosphere. Each of the boiler baghouses vent to a commons tack for both boilers. Each compartment of the baghouse is equipped with a magnehelic gauge to monitor pressure drop. After exiting the baghouse building, the inspection team observed the turbine and the boiler nameplates. The nameplates indicate the boilers were constructed by Pyropower in 1991. The inspection team then entered the boiler control room. The operator overview screens for both boilers were observed. The combustion chamber for Boilers 1 & 2 was <550°F and coal/TDF were not being introduced into the boiler. Also, the turbine was not operating and no MW were being produced. The opacity in the common boiler stack was 2.0%. Both Boiler 1 & Boiler 2 are equipped with continuous emission monitoring systems (CEMS) to continuously monitor the emissions of NO_x and SO₂ to the atmosphere. The CEMS are located in the flue gas after the injection of limestone and ammonia but prior to the flue gases from each boiler combining.

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

TABLE 1				
	Boiler 1		Boiler 2	
	Observed	Permit Limit	Observed	Permit Limit
SO₂ 24 hr avg. (lb/MMBtu)	0.023	0.156	0.000	0.156
SO₂ 24 hr avg (lb/hr)	18.8	75.4	14.3	75.4
NO_x 1 hr avg (lb/MMBtu)	0.000	0.15	0.000	0.15
NO_x 1 hr avg (lb/hr)	4.8	72.5	1.3	72.5

Several photographs were taken of the screens in the control room and are included in Attachment 1. Panther Creek is also subject under the Title V permit to mercury and PM limits. However, these parameters are not measured using CEMS and are tested periodically via stack test to determine compliance.

After exiting the boiler control room, the inspection team proceeded to the data center. The data center is located a short distance away from the power generating portion of the Facility but is still within the property boundary. The data center is comprised of multiple storage containers that have been converted to hold hundreds of computers. The containers are arranged in multiple pads that were constructed in various stages. The containers are also equipped with fans to cool the computers and prevent overheating. The data center operation, although connected to the power generating side of the Facility, is operated separately. Due to the fact that the plant was not producing any electricity during the inspection, the data center was not operating. No other combustion or emission sources were observed at the data center.

Finally, the inspection team observed the Caterpillar generator and the fire pump. Neither source was operating during the inspection. The fire pump hour meter was observed at 456 hours.

The walkthrough concluded at 1:25PM.

IV. Records Review

The records review commenced after a short break at 1:58PM. 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 Cliff Heistand (see Attachment 1). The request that was attached is included as Attachment 3. Some records were provided at the time of the inspection by Mr. Heistand while other records were provided prior to and after the inspection 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 monthly emissions calculations for criteria pollutants and HAP for 2019-May 2022. Panther Creek provided a spreadsheet with monthly and rolling 12 month emissions for NO_x, SO₂, CO and VOC. This spreadsheet also included monthly fuel totals for coal, TDF, and diesel fuel oil. EPA is currently reviewing the data submitted.
2. EPA requested CEMS data for each pollutant from January 2019-May 2022. Mr. Heistand provided CEMS data for NO_x 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. Heistand provided copies of the AIMS reports submitted to PADEP for 2019-2021.
4. EPA requested information specific to the combustion units onsite. Conversations with Panther Creek representatives during the inspection and observations made of the combustion units onsite resolved this request.
5. EPA requested the hours of operation (monthly) for each combustion unit from January 2019-May 2022. After the inspection, Mr. Heistand provided quarterly CEMS reports that are submitted to PADEP. The hours are included in these reports on a daily basis.

The hours of operation for the fire pump and emergency generator have not been provided.

