SECCRA Community Landfill

RFP for Landfill Gas Beneficial Use Facility

SECCRA Community Landfill
219 Street Rd
West Grove, PA 19390
ADDENDUM No. 2
January 16, 2023

A. **Addendum No. 2** is issued as part of the RFP Document, to inform and/or specify changes, which take precedence over information contained in the original RFP Documents. Unless otherwise specifically noted or specified hereinafter, or shown on drawings or schedules accompanying this Addendum, all work required by this Addendum shall conform to the applicable provisions of the RFP Documents. **It shall be the responsibility of the Respondent to include in their proposal any implications of this Addendum. All Respondents are to indicate on the form of proposal submitted by them, acknowledgement of receipt and compliance with the contents of this Addendum No. 2.**

B. Any provision in any of the RFP Documents, which may be in conflict or be inconsistent with the contents of this Addendum, shall be void to the extent of such conflict or inconsistency.

C. The following clarifications/answers are provided in response to questions provided by potential proposers. Similar questions from different proposers are grouped together:

C.1. Can you provide an estimate of MSW? **A breakdown of waste received from 2022 is attached to this addendum.**

C.2. Can you provide information on LFG quality? **We have attached recent LFG testing, but make no guarantee of actual LFG quality, data is for information purpose only.**

C.3. How often is the wellfield tuned. **Typically, once per month.**

C.4. Can you provide a contact at PECO - Electric? **No.**

C.5. Can you provide a contact at PECO - Gas? **No.**

C.6. Can you provide gas specs for PECO connection? **No, that is a question for PECO, not SECCRA.**

C.7. How will your firm keep the process open and transparent for all of the responding firms? **A list of the firms that responded by 2 pm, February 3rd , 2023, will be published. Once a Short list of firms is picked, that will also be published.**

C.8. Is this considered an MUA public project? **We don't know what "MUA" would be.**

C.9. Can you provide a LandGem report? **No, that is the responsibility of the proposer.**

C.10. Advise the type / kind of internet connections and available status at this site for developer to connect. Developer of this RFP to use existing on site internet connection and hi speed WIFI as a part of the dollar per year lease? What is the current service?

SECCRA will not be providing internet service, the proposer will need to provide their own service.

C.11. Confirming that SECCRA provide a gravel bed or concrete slab insitu for our skid set equipment on the one acre? What is the expected spec for the grounds prep? Parking lot? Land grading services are by SECCRA onsite? Any others required or allowed? As stated in the preproposal meeting, **SECCRA will provide NOTHING, but a flange connection and land. As stated in the RFP, it is up to the proposer to do all work and all costs associated with project development.**

C.12. **SECCRA currently sells it's electricity to the wholesale market using LMP pricing, the prices varies.**

C.13. Uptime % of power gen? **Varies due to parts availability.**

C.14. Uptime % of Flare? **As needed, when generators are offline.**

C.15. Net uptime of GCCS? **Near 100%**

C.16. Downtime % & event list for case by case basis? **SECCRA will not be providing.**

C.17. Downtime totals and average time to get the GCCS back online? **Depends on what caused the outage.**

C.18. What are the benefits to the landfill from the power being generated on site? **On site energy use, sale of energy and environmental attributes.**

C.19. How many KWh are currently being used behind the meter? **Varies, usually no more than 100KWh.**

C.20. How many KWh is currently being exported to PECO? **Up to 2.4 MWh. Varies on uptime of generators.**

C.21. **As stated in the RFP, if you would like LFG flow information, please send an email to roman543@aol.com to request.**

C.22. **If you would like a copy of the maintenance records for the 2 existing generators, please send an email to roman543@aol.com to request.**

C.23. **If you would like a copy of SECCRA's PECO bills (there are 7), please send and email to roman543@aol.com to request.**

C.24. **Attached is SECCRA's Title V permit dated 07/29/2019.**

C.25. **Attached is a Table of waste received and projection of volumes to capacity of current permitted areas.**

C.26. **SECCRA's current PaDEP Solid Waste Permit expires 10/4/2029.**

C.27. **Disposal of wastewater and/or condensate will need to be on a case by case basis.**

C.28. **A drawing of the existing LFGTE plant area is attached.**

END ADDENDUM NO. 2

RpWs.rpt

Material in List: 1, 2, 3, 4, 5, 11, 14, 15

SECCRA

Material Report

Transactions from 01/01/2022 through 12/31/2022
Inbound and Outbound Tickets
Third Party and Intercompany Customers
Recycle and Disposal Material
Material Summary

	Bill Units	YARDS	TONS	Est TONS	Tax
1 - Residential w/Manifest *5,182 tickets and 5,182 transactions*	40,082.27 TN	0.00	40,082.2740	0.0000	$0.00
2 - Commmercial MSW *4,135 tickets and 4,997 transactions*	34,294.78 TN	0.00	34,294.7800	0.0000	$0.00
3 - C&D *8,592 tickets and 8,592 transactions*	30,848.56 TN	0.00	30,848.5600	0.0000	$0.00
4 - Sewage Sludge *227 tickets and 227 transactions*	3,003.33 TN	0.00	3,003.3300	0.0000	$0.00
5 - Residual *576 tickets and 576 transactions*	2,713.21 TN	0.00	2,713.2100	0.0000	$0.00
11 - Demo *44,355 tickets and 44,355 transactions*	16,854.27 TN	0.00	16,854.2700	0.0000	$0.00
14 - Civic Cleanup *131 tickets and 131 transactions*	218.50 TN	0.00	218.5000	0.0000	$0.00
15 - Community Credit *106 tickets and 106 transactions*	399.66 TN	0.00	399.6600	0.0000	$0.00
Report Grand Totals		0.00	128,414.5840	0.0000	$0.00

63,304 tickets and 64,166 transactions

Air TECHNOLOGY
Laboratories, Inc.

July 20, 2022

LA Cert #04140
EPA Methods TO3, TO14A, TO15, 25C/3C, ASTM D1946, RSK-175

TX Cert T104704450-14-6
EPA Methods TO14A, TO15

UT Cert CA0133332015-3
EPA Methods TO3, TO14A, TO15, RSK-175

Southeastern Chester County Refuse Authority
ATTN: Steve Burn
219 Street Road
West Grove, PA 19390

LABORATORY TEST RESULTS

Project Reference: SECCRA LFG Sampling
Project Number: 202206
Lab Number: N070104-01

Enclosed are results for sample(s) received 7/01/22 by Air Technology Laboratories. Samples were received intact. Analyses were performed according to specifications on the chain of custody provided with the sample(s).

Report Narrative:

- Unless otherwise noted in the report, sample analyses were performed within method performance criteria and meet all requirements of the TNI Standards.
- The enclosed results relate only to the sample(s).

Preliminary results were e-mailed to Steve Burn on 7/19/22.

ATL appreciates the opportunity to provide testing services to your company. If you have any questions regarding these results, please call me at (626) 964-4032.

Sincerely,

Mark Johnson
Operations Manager
MJohnson@AirTechLabs.com

Note: The cover letter is an integral part of this analytical report.

CHAIN OF CUSTODY RECORD

AirTECHNOLOGY Laboratories, Inc.
18501 E. Gale Ave., Suite 130
City of Industry, CA 91748
Ph: 626-964-4032
Fx: 626-964-5832

TURNAROUND TIME

Standard	☒	48 hours	☐
Same Day	☐	72 hours	☐
24 hours	☐	96 hours	☐
Other:			

DELIVERABLES

EDD	☒
EDF	☐
Level 3	☐
Level 4	☐

PAGE: 1 **OF** 1

Condition upon receipt:
Sealed Yes ☒ No ☐
Intact Yes ☒ No ☐
Chilled _____ deg C

Project No.:	202206
Project Name:	SECCRA LFG Sampling
Report To:	Steve Burn
Company:	SECCRA
Street:	219 Street Road
City/State/Zip:	West Grove, PA 19390
Phone& Fax:	610-869-2452
e-mail:	steve@seccra.org

BILLING

P.O. No.:
Bill to: Paid by CC

ANALYSIS REQUEST

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE DATE	SAMPLE TIME	CONTAINER QTY/TYPE	MATRIX	PRESERVATION	EPA TO15	Nitrogen, oxygen, methane EPA 3	~~H2S EPA15/16~~ cancelled 7/15/22	Siloxanes		
N070104-01	SECCRA LFG 2022-06	6/24/22	1345	1 Can	LFG	N	X	X	X	X		

Form-24 Rev. 1 — QA Manager 2/22/10

AUTHORIZATION TO PERFORM WORK	COMPANY SECCRA	DATE/TIME 6/24/22 1345	
SAMPLED BY Steve Burn	COMPANY SECCRA	DATE/TIME 6/24/22 1345	
RELINQUISHED BY Steve Burn	DATE/TIME	RECEIVED BY	DATE/TIME
RELINQUISHED BY FedEx	DATE/TIME 7/1/22	RECEIVED BY	DATE/TIME 7/1/22 1330
RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME

METHOD OF TRANSPORT (circle one): Walk-In FedEx UPS Courier ATLI Other_____

COMMENTS

- Sample exp'd day of receipt, analysis cancelled for 15/16 per S. Burn via email. GD 7/15/22

DISTRIBUTION: White & Yellow - Lab Copies / Pink - Customer Copy

Preservation: **H**=HCl **N**=None / Container: **B**=Bag **C**=Can **V**=VOA **O**=Other

Rev. 03 - 5/7/09

Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: 202206
Date Received: 7/1/2022
Matrix: Air

Fixed Gases by EPA METHOD 3C

Lab No.:	N070104-01							
Client Sample I.D.:	SECCRA LFG 2022-06							
Date/Time Sampled:	6/24/22 13:45							
Date/Time Analyzed:	7/6/22 11:13							
QC Batch No.:	220706GC8A1							
Analyst Initials:	RC/AS							
Dilution Factor:	1.9							
ANALYTE (Units)	Result	RL						
Nitrogen (% v/v)	9.8	1.9						
Oxygen/Argon (% v/v)	ND	0.93						
Methane (% v/v)	56	0.0019						

RL = Reporting Limit
ND = Not detected at or above the RL.

Reviewed/Approved By: _____ Date 7/14/22
Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: 202206
Date Received: 07/01/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N070104-01
Client Sample I.D.:	SECCRA LFG 2022-06
Date/Time Sampled:	6/24/22 13:45
Date/Time Analyzed:	7/13/22 11:51
QC Batch No.:	220713MS2A1
Analyst Initials:	VM
Dilution Factor:	27

ANALYTE	Result ppbv	RL ppbv
Dichlorodifluoromethane (12)	88	27
Chloromethane	ND	53
1,2-Cl-1,1,2,2-F ethane (114)	ND	27
Vinyl Chloride	870	27
Bromomethane	ND	27
Chloroethane	110	53
Trichlorofluoromethane (11)	60	27
1,1-Dichloroethene	ND	27
Carbon Disulfide	120	53
1,1,2-Cl 1,2,2-F ethane (113)	ND	27
Acetone	3,100	53
Methylene Chloride	56	27
t-1,2-Dichloroethene	79	27
1,1-Dichloroethane	36	27
Vinyl Acetate	ND	27
c-1,2-Dichloroethene	460	27
2-Butanone	3,500	27
t-Butyl Methyl Ether (MTBE)	45	27
Chloroform	ND	27
1,1,1-Trichloroethane	ND	27
Carbon Tetrachloride	ND	27
Benzene	500	27
1,2-Dichloroethane	140	27
Trichloroethene	100	27
1,2-Dichloropropane	ND	27
Bromodichloromethane	ND	27
c-1,3-Dichloropropene	ND	27
4-Methyl-2-Pentanone	ND	27
Toluene	5,800	27

18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: 202206
Date Received: 07/01/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N070104-01
Client Sample I.D.:	SECCRA LFG 2022-06
Date/Time Sampled:	6/24/22 13:45
Date/Time Analyzed:	7/13/22 11:51
QC Batch No.:	220713MS2A1
Analyst Initials:	VM
Dilution Factor:	27

ANALYTE	Result ppbv	RL ppbv
t-1,3-Dichloropropene	ND	53
1,1,2-Trichloroethane	ND	27
Tetrachloroethene	280	27
2-Hexanone	ND	27
Dibromochloromethane	ND	27
1,2-Dibromoethane	ND	27
Chlorobenzene	61	27
Ethylbenzene	2,600	27
p,&m-Xylene	4,200	27
o-Xylene	1,300	27
Styrene	250	27
Bromoform	ND	27
1,1,2,2-Tetrachloroethane	ND	27
Benzyl Chloride	ND	66
4-Ethyl Toluene	580	27
1,3,5-Trimethylbenzene	240	27
1,2,4-Trimethylbenzene	490	27
1,3-Dichlorobenzene	ND	27
1,4-Dichlorobenzene	56	27
1,2-Dichlorobenzene	ND	27
1,2,4-Trichlorobenzene	ND	27
Hexachlorobutadiene	ND	27

ND = Not Detected (below RL)
RL = Reporting Limit

Reviewed/Approved By: _____ Date 7/18/22
Mark Johnson
Operations Manager

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Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: 202206
Date Received: 07/01/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	Method_Blank
Client Sample I.D.:	-
Date/Time Sampled:	-
Date/Time Analyzed:	7/13/22 11:01
QC Batch No.:	220713MS2A1
Analyst Initials:	VM
Dilution Factor:	0.20

ANALYTE	Result ppbv	RL ppbv
Dichlorodifluoromethane (12)	ND	0.20
Chloromethane	ND	0.40
1,2-Cl-1,1,2,2-F ethane (114)	ND	0.20
Vinyl Chloride	ND	0.20
Bromomethane	ND	0.20
Chloroethane	ND	0.40
Trichlorofluoromethane (11)	ND	0.20
1,1-Dichloroethene	ND	0.20
Carbon Disulfide	ND	0.40
1,1,2-Cl 1,2,2-F ethane (113)	ND	0.20
Acetone	ND	0.40
Methylene Chloride	ND	0.20
t-1,2-Dichloroethene	ND	0.20
1,1-Dichloroethane	ND	0.20
Vinyl Acetate	ND	0.20
c-1,2-Dichloroethene	ND	0.20
2-Butanone	ND	0.20
t-Butyl Methyl Ether (MTBE)	ND	0.20
Chloroform	ND	0.20
1,1,1-Trichloroethane	ND	0.20
Carbon Tetrachloride	ND	0.20
Benzene	ND	0.20
1,2-Dichloroethane	ND	0.20
Trichloroethene	ND	0.20
1,2-Dichloropropane	ND	0.20
Bromodichloromethane	ND	0.20
c-1,3-Dichloropropene	ND	0.20
4-Methyl-2-Pentanone	ND	0.20
Toluene	ND	0.20

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Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: 202206
Date Received: 07/01/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	Method_Blank
Client Sample I.D.:	-
Date/Time Sampled:	-
Date/Time Analyzed:	7/13/22 11:01
QC Batch No.:	220713MS2A1
Analyst Initials:	VM
Dilution Factor:	0.20

ANALYTE	Result ppbv	RL ppbv
t-1,3-Dichloropropene	ND	0.40
1,1,2-Trichloroethane	ND	0.20
Tetrachloroethene	ND	0.20
2-Hexanone	ND	0.20
Dibromochloromethane	ND	0.20
1,2-Dibromoethane	ND	0.20
Chlorobenzene	ND	0.20
Ethylbenzene	ND	0.20
p,&m-Xylene	ND	0.20
o-Xylene	ND	0.20
Styrene	ND	0.20
Bromoform	ND	0.20
1,1,2,2-Tetrachloroethane	ND	0.20
Benzyl Chloride	ND	0.50
4-Ethyl Toluene	ND	0.20
1,3,5-Trimethylbenzene	ND	0.20
1,2,4-Trimethylbenzene	ND	0.20
1,3-Dichlorobenzene	ND	0.20
1,4-Dichlorobenzene	ND	0.20
1,2-Dichlorobenzene	ND	0.20
1,2,4-Trichlorobenzene	ND	0.20
Hexachlorobutadiene	ND	0.20

ND = Not Detected (below RL)
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Reviewed/Approved By: _____ Date 7/18/22
Mark Johnson
Operations Manager

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Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: 202206
Date Received: 07/01/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N070104-01							
Client Sample I.D.:	SECCRA LFG 2022-06							
Date/Time Sampled:	6/24/22 13:45							
Date/Time Analyzed:	7/13/22 11:51							
QC Batch No.:	220713MS2A1							
Analyst Initials:	VM							
Dilution Factor:	27							
ANALYTE	Result ppbv	RL ppbv						
Hexamethyldisiloxane (L2, MM)	170	130						
Hexamethylcyclotrisiloxane (D3)	ND	130						
Octamethyltrisiloxane (L3, MDM)	ND	130						
Octamethylcyclotetrasiloxane (D4)	1,400	130						
Decamethyltetrasiloxane (L4, MD2M)	ND	130						
Decamethylcyclopentasiloxane (D5)	680	130						
Dodecamethylpentasiloxane (L5, MD3M)	ND	130						

ND = Not Detected (below RL)
RL = Reporting Limit

Reviewed/Approved By: _____ Date 7/18/22
Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: 202206
Date Received: 07/01/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	Method_Blank							
Client Sample I.D.:	-							
Date/Time Sampled:	-							
Date/Time Analyzed:	7/13/22 11:01							
QC Batch No.:	220713MS2A1							
Analyst Initials:	VM							
Dilution Factor:	0.20							
ANALYTE	Result ppbv	RL ppbv						
Hexamethyldisiloxane (L2, MM)	ND	1.0						
Hexamethylcyclotrisiloxane (D3)	ND	1.0						
Octamethyltrisiloxane (L3, MDM)	ND	1.0						
Octamethylcyclotetrasiloxane (D4)	ND	1.0						
Decamethyltetrasiloxane (L4, MD2M)	ND	1.0						
Decamethylcyclopentasiloxane (D5)	ND	1.0						
Dodecamethylpentasiloxane (L5, MD3M)	ND	1.0						

ND = Not Detected (below RL)
RL = Reporting Limit

Reviewed/Approved By: _____ **Date** 7/18/22
Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

LCS/LCSD Recovery and RPD Summary Report

QC Batch #: 220713MS2A1

Matrix: Air

Reporting Units: ppbv

EPA Method TO15
LABORATORY CONTROL SAMPLE SUMMARY

Lab No.:	METHOD BLANK			LCS		LCSD					
Date/Time Analyzed:	7/13/22 11:01			7/13/22 9:26		7/13/22 10:06					
Analyst Initials:	VM			VM		VM					
Dilution Factor:	0.20			1.0		1.0					
ANALYTE	**Result ppbv**	**RL ppbv**	**AMT. ppbv**	**Result ppbv**	**% Rec.**	**Result ppbv**	**% Rec.**	**RPD**	**Low %Rec**	**High %Rec**	**Max. RPD**
1,1-Dichloroethene	ND	0.20	10	**8.92**	89.2	**8.77**	87.7	1.7	70	130	30.0
Methylene Chloride	ND	0.20	10	**9.03**	90.3	**8.85**	88.5	2.0	70	130	30.0
Trichloroethene	ND	0.20	10	**8.71**	87.1	**8.38**	83.8	3.8	70	130	30.0
Toluene	ND	0.20	10	**8.59**	85.9	**8.37**	83.7	2.6	70	130	30.0
1,1,2,2-Tetrachloroethane	ND	0.20	10	**7.48**	74.8	**7.38**	73.8	1.3	70	130	30.0

ND = Not Detected (below RL)
RL = Reporting Limit

Reviewed/Approved By: _____ **Date:** 7/18/22

Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

AirTECHNOLOGY Laboratories, Inc.
18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

Air TECHNOLOGY
Laboratories, Inc.