6. EPA requested the amount of each fuel combusted on a monthly basis. Mr. Heistand provided an emission spreadsheet in response to request 1 that included the monthly fuel combusted in Boilers 1 & 2. However, the fuel oil combusted in the fire pump and emergency generator have not been provided.
7. EPA requested the date of each air permit application submitted to PADEP since January 2017. Mr. Heistand indicated that other than the Title V permit he was unaware of any permit application to PADEP within that timeframe. However, he did indicate that Panther Creek has submitted an application to PADEP for Plantwide Applicable Limit (PAL) permit that would cover the entire facility and allow the site to make operational changes that could change emissions. He stated that this permit is in draft form and has not yet been issued by the PADEP. He offered to provide a copy of the application that was submitted to PADEP. This application has not yet been provided to EPA.
8. EPA requested a copy of each permit issued to SDM or the Facility since January 2017. Pursuant to Panther Creek's response to the previous request, Mr. Heistand agreed to provide a copy of the draft PAL permit from PADEP. This draft permit has not yet been submitted to EPA.
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. During the inspection this request was revised so that Panther Creek would provide a list of each test conducted, the date of the test, and the pollutant(s) being tested. This list has not yet been submitted to EPA for review.
10. EPA requested fluidized bed temperatures for Boilers 1 & 2 from January 2021-May 2022. Mr. Heistand agreed to provide copies of the fluidized bed temperature monitoring, however, as of the date of this report those records have not been provided.
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. Mr. Heistand indicated that Panther Creek does not maintain the records required for the sources in Group 02 of the Title V permit and can't produce the records for review. Furthermore, he stated that the boilers are not on a set maintenance/shutdown schedule and that the Facility operates until an outage is necessary. He also indicated that Panther Creek does not maintain records of oil changes and tune-ups for either the fire pump or the emergency generator. Panther Creek did provide copies of fuel sampling analysis for April 4, 2022, and the weekly fuel sample composite for 3/28/22-4/7/22. These analyses provide the heating value, ash content, moisture and sulfur content of the fuel samples.

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. Panther Creek has yet to provide any of these records to EPA.

This completed the record review.

V. Closing Conference

After the records review, EPA and Panther Creek 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 3:07PM.

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].

- Panther Creek is required to keep records of daily pressure drop across several magnehelic gauges (baghouse compartments, limestone bins, etc.). During the inspection, Mr. Heistand indicated that Panther Creek does maintain these records as required in the requirements for Group 02 sources in the Title V permit (Page 88).
- MACT ZZZZ requires sources that are subject to this regulation and operate as an emergency source to maintain the hours of operation to verify that the source has not exceeded the annual allowable hours to maintain emergency status. Furthermore, MACT ZZZZ requires periodic tune-ups and oil changes to maintain the equipment. Prior to the inspection, EPA requested copies of these records and is awaiting for Panther Creek to provide records indicating that maintenance required is being completed.
- A review of the emission data (CEMS and calculations) is underway to determine if Panther Creek is in compliance with the various long and short term NO_x and SO₂ limits in the Title V permit. The two waste coal fired boilers both have multiple NO_x and SO₂ limits based on state and federal regulations.
- It is not clear from the inspection why the two boilers at Panther Creek are not subject to the Acid Rain Program requirements at 40 C.F.R. Part 75, Subparts A-H and the regulations at 40 C.F.R. Part 97, Subparts AAAAA, CCCCC, EEEEE: CSAPR NO_x & SO_x Trading Program. Panther Creek should provide an explanation as to why these sources are not subject to these regulations.
- It is not clear from the inspection that Panther Creek 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. Panther Creek has not provided these records.
 - Panther Creek has applied for a PAL permit from PADEP that would allow the Facility to make operational changes that may increase emissions of criteria pollutants

above significant thresholds. This permit is in draft form and EPA has requested a copy of the draft permit for review.

VI. List of Attachments

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

Attachment 1

From: [Augustine, Bruce](#)
To: cheistand@panthercreekenergy.com
Cc: rmullin@pa.gov
Subject: EPA Inspection of Panther Creek Station
Date: Thursday, June 02, 2022 4:40:00 PM
Attachments: [EPA Record Request Panther Creekv2.docx](#)

Cliff,

Per our conversation this afternoon, EPA is planning to conduct an onsite inspection of the Panther Creek Station on Wednesday June 8, 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 one inspector 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 Panther Creek 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

Attachment 2 – Panther Creek Generating Plant Inspection Photos June 8, 2022



1. Waste Coal Pile – Panther Creek Generating – 6/8/22



2. Tire Derived Fuel Pile – Panther Creek Generating – 6/8/22



3. Conveyor from Coal Pile to Crusher Building – Panther Creek Generating – 6/8/22



4. Plant and Combined Boiler Stack – Panther Creek Generating – 6/8/22



5. Ammonia Tank for Injection into Boilers for NOx Control – Panther Creek Generating – 6/8/22



6. Overview of Data Center from Plant – Panther Creek Generating – 6/8/22



7. Ammonia Injection Ports – Panther Creek Generating – 6/8/22



8. Fugitive Emission Point from Bucket Elevator – Panther Creek Generating – 6/8/22



9. Two Limestone Pulverizer Dust Collectors – Panther Creek Generating – 6/8/22



10. Coal And Limestone Injection Boiler 2 – Panther Creek Generating – 6/8/22



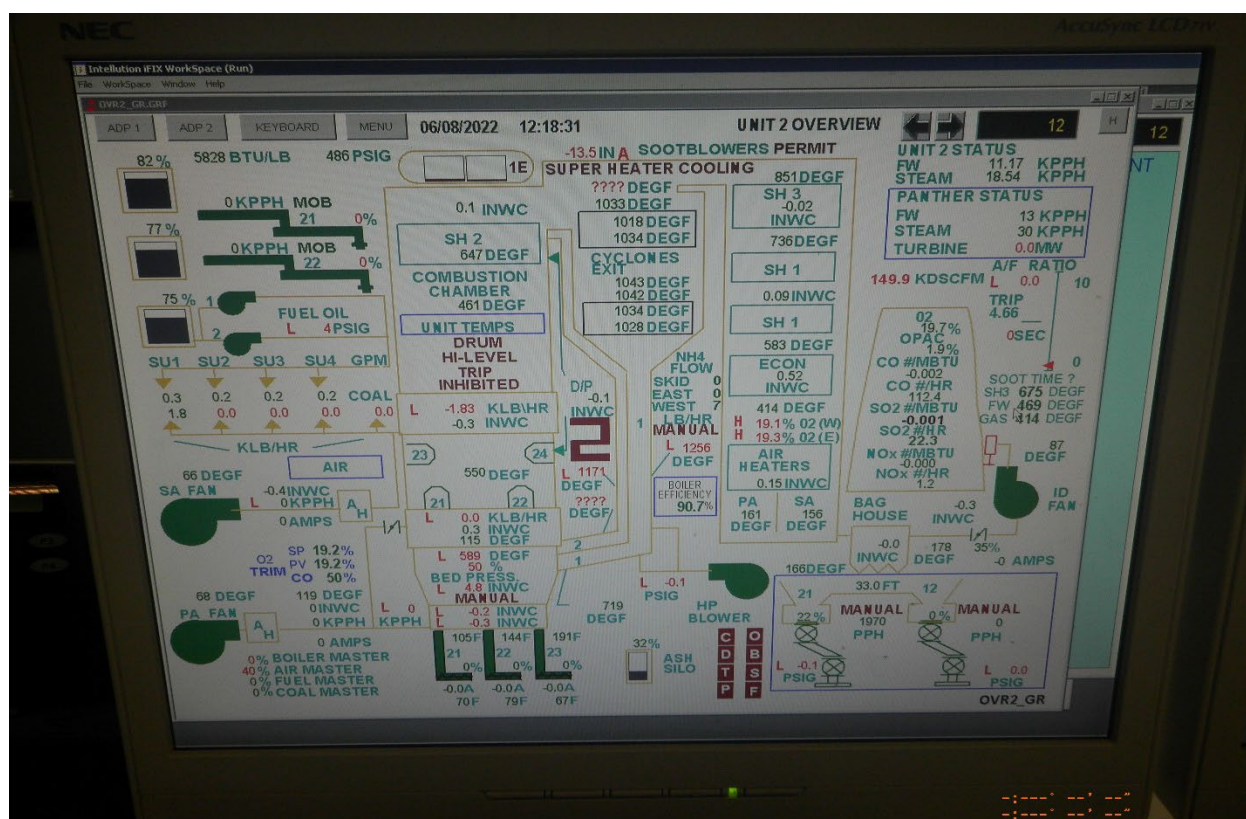
11. Top of Boiler 2 Baghouse (not operating) – Panther Creek Generating – 6/8/22