July 27, 2022

Southeastern Chester County Refuse Authority
ATTN: Steve Burn
219 Street Road
West Grove, PA 19390

LA Cert #04140
EPA Methods TO3, TO14A, TO15, 25C/3C, ASTM D1946, RSK-175
TX Cert T104704450-14-6
EPA Methods TO14A, TO15
UT Cert CA0133332015-3
EPA Methods TO3, TO14A, TO15, RSK-175

LABORATORY TEST RESULTS

Project Reference: SECCRA LFG Sampling
Lab Number: N071501-01

Enclosed are results for sample(s) received 7/15/22 by Air Technology Laboratories. Samples were received intact. Analyses were performed according to specifications on the chain of custody provided with the sample(s).

Report Narrative:

- Unless otherwise noted in the report, sample analyses were performed within method performance criteria and meet all requirements of the TNI Standards.
- The enclosed results relate only to the sample(s).

Preliminary results were e-mailed to Steve Burn on 7/26/22.

ATL appreciates the opportunity to provide testing services to your company. If you have any questions regarding these results, please call me at (626) 964-4032.

Sincerely,

Mark Johnson
Operations Manager
MJohnson@AirTechLabs.com

Note: The cover letter is an integral part of this analytical report.

AirTECHNOLOGY Laboratories, Inc.
18501 E. Gale Ave., Suite 130
City of Industry, CA 91748
Ph: 626-964-4032
Fx: 626-964-5832

CHAIN OF CUSTODY RECORD

TURNAROUND TIME				DELIVERABLES		PAGE:	OF
Standard	☐	48 hours	☐	EDD	☐	Condition upon receipt:	
Same Day	☐	72 hours	☐	EDF	☐	Sealed Yes ☐	No ☐
24 hours	☐	96 hours	☐	Level 3	☐	Intact Yes ☐	No ☐
Other:				Level 4	☐	Chilled _____	deg C

Project No.:	202206
Project Name:	SECCRA LFG Sampling
Report To:	Steve Burn
Company:	SECCRA
Street:	219 Street Road
City/State/Zip:	West Grove, PA 19390
Phone& Fax:	610-869-2452
e-mail:	steve@seccra.org

BILLING

P.O. No.:

Bill to:

ANALYSIS REQUEST

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE DATE	SAMPLE TIME	CONTAINER QTY/TYPE	MATRIX	PRESERVATION	H2S EPA15/16					
N071501-01	SECCRA LFG 2022-07	7/13/22	1327	1 Can	LFG	N	X					

Form-24 Rev. 1 — QA Manager 2/22/10

AUTHORIZATION TO PERFORM WORK	COMPANY SECCRA	DATE/TIME	
SAMPLED BY Steve Burn	COMPANY SECCRA	DATE/TIME	
RELINQUISHED BY Steve Burn	DATE/TIME 7/13/22 1327	RECEIVED BY	DATE/TIME
RELINQUISHED BY FEDEX	DATE/TIME 7/15/22	RECEIVED BY	DATE/TIME 7/15/22 0940
RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME

METHOD OF TRANSPORT (circle one): Walk-In FedEx UPS Courier ATLI Other_____

COMMENTS

DISTRIBUTION: White & Yellow - Lab Copies / Pink - Customer Copy

Preservation: **H**=HCl **N**=None / Container: **B**=Bag **C**=Can **V**=VOA **O**=Other

Rev. 03 - 5/7/09

Client: Southeastern Chester County Refuse Authority
Attn: Steve Burn
Project Name: SECCRA LFG Sampling
Project No.: NA
Date Received: 07/15/22
Matrix: Air
Reporting Units: ppmv

EPA Methods 15/16

Lab No.:	N071501-01							
Client Sample I.D.:	SECCRA LFG 2022-07							
Date/Time Sampled:	7/13/22 13:27							
Date/Time Analyzed:	7/18/22 9:59							
QC Batch No.:	220718GC3A1							
Analyst Initials:	RC/AS							
Dilution Factor:	1.7							
ANALYTE	Result ppmv	RL ppmv						
Hydrogen Sulfide	61 d	3.5						

ND = Not Detected (below RL)
RL = Reporting Limit
d = Result obtained from a secondary dilution

Reviewed/Approved By: _____ Date 7/22/22
Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

AirTECHNOLOGY Laboratories, Inc.
18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

QC Batch No.: 220718GC3A1
Matrix: Air
Reporting Units: ppmv

EPA Methods 15/16

Lab No.:	METHOD BLANK			LCS		LCSD					
Date/Time Analyzed:	7/18/22 9:43			7/18/22 9:12		7/18/22 9:27					
Analyst Initials:	RC/AS			RC/AS		RC/AS					
Dilution Factor:	1.0			1.0		1.0			Limits		
ANALYTE	Result ppmv	RL ppmv	SPIKE AMT. ppmv	Result ppmv	% Rec.	Result ppmv	% Rec.	% RPD	Low %Rec	High %Rec	Max. RPD
Hydrogen Sulfide	ND	0.20	1.19	1.18	99	1.08	91	8.9	70	130	30

ND = Not Detected (below RL)
RL = Reporting Limit

Reviewed/Approved By: Mark Johnson
Operations Manager

Date 7/26/22

The cover letter is an integral part of this analytical report

AirTECHNOLOGY Laboratories, Inc.
18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

July 29, 2019

AUG 0 1 2019

Mr. Scott Mengle
General Manager
Southeastern Chester County Refuse Authority
219 Street Road
West Grove, PA 19390

Re: SECCRA Landfill
Title V Operating Permit No. 15-00060
Final Permit Issuance
APS ID No. 770788, AUTH ID No. 1205324
London Grove Township, Chester County

Dear Mr. Mengle:

Enclosed, please find the renewal Title V Operating Permit for Southeastern Chester County Refuse Authority's (SECCRA) landfill located in London Grove Township, Chester County. The renewal also includes the incorporation of Plan Approval 15-0060G. All monitoring, recordkeeping, and reporting requirements shall begin on the effective date. Please include the permit number above with any correspondence to the Department of Environmental Protection (DEP) concerning this Operating Permit.

Condition No. 026 of the General Title V Requirements, Section B of the subject Operating Permit requires you to submit the annual compliance certifications (the appropriate form will be forwarded to your attention electronically) to the Environmental Protection Agency's (EPA) Administrator as well as to DEP. The appropriate addresses are as follows:

R3_APD_ Permits@epa.gov

Regional Air Quality Program Manager
Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

The following areas are addressed in your Title V Operating Permit concerning the sources and any noted control equipment at your facility:

- Restrictions
- Testing Restrictions
- Monitoring Requirements
- Recordkeeping Requirements
- Reporting Requirements

- Work Practice Standards
- Compliance Certification

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at http://ehb.courtapps.com by contacting the Secretary to the Board at 717-787-3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions concerning this matter, please contact me at the phone number located in the first page footer.

Sincerely,

Janine Tulloch-Reid P.E.

for James A. Beach, P.E.
Environmental Engineer Manager
New Source Review Section
Air Quality

Enclosures

cc: PADEP, Harrisburg, Division of Permits
Ms. Gallagher, EGM
Mr. McLemore, District Supervisor
Ms. Vogler, Permit Reviewer
Mr. Burn, Permit Contact
File No. 15-00060
Re (VMC19) 210

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: July 29, 2019 Effective Date: July 29, 2019

Expiration Date: July 28, 2024

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 15-00060

Federal Tax Id - Plant Code: 23-1695190-1

Owner Information

Name: SOUTHEASTERN CHESTER CNTY REFUSE AUTH
Mailing Address: 219 STREET RD
WEST GROVE, PA 19390-9230

Plant Information

Plant: SECCRA LDFL/LONDON GROVE TWP
Location: 15 Chester County 15935 London Grove Township
SIC Code: 4953 Trans. & Utilities - Refuse Systems

Responsible Official

Name: SCOTT MENGLE
Title: GEN MGR
Phone (610) 869 - 2452 Ext.117

Permit Contact Person

Name: STEVE BURN
Title: SITE MGR
Phone: (610) 869 - 2452

[Signature] James D. Rebarchak

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER

SECTION A. Table of Contents

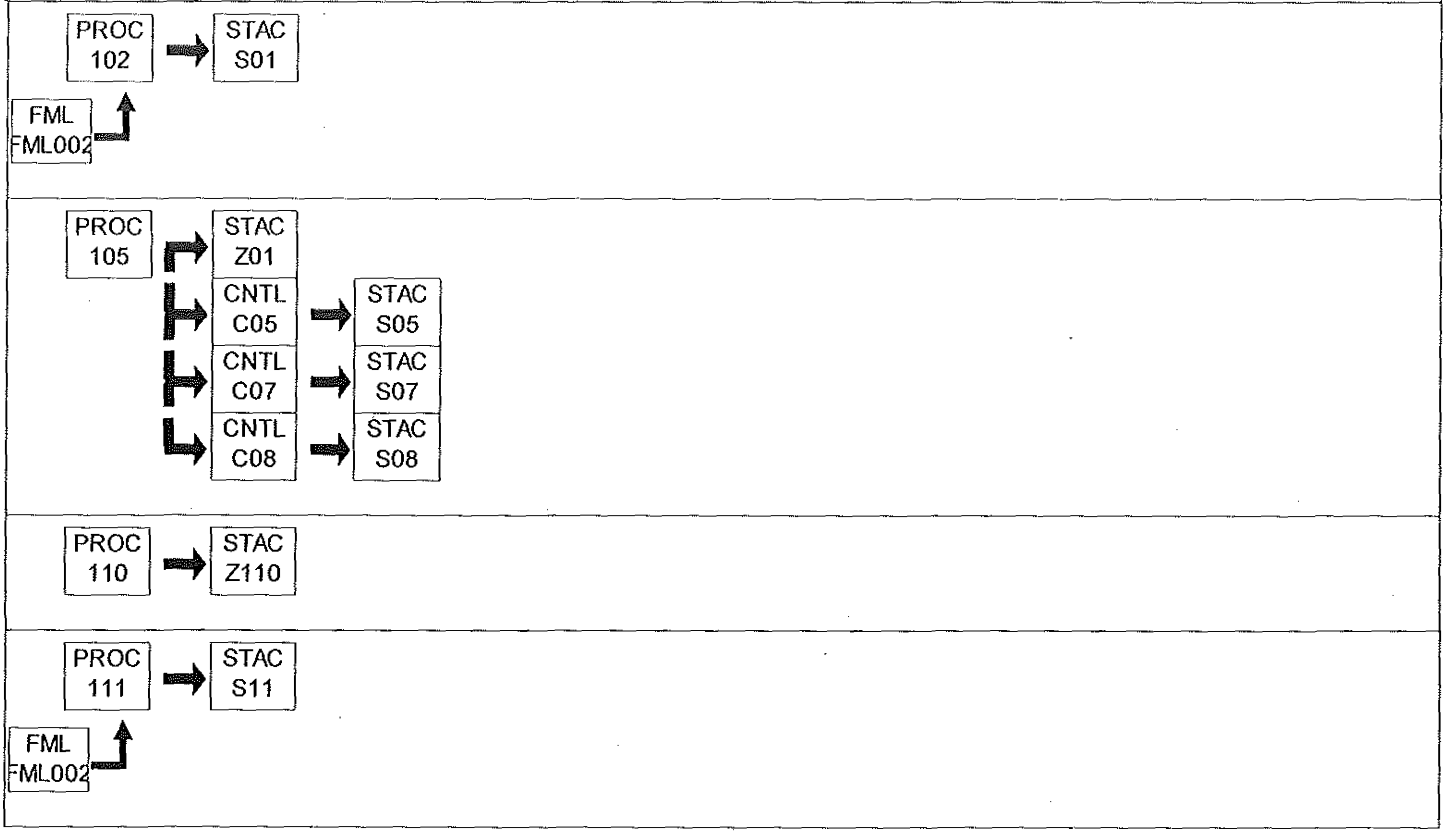
SECTION A. Table of Contents

Note: These same sub-sections are repeated for each source!

SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput		Fuel/Material
102	EMERGENCY GENERATOR (102 HP)			
105	MSW LANDFILL (NORTH, SOUTH CELL & WILLA EXPANSION)	N/A		700 TONS/DAY
110	PARTS WASHER			
111	EMERGENCY GENERATOR (335 HP)			
C05	IC ENGINE/GENERATOR CATERPILLAR G3516LE	1,148.000	HP-Hr/HR	LANDFILL GAS
C07	ENCLOSED FLARE	72,000.000	CF/HR	
C08	IC ENGINE/GENERATOR CATERPILLAR G3520C (PA60F)	2,233.000	HP-Hr/HR	LANDFILL GAS
FML002	DIESEL FUEL			
S01	STACK FOR EMERGENCY GENERATOR (102 HP)			
S05	IC ENGINE/GENERATOR C05 STACK			
S07	ENCLOSED FLARE STACK			
S08	IC ENGINE/GENERATOR C08 STAC			
S11	STACK FOR EMERGENCY GENERATOR (335 HP)			
Z01	LANDFILL EMISSIONS			
Z110	PARTS WASHER FUGITIVES			

PERMIT MAPS



SECTION B. General Title V Requirements

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

(1) The identification of each term or condition of the permit that is the basis of the certification.

(2) The compliance status.

(3) The methods used for determining the compliance status of the source, currently and over the reporting period.

(4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #022 of this section.

#027 [25 Pa. Code § 127.3]

Operational Flexibility

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

(1) Section 127.14 (relating to exemptions)

SECTION B. General Title V Requirements

the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given on the permit transmittal letter,
or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Air Enforcement and Compliance Assistance (3AP20)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code §§ 127.511 & Chapter 135]

Recordkeeping Requirements

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

(1) The date, place (as defined in the permit) and time of sampling or measurements.

(2) The dates the analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

SECTION B. General Title V Requirements

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#020 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#021 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department,

SECTION B. General Title V Requirements

(e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.

(f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#019 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

SECTION B. General Title V Requirements

25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]

Severability Clause

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction, or US EPA to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

SECTION B. General Title V Requirements

to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#013 [25 Pa. Code § 127.522(a)]

Operating Permit Application Review by the EPA

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#014 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with

SECTION B. General Title V Requirements

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or

SECTION B. General Title V Requirements

#001 [25 Pa. Code § 121.1]

Definitions

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]

Prohibition of Air Pollution

No person may permit air pollution as that term is defined in the act.

#003 [25 Pa. Code § 127.512(c)(4)]

Property Rights

This permit does not convey property rights of any sort, or any exclusive privileges.

#004 [25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

Permit Renewal

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

Transfer of Ownership or Operational Control

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

(1) The Department determines that no other change in the permit is necessary;

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

SECTION B. General Title V Requirements

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)

(6) Section 127.462 (relating to minor operating permit amendments)

(7) Subchapter H (relating to general plan approvals and operating permits)

#028 **[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]**

Risk Management

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:

(i) Three years after the date on which a regulated substance is first listed under § 68.130; or,

(ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

(2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

SECTION B. General Title V Requirements

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #26 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

 # 001 [25 Pa. Code §121.7]
Prohibition of air pollution.
No person may permit air pollution as that term is defined in the Air Pollution Control Act 35 P.S. (Section 4003).

 # 002 [25 Pa. Code §123.1]
Prohibition of certain fugitive emissions
No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

(a) construction or demolition of buildings or structures;

(b) grading, paving and maintenance of roads and streets;

(c) use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;

(d) clearing of land;

(e) stockpiling of materials;

(f) open burning operations, as specified in 25 Pa. Code § 129.14;

(g) blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting;

(h) coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations); and

(i) sources and classes of sources other than those identified in (a)-(h), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(1) the emissions are of minor significance with respect to causing air pollution; and

(2) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

 # 003 [25 Pa. Code §123.2]
Fugitive particulate matter
A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1) - (9) (relating to prohibition of certain fugitive emissions), if such emissions are visible at the point the emissions pass outside the person's property.

 # 004 [25 Pa. Code §123.31]
Limitations
A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

 # 005 [25 Pa. Code §123.41]
Limitations
A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

(a) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour; or

(b) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]
Exceptions
The opacity limitations as per 25 Pa. Code § 123.41 shall not apply to a visible emission in either of the following instances:

(a) When the presence of uncombined water is the only reason for failure to meet the limitations.

(b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

(c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The permittee shall limit the facility to the following emissions, calculated as a 12-month rolling sum:

(1) Volatile Organic Compounds (VOC): 19.98 tons/year (post closure of the landfill)
20.97 tons/year (pre- closure of the landfill)
(2) Nitrogen Oxides (NOx): 23.31 tons/year
(3) Carbon Monoxide (CO): 147.28 tons/year
(4) Sulfur Oxides (SOx): 14.80 tons/year.
(5) Particulate Matter (PM): 99.9 tons/year
(6) Particulate Matter less than 10 microns (PM10): 30.32 tons/year.
(7) Particulate Matter less than 2.5 microns: 8.44 tons/year.
(8) Hazardous Air Pollutants (HAP): 14.50 tons/year (post-closure of the landfill)
15.06 tons/year (pre-closure of the landfill)

008 [25 Pa. Code §129.14]
Open burning operations
No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from:

(a) a fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer;

(b) any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department;

(c) a fire set for the prevention and control of disease or pests, when approved by the Department;

(d) a fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation;

(e) a fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure;

(f) a fire set solely for recreational or ceremonial purposes; or

(g) a fire set solely for cooking food.

II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

(a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

010 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The Department reserves the right to require stack testing of any source(s) as necessary to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirement.

III. MONITORING REQUIREMENTS.

011 [25 Pa. Code §123.43]
Measuring techniques
Visible emissions may be measured using either of the following:

(a) A device approved by the Department and maintained to provide accurate opacity measurements; or

(b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

012 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

(a) The permittee shall monitor the facility, once per operating day, for the following:

(1) odors which may be objectionable (as per 25 Pa. Code §123.31);
(2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42).; and
(3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, which may cause annoyance or discomfort to the public noticed at the site property boundaries that are caused or may be caused by operations at the site, as well as fugitive particulate emissions that originated on-site and cross the property line, and visible emissions that originated on site shall:

(1) be investigated;
(2) be reported to the facility management, or individual(s) designated by the permittee;
(3) have appropriate corrective action taken (for emissions that originate on-site); and
(4) be recorded in a permanent written log.

SECTION C. Site Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

 # 013 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The permittee shall maintain records of all the facility's increases of emissions from the following categories:

(a) emissions increase of minor significance without notification to the Department.
(b) de minimis increases with notification to the Department, via letter.
(c) increases resulting from a Request for Determination (RFD) to the Department.
(d) increases resulting from the issuance of a plan approval and subsequent operating permit.

 # 014 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

(a) date, time, and location of the incident(s);
(b) the cause of the event; and
(c) the corrective action taken, if necessary, to abate the situation and prevent future occurrences.

 # 015 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The owner/operator shall keep all records required by this Operating Permit for a period of 5 years, unless otherwise specified.

 # 016 [25 Pa. Code §127.441]
Operating permit terms and conditions.
(a) The owner/operator shall calculate and record the emissions of NOx, CO, VOC, SOx, particulate matter (PM, PM10 and PM2.5), and HAP) from individual sources and from the total facility on a monthly and on a 12-month rolling basis. The following sources shall be included: the landfill, use of roads, control devices (C05, C07 and C08) and minor sources. Calculations shall use emission factors determined during the most recent stack test, if available. Calculation procedures shall be as submitted with the application for Plan Approval 15-0060G, unless otherwise approved by the Department.

(b) The owner/operator shall keep records of the emission factors and procedures used in the emissions calculations.

 # 017 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The permittee shall keep records on a monthly and on a 12-month rolling basis of the volume of landfill gas (LFG) captured, the average Btu value of the captured gas and the volume of LFG combusted in the engines for the electrical generators.

 # 018 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The permittee shall record when the roads are wetted weekly.

V. REPORTING REQUIREMENTS.

 # 019 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The Department address for submissions required by this Operating Permit is:

Regional Air Quality Manager
PA Department of Environmental Protection
2 East Main Street

SECTION C. Site Level Requirements

Norristown, PA 19401

The USEPA address for submissions required by this Operating Permit is:

Office of Air Enforcement and Compliance Assistance (3AP20)
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Note: The above address applies for EPA only if an electronic reporting interface has not been established for the respective Subpart.

Notices and reports to be submitted to the Administrator in compliance with the provisions of 40 CFR Part 60, Subparts WWW and JJJ or 40 CFR Part 63 Subparts AAAA and ZZZZ shall be submitted to both the Department and the EPA.

 # 020 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

(a) The permittee shall notify the Department at 484-250-5920 within two (2) hours of discovery of the occurrence of any malfunction of the source(s) or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or of a regulation contained in 25 Pa. Code Article III.

(b) Malfunction(s) which occur at this facility, and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate permit conditions if the source were to continue to operate after the malfunction, shall immediately be reported to the Department by telephone at the above number.

(c) A written report shall be submitted to the Department within two (2) working days following the notification of the incident, and shall describe the following:

(1) The malfunction(s).
(2) The emission(s).
(3) The duration.
(4) Any corrective action taken.

 # 021 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]

The permittee shall submit the following:

(a) An annual certification of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certification of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #026 of section B of this permit. The annual certification of compliance shall be submitted to the Department in paper form, and EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov

(b) A semi-annual deviation report, due by October 1, of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

SECTION C. Site Level Requirements

 # 022 [25 Pa. Code §135.3]
Reporting
[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.441 and 135.21.]

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year.The report shall include information from all previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported, including those sources listed in the Miscellaneous Section of this permit.

The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.

 # 023 [25 Pa. Code §123.1]
Prohibition of certain fugitive emissions
A person responsible for any source specified in specified 25 Pa. Code § 123.1, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land;

(b) Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts;

(c) Paving and maintenance of roadways; and

(d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

 # 024 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall ensure that the source(s) and air pollution control device(s), listed in Section A and Section G, where applicable, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications.

 # 025 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III, or any other applicable rule promulgated under the Clean Air Act.

 # 026 [25 Pa. Code §127.441]
Operating permit terms and conditions.
The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #019(g) of Section B of this permit.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

SECTION C. Site Level Requirements

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

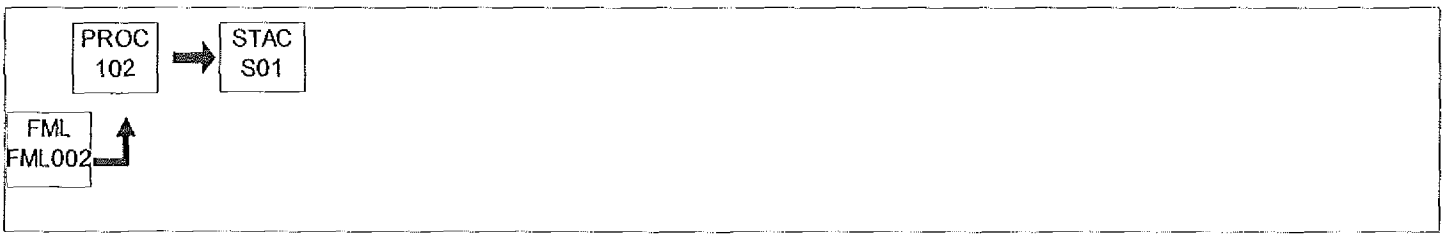
***** Permit Shield In Effect *****

SECTION D. Source Level Requirements

Source ID: 102 Source Name: EMERGENCY GENERATOR (102 HP)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: EMERGENCY GENERATOR ENGINES



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

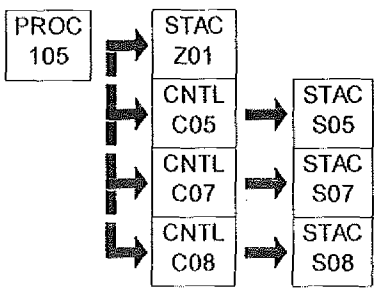
 # 001 [25 Pa. Code §127.441]
Operating permit terms and conditions.
This generator is rated at 102 hp and is a Kohler Model 80,

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: 105 Source Name: MSW LANDFILL (NORTH, SOUTH CELL & WILLA EXPANSION)

Source Capacity/Throughput: N/A 700 TONS/DAY



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Sections 60.752 (b), 60.752(b)(2), 60.752(b)(2)(ii), 60.753(a)].

The owner or operator shall:

(a) Submit to the Department a collection and control system design plan prepared by a professional engineer within 1 year of the issuance of Plan Approval 15-0060G.

Note: DEP received the plan on April 5, 2017.

(b) The collection and control system as described in the plan or subsequent modifications shall meet the design requirements of paragraph 40 CFR § 60.752 (b)(2)(ii), as indicated in section (c) and (d) of this condition.

(i) Operation of the landfill shall conform to the provisions of 40 CFR §§ 60.753 through 60.758 or the collection and control system design plan shall include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions of 40 CFR §§ 60.753 through 60.758 proposed by the owner or operator.

(ii) The collection and control system design plan shall either conform with specifications for active collection systems in 40 CFR § 60.759 or include a demonstration to the Department's satisfaction of the sufficiency of the alternative provisions to § 60.759.

(iii) The Department shall review the information submitted under paragraphs (b)(i), (b)(ii), and (c) and (d) of this condition and either approve it, disapprove it, or request that additional information be submitted. Because of the many site-specific factors involved with landfill gas system design, alternative systems may be necessary. A wide variety of system designs are possible, such as vertical wells, combination horizontal and vertical collection systems, or horizontal trenches only, leachate collection components, and passive systems.

(c) Maintain the gas collection and control system, in accordance with the plans submitted in part (a) of this Condition or subsequent modifications.

(d) As specified by 40 CFR 60.752(b)(2)(ii)(A), the gas collection and control system shall:

(i) Be designed to handle the maximum expected gas flow from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment;

(ii) Collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a

period of:

(1) 5 years or more if active; or

(2) 2 years or more if closed or at final grade;

(iii) Collect gas at a sufficient extraction rate;

(iv) Be designed to minimize off-site migration of subsurface gas.

(e) Operate the landfill according to the requirements of 40 CFR 60.752 through 60.759, or alternatives approved by the Department under paragraph (b)(i) of this Condition.

Note: The Department reserves the right to reevaluate the adequacy of the gas collection and control system design plan (GCCS) and any proposed modifications.

 # 002 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 60.753(c) ; 60.755(a)(5); 60.753(g), 60.756(a)(2-3), 60.752(b)(2).]

The owner or operator shall:

(a) As specified by 40 CFR Section 60.753(c), operate the collection system such that each interior wellhead in the collection system has a landfill gas temperature less than 55°C and either a nitrogen level less than 20 percent or an oxygen level less than five percent. However, the permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

The higher operating value (HOV) demonstration shall be submitted to the Department for approval.
The owner/operator shall not use the HOV until approval by the Department is received.

(b) If monitoring performed in accordance with Condition # 015(a) & (b) for this source, demonstrates that a well exceeds one of the operating parameters set forth in paragraph (a) of this condition, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance.

An alternative timeline for correcting the exceedance may be submitted in writing to the Department for approval. Any attempted corrective measure shall not cause exceedances of other operational or performance standards.

(c) If corrective actions are taken pursuant to paragraph (b) of this condition the monitored exceedance is not a violation of the operational requirements in paragraph (a) of this condition.

 # 003 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 60.753(d), 60.755(c)(4), 60.755(c)(4)(i) through (v), 60.752(b)(2)].

The owner or operator shall:

(a) As specified by 40 CFR Section 60.753(d), operate the collection system such that the methane concentration at the surface of the landfill is less than 500 parts per million above background at the surface of the landfill.

(b) To determine if this level is exceeded, the permittee shall conduct monitoring according to the procedures indicated in 40 CFR § 60.753(d), (Condition #013).

(c) Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified in paragraphs (i) through (v) listed below shall be taken. As long as the specified actions are taken, the exceedance is not a violation of paragraph (a) of this condition.

(i) The location of each monitored exceedance shall be marked and the location recorded.

(ii) Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be re-monitored within 10 calendar days of detecting the exceedance.

(iii) If the re-monitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the re-monitoring shows a third exceedance for the same location, the action specified in paragraph (v) of this Condition shall be taken, and no further monitoring of that location is required until the action specified in paragraph (v) has been taken.

(iv) Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day re-monitoring specified in paragraph (c) (ii) shall be re-monitored 1 month from the initial exceedance. If the 1-month re-monitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month re-monitoring shows an exceedance, the actions specified in paragraph (c)(iii) or (v) shall be taken.

(v) For any location where monitored methane concentration equals or exceeds 500 parts per million above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted in writing to the Department for approval.

 # 004 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR §§ 60.753(b)(1-3); 60.753(g); 60.755(a)(3-4), 60.757(f)(1), and 127.12(a)(5).]

The owner or operator shall:

(a) As specified by 40 CFR Section 60.753(b), operate the gas collection and control system with negative pressure at each wellhead, except under the following conditions.

(i) When a fire or increased well temperature is detected. The permittee shall record instances when positive pressure occurs in efforts to avoid fire and submit the records with the report specified by Condition #022.

(ii) When a geomembrane or synthetic cover is used. The permittee shall develop acceptable pressure limits in the design plan.

(iii) When a well is decommissioned. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Department.

(b) If the monitoring performed as indicated by Condition #014 demonstrates that a positive pressure exists and none of the exceptions provided by paragraph (a)(i)-(iii) applies, action shall be initiated to correct the exceedance within five calendar days. If a negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first positive measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure.

An alternative timeline for correcting the exceedance may be submitted in writing to the Department for approval. Any

attempted corrective measure shall not cause exceedances of other operational or performance standards.

(c) Notwithstanding the provisions of paragraph (b) above, the permittee is not required to install additional wells, during the first 180 days after gas collection system start-up.

(d) If corrective actions are taken pursuant to paragraph (b) of this condition, the monitored exceedance is not a violation of the operational requirements in paragraph (a) of this condition.

005 [25 Pa. Code §127.441]
Operating permit terms and conditions.

Fugitive emissions of volatile organic compounds (VOC) from the North, South Cells and the Willa Expansion of the landfill shall be limited to 2.97 tons per year before closure and 1.98 tons per year after closure, both as a 12-month rolling sum.

Throughput Restriction(s).

006 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) The maximum amount of solid waste disposal in the entire SECCRA landfill, including the North, South cells and the Willa Expansion shall be limited to 700 tons of municipal solid waste (MSW) on any one day.

(b) The design capacity of the Willa Expansion shall not exceed 1,800,000 tons (3,000,000 cubic yards) of MSW.

(c) The total capacity of the North Cell, South Cell and Willa Expansion shall not exceed 4,046,364 tons (7,264,184 cubic yards).

(d) If the solid waste permit is modified to increase the amount of permitted waste that can be placed in either the North or South cells or the Willa expansion either an Air Quality Request for Determination (RFD) or a new Air Quality Plan Approval shall be obtained from the Department prior to increasing the landfill waste volume.

007 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this Plan Approval condition is derived from 40 CFR Sections 61.140 and 61.154]

The owner/operator shall not receive any asbestos-containing material (ACM) waste from a source covered under 40 CFR Part 61, Subpart M, §§61.149, 61.150, or 61.155 without a 7-day prior initial-notice to the Department of the intent to begin accepting ACM regulated waste under Subpart M and receipt of Department approval. Any acceptance of asbestos containing material shall be in compliance with the owner/operator's solid waste permit.

After timely notice to and approval by the Department, the owner/operator will comply with all applicable requirements of 40 CFR Part 61, Subpart M, §61.154, Standard for active waste disposal sites, for the disposal of any ACM waste accepted for disposal at the landfill site.

Control Device Efficiency Restriction(s).

008 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this Plan Approval condition is derived from 25 Pa. Code Section 127.12(a)(5)]

(a) The permittee shall install a landfill gas collection system for each cell, group of cells, or area, within 24 months from the start of the placement of waste in the cell. The landfill gas collection system may initially be an interim system. The landfill gas collected during the interim period shall be delivered to either of two engines, Source IDs C05 and C08 or to the enclosed flare, Source ID C07.

(b) The interim landfill gas collection period shall not exceed 5 years. The permanent landfill gas collection system shall be in place within 5 years of initial solid waste placement in a cell or group of cells.

(c) Both interim and permanent landfill gas collection systems shall include the gas collection system, cell or group of cells and shall be sized such that it can handle the maximum expected gas flow rate from the entire SECCRA landfill, including the North and South cells and the Willa expansion.

(d) Both interim and permanent landfill gas collection systems shall be designed to minimize off-site migration of the landfill gas.

(e) The permanent landfill gas management system shall have a minimum collection efficiency of 75% before closure and 90% after closure.

 # 009 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) The owner/operator shall route all landfill gas collected from the entire SECCRA landfill, including the North and South cells and the Willa expansion, to a control system comprising any combination of two engines, Source IDs C05 or C08 or the the enclosed flare, Source ID C07.

(b) The owner/operator shall operate the control system at all times when the collected gas is routed to the system.

 # 010 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 60.753(e)and (f).]

The owner or operator shall:

As specified by 40 CFR 60.753(e) and (f),

(a) Operate the system such that all collected gases are vented to the control system specified by Condition #001. In the event the control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour.

(b) Operate the control system at all times when the collected gas is routed to the system.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

 # 011 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) Within 5 years from the last determination, the owner/operator shall make a demonstration of the site specific VOC concentration as a percent composition of the NMOC content of uncombusted landfill gas. This demonstration shall be made using U.S. EPA Test Method TO-14 or TO-15, or an equivalent test method proposed by the owner/operator and approved by the Department, to determine the VOC content of the landfill gas.

(b) The NMOC concentration of the landfill gas shall be determined using U.S. EPA Test Method 25 or 25C in accordance with the requirements of Part 60, Subpart WWW, Section 60.754, Test Methods.

(c) A copy of the report, containing the results of the NMOC/VOC determination, shall be submitted to the Air Quality Program Manager within 90 days of completion of gas sample collection.

(d) Except as provided below in paragraphs (i) - (iii), the owner/operator shall use the following parameters in calculating the NMOC and VOC emission rate: methane generation rate constant, k, equal to 0.045/year; and methane generation potential Lo, equal to 115 m3/Mg (Mega gram) of solid waste.

(i) The owner/operator shall annually reevaluate the k and Lo values listed above. The owner/operator shall submit the results of the reevaluation to the Department. If such reevaluation demonstrates a k or Lo value different than that listed above, then the owner/operator shall provide a notification to the Department of the owner/operator's intent to use such k or Lo value. The notification shall include a discussion of the basis for use of such k and Lo value. Within thirty (30) days of its receipt of the notification, the Department may provide to the owner/operator a written determination, and basis for such determination, rejecting the permittee's use of such alternative parameter.

(ii) In the event that the owner/operator derives additional data that demonstrates that values different than those listed above should be used, or otherwise intends to use a value other than the values listed above (such as the value for the parameter published in the most recent Compilation of Air Pollutant Emission Factors (AP-42)) in the calculation of the annual VOC emission rate, then the owner/operator shall provide a notification to the Department of the owner/operator's intent to use such alternative parameter. The notification shall include a discussion of the bases for use of such alternative parameter. Within thirty (30) days of its receipt of the notification, the Department may provide to the owner/operator a written determination, and basis for such determination, rejecting the owner/operator's use of such alternative parameter.

(iii) Notwithstanding the Department's failure to object within 30 days of notification to the owner/operator's use of an alternative parameter pursuant to paragraphs (a) or (b), the Department reserves the right to reevaluate such parameters and to reject the owner/operator's continued use of such alternative parameter.

 # 012 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 60.755(c)(5)].

The owner or operator shall:

As specified by 40 CFR Section 60.755(c)(5),

On a monthly basis, implement a program to monitor for cover integrity and implement cover repairs as necessary.