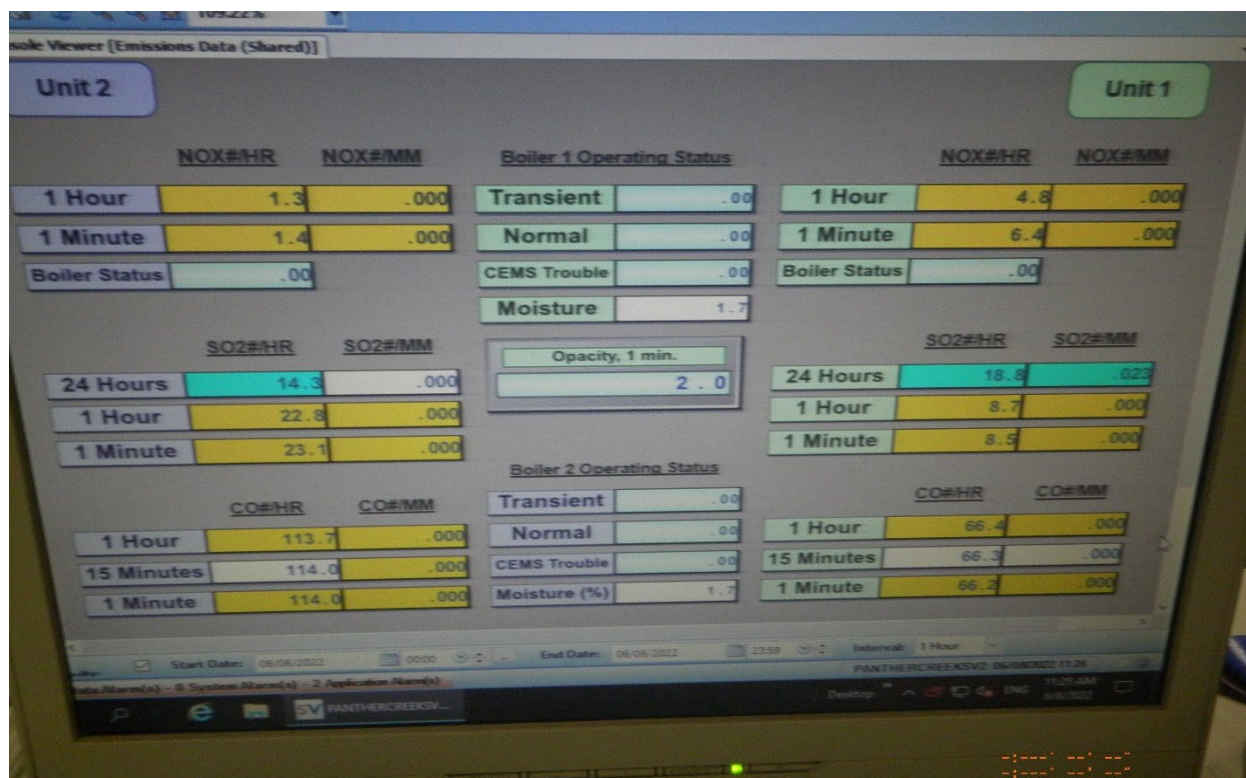
12. Boiler 1 and Boiler 2 Nameplates – Panther Creek Generating – 6/8/22