 # 013 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Sections 60.755(c) and (d), 60.753 (d), 60.756 (f)].

The owner or operator shall:

Perform surface monitoring as specified by 40 CFR Sections 60.755(c), 60.755(d), and 60.753(d), and 60.756(f),

(a) On a quarterly basis, monitor the surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The owner/operator may establish an alternative traversing pattern that ensures equivalent coverage. The owner/operator shall maintain a surface monitoring design plan that includes a topographic map with the monitoring route and the rationale for any site-specific deviations from the 30 meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

(b) In performing the surface monitoring, use an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the following specifications and procedures:

(i) The portable analyzer shall meet the instrument specification provided in section 3 of Method 21 of appendix A of 40 CFR. Part 60, except that "methane" shall replace all references to VOC.

(ii) The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air.

(iii) The instrument evaluation procedures of section 4.4 of Method 21 of appendix A of 40 CFR Part 60 shall be used to meet the performance evaluation requirements in section 3.1.3 of Method 21 of appendix A of 40 CFR Part 60.

(iv) The calibration procedures provided in section 4.2 of Method 21 of appendix A of 40 CFR Part 60 shall be followed immediately before commencing a surface monitoring scan.

(c) Determine the background concentration by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.

(d) Perform surface emissions monitoring in accordance with section 4.3.1 of Method 21 of appendix A of 40 CFR Part 60, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.

(e) Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may go to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring until the landfill has no monitored exceedances of the 500 ppm standard for three consecutive quarterly monitoring periods.

 # 014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Sections 60.755(a)(3) and 60.756(a)(1).]

The owner or operator shall:

On a monthly basis, measure gauge pressure in the gas collection header at each well as provided in 40 CFR Section 60.755 (a)(3).

 # 015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 60.753(c)(1-2); 60.755(a)(5); 60.756(a).]

The owner or operator shall:

(a) As specified by 40 CFR Sections 60.756(a), (a)(3) and 60.755(a)(5),

Monitor the temperature of the wellhead, monthly, using a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements installed at each wellhead to determine compliance with the operating parameters indicated in Condition #002(a).

(b) As specified by 40 CFR Sections 60.756(a)(2) and 60.755(a)(5),

Monitor each well, monthly, for nitrogen or oxygen to check for air infiltration into the landfill and to determine compliance with the operating parameters indicated in Condition #002(a).

(i) As specified by 40 CFR 60.753(c)(1),

The nitrogen level, if monitored, shall be determined by using Method 3C or other Department approved method or an alternative method that was established and approved by the Department, pursuant to Condition #001(b)(i) of this Section.

(ii) As specified by 40 CFR 60.753 (c)(2),

The oxygen level, if monitored, shall be determined by an oxygen meter using Method 3A or 3C, or other Administrator approved method or an alternative method that was established and approved by the Department pursuant to Condition #001(b)(i) of this Section,except that:

(1) The span shall be set so that the regulatory limit is between 20 and 50% of the span.
(2) A data recorder is not required.
(3) Only two calibration gases are required, a zero and span, and ambient air may be used as the span.
(4) A calibration error check is not required.
(5) The allowable sample bias, zero drift, and calibration drift are +/- 10 percent.

IV. RECORDKEEPING REQUIREMENTS.

 # 016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR §§ 60.758(a); 60.758(b)(1); 60.758(d-e); 60.755(a)(1) and 25 Pa. Code Section 127.12(a)(5).]

The owner/operator shall

In accordance with 40 CFR §§ 60.758(a) or 25 Pa. Code 127.441,

(a) Keep for at least 5 years, up-to-date, readily accessible, on-site records of the design capacity report which triggered 40 CFR 60.752(b), current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.

(b) As specified by 40 CFR §§ 60.758(b) or in accordance with 25 Pa. Code 127.441,

Keep up-to-date, readily accessible records for the life of the control equipment of the data listed below, as measured during the initial compliance determination. Records of subsequent monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal.

(i) maximum expected gas generation flow rate calculated , as indicated by Condition #028; and

(ii) density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 C.F.R. § 60.759(a)(1).

(c) As specified by 40 CFR §§ 60.758(d) or in accordance with 25 Pa. Code 127.441,

The permittee shall keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector. The permittee shall also keep:

(i) up-to-date, readily accessible records of the installation date and location of all newly installed collectors; and

(ii) readily accessible documentation of the nature, date of deposition, amount and location of nondegradable waste excluded from collection, as well as any nonproductive areas excluded from production.

(d) Keep, for at least 5 years, up-to-date, readily accessible records of all collection and control system exceedances of the operational standards indicated by Conditions #002 through #004 for this source, the reading in the subsequent month, whether or not the second reading is an exceedance, and the location of each exceedance.

017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1955]
Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
What requirements must I meet?

In accordance with 40 CFR Sections 63.1955(b), 63.1980(b) and 63.10(b)(2), the owner/operator shall keep records of:

(a) the occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;

(b) the occurrence and duration of each malfunction of operation (process equipment) or the required air pollution control and monitoring equipment;

(c) all required maintenance performed on the air pollution control and monitoring equipment;

(d) (i) actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startip, shutdown, and malfunction plan;

(ii) actions taken during periods of malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan;

(e) all information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist" or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events).

018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1980]
Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
What records and reports must I keep and submit?

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.6(e)(3)(v) and (viii).]

(a) In accordance with 40 CFR Sections 63.1980(b), 63.6(3)(v), and 63.1960, the owner/operator shall:

Maintain at the affected source a current startup, shutdown, and malfunction plan and must make the plan available upon request for inspection and copying by the Administrator. In addition, if the startup, shutdown, and malfunction plan is subsequently revised pursuant to paragraph (b) (40 CFR Section 63.6(e)(3)(viii)), the owner/operator must maintain at the affected source each previous (i.e., superseded) version of the startup, shutdown, and malfunction plan, and must make each such previous version available for inspection and copying by the Administrator for a period of 5 years after revision of the plan. If at any time after adoption of a startup, shutdown, and malfunction plan the affected source ceases operation or is otherwise no longer subject to the provisions of this part, the owner/operator must retain a copy of the most recent plan for 5 years from the date the source ceases operation or is no longer subject to this part and must make the plan available upon request for inspection and copying by the Adminstrator. The Administrator may at any time request in writing that the owner or operator submit a copy of any startup, shutdown, and malfunction plan (or a portion thereof) which is maintained at the affected source or in the possession of the owner or operator. Upon receipt of such a request, the permittee must promptly submit a copy of the requested plan (or a portion thereof) to the Adminstrator, either paper copy or electronic copy. If the owner or operator claims that any portion of such a startup, shutdown, and malfunction plan is confidential business information entitled to protection from disclosure under section 114(c) of the Act or 40 CFR Section 2.301, the material which is claimed as confidential must be clearly designated in the submission.

(b) In accordance with 40 CFR Sections 63.1980(b) and 63.6(3)(viii),

Periodically revise the startup, shutdown, and malfunction plan for the affected source as necessary to satisfy the

requirements of this part or to reflect changes in equipment or procedures at the affected source. Unless the permitting authority provides otherwise, the owner or operator may make such revisions to the startup, shutdown, and malfunction plan without prior approval by the Administrator or Department. However, each such revision to a startup, shutdown, and malfunction plan must be reported in the semiannual report required by [40 CFR Section 63.10(d)(5)(Condition #027). If the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the owner or operator developed the plan, the permittee must revise the startup, shutdown, and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control and monitoring equipment. In the event that the owner or operator makes any revision to the startup, shutdown, and malfunction plan which alters the scope of the activities at the source which are deemed to be a startup, shutdown, or malfunction, or otherwise modifies the applicability of any emission limit, work practice requirement, or other requirement in a standard established under this part, the revised plan shall not take effect until after the owner or operator has provided a written notice describing the revision to the Department.

 # 019 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1980]

Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

What records and reports must I keep and submit?

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.6(e)(3)(iii)]

The following applies to the owner/operator of an MSW landfill by the time the landfill is required to install a collection and control system by 40 CFR Section 60.752(b)(2),

In accordance with 40 CFR Sections 63.1980 and 63.6(e)(3)(iii),

When actions taken by the owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the owner or operator must keep records for that event which demonstrate that the procedures specified in the plan were followed. These records may take the form of a ``checklist,'' or other effective form of recordkeeping that confirms conformance with the startup, shutdown, and malfunction plan for that event. In addition, the permittee must keep records of these events as specified in 40 CFR Section 63.10(b) (Condition #017), including records of the occurrence and duration of each startup or shutdown (if the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards) or malfunction of operation and each malfunction of the air pollution control and monitoring equipment. Furthermore, the owner or operator shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown, and malfunction report required by 40 CFR Section 63.10(d)(5) (Condition #023).

V. REPORTING REQUIREMENTS.

 # 020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Sections 60.757(d) and 60.752(b)(1)(B) and 60.7(a)(4)]

(a)The owner/operator shall submit a closure report to the Department within 30 days of waste acceptance cessation. The Department may request additional information as may be necessary to verify that permanent closure has taken place. If a closure report has been submitted to the Department, no additional wastes may be placed into the landfill without written notification and approval by the Department.

(b) A report in this case shall also be provided to the EPA. No additional wastes may be placed into the landfill without filing a notification of modification as described in 40 CFR Section 60.7(a)(4).

021 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.757]
Subpart WWW--Standards of Performance for Municipal Solid Waste Landfills
Reporting requirements.

[Additional authority for this permit condition is also derived from 40 CFR §§60.757(e) and 60.752(b)(v)(C)]

The owner/operator of an MSW landfill with a landfill gas collection and control system used to comply with the provisions of 40 CFR Section 60.752(b)(2)(ii) shall

In accordance with 40 CFR §60.757(e),

Submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment. The equipment removal report shall contain all of the following items:

(a) a copy of the closure report submitted as specified by 40 CFR § 60.757(d), as indicated by Condition #020(2)(b).

(b) a copy of the initial performance test report demonstrating that the 15 year minimum control period has expired; and

(c) dated copies of three successive NMOC emission rate reports demonstrating that the landfill does not produce 50 megagrams per year or greater of NMOC. As specified by 40 CFR Section 60.752(b)(v)(C), the test dates shall be no less than 90 days apart, and no more than 180 days apart.

(d) The Administrator may request such additional information as may be necessary to verify that all of the conditions for removal as specified by 40 CFR Section 60.752(b)(2)(v) have been met.

022 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 60.757(f) and 40 C.F.R. § 63.1980(a).]

The owner or operator shall:

Submit a report to the Department, every 6-months containing the following recorded information:

(a) value and length of time for exceedance of parameters monitored at each well head, that is the gauge pressure pursuant to Condition #004, nitrogen or oxygen concentration , pursuant to Condition #002 and the temperature pursuant to Condition #002.

(b) all periods when the collection system was not operating in excess of 5 days;

(c) description and duration of all periods when the control devices were not operating for a period exceeding 1 hour and the length of time the control device was not operating. Periods when the flare or one or more engines are idle because the landfill gas is already being controlled by one or more of the approved control devices does not constitute non-operation and therefore is not subject to inclusion in the biennial reporting.

(d) the location of each exceedance of the 500 ppm methane concentration, monitored according to the procedures in 40 CFR Section 60.753(d) [Condition #013] at the surface of the landfill and the concentration recorded at each location for which an exceedance was recorded in the previous month, pursuant to Condition #003.

(e) the date of installation and the location of each well or collection system expansion added in response to the exceedance.

023 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1980]
Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
What records and reports must I keep and submit?

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.6(e)(3)(iv)]

In accordance with 40 CFR Sections 63.1980 and 63.6(e)(3)(iv),

If an action taken by the owner or operator during a startup, shutdown or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown and malfunction plan, and the source exceeds any applicable emission limitation in the relevant emission standard, then the owner or operator must record the actions taken for that event and must report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event, in accordance with 40 CFR Section 60.10(d)(5)(ii) (unless the permittee makes alternative reporting arrangements, in advance, with the Administrator.)

 # 024 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1980]

Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

What records and reports must I keep and submit?

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.10(d)(5)]

In accordance with 40 CFR 63.1980(b) and 63.10(d)(5),

The owner/operator shall submit reports semi-annually and the report shall

(a) identify any instance during which actions taken by the owner/operator during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) were consistent with the procedures specified in the start-up, shutdown, malfunction plan.

(b) identify any instance where any action taken by permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the affected source's startup, shutdown, and malfunction plan, but the source does not exceed any applicable emission limitation in the relevant emission standard, or any revisions to the startup, shutdown, malfunction plan.

(c) include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded.

(d) consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy.

(e) Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period.

(f) The startup, shutdown and malfuntion report shall be postmarked by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate).

VI. WORK PRACTICE REQUIREMENTS.

 # 025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall install, operate and maintain a landfill collection and control system for Source ID 105 including the North, South cells and the Willa expansion.

The capture efficiency of the landfill gas collection system shall be at the minimum 75% before closure and at the minimum 90% after closure.

 # 026 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.752]

Subpart WWW--Standards of Performance for Municipal Solid Waste Landfills

Standards for air emissions from municipal solid waste landfills.

[Additional authority for this permit condition is also derived from 40 CFR § 60.752(b)(2)(v) and 25 Pa. Code section

127.12(a)(5).]

(1) In accordance with 40 CFR Section 60.752(b)(2)(v),

The owner/operator of an MSW landfill with a landfill gas collection and control system used to comply with the provisions of 40 CFR Section 60.752(b)(2)(ii), may cap or remove the collection and control system provided that all the conditions of paragraphs (a), (b) and (c) are met:

(a) The landfill shall be a closed landfill, which is defined by 40 CFR Section 60.751as a landfill in which solid waste is no longer being placed, and in which no additional solid wastes will be placed without first filing a notification of modification as prescribed under 40 CFR § 60.7(a)(4). A closure report shall be submitted to the Administrator as provided in 40 CFR Section 60.757(d) (Condition #020).

(b) The collection and control system shall have been in operation a minimum of 15 years; and

(c) Following the procedures specified in 40 CFR Section 60.754(b) (Condition #027), the calculated NMOC gas produced by the landfill shall be less than 50 megagrams per year on three successive test dates.The test dates shall be no less than 90 days apart, and no more than 180 days apart.

(2) A landfill gas collection and control system meeting parts (1)(a) through (1)(c) of this Condition is no longer subject to the requirements of 40 CFR Section 60.752 (b)(2). However, as part of the evaluation of BAT for this source, the Department will approve removal of equipment, as indicated in Condition #033 of this section.

 # 027 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.754]
Subpart WWW--Standards of Performance for Municipal Solid Waste Landfills
Test methods and procedures.

[Additional authority for this permit condition is also derived from 40 CFR § 60.754(b).]

(1) The owner/operator of an MSW landfill with a landfill gas collection and control system used to comply with the provisions of 40 CFR Section 60.752(b)(2) shall

In accordance with 40 CFR Section 60.754(b),

Calculate the NMOC emission rate for purposes of determining when the collection and control system can be removed as provided in 40 CFR 60.752(b)(2)(v), using the following equation:

M-NMOC = 1.89 x 10 -3 Q-LFG C-NMOC

M-NMOC = mass emission rate of NMOC, megagrams per year
Q-LFG = flow rate of landfill gas, cubic meters per minute
C-NMOC = NMOC concentration, parts per million by volume as hexane

(a) The flow rate of landfill gas, Q-LFG, shall be determined by measuring the total landfill gas flow rate at the common header pipe that leads to the control devices using a gas flow measuring device calibrated according to the provision of section 4 of Method 2E of appendix A of 40 CFR Part 60.

(b) The average NMOC concentration, C-NMOC , shall be determined by collecting and analyzing landfill gas sampled from the common header pipe before the gas moving or condensate removal equipment using the procedures in Method 25C or Method 18 of appendix A of 40 CFR Part 60. If using Method 18, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The sample location on the common header pipe shall be before any condensate removal or other gas refining units. The permittee shall divide the NMOC concentration from Method 25C by six to convert from C-NMOC as carbon to C-NMOC as hexane.

(c) The permittee may use another method to determine landfill gas flow rate and NMOC concentration if the method has

been approved by the Administrator.

(2) Paragraphs (1)(a) through (1)(c) of this condition will determine when the landfill gas collection and control system is no longer subject to the requirements of 40 CFR Section 60.752 (b)(2). However, as part of the evaluation of BAT for this source, the Department will approve removal of equipment, as indicated in Condition #033 of this section.

 # 028 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Sections 60.755(a)(1) and (2).]

The owner/operator shall

(a) As specified by 40 CFR Section 60.755(a)(1),

(i) For the purposes of calculating the maximum expected gas generation flow rate from the landfill, to determine compliance with Conditions #001 (c) and (d) of this section, use the equation pursuant to 40 CFR § 60.755(a)(1)(ii), unless another method has been approved by the Department. The k and Lo kinetic factors should be those referenced in Condition #011. A value of no more than 15 years shall be used for the intended use period of the gas mover equipment. The active life of the landfill is the age of the landfill plus the estimated number of years until closure.

(ii) If a collection and control system has been installed at the facility, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, the equation referenced in paragraph (a) above. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using the equation referenced in paragraph (a)(i) or other methods shall be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment.

(b) As specified by 40 CFR Section 60.755(a)(2),

For the purposes of determining sufficient density of gas collectors for compliance with Conditions #001 (c) and (d) for this source, design a system of vertical wells, horizontal collectors, or other collection devices, satisfactory to the Department, capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.

The Administrator shall approve any alternate calculation methods.

 # 029 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 60.759].

(a) Each owner or operator of a landfill gas collection and control system used to comply with Condition #001 for this source, shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless alternative procedures have been approved by the Department as provided in Condition #001(1)(b):

(i) The collection devices within the interior and along the perimeter areas shall be certified to achieve comprehensive control of surface gas emissions by a professional engineer. The following issues shall be addressed in the design: depths of refuse, refuse gas generation rates and flow characteristics, cover properties, gas system expandability, leachate and condensate management, accessibility, compatibility with filling operations, integration with closure end use, air intrusion control, corrosion resistance, fill settlement, and resistance to the refuse decomposition heat.

(ii) The sufficient density of gas collection devices determined in paragraph (a)(i) of this condition shall address landfill gas migration issues and augmentation of the collection system through the use of active or passive systems at the landfill perimeter or exterior.

(iii) The placement of gas collection devices determined in paragraph (a)(i) of this section shall control all gas producing areas, except as provided by paragraphs (a)(iii)(1) and (a)(iii)(2) of this condition.

(1) Any segregated area of non-degradable material may be excluded from collection if documented as provided under Condition #016(c)(ii). The documentation shall provide the nature, date of deposition, location and amount of non-degradable material deposited in the area, and shall be provided to the Department upon request.

(2) Any nonproductive area of the landfill may be excluded from control, provided that the total of all excluded areas can be shown to contribute less than 1 percent of the total amount of NMOC emissions from the landfill. The amount, location, and age of the material shall be documented and provided to the Department upon request. A separate NMOC emissions estimate shall be made for each section proposed for exclusion, and the sum of all such sections shall be compared to the NMOC emissions estimate for the entire landfill. Emissions from each section shall be computed using the following equation, as given in 40 CFR Section 60.759(a)(3)(ii):

$$Qi = 2 k Lo Mi (e^{-kti}) (C\text{-}NMOC) (3.6 \times 10^{-9})$$

where,

Qi = NMOC emission rate from the ith section, megagrams per year

k = methane generation rate constant, year -1

Lo = methane generation potential, cubic meters per megagram solid waste

Mi = mass of the degradable solid waste in the ith section, megagram

ti = age of the solid waste in the ith section, years

C-NMOC = concentration of non-methane organic compounds, parts per million by volume

3.6 x 10 -9 = conversion factor

(3) The values for k, Lo, and C-NMOC determined in field testing shall be used, if field testing has been performed in determining the NMOC emission rate or the radii of influence. If field testing has not been performed, the default values for k, Lo and C-NMOC provided in 60.754(a)(1) shall be used. The mass of non-degradable solid waste contained within the given section may be subtracted from the total mass of the section when estimating emissions provided the nature, location, age, and amount of the non-degradable material is documented as provided in paragraph (1)(a)(iii)(1) of this condition.

(b) Each owner or operator of a landfill collection and control system used to comply with Condition #001 for this source shall construct the gas collection devices using the following equipment or procedures:

(i) The landfill gas extraction components shall be constructed of polyvinyl chloride (PVC), high density polyethylene (HDPE) pipe, fiberglass, stainless steel, or other nonporous corrosion resistant material of suitable dimensions to: convey projected amounts of gases; withstand installation, static, and settlement forces; and withstand planned overburden or traffic loads. The collection system shall extend as necessary to comply with emission and migration standards. Collection devices such as wells and horizontal collectors shall be perforated to allow gas entry without head loss sufficient to impair performance across the intended extent of control. Perforations shall be situated with regard to the need to prevent excessive air infiltration.

(ii) Vertical wells shall be placed so as not to endanger underlying liners and shall address the occurrence of water within the landfill. Holes and trenches constructed for piped wells and horizontal collectors shall be of sufficient cross-section so as to allow for their proper construction and completion including, for example, centering of pipes and placement of gravel backfill. Collection devices shall be designed so as not to allow indirect short circuiting of air into the cover or refuse into the collection system or gas into the air. Any gravel used around pipe perforations should be of a dimension so

as not to penetrate or block perforations.

(iii) Collection devices may be connected to the collection header pipes below or above the landfill surface. The connector assembly shall include a positive closing throttle valve, any necessary seals and couplings, access couplings and at least one sampling port. The collection devices shall be constructed of PVC, HDPE, fiberglass, stainless steel, or other nonporous material of suitable thickness.

(c) Each owner or operator of a landfill collection and control system used to comply with Condition #001 for this source shall convey the landfill gas to a control system as specified by 60.752(b)(2)(iii) through the collection header pipe(s). The gas mover equipment shall be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment using the following procedures:

(i) For existing collection systems, the flow data shall be used to project the maximum flow rate. If no flow data exists, the procedures in paragraph (c)(ii) of this condition shall be used.

(ii) For new collection systems, the maximum flow rate shall be as specified by 60.755(a)(1)

The Administrator will approve any alternative procedures.

 # 030 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1955]
Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
What requirements must I meet?

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.6(e)(1)(i) and (ii)]

In accordance with 40 CFR Sections 63.1955(b) and 63.6(e)(1)(i), the owner/operator shall:

(a) At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emisions. During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires that the permittee reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

(b) In accordance with 40 CFR Sections 63.1955(b) and 63.6(e)(1)(ii),

Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan pursuant to 40 C.F.R. § 63.6(e)(3) (Condition #031). To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the owner/operator must comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices.

 # 031 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1955]
Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
What requirements must I meet?

In accordance with 40 CFR Sections 63.1955(b) and 63.6(e)(3), the owner/operator shall:

Develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. The startup, shutdown, and malfunction plan does not need to address any scenario that would not cause the source to exceed an applicable emission limitation in the relevant standard. The purpose of the startup, shutdown and malfunction plan is to

(i) Ensure that at all times, the owner or operator operates and maintains each affected source, including associated air pollution control and monitoring equipment, in a manner which satisfies the general duty to minimize emissions established by 40 CFR Section 63.6(e)(1)(i) (Condition #029).

(ii) Ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and

(iii) Reduce the reporting burden associated with periods of startup, shutdown and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

VII. ADDITIONAL REQUIREMENTS.

 # 032 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 C.F.R. § 60.755(e).]

As specified by 40 CFR Section 60.755(e),

The provisions of 40 CFR Part 60, Subpart WWW set forth in this permit shall apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of any period of start-up shutdown or malfunction shall not exceed 5 days for the gas collection system and shall not exceed 1 hour for any control device. Periods when a control device is idle because the landfill gas is being controlled by one or more of the approved control devices do not constitute a period of shutdown or malfunction.

The malfunction exemption is only applicable for determinations of compliance with the provisions of 40 CFR Part 60, Subpart WWW.

 # 033 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Other than routine maintenance and repair, the owner/operator shall only remove equipment from the landfill gas collection and control system upon approval of the Department. The owner/operator shall provide a description in writing of the equipment proposed to be removed and a sketch, if applicable. The Department shall request additional information as necessary in order to evaluate the proposed equipment removal.

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: 110 Source Name: PARTS WASHER

Source Capacity/Throughput:

PROC 110 → STAC Z110

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

 # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall monitor and record, on an annual basis, the amount of solvent lost to the atmosphere from this parts washer.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

 # 002 [25 Pa. Code §129.63]

Degreasing operations

Cold cleaning machines. Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.

(1) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:

(i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (2). In addition, the label shall include the following discretionary good operating practices:

(A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

(B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

(C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser

unit.

(ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.

(2) Cold cleaning machines shall be operated in accordance with the following procedures:

(i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.

(iv) Air agitated solvent baths may not be used.

(v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

(3) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

(4) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:

(i) The name and address of the solvent supplier.

(ii) The type of solvent including the product or vendor identification number.

(iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

(5) A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (4). An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

(6) Paragraph (3) does not apply:

(i) To cold cleaning machines used in extreme cleaning service.

(ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (3) will result in unsafe operating conditions.

VII. ADDITIONAL REQUIREMENTS.

 # 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This parts washer is a "remote reservoir cold cleaning machine" containing an approximately 10 gallon sink and a 30 gallon drum.

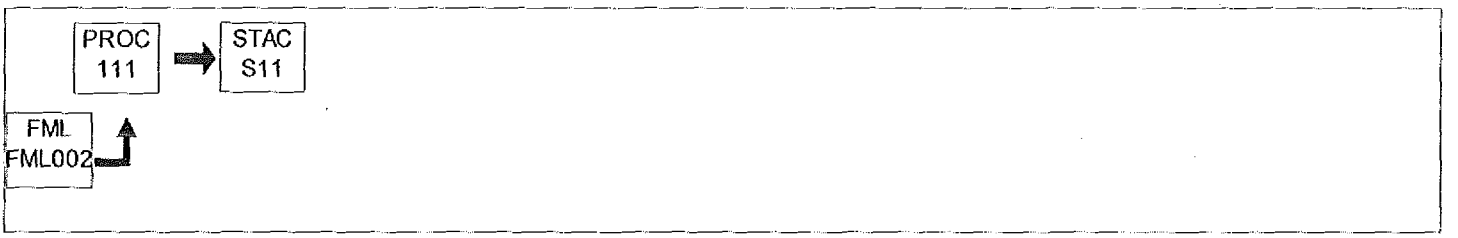
***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: 111 Source Name: EMERGENCY GENERATOR (335 HP)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: EMERGENCY GENERATOR ENGINES



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

 # 001 [25 Pa. Code §127.441]
Operating permit terms and conditions.

This generator engine is a Kohler 250REOZV, Model Year 2003.

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: C05 Source Name: IC ENGINE/GENERATOR CATERPILLAR G3516LE

Source Capacity/Throughput: 1,148.000 HP-Hr/HR LANDFILL GAS

Conditions for this source occur in the following groups: SMALL NOX
STACK TESTS

I. RESTRICTIONS.

Emission Restriction(s).

 # 001 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) Emissions of oxides of nitrogen (NOx) shall be limited to 0.7 g/BHP-hr and 7.76 tons per year, calculated as a 12-month rolling sum.

(b) Emissions of volatile organic compounds (VOC) shall be limited to 0.50 g/BHP-hr and 5.54 tons per year, calculated as a 12-month rolling sum.

(c) Emissions of carbon monoxide (CO) shall be limited to 3.4 g/BHP-hr and 37.7 tons per year, calculated as a 12-month rolling sum.

(d) Emissions of sulfur oxides, expressed as SO2 shall be limited to 500 parts per million by volume, dry basis (ppmvd).

 # 002 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The two IC engines, Source IDs C05 and C08, and the enclosed flare, Source ID C07, shall be limited to the combined emissions of the following pollutants, all on a 12-month rolling basis:

	tons/year
VOC:	17.98
NOx:	22.93
CO:	147.20
SOx:	14.77
PM, PM10 and PM2.5	5.97

Fuel Restriction(s).

 # 003 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The IC engine shall be operated only using landfill gas generated in the North, and South Cells and the Willa expansion of the SECCRA Landfill, or other Department approved landfill sources.

Operation Hours Restriction(s).

 # 004 [25 Pa. Code §127.441]
Operating permit terms and conditions.

There is no restriction in the operating hours of the IC engine.

Throughput Restriction(s).

 # 005 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) The IC engine shall have a maximum rated capacity of 1,148 BHP.

(b) The IC engine shall be limited to 7,742 BTU/BHP-hr.

(c) The IC engine shall be limited to a maximum of 366 SCFM of landfill gas.

(d) A written request shall be made to the Department if the BTU value of the landfill gas changes to the extent that the volume flow of the landfill gas sent to the IC engine needs to be increased. The volume flow and the BTU content together shall not exceed a heat input rate of 8.9 MMBTU/hr.

Control Device Efficiency Restriction(s).

006 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Authority for the permit condition is also derived from 40 CFR Section 60.752(b)(2)(iii)(B).]

The IC engine shall have a minimum NMOC destruction efficiency of 98% by weight or the concentration of NMOC in the outlet shall be less than 20 ppmv dry basis as hexane at 3% oxygen.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.441]
Operating permit terms and conditions.

A gas flow meter shall be installed on the main pipeline taking landfill gas from the North and South Cells, the Willa expansion and other Department approved landfill sources, to the IC engine.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) Landfill gas flow rate to the IC engine shall be be recorded daily.

(b)
(1) Emissions of all pollutants for which limitations are given in this Operating Permit shall be calculated and recorded on a monthly and on a 12-month rolling basis, in order to demonstrate compliance with the limitations in Condition # 001 for this source..

(2) The combined emissions from Sources C05, C07 and C08 shall be calculated and recorded on a monthly and 12-month rolling basis to demonstrate compliance with the combined limitations for these sources in Condition #002 of this section.

(3) Emission factors determined during the most recent stack test (where available) shall be used in the calculation. If stack test data are not available, emission factors presented in Plan Approval application 15-0060G shall be used, unless another factor is approved in writing by the Department

(c) Records of maintenance shall be kept on file and shall be provided to the Department upon request.

009 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Authority for this permit condition is also derived from 40 CFR Section 60.758(b).]

The owner/operator shall keep records of:

(a) the percent reduction of NMOC achieved by this control device in its initial performance test for the life of the control

device and in subsequent performance tests for a minimum of 5 years;

(b) records of vendor specifications for this control device until its removal.

V. REPORTING REQUIREMENTS.

010 [25 Pa. Code §127.441]
Operating permit terms and conditions.

All landfill gas flow to the IC engine and emissions reports shall be reported to the Department annually.

VI. WORK PRACTICE REQUIREMENTS.

011 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) The IC engine and generator shall be maintained as per manufacturer's specifications.

(b) If the IC engine is not operated for more than 48 hours for any reason, the Department shall be notified in writing, within 2 business days after the first 48 hours of inoperation.

VII. ADDITIONAL REQUIREMENTS.

012 [25 Pa. Code §127.441]
Operating permit terms and conditions.

Manufacturer: Caterpillar
Model: G3516LE-SITA
Type: IC Engine/Generator
Source Designation: LFGTE
Rated Capacity: 1,148 BHP
Maximum Capacity: 1,148 BHP
S/N: 8LZ00556

013 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 60.755(e).]

As specified by 40 CFR Section 60.755(e),

The provisions of 40 CFR Part 60, Subpart WWW set forth in this permit shall apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of any period of start-up shutdown or malfunction shall not exceed 5 days for the gas collection system and shall not exceed 1 hour for any control device. Periods when a control device is idle because the landfill gas is being controlled by one or more of the approved control devices do not constitute a period of shutdown or malfunction.

The malfunction exemption is only applicable for determinations of compliance with the provisions of 40 CFR Part 60, Subpart WWW.

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: C07 Source Name: ENCLOSED FLARE

Source Capacity/Throughput: 72,000.000 CF/HR

Conditions for this source occur in the following groups: STACK TESTS

I. RESTRICTIONS.

Emission Restriction(s).

 # 001 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) Emissions of oxides of nitrogen (NOx) shall be limited to 0.06 lb/MMBtu, 2.15 lbs/hr, and 9.42 tons per year, calculated as a 12-month rolling sum.

(b) Emissions of volatile organic compound (VOC) shall be limited to 0.075 lb/hr, and 0.33 ton per year, calculated as a 12-month rolling sum.

(c) Emissions of carbon monoxide (CO) shall be limited to 0.2 lb/MMBtu, 7.20 lbs/hr, and 31.54 tons per year, calculated as a 12-month rolling sum.

(d) Emissions of oxides of sulfur (SOx) shall be limited to 3.10 lbs/hr, and 13.58 tons per year, calculated as a 12-month rolling sum.

(e) Emissions of particulate matter (PM, PM10 and PM2.5) shall be limited to 0.60 lbs/hr, and 2.63 tons per year, calculated as a 12-month rolling sum.

 # 002 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The two IC engines, Source IDs C05 and C08, and the enclosed flare, Source ID C07, shall be limited to the combined emissions of the following pollutants, all on a 12-month rolling basis:

	tons/year
VOC:	17.98
NOx	22.93
CO:	147.20
SOx	14.77
PM, PM10 and PM2.5	5.97

 # 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.752]
Subpart WWW--Standards of Performance for Municipal Solid Waste Landfills
Standards for air emissions from municipal solid waste landfills.

In accordance with 40 CFR Section 60.752(b)(2)(iii)(B),

the owner/operator of this enclosed flare shall design and operate the enclosed flare to reduce NMOC by 98 weight percent, or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

 # 004 [25 Pa. Code §127.441]
Operating permit terms and conditions.

A gas flow meter shall be installed on the main pipeline taking landfill gas from the North and South Cells, the Willa expansion, and other Department approved landfill sources, to the enclosed flare so that landfill gas flow can be monitored

on a continuous basis when the enclosed flare is operating.

005 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Authority for this permit condition is also derived from 40 CFR Section 60.756(b).]

The owner/operator shall calibrate, maintain and operate according to the manufacturer's specifications:

(a) a temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of +/- 1 percent of the temperature being measured expressed in degrees Celsius or +/- 0.5 degrees Celsius, whichever is greater.

(b) a gas flow rate measuring device that provides a measurement of gas flow to or bypass of the control device. The owner/operator shall install, calibrate and maintain the gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) Records of flow of landfill gas to the flare shall be maintained on a continuous basis.

(b) Records of operating temperature of the flare shall be maintained on a continuous basis.

(c) Records of hours of operation shall be maintained on a daily basis.

(d) Whenever the enclosed flare is operated, a record shall be kept for the reason of operation of the enclosed flare.

(e) The landfill gas shall be analyzed by an on-line process gas chromatograph, or other instrument equivalent in accuracy, to determine the methane content of the fuel. Records of the methane content shall be maintained on a daily basis.

(f)

(1) Emissions of all pollutants for which limitations are given in this Operating Permit shall be calculated and recorded on a monthly and on a 12-month rolling basis, in order to demonstrate compliance with the limitations in Condition # 001 for this source..

(2) The combined emissions from Sources C05, C07 and C08 shall be calculated and recorded on a monthly and 12-month rolling basis to demonstrate compliance with the combined limitations for these sources in Condition #002 of this section.

(3) Emission factors determined during the most recent stack test (where available) shall be used in the calculation. If stack test data are not available, emission factors presented in Plan Approval application 15-0060G shall be used, unless another factor is approved in writing by the Department

007 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The owner/operator shall record all periods during which landfill gas flow to the flare was bypassed dirctly to the atmosphere for a period of one hour or more.

008 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is from 40 CFR Section 60.758(b).]

The owner/operator of this control device shall keep records of

(a) the average combustion temperature measured at least every 15 minutes and averaged over the time period as the performance test;

(b) the percent reduction of NMOC achieved by the control device in its initial performance test for the life of the control device and in subsequent performance tests for a minimum of 5 years;

(c) records of vendor specifications for the control device until its removal.

 # 009 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Authority for this permit condition is also derived from 40 CFR Section s 60.758(c) and (b).]

The owner/operator shall keep records of the following:

(a) for 5 years

(i) the combustion temperature and gas flow rate monitored;

(ii) all 3-hour periods of operation during which the average combustion temperature was more than 28 C below the average combustion temperature during the most recent performance test;

(iii) records of performances tests subsequent to the initial.

(b) initial performance tests for the life of the control device.

V. REPORTING REQUIREMENTS.

 # 010 [25 Pa. Code §127.441]
Operating permit terms and conditions.

All landfill gas flow to the enlcosed flare shall be reported to the Department annually.

VI. WORK PRACTICE REQUIREMENTS.

 # 011 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is from $) CFR Section 60.758(c)(1)(i).]

(a) The enclosed flare covered under this Operating Permit and manufactured by LFG Specialties, Inc., model EF83516, shall be used to burn landfill gas generated on-site from the North and South Cells, and the Willa expansion, and any other Department approved landfill sources. The flare shall not burn landfill gas generated from any future expansion without appropriate approval from the Department.