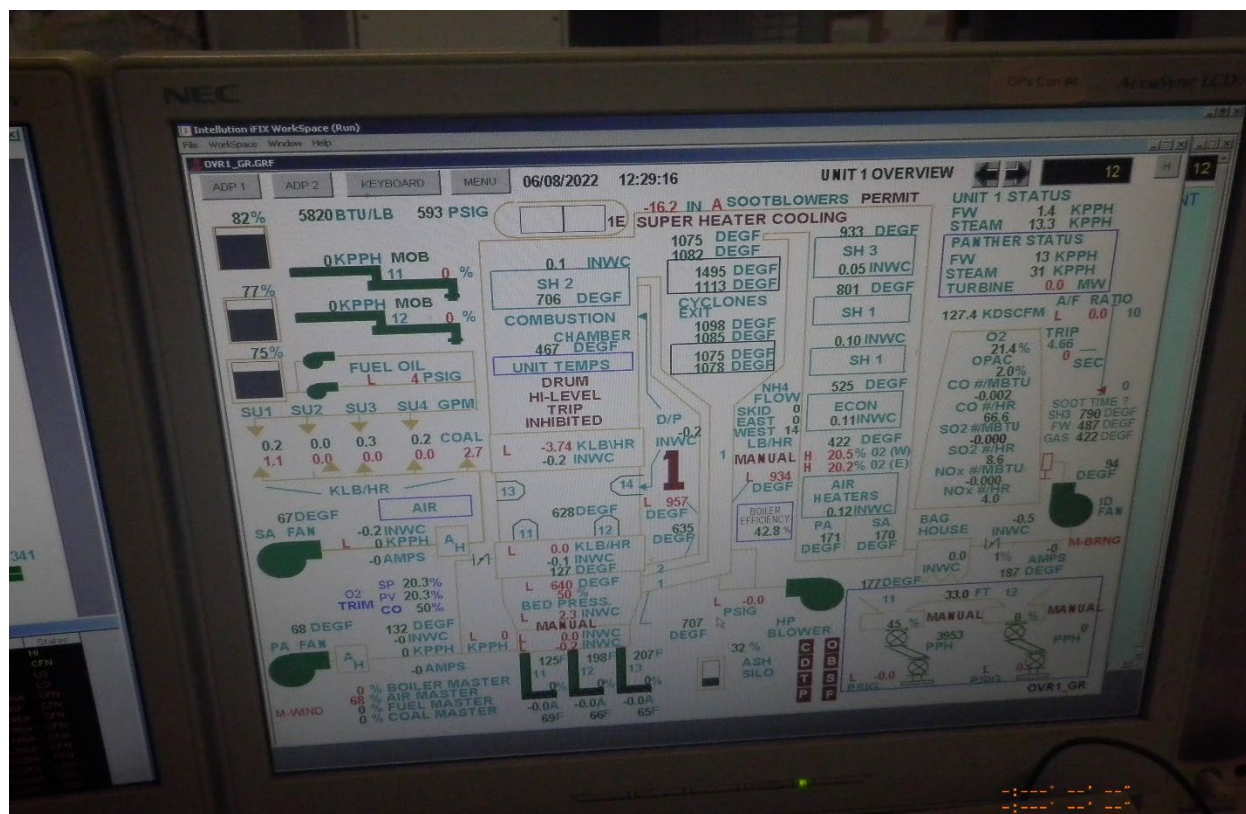
13. Steam Turbine – Panther Creek Generating – 6/8/22