(b) The enclosed flare may be used up to its full capacity (i) independently as a primary control device (ii) as a backup flare in case of disruption in the supply of landfill gas to one or both IC engines installed to generate electricity (iii) for control of offsite migration of landfill gas (iv) for control of malodors (v) as a control device in conjunction with one or both engines when the landfill gas production exceeds the capacity of the two IC engines installed to generate electricity.

(c). The flare shall burn a maximum of 1200 scfm of landfill gas at 50% methane.

(d) The enclosed flare shall maintain, for each 3-hour period of operation based on rolling hourly data, an average combustion temperature of no more than 28°C(50.4°F) below the average combustion temperature during the most recent performance test in which compliance with the destruction efficiency/NMOC removal in Condition was demonstrated.

(e) Tthe retention time at the operating temperature shall be 1.158 seconds as documented by the design standards. The flare will be allowed an appropriate warm-up sequence in accordance with the manufacturer's specifications, to attain this minimum operating temperature. The flue gas temperature shall be monitored and recorded.

(f) The flare shall be equipped with a pilot and shall be designed to meet the criteria for automatic system shutoff if a flame-out occurs.

VII. ADDITIONAL REQUIREMENTS.

 # 012 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Authority for this permit condition is also derived from 40 CFR Section 60.755(e).]

As specified by 40 CFR Section 60.755(e),

The provisions of 40 CFR Part 60, Subpart WWW set forth in this permit shall apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of any period of start-up shutdown or malfunction shall not exceed 5 days for the gas collection system and shall not exceed 1 hour for any control device. Periods when a control device is idle because the landfill gas is being controlled by one or more of the approved control devices do not constitute a period of shutdown or malfunction.

The malfunction exemption is only applicable for determinations of compliance with the provisions of 40 CFR Part 60, Subpart WWW.

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: C08 Source Name: IC ENGINE/GENERATOR CATERPILLAR G3520C (PA60F)

Source Capacity/Throughput: 2,233.000 HP-Hr/HR LANDFILL GAS

Conditions for this source occur in the following groups: SMALL NOX
STACK TESTS

I. RESTRICTIONS.

Emission Restriction(s).

 # 001 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The permittee shall comply with the following emissions limitations:

(a) Emissions of oxides of nitrogen (NOx) shall be limited to 0.50 g/bhp-hr and 10.78 tons/year on a 12-month rolling basis.

(b) Emissions of volatile organic compounds (VOC) shall be limited to 0.57 g/bhp-hr and 12.29 tons/year on a 12-month rolling basis.

(c) Emissions of carbon monoxide (CO) shall be limited to 4.40 g/bhp-hr and 94.88 tons/year on a 12-month rolling basis.

(d) Emissions of sulfur oxides, expressed as SO2 shall be limited to 500 parts per million by volume, dry basis (ppmvd).

(e) Emission rate of formaldehyde shall be limited to 0.436 g/bhp -hr, in order to protect ambient air quality, based on the Department's Risk Assessment.

Note: The permittee shall comply with lower formaldehyde emission limits as necessary in order to comply with facility wide limitations for HAPs.

 # 002 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The two IC engines, Source IDs C05 and C08, and the enclosed flare, Source ID C07, shall be limited to the combined emissions of the following pollutants, all on a 12-month rolling basis:

	tons/year
VOC:	17.98
NOx	22.93
CO:	147.20
SOx	14.77
PM, PM10 and PM2.5	5.97

Fuel Restriction(s).

 # 003 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The IC engine shall be operated only using landfill gas generated in the North Cell, the South Cell and the Willa expansion of the SECCRA Landfill, or other Department approved landfill sources.

Operation Hours Restriction(s).

 # 004 [25 Pa. Code §127.441]
Operating permit terms and conditions.

There is no restriction in the operating hours of the IC engine.

SECTION D. Source Level Requirements

Throughput Restriction(s).

005 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) The IC engine shall have a maximum rated capacity of 2,233 bhp.

(b) The IC engine shall be limited to 14.19 MMBtu/hr.

(c) The IC engine shall be limited to a maximum of 473 scfm of landfill gas.

(d) A written notification shall be made to the Department if the Btu value of the landfill gas changes to the extent that the volume flow of the landfill gas sent to the IC engine needs to be increased. The volume flow and the Btu content together shall not exceed a heat input rate of 14.19 MMBtu/hr.

Control Device Efficiency Restriction(s).

006 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Authority for this permit condition is also derived from 40 CFR Section 60.752(b)(2)(iii)(B).]

The IC engine shall have a minimum NMOC destruction efficiency of 98% by weight or the concentration of NMOC in the outlet shall be less than 20 ppmv dry basis as hexane at 3% oxygen.

II. TESTING REQUIREMENTS.

007 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

[Additional authority for this condition is derived from 40 CFR Sections 60.4243(b), 60.4245(d), and 25 Pa. Code Section 127.441.]

(a) In accordance with 40 CFR Section 60.4243(b)(2)(ii) for an engine not certified to the procedures in 40 CFR Subpart JJJJ, the owner/operator shall conduct performance testing in addition to the 5-year testing required by Condition #005, every 8760 hours or 3 years, whichever comes first, to demonstrate compliance with the emissions limits for NOx, CO and VOC in 40 CFR Subpart JJJJ, Table 1 and as given in Condition #001 of this section.

[Compliance with the NOx and CO emission limits in Condition #001 of this section assures compliance with the limits for those pollutants in 40 CFR Section 60.4233(e).]

(b) In accordance with 40 CFR 60.4243, additional performance testing is not required for a certified engine.

(c) Performance tests shall be conducted with Department approved methods and in accordance with the provisions of 25 Pa Code Chapter 139, the Department's Source Testing Manual (274-0300-002) and 40 CFR Section 60.4244.

(d) At least ninety (90) days prior to the test, the company shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples Submission shall be in accordance with Section E of this Operating Permit, Stack Test Submissions, Condition #001.

When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(e) At least thirty (30) days prior to the test, the Department shall be informed of the expected date and time of the test, in accordance with Section E of this Operating Permit, Stack Test Submissions, Condition #001. Final acceptance of the test date is contingent on approval of the test protocol.

(f) In accordance with 40 CFR 60.4245 (d) and 25 Pa. Code Section 127.441,

Within sixty (60) days after the source test(s), copies of the complete test report, including all operating conditions, shall be submitted to the Department in accordance with Section E of this Operating Permit, Stack Test Submissions. and 1 to the EPA for approval.

Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference—see 40 CFR 60.17) to measure VOC require reporting of all QA/QC data. For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 report results of all QA/QC procedures in Annexes 1-7.

III. MONITORING REQUIREMENTS.

 # 008 [25 Pa. Code §127.441]
Operating permit terms and conditions.

A gas flow meter shall be installed on the main pipeline taking landfill gas from the NorthCell, the South Cells, the Willa expansion, and other Department approved landfill sources, to the IC engine.

IV. RECORDKEEPING REQUIREMENTS.

 # 009 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 60.4245(a)(2).]

(a) Landfill gas flow rate to the IC engine shall be recorded daily.

(b)
(1) Emissions of all pollutants for which limitations are given in this Operating Permit shall be calculated and recorded on a monthly and on a 12-month rolling basis, in order to demonstrate compliance with the limitations in Condition # 001 for this source.

(2) The combined emissions from Sources C05, C07 and C08 shall be calculated and recorded on a monthly and 12-month rolling basis to demonstrate compliance with the combined limitations for these sources in Condition #002 of this section.

(3) Emission factors determined during the most recent stack test (where available) shall be used in the calculation. If stack test data are not available, emission factors presented in Plan Approval application 15-0060G shall be used, unless another factor is approved in writing by the Department

(c) Records of maintenance shall be kept on file and shall be provided to the Department upon request.

[Compliance with maintenance recordkeeping assures compliance with 40 CFR Section 60.4245(a)(2).]

 # 010 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The owner/operator shall maintain a running log of the hours of operation since the last performance test conducted pursuant to 40 CFR Section 60.4243(b)(2)(iii).

 # 011 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR Section 60.758(b).]

The owner/operator shall keep records of:

(a) the percent reduction of NMOC achieved by this control device in its initial performance test for the life of the control device and in subsequent performance tests for a minimum of 5 years;

(b) records of vendor specifications for this control device until its removal.

 # 012 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) In accordance with 40 CFR Section 60.4245 (a)(1), the owner/operator of a non-certified engine shall keep records of notifications and supporting documentation to include the information in 40 CFR Section 60.4245 (c):

(1) the name and address of the owner/operator;
(2) the address of the source;
(3) engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
(4) fuel used.

(b) In accordance with 40 CFR Section 60.4245 (a) (4), the owner/operator of a non-certified engine shall keep documentation that the engine meets the emissions standards of Table 1 to 40 CFR Part 60, Subpart JJJJ.

V. REPORTING REQUIREMENTS.

 # 013 [25 Pa. Code §127.441]
Operating permit terms and conditions.

All landfill gas flow to the IC engine and emissions reports shall be reported to the Department annually.

VI. WORK PRACTICE REQUIREMENTS.

 # 014 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) The IC engine and generator shall be maintained as per manufacturer's specifications.

(b) If the IC engine is not operated for more than 48 hours for any reason, the Department shall be notified in writing, within 2 business days after the first 48 hours of inoperation.

VII. ADDITIONAL REQUIREMENTS.

 # 015 [25 Pa. Code §127.441]
Operating permit terms and conditions.

Manufacturer: Caterpillar
Model: G3520C
Type: IC Engine/Generator
Source Designation: LFGTE
Rated Capacity; 2,233 BHP
Maximum Capacity: 2,233 BHP

 # 016 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The owner/operator shall ensure that the stack height is at the minimum 34.6 ft with a diameter of 1.33 ft in accordance with Good Engineering Practice (GEP). The Department reserves the right to revise the stack height in accordance with the GEP to ensure that emissions of Hazardous Air Pollutants (HAPs) meet ambient air quality standards.

 # 017 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 60.755(e).]

As specified by 40 CFR Section 60.755(e),

SECTION D. Source Level Requirements

The provisions of 40 CFR Part 60, Subpart WWW set forth in this permit shall apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of any period of start-up shutdown or malfunction shall not exceed 5 days for the gas collection system and shall not exceed 1 hour for any control device. Periods when a control device is idle because the landfill gas is being controlled by one or more of the approved control devices do not constitute a period of shutdown or malfunction. The malfunction exemption is only applicable for determinations of compliance with the provisions of 40 CFR Part 60, Subpart WWW.

 # 018 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4230]

Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Am I subject to this subpart?

This source is subject to the requirements of 40 CFR Part 60 Subpart JJJJ and shall comply with all applicable requirements.

***** Permit Shield in Effect. *****

SECTION E. Source Group Restrictions.

Group Name: EMERGENCY GENERATOR ENGINES

Group Description: Subpart ZZZZ & 127.441 conditions for emergency engines

Sources included in this group

ID	Name
102	EMERGENCY GENERATOR (102 HP)
111	EMERGENCY GENERATOR (335 HP)

I. RESTRICTIONS.

Emission Restriction(s).

 # 001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

 # 002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 ppmvd.

Fuel Restriction(s).

 # 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall use diesel fuel only for these sources.

(b) The diesel fuel used shall conform to the 15 ppm fuel sulfur limitation of 40 CFR Section 80.510 (EPA Clean Diesel Rule).

Operation Hours Restriction(s).

 # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate either of these emergency generator engines more than 500 hours in any 12 consecutive month period.

 # 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requiremer

[Additional authority for this condition is derived from 25 Pa. Code Section 127.441.]

In accordance with 40 CFR section 63.6640(f),

The owner/operator shall operate each engine according to the requirements in paragraphs (a) through (c) of this condition. In order for the engine to be considered an emergency stationary RICE under 40 CFR Part 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) through (c), is prohibited. If the engine is not operated according to the requirements in paragraphs (a) through (c), the engine will not be considered an emergency engine under 40 CFR Subpart ZZZZ and must meet all requirements for non-emergency engines.

(a) There is no time limit on the use of either engine in emergency situations unless elsewhere specified.

(b) The emergency engine may be operated for any combination of purposes specified in this paragraph for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this condition counts as part of the 100 hours per calendar year allowed by paragraph (b) of this condition.

SECTION E. Source Group Restrictions.

The emergency engine may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per year.

(c) The emergency engine may be operated for up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing, provided in paragraph (b). Except as provided in paragraphs (c)(A) through (E) of this condition, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

 # 006 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The permittee shall monitor the hours of operation and type of fuel used, for each of these sources, monthly.

 # 007 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The permittee shall record the hours of operation and type of fuel used, for each of these sources, monthly.

 # 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What are my monitoring, installation, operation, and maintenance requirements?

In accordance with 40 CFR Section 63.6625(f),

the owner/operator shall install a non-resettable hour meter if one is not already installed on each engine.

SECTION E. Source Group Restrictions.

IV. RECORDKEEPING REQUIREMENTS.

 # 009 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The owner/operator shall keep a fuel delivery receipt, which indicates the sulfur content, for each delivery of diesel fuel to be used in the emergency generator engines.

 # 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What are my monitoring, installation, operation, and maintenance requirements?

The owner/operator using an oil analysis program, as described in Condition # 021 of this section, shall keep records of the parameters that are analyzed as part of the oil analysis program, the results of the analysis, and the oil changes for each engine.

 # 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What are my monitoring, installation, operation, and maintenance requirements?

In accordance with 40 CFR Section 63.6655,

The owner/operator shall keep the following:

(a) a copy of any submission made under 40 CFR Part 63 Subpart ZZZZ

(b) records of the occurrence and duration of each malfunction of an engine or its monitoring equipment

(c) records of all required maintenance performed on the monitoring equipment

(d) records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR Section 63.6605(b) (Condition # 018), including actions to restore the malfunctioning process and monitoring equipment to its normal or usual manner of operation.

(e) records of the maintenance performed on each engine in order to demonstrate that the engine was operated and maintained according to the facility's own maintenance plan and/or the manufacturer's emission related operation and maintenance instructions.

 # 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What records must I keep?

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.441.]

(a) In accordance with 40 CFR Section 63.6655(f), the owner/operator shall keep records of the hours of operation of each engine that is recorded through the non-resettable hour meter. The owner/operator shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(1) The hours of operation for non-emergency operation shall identify the hours the engine was operated for maintenance checks and readiness testing, even if the operation for this purpose was for greater than 100 hours per calendar year. If the engine is operated for greater than 100 hours per calendar year, the owner/operator shall keep a record of the authorization, to include the number of hours authorized, for the additional hours of maintenance and readiness testing pursuant to 40 CFR Section 63.6640(f)(i)[Condition #005(b)], whether this authorization is an approval of the petition from the Administrator or the Federal, State, or local standard mandating the additional hours.

(2) If the engine is used for the purposes specified in 40 CFR 63.6640(f)(4)(ii) [Condition #005(c)(A - E)], the owner or operator must keep records of the notification of the emergency
situation, and the date, start time, and end time of engine operation for these purposes.

(b) Hours shall be recorded and classified in accordance with paragraph (a) of this conditon whenever the engine is

SECTION E. Source Group Restrictions.

operated and tabulated on a monthly and on a calendar year basis.

 # 013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
In what form and how long must I keep my records?

In accordance with 40 CFR Section 63.6660,

(a) Each record kept for 40 CFR Part 63 Subpart ZZZZ shall be kept readily accessible in hard copy or electronic format for 5 years following the date of each occurrence, maintenance action, measurement, etc.

(b) Records shall be in a format for expeditious review.

V. REPORTING REQUIREMENTS.

 # 014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6650]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What reports must I submit and when?

In accordance with 40 CFR Section 63.6650(f),

The owner/operator shall report all deviations as defined in 40 CFR Part 63 Subpart ZZZZ in the semi-annual deviation report, required pursuant to Section C Condition # 020.

 # 015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6650]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What reports must I submit and when?

If an engine operates for the purposes specified in 40 CFR Section 63.6640(f)(4)(ii)(Condition #005(c)), the owner/operator shall submit an annual report according to the requirements in 40 CFR Sections 63.6650(h)(1) through (3).

VI. WORK PRACTICE REQUIREMENTS.

 # 016 [25 Pa. Code §127.441]
Operating permit terms and conditions.

These sources shall be operated and maintained in accordance with manufacturer's specifications.

 # 017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

In accordance with 40 CFR Section 63.6603, the owner/operator shall perform the following maintenance on each engine:

(a) change the engine oil and filter every 500 hours of operation or annually, whichever comes first;
(b) inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and
(c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary

 # 018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6605]
Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
What are my general requirements for complying with this subpart?

In accordance with 40 CFR Section 63.6605(b),

The owner/operator must operate and maintain these sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.The general duty to minimize emissions does not require the owner/operator to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and

maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

 # 019 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What are my monitoring, installation, operation, and maintenance requirements?

In accordance with 40 CFR Section 63.6625(e)(3),

The owner/operator shall operate and maintain each engine according to manufacturer's emission related written instructions or develop his own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practices for minimizing emissions.

 # 020 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What are my monitoring, installation, operation, and maintenance requirements?

In accordance with 40 CFR Section 63.6625(h),

The owner/operator shall minimize an engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

 # 021 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What are my monitoring, installation, operation, and maintenance requirements?

In accordance with 40 CFR Section 63.6625(i),

(a) The owner/operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition # 017 of this section. The oil analysis must be performed at the same frequency specified for changing the oil in Condition # 017. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later.

(b) The analysis program must be part of the maintenance plan for the engine.

VII. ADDITIONAL REQUIREMENTS.

 # 022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

These engines are subject to the requirements of 40 CFR Part 63 Subpart ZZZZ. The owner/operator shall comply with all applicable requirements.

***** Permit Shield in Effect. *****

SECTION E. Source Group Restrictions.

Group Name: SMALL NOX

Group Description: requirements of 25 Pa. Code Section129.203

Sources included in this group

ID	Name
C05	IC ENGINE/GENERATOR CATERPILLAR G3516LE
C08	IC ENGINE/GENERATOR CATERPILLAR G3520C (PA60F)

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

 # 001 [25 Pa. Code §129.203]

Stationary internal combustion engines.

[Additional authority for this condition is derived from 25 Pa. code Section 129.204]

The owner or operator of a stationary internal combustion engine rated at greater than 1000 hp and located in Bucks,Chester, Delaware, Montgomery or Philadelphia County shall comply with 25 Pa. Code §§ 129.203 and 129.204.

(a) By October 31 of each year, the permittee shall calculate the difference between the actual emissions from the engine during the period from May 1 through September 30 and the allowable emissions for that period.

(b) The owner/operator shall calculate the allowable emissions by multiplying the cumulative hours of operation for each engine for the period by the horsepower rating of the unit and by the applicable emission rate set forth in paragraph (c).

(c) For a spark ignited engine, 3.0 grams of NOx per brake horsepower-hour is the applicable emissions rate for allowable emissions.

(d) The permittee shall determine the NOx actual emissions between May 1 and September 30 of each year in accordance with one of the following methods:

(1) The 1-year average emission rate calculated from the most recent emission limit compliance demonstration test data for nitrogen oxides, or if unavailable,

SECTION E. Source Group Restrictions.

(2) The maximum hourly allowable nitrogen oxides emisson rate contained in this Operating Permit.

(e) The owner/operator shall surrender CAIR NOx allowances, if required, in accordance with 25 Pa. Code Section 129.204.

***** Permit Shield in Effect. *****

SECTION E. Source Group Restrictions.

Group Name: STACK TESTS

Group Description: Stack Test Requirements and Submission Procedures.

Sources included in this group

ID	Name
C05	IC ENGINE/GENERATOR CATERPILLAR G3516LE
C07	ENCLOSED FLARE
C08	IC ENGINE/GENERATOR CATERPILLAR G3520C (PA60F)

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

 # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For Source IDs C05, C07 and C08,

(a) The permittee shall perform a stack test using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples. Procedures shall be submitted according to the submission requirements in Section E, Stack Tests, Condition #002.

If the Department is not able to approve the test procedures, which were submitted in a timely manner, within three weeks of the proposed test date; an alternative test date will be negotiated between the permittee and the Department. Alternative test dates that do not meet the testing time-limits established in this operating permit, shall not be considered a deviation.

(c) The stack test shall, at a minimum, test for VOC, CO, SO2 and NOx in order to demonstrate compliance with the limits in Section D Condition #001 of the respective source. In addition, testing of Source ID C08 shall include formaldehyde. Tests shall be conducted in accordance with the provisions of EPA Methods 25, 25A, or 18, as described in paragraphs (c)(i),(ii) and iii of this Condition, 10, 6C, 7E, and 323 or other Department approved methodology and 25 Pa. Code Chapter 139.

Stack testing shall also be performed to demonstrate compliance with the NMOC limitation in Section D Condition #006 for Source IDs C05 and C07 and Condition #003 for Source ID C07.

(i) Compliance with the control system outlet concentration requirement shall be indicated by an emission test program demonstrating the NMOC concentration to be <50 ppmvd (as carbon) measured at the control system outlet by U.S. EPA Reference Method 25A (RM25A) and U.S. EPA Reference Method 18 (RM18). RM18 is only used to quantify and subtract the non-regulated pollutant of methane from the results of the RM25A test results in order to obtain the control system exhaust concentration as NMOC. If an NMOC concentration of greater than or equal to 50 ppmvd as carbon is measured at the control system outlet by RM25A; that RM25A test cannot be used to demonstrate compliance with the NMOC emission concentration limit. In that event, the owner/operator must retest the device within 90 days, or a longer period as approved in writing by the Department. The owner/operator will select one of the following options:

(1) Perform any necessary evaluation, maintenance and/or adjustments, and perform the retest using RM25A and M18, or

(2) Retest using U.S. EPA Reference Method 25 (RM25) to determine if the outlet emissions are less than 20 ppmv (as hexane at 3% oxygen), or

(3) Retest using RM25, in conjunction with U.S. EPA Reference Methods 1, 2, 3 or 3A, and 4, for testing the control system inlet and outlet or to determine the control device destruction efficiency, or

(4) Retest using another methodology otherwise approved by the Department upon the permittee's request.

(ii) If the original test included carbon monoxide (CO) and nitrogen oxide (NOX) emissions testing to determine compliance with an applicable emission limit, then the retest of the control system (for failure to demonstrate compliance with the NMOC emission concentration) should also include a retest of the CO and NOX emissions to assure continued compliance with those emissions standards.

(iii) The NMOC stack test shall, at a minimum, test for NMOC at the control system outlet in accordance with the provisions of U.S. EPA Reference Method 25A (RM25A), U.S. EPA Reference Method 18 (RM18) for methane only and 25 Pa. Code Chapter 139; or utilize another test methodology that has been approved by the Department at the permittee's request. Alternatively, the permittee may choose to test the control system outlet concentration or percent destruction efficiency on a mass basis as determined in accordance with the provisions of U.S. EPA Reference Methods 1, 2, 3 or 3A, 4; and 25 or 25A/18; and with 25 Pa. Code Chapter 139 at the control system inlet and/or control system outlet; or by another test methodology otherwise approved by the Department.

(d) At least thirty (30) days prior to the test, the Department shall be informed of the date and time of the test, in accordance with the submission requirements in Section E, Stack Tests, Condition #002. Final acceptance of the test date is contingent on approval of the test protocol.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), paper and electronic copies of the complete test report, including all operating conditions, shall be submitted to the Department for approval, in accordance with Section E, Stack Tests, Condition #002.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause. The Department can, at its discretion, change dates or time limits specified in operating permits that are not otherwise prohibited from change by regulation.

 # 002 [25 Pa. Code §127.441]
Operating permit terms and conditions.

(a) The permittee shall submit one paper copy plus one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (mail and email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

a. For protocols, provide the proposed date on which testing will commence or "TBD"
b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF Id under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

a. Plan approval number(s)
b. Operating permit number
c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
d. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

SECTION E. Source Group Restrictions.

(c) Mail all paper submissions to both the PSIMS Administrator and the Air Quality Program Manager for the Southeast Regional Office. Mailing addresses are provided below.

Central Office
Pennsylvania Department of Environmental Protection
Attn: PSIMS Administrator
P.O. Box 8468
Harrisburg, PA 17105-8468

Southeast Region
Pennsylvania Department of Environmental Protection
Attn: Air Quality Program Manager
2 East Main Street
Norristown, PA 19401

(d) Eliminate shading, color ink for data emphasis, small font size, and color saturation as the scanning to create an electronic file is done in black and white. Shading and color emphasis do not scan well and make the electronic copies difficult to read.

(e) Email all electronic submissions to both the PSIMS Administrator in Central Office and the Air Quality Program Manager for the Southeast Regional Office. Email addresses are provided below.

Central Office
RA-EPstacktesting@pa.gov

Southeast Region
RA-EPSEstacktesting@pa.gov

(f) The Department limits emails to 15 MB and PSIMS has a file size limitation of 100 MB for electronic files. Submit just one electronic file (convert any Microsoft Word or Excel files to an Adobe PDF format and combine them with the report or protocol), unless the submission contains CONFIDENTIAL information.

(g) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

SECTION E. Source Group Restrictions.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

*** Permit Shield in Effect. ***

SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

SECTION G. Emission Restriction Summary.

Source Id	Source Description
105	MSW LANDFILL (NORTH, SOUTH CELL & WILLA EXPANSION)

Emission Limit			Pollutant
1.980	Tons/Yr	as a 12-month rolling sum, post-closure	VOC
2.970	Tons/Yr	as a 12-month rolling sum (pre-closure)	VOC

C05	IC ENGINE/GENERATOR CATERPILLAR G3516LE

Emission Limit			Pollutant
3.400	GRAMS/HP-Hr	g/bhp-hr	CO
37.700	Tons/Yr	12-month rolling sum	CO
147.200	Tons/Yr	12-month rolling sum, combined C05, C08, C07	CO
0.700	GRAMS/HP-Hr	g/bhp-hr	NOX
7.760	Tons/Yr	12-month rolling sum	NOX
22.930	Tons/Yr	12-month rolling sum, combined C05, C08, C07	NOX
5.970	Tons/Yr	12-month rolling sum, combined C05, C08, C07, PM, PM10, PM2.5	PM10
500.000	PPMV	dry basis, expressed as SO2	SOX
0.500	GRAMS/HP-Hr	g/bhp-hr	VOC
5.540	Tons/Yr	12-month rolling sum	VOC
17.980	Tons/Yr	12-month rolling sum, combined C05, C08, C07	VOC

C07	ENCLOSED FLARE

Emission Limit			Pollutant
0.200	Lbs/MMBTU		CO
7.200	Lbs/Hr		CO
31.540	Tons/Yr	as a 12-month rolling sum	CO
147.200	Tons/Yr	12-month rolling sum, C05, C07, C08 combined	CO
0.060	Lbs/MMBTU		NOX
2.150	Lbs/Hr		NOX
9.420	Tons/Yr	as a 12-month rolling sum	NOX
22.930	Tons/Yr	12-month rolling sum, C05, C07, C08 combined	NOX
0.600	Lbs/Hr	PM, PM10 and PM2.5	PM10
2.630	Tons/Yr	as a 12-month rolling sum, PM, PM10, PM2.5	PM10
5.970	Tons/Yr	12-month rolling sum, PM, PM10, PM2.5 combined C05, C07 and C08	PM10
3.100	Lbs/Hr		SOX
13.580	Tons/Yr	as a 12-month rolling sum	SOX
14.770	Tons/Yr	as 12-month rolling sum C05, C07, C08 combined	SOX
0.075	Lbs/Hr		VOC
0.330	Tons/Yr	as a 12-month rolling sum	VOC
17.980	Tons/Yr	12-month rolling sum, combined C05, C08, C07	VOC

SECTION G. Emission Restriction Summary.

Source Id	Source Description
C08	IC ENGINE/GENERATOR CATERPILLAR G3520C (PA60F)

Emission Limit			Pollutant
4.400	GRAMS/HP-Hr	g/bhp-hr	CO
94.880	Tons/Yr	12-month rolling sum	CO
147.200	Tons/Yr	12-month rolling sum, C05, C07, C08 combined	CO
0.436	GRAMS/HP-Hr	g/bhp-hr	Formaldehyde
0.500	GRAMS/HP-Hr	g/bhp-hr	NOX
10.780	Tons/Yr	12-month rolling sum	NOX
22.930	Tons/Yr	12-month rolling sum, C05, C07, C08 combined	NOX
5.970	Tons/Yr	12-month rolling sum, PM, PM10, PM2.5, combined C05, C07, C08	PM10
14.770	Tons/Yr	12-month rolling sum, combined C05, C08, C07	SOX
500.000	PPMV	dry basis, expressed as SO2	SOX
0.570	GRAMS/HP-Hr	g/bhp-hr	VOC
12.290	Tons/Yr	12-month rolling sum	VOC
17.980	Tons/Yr	12-month rolling sum, C05, C07, C08 combined	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
147.280 Tons/Yr	12-month rolling sum	CO
14.800 Tons/Yr	12-month rolling sum	SOX
99.900 Tons/Yr	12-month rolling sum, PM	TSP
23.310 Tons/Yr	12-month rolling sum	NOX
20.970 Tons/Yr	12-month rolling sum (pre-closure)	VOC
30.330 Tons/Yr	12-month rolling sum	PM10
8.440 Tons/Yr	12-month rolling sum	PM2.5
15.060 Tons/Yr	12-month rolling sum (pre-closure)	Hazardous Air Pollutants
19.980 Tons/Yr	12-month rolling sum (post-closure)	VOC
14.500 Tons/Yr	12-month rolling sum (post-closure)	Hazardous Air Pollutants

SECTION H. Miscellaneous.

1. The Department has determined that emissions from the following activities, excluding those indicated as Site Level Requirements in Section C of this permit, do not require additional limitations, monitoring or recordkeeping.

Storage Tanks
Material - Size - Location
a. Propane (FML001) - 250 gallon for flare (C07) pilot- Enclosed Flare Propane Storage
b. Waste Oil - 300 gallon - Engine No. 1 Building
- 300 gallon - Engine No. 3 Building
- 275 gallon - Maintenance Building
- 385 gallon - Recycling Collection Center
Diesel - 500 gallon on-road - Fuel Island
- 275 gallon - Maintenance Building
- 500 gallon- Maintenance Building
- 2 @ 300 gallon each - Mobile refueling Unit
- 575 gal (FML002) for 102 hp Emergency Generator Source ID 102
- 500 gallon for 335 hp Emergency Generator Source ID 111 - Pump House 1
Gasoline - 300 gallons - Fuel Island
Water - 6,000 gallons - Mobile Spraying Unit
Leachate - 14,000 gallons - Pump House No. 2
- 6,000 gallons - Pump House No. 3
- 4,000 gallons - Pump House No. 4
- 2@ 330,000 gallons each - Pump House 1
- 800 gallon raw leachate process tank - Reverse Osmosis Treatment Plant

Condensing Boiler 205,000 Btu/hr - Reverse Osmosis Treatment Plant

50,000 Btu/hr infrared heater (natural gas fired)

Space Heaters
1 @ 118,000 Btu/hr No. 2 distillate fuel fired - Maintenance Building
1@ 30,000 Btu/hr natural gas fired

2. The original State Only Operating Permit 15-00060 (APS 469027 AUTH 485313) issued on June 6, 2006 serves as the basis for certain terms and conditions set forth in this State Only Operating Permit.

3. November 16, 2011:This issuance of the State Only Operating Permit (APS #469027 AUTH # 881213) incorporates Plan Approval PA-15-0060C and RFD 15-A01-1130.

4. May, 2013: This initial issuance of the Title V Operating Permit (APS # 770788 AUTH # 911535) incorporates Plan Approval 15-0060D.

5. The following changes from SOOP 15-00060 are made with the initial issuance of TVOP 15-00060:

Section A:
Fuel Material Locations are added for propane, diesel fuel and natural gas.
The Parts Washer is added as a source and a map included.
The permit maps for Source ID 102 and 103 are revised to include the fuel.
The permit map for Source 105 is revised to include the flare.

Section C:
Emissions Restrictions-
- Emissions limitations are indicated as being finalized after the incorporation of Plan Approval 15-0060G.

Monitoring-
- Tiered monitoring is removed. Perimeter monitoring will be required once daily. The facility monitoring condition is revised to include the requirement for approprate action to be taken upon observation of odors, fugitive or visible emissions.

SECTION H. Miscellaneous.

Recordkeeping-
A condition is included for recordkeeping of facility-wide emissions of NOx, CO, VOC,SOx, PM10/PM2.5 and HAP on a monthly and on a 12-month rolling basis.

Reporting-
- The condition for reporting of accidental releases pursuant to 40 CFR Part 68 is removed, as the condition is included in Section B.
- The wording of the AIMS reporting requirement is revised to conform to current Department practice.
- A condition for semi-annual deviation reporting is added for the Title V facility.

Work Practice-
-The reference for the condition prohibiting modifications without Department approval is revised for the Title V.

Section D
Source ID 102
- The applicable conditions of 40 CFR Part ZZZZ are included.

Source ID 105

Throughput Restriction-
-The condition is revised to reflect issuance of the solid waste permit for the North cell re-grade.

Source ID C05
Fuel Restriction-
-The condition is revised to permit use of landfill gas from all Department approved sources.

Testing-
- Conditions reflecting current Department guidance for NMOC concentration and destruction efficiency testing are included.

Monitoring-
-The condition is revised to include monitoring from all Department approved landfill gas sources.

Recordkeeping-
The requirement to record emissions on a 12-month rolling basis is added.

Source ID 110
Requirements for the source are included.
Recordkeeping- solvent loss on an annual basis.
Work Practice- requirements of 25 Pa. Code Section 129.63.
Additional- description of the parts washer.

The following changes to Source C07 requirements are made with incorporation of Plan Approval 15-0060D.

Fuel Restriction-
-The condition is revised to allow use of landfill gas from all Department approved sources.

Testing-
The testing requirement from the Plan Approval is included on a once in 5 years basis. Current Department guidelines for test report preparation are included.

Recordkeeping
The recordkeeping condition for methane content of the fuel is revised to include analysis by a gas chromatograph or "equivalent instrument."

6. August, 2013: The Title V Operating Permit (APS # 770788 AUTH # 978753) is amended to incorporate Plan Approval 15-0060F for IC engine Source ID C08 and change the permit contact and responsible official to Scott Mengle.

The following changes are made with the incoporation of Plan Approval 15-0060F:

SECTION H. Miscellaneous.

Section C
Facility wide emissions limitations are referenced to Plan Approval 15-0060G.

Malfunction reporting condition is included in accordance with Department guidelines.

Section D
The requirements of 40 CFR Part 60 Subpart JJJJ are included.

Emission Restrictions
- Formaldehyde limitation is set in accordance with Department guidelines for Risk Assessment.
- Emissions of NOx, CO and VOC on a 12-month rolling basis are referenced to Plan Approval 15-0060G.

Fuel Restriction
-The condition is revised to allow use of landfill gas from all Department approved sources.

Operating Hours Restriction
- The condition is removed, pursuant to Plan Approval 15-0060G.

Throughput Restriction
- A typographical error is corrected to 14.19 MMBtu/hr.

Testing
-The testing requirement from the Plan Approval is included on a once in 5-year basis, with either destruction efficiency or NMOC concentration determineation required. Current Department guidelines for report preparation and testing procedures for NMOC compliance demonstration are included.

Recordkeeping
A condition for the keeping of a running log of the hours of operation since the last test pursuant to 40 CFR Section 60.4243(b)(2)(ii) is included.

Work Practice
- A limit of 2 business days is included for reporting of the engines's inoperation.

7. August, 2019: APS # 770788, AUTH # 1205324
The Operating Permit is renewed and Plan Approval 15-0060G is incorporated.

The following changes were made with the renewed TVOP. Condition numbers refer to the August 16, 2013 amended issuance.

Section G was rearranged to keep the minor source listing in Item 1. Item 1 was modified to account for changes in the insignificant sources as follows:
Size changes: 2 waste oil tanks to 300 gal. from 275 gal.,1 water tank to 6000 gal from 2000 gal..
Location change: 1 - 500 gal diesel tand 1- 300 gal gasoline located to Fuel Island
Correction : to 2- 330,000 gal leachate tanks from 2 @33,000 gal.
Additions: leachate; 1@4000 gal, 1@800 gal., 1-diesel @500 gal., 1- condensing boiler @ 205,000 Btu/hr, 1 infrared heater @ 50,000 Btu/hr, 1-space heater @30,000 Btu/hr.

Cover Page
Steve Burn's title was changed to "Site Manager."

Section A
The Leachate Evaporators (Source ID 103) were removed and an Emergency Generator (335 hp) (Source ID 111) was added.

All references to condition numbers in the Operating Permit apply to the August 16, 2013 amended issuance of the Operating Permit 15-00060. All references to condition numbers in the Plan Approval apply to the September 24, 2013 modified issuance of the Plan Approval 09-0060G.

The wording of the following standard facility-wide conditions in the Operating Permit was changed based on current Department guidance.

SECTION H. Miscellaneous.