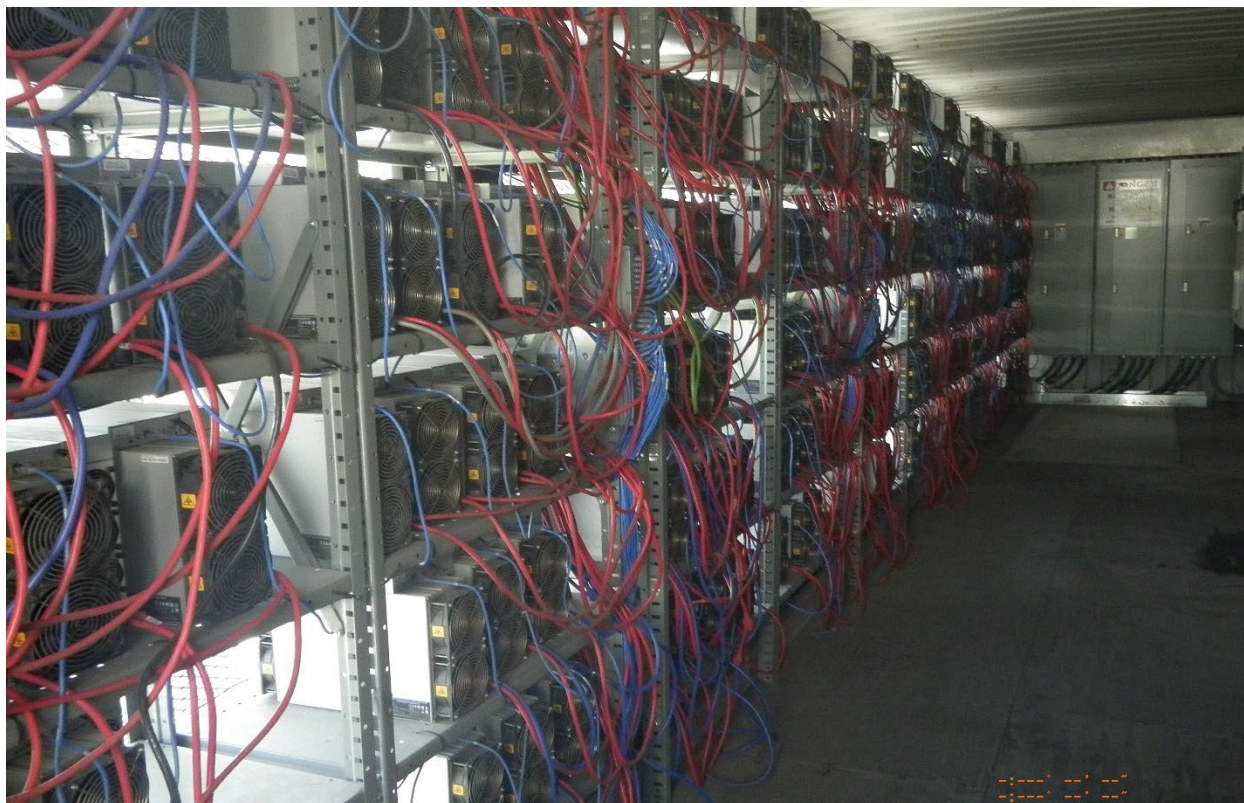
14. Boiler 2 Control Room Overview – Panther Creek Generating – 6/8/22



15. Boiler 2 CEMS Control Room Overview – Panther Creek Generating – 6/8/22



16. Boiler 1 Control Room Overview – Panther Creek Generating – 6/8/22



17. Computer Bank Inside Storage Container at Data Center – Panther Creek Generating – 6/8/22



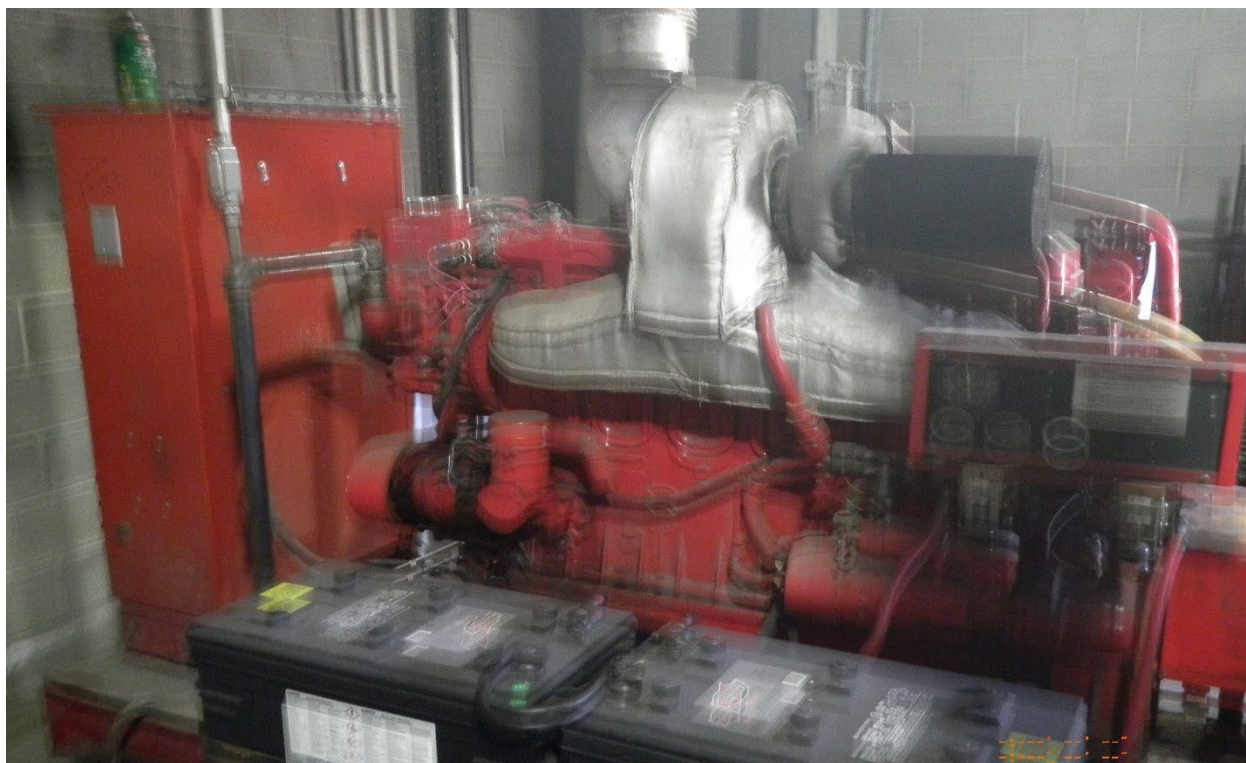
18. Outside View of Storage Container at Data Center – Panther Creek Generating – 6/8/22



19. Caterpillar Emergency Generator Nameplate – Panther Creek Generating – 6/8/22



20. Outside View of Caterpillar Emergency Generator and Fuel Tank – PantherCreek Generating – 6/7/22



21. Diesel Fire Pump –Panther Creek Generating – 6/8/22



22. Fugitive Emissions from Building Adjacent to Baghouse – Panther Creek Generating – 6/8/22

Attachment 3

Records Requested by EPA

Panther Creek 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 (NO_x, SO_x, 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 Panther Creek Station by PADEP since January 2017.
9. Provide a hardcopy for review during the inspection of each performance test conducted at the Panther Creek 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 monitoring of source s in Group 2 of the Title V permit;
 - b. Records of pressure differential monitoring at sources in Group 2 of the Title V permit;
 - c. Records of fuel sampling analyses conducted;
 - d. Maintenance performed on the diesel fire pump and two 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 63, Subpart ZZZZ
 - c. 40 C.F.R. Part 63, Subpart UUUUU.