Section C, Operating Permit
Condition #002 – regulatory reference to the open burning prohibition was included.
Condition #003 – regulatory reference was included
Condition #006 – The condition was revised to include the exemptions of opacity training and the regulatory reference for the allowable fugitive emissions.
Condition #008
The complete list of exceptions in 25 Pa. Code Section 129.14(c) to the open burning prohibition was included.

Condition #009
In part (b) of the condition, a reference to the latest version of the DEP Source Test manual was included.

Condition #012
The regulatory references for prohibitions against odors, visible and fugitive emissions were included to better define the monitoring required.

Condition #013
"Monthly" was added to the recordkeeping requirement for landfill gas volumes, on a 12-month rolling basis, since the monthly amount must be known before the 12-month rolling amount is calculated.

Condition #014
Was combined with similar condition Section C #003 from Plan Approval 15-0060G.

Condition #023
Paragraph (b) of this condition was removed, since it no longer fits DEP guidelines for standard conditions.

Section C, Plan Approval
The following Conditions from the Plan Approval were incorporated into the Operating Permit, Section C:
#001, pertaining to facility emissions limits.
#002, pertaining to the keeping of records for 5 years
#003, pertaining to calculating and recording emissions from individual sources and the facility. Condition #003 was modified to include use of emission factors from the latest stack test if available.
#004, pertaining to addresses for notices and reports. The condition was modified to include electronic reporting
Condition #005, #006 were removed since they only apply to the Plan Approval

Section D, Operating Permit
Source ID 102

Condition #005
The following changes were made in response to the US Court of Appeals vacatur on May 2, 2016.
"Emergency demand response" was removed from the lead paragraph.
Paragraphs (b)(2) and (3) were removed.
Paragraph (c)(1) was removed, since the applicability date has passed.

Condition #012
40 CFR Sections 63.6640(f)(2)(ii) – (iii) was removed in response to the Court of Appeals vacatur.

Condition #023
Section (b) containing the compliance date for 40 CFR Part 63 Subpart ZZZZ was removed, since the date is past.

Additional
Source ID 102 was grouped with Source ID 111, which has the same conditions, into Section E, Emergency Generator Engines.

Section D, Operating Permit
Source ID 105
Condition #001, pertaining to finalization of emissions was removed, since the emissions limits are finalized herein.
Condition #002, pertaining to allowable waste capacity was replaced by Condition #007 from the Plan Approval
Conditions #003 and #004, pertaining to calculation of VOC emissions were combined with a similiar emissions calculation condition in Section C

SECTION H. Miscellaneous.

Condition #005, pertaining to recordkeeping for road wetting, was moved to Section C
Condition #007, pertaining to good operating and maintenance practices was removed since it is covered by the Section C condition.

Section D, Plan Approval
Source ID 105

In All references to requirements of 40 CFR Part 60 Subpart WWW conditions as being Best Available Technology were removed. While the conditions do define Best Available Technology, pursuant to DEP's Landfill Guidance Document (275-2101-007), the facility is now subject to 40 CFR Part 60 Subpart WWW conditions in its own right with inclusion of the Willa expansion. This has affected Conditions
#001, #002, #003, #004, #011, #014, #015, #016, #017, #023, #025, #032, #033, #036 of the Plan Approval.

Condition #001
(a) The date the gas collection and control plan was received was included, since the no additional submissions are currently required.

(b) The phrase "and subsequent modifications" was included since the GCC plan can be revised.

(c) This condition required installation of the gas collection and control system within 30 months of the issuance of the Plan Approval. It was removed since the gas collection control system is operating. The condition was replaced with the requirement to maintain the gas collection and control system.

Condition #006
The condition was removed since the NMOC emission rate was determined to be 50 megagrams per year and the landfill gas collection and control system has been installed.

Condition #012
The condition specifying the calculation procedure for the annual NMOC emission rate from the landfill was removed since 50 megagrams per year has been exceeded and the landfill gas control system installed.

Condition #013
The requirement to submit the VOC/NMOC ratio determination report within 90 days of completion of the testing, to the Air Quality Manager, was included.

Conditions #019, #020, #021, #027, #028,034, #035
The introductory phrase "by the time the landfill is required to install a collection and control system" was removed from the conditions since the time for this requirement has passed.

Condition #022
The condition was removed, since the owner/operator is exempted from the required annual NMOC reporting once the gas collection and control system is installed and operational.

Condition #026
The condition was removed since the report indicating a design capacity of over 2.5 million megagrams and cubic meters was submitted.

Section D, Operating Permit
Source ID C05

Condition #002, #009
The Willa expansion was added to the list of landfill area approved to deliver landfill gas to the engine.

Condition #005
The newly applicable authority of 40 CFR Section 60.752(b)(2)(iii)(B) was added to the condition.

Condition #006

SECTION H. Miscellaneous.

The Condition was updated for current guidelines for stack testing to include 90 days for protocol review, including 90 days for protocol approval, a single protocol for routine testing under the same conditions, and removal of the reference to DEP's Source Testing Manual. The Condition was combined with similar ones for Source IDs C07 and C08 and placed in Section E (Stack Tests).

Conditions #007 and #008, pertaining to stack test submissions were replaced with an updated condition, in Section E(Stack Tests), requiring provision of 1 electronic and 1 paper copy submission to the Regional Office and to DEP's stack testing group was added based on recent guidance from DEP's Source Test Group. The updated condition also includes requirement for organization of pertinent information related to the stack test.

Condition #010
The emissions recordkeeping condition was combined with the emissions recordkeeping condition from the Plan Approval (Condition #007) to include individual source emissions on a 12-month rolling basis as well as the combined C05, C07 and C08.

Additional
The requirements of 25 Pa. Code Sections 129.203 and 129.204 for C05 and C08 were added to a new Section E (Small NOx).

Section D, Plan Approval
Source ID C05

Condition #006
The newly applicable authority of 40 CFR Section 60.758(b) was added to the performance testing and vendor specification recordkeeping condition.

Condition #008
The start-up, shutdown and malfunction definition condition was stated under the authority of 40 CFR Section 60.755(e) only.

Operating Permit
Source ID C07

Condition #001
The emissions limits were replaced by emissions limits from Plan Approval 15-0060G.

Condition #002
The Condition was updated for current guidelines for stack testing to include 90 days for protocol review, including 90 days for protocol approval, a single protocol for routine testing under the same conditions, and removal of the reference to DEP's Source Testing Manual. The condition was combined with similar ones for Source IDs C05 and C08 and placed in Section E (Stack Tests).

Conditions #003 and #004, pertaining to stack test submissions, were replaced with an updated condition in Section E, (Stack Tests), requiring provision of 1 electronic and 1 paper copy to the Regional Office and DEP's stack testing group was added based on recent guidance from DEP's Source Test Group. The updated condition also includes requirement for organization of pertinent information related to the stack test.

Condition #005, #008
The Willa expansion was added to the list of landfill areas approved to deliver landfill gas to the engine.

Condition #006
Emissions calculations on a monthly & 12-month rolling basis was added to the condition for the source and combination of sources C05, C06, C07.

Condition #007
Part (b) of the condition, pertaining to annual reporting of pollutants to the Department, was removed since the requirement is covered under the annual source report, Section C, Condition #022.

Condition #008
*Paragraphs (b) and (c) limiting the flare as a back-up or temporary control device were replaced with conditions from the Plan Approval allowing it's use as a primary control device if the production of landfill gas exceeds the capacity of the 2 engines.

SECTION H. Miscellaneous.

*1600 °F was replaced with requirements from 40 CFR Part 60 Subpart WWW, setting the temperature not to be operated for each 3-hour period of operation based on rolling hourly data, an average combustion temperature of no more than 28°C(50.4°F) below the average combustion temperature during the most recent performance test in which compliance with the destruction efficiency/NMOC removal was demonstrated.

Plan Approval
Source ID C07

Condition #002
The condition requiring NMOC 98% destruction efficiency or NMOC outlet concentration of 20ppmdv was added under the authority of 40 CFR Section 60.752(b)(2)(iii)(B), since the regulation now directly applies to the facility.

Condition #004, #006, #007, #011
The reference to BAT was removed with the incorporation of the conditions, since the requirements from 40 CFR Part 60 Subpart WWW now apply directly to the flare.

Operating Permit
Source ID C08

Condition #001
Limits per 12-month rolling period were added from the Plan Approval

Condition #002, #009
The Willa expansion was added to the list of landfill areas approved to deliver landfill gas to the engine.

Condition #004
The newly applicable authority of 40 CFR Section 60.752(b)(2)(iii)(B) was added to the condition.

Conditions #005, #008
The Conditions were updated for current guidelines for stack testing to include 90 days for protocol review, including 90 days for protocol approval, a single protocol for routine testing under the same conditions, and removal of the reference to DEP's Source Testing Manual.The condition was combined with similar ones for Source IDs C05 and C07 and placed in Section E (Stack Tests).

Conditions #006, #007 pertaining to stack test submissions were replaced with an updated condition in Section E, (Stack Tests), requiring provision of 1 electronic and 1 paper copy submission to the Regional Office and to DEP's stack testing group was added based on recent guidance from DEP's Source Test Group. The updated condition also includes requirement for organization of pertinent information related to the stack test.

Condition #010
The emissions recordkeeping condition was combined with the emissions recordkeeping condition from the Plan Approval (Condition #007) to include individual source emissions on a 12-month rolling basis as well as the combined C05, C07 and C08.

Additional
The requirements of 25 Pa. Code Sections 129.203 and 129.204 were added for Source IDs C05 and C08 in a new Section E (Small NOx).

Plan Approval
Source ID C08.

Condition #006
The newly applicable authority of 40 CFR Section 60.758(b) was added to the condition.

Condition #009
The start-up, shutdown and malfunction definition condition was stated under the authority of 40 CFR Section 60.755(e) only.

****** End of Report ******

Commonwealth of Pennsylvania
Department of Environmental Protection
Southeast Regional Office
(484) 250-5920

Date: July 12, 2019

Subject: Review Memo:
Title V Operating Permit, Renewal
Incorporation of Plan Approval 15-0060G
Southeastern Chester County Refuse Authority (SECCRA)
London Grove Township
Chester County
Application No. 15-00060
APS ID #770788, AUTH ID #1205324

To: James D. Rebarchak
Regional Manager
Air Quality Program
7/25/19

From: Tina C. Vogler, P.E. TCV
Air Quality Engineer
New Source Review Section

Through: James A. Beach, P.E. JAB 7/17/2019
Environment Engineer Manager
New Source Review Section
Air Quality
and
Janine Tulloch-Reid, P.E. JTR 7/22/2019
Environmental Engineer Manager
Facilities Permitting Section
Air Quality

1. Application Overview

On September 27, 2017, the Department of Environmental Protection (DEP) received an application from Southeastern Chester County Refuse Authority (SECCRA) for renewal of the Title V Operating Permit for its landfill and associated landfill gas collection and control system located at 219 Street Road, London Grove Township, Chester County. The DEP issued the initial Title V Operating Permit for the facility on May 28, 2013 and an Administrative amendment to incorporate Plan Approval 15-0060F for a landfill gas fired engine on August 16, 2013. TVOP 15-00060 expired on May 27, 2018. The facility is eligible for a permit shield in accordance with 25 Pa. Code Section 127.446(c). The permit shield provided by 25 Pa. Code Section 127.446(c) automatically extends the terms of an expired permit if the applicant has submitted a timely and complete renewal application.

Prior to issuance of the Title V Operating Permit,[1] SECCRA operated under State Only Operating Permit 15-00060, initially issued on June 6, 2006. SECCRA also operates under Plan Approval 15-0060G (expiration June 17, 2020), for an expansion (Willa Expansion) of the landfill and associated landfill collection and control system, which is being incorporated with this renewal.

SECCRA has submitted municipal notification to London Grove Township and Chester County, as required by 25 Pa Code §127.413. The applicant has also submitted an operating permit fee of $750.00 with the application as required by 25 Pa. Code Section 127.704(a)(3) and is up-to-date on payment of emission fees pursuant to 25 Pa. Code Section 127.705.

The SECCRA facility (SIC Code 4953 Trans. & Utilities – Refuse Systems and NAIC Code 562212 -Solid Waste Landfill) comprises a municipal solid waste (MSW) landfill and its gas collection system (Source ID 105), two (2) diesel fired emergency generators (Source IDs 102 and 111), two (2) landfill gas fired engines (Source IDs C05 and C08), an enclosed flare (Source ID C07) and a Parts Washer (Source ID 110). Two Leachate Evaporators (Source ID 103), which were removed from the facility were removed from the Operating Permit with the Renewal.

SECCRA is a Title V facility for carbon monoxide (CO).

2. Source Description/Operation

The SECCRA Landfill is a publicly owned and operated facility that began operations in 1986. Only municipal solid waste from 24 designated boroughs and townships in southern Chester county is accepted. Landfill areas include the North Cell[2], the South Cell and the Willa Expansion. The combined area of the three areas encompasses about 86 acres. Combined disposal mass is 4.0 million tons.

The North cell is capped and no longer receiving waste. The South Cell is not receiving waste at this time. SECCRA plans on applying to DEP for authorization to increase the disposal volume of the South cell by a regrade. Only the Willa Expansion is receiving waste, which commenced on October 13, 2014 and is expected to continue until the year 2036.

Landfill

The landfill gas contains methane and volatile organic compounds (VOCs), generated by the decomposition of MSW. It is collected from the landfill by applying vacuum within the waste mass through a number of landfill gas (LFG) extraction wells using a gas blower.[3] SECCRA operates under the Landfill Gas Collection Control System (GCCS) Plan, received in DEP on April 5, 2017. In accordance with the GCCS Plan and the requirements of 40 CFR Part 60 Subpart WWW (see Section 6), landfill gas collectors would include vertical collectors,

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[1]The Title V became required, pursuant to 25 Pa. Code Section 121.1, when the potential to emit increased to over 100 tons/year carbon monoxide emissions.

[2] An additional 117,330 cubic yards[2], acquired due to a re-grade of the North Cell, was approved by the Department's Solid Waste Program. The emissions increase due to the re-grade was considered exempt from Air Quality Plan Approval by RFD 15-A01-1130.

[3] Pump tests performed by the facility have indicated a collection efficiency of 91%. Paresh Desai to Renata Gryn, Re: SECCRA Community Landfill – Pump Test Report, September 3, 2009

horizontal collectors, surface collectors, and supplemental gas collection points. Currently there are 54 vertical extraction wells operative at the SECCRA landfill.

Engines and Enclosed Flare

In order to control the emissions of landfill gas, the landfill gas is conveyed to either of two (2) Internal Combustion (IC) engines or to the enclosed flare. Combustion of the landfill gas in the engines produces electricity which is sold by SECCRA to the grid. Emissions from the engines comprise unreacted or generated volatile organic compounds (VOC), hazardous air pollutants (HAP), nitrogen oxides (NOx), carbon dioxide (CO), particulate matter (PM10, PM2.5)[4] from the combustion process and sulfur dioxide (SO2), from combustion of sulfur bearing compounds in the landfill gas. With the incorporation of Plan Approval 15-0060G, the enclosed flare may operate when one or both engines are out of service. The flare may also operate when landfill gas production exceeds the capacity of the engines.

Vehicular traffic is the major source of particulate matter, which is controlled by wet dust suppression (water truck).

Summary of Sources

Table 1 summarizes the sources present at the SECCRA facility and being included in this Operating Permit renewal.

The 335 hp Emergency Generator engine is newly included in the Operating Permit. Its installation was exempt from Plan Approval, as both the Emergency Generators at the facility will be operated in accordance with the exemption criteria in 25 Pa. Code Section 127.14(a)(8[5]).

The Leachate Evaporators (Source ID 103), which were last operated in February 2012, have been removed from the facility and the Operating Permit. The company constructed a system employing ultrafiltration and reverse osmosis in the area of the Leachate Evaporators for treating leachate (see Section 4).

The Emergency Generator engines do not have control devices. As indicated in the previous section, the IC Generators and the Enclosed Flare (Source IDs C05, C07 and C08) are control devices for the MSW Landfill (Source ID 105).

Additions to the Source data reflecting new or revised information are shown in bold in Table 1 with the specific changes noted below the Table.

[4] PM10 = particulate matter less than 10 microns, PM2.5 = particulate matter less than 2.5 microns

[5] Internal combustion engines regardless of size, with combined NOx emissions less than 100 lb/hr, 1000 lb/day, 2.75 tons per ozone season and 6.6 tons/year on a 12-month rolling basis.

Table 1
SECCRA Significant Facility Sources
TVOP 15-00060

Source ID	Source Name	Make/Model/ Model Year	Capacity	Date of Installation
102	Emergency Generator **(102 hp)**	Kohler/80	102 hp	April, 2000
105	MSW Landfill **(North, South Cells And Willa Expansion)**	-	**4.0 million tons**	**1986 North & South Cells** **July 15, 2013 -present Willa Expansion**
C05	IC Engine/Generator **Caterpillar G3616LE**	Caterpillar 3516LE-SITA	1148 hp/ 366 scfm LFG	January 15, 2007
C07	Enclosed Flare	LFG Specialties/ EF83516	36 MMBtu/hr/ 1200 scfm LFG	January, 2011
C08	IC Engine/Generator G3520C	Caterpillar G3520C	2233 hp	2011
110	Parts Washer	Safety Kleen solvent	~ 10 gallon sink with 30 gallon drum	2005
111	**Emergency Generator (335 hp)**	**Kohler 250REOZV/ Model Year 2003**	**335 hp**	**July, 2015**
S01	Stack for Emergency Generator **(102 hp)**		unknown	
S05	IC Engine/Generator **C05** Stack		**2727** scfm	
S07	Enclosed Flare Stack		**4392** scfm	
S08	IC Engine/Generator C08 Stack		**4851** scfm	
S11	**Stack for Emergency Generator (335 hp)**		**780 scfm**	

Source IDs

102	Name change to distinguish the 2 Emergency Generators
105	Name change to reflect inclusion of the Willa Expansion in the Source Installation date of North and South cells corrected Commencement of construction of Willa Expansion indicated
C05	Added identifying model number to name
111, S11	Added data for new source
S01, S05	Added identifying information to source name
S01, S05, S08	Corrected flow rate data in Air Management Information System (AIMS)

Summary of Sources of Minor Significance

SECCRA has indicated that the sources listed in Table 2 are of minor significance. There have been some changes or corrections to the sizes of units, as well as additions of units over the previous issuance of the Operating Permit. Additions or new or revised information are shown in bold in Table 2, with the specific change indicated in the 3rd column of the Table. These sources of minor significance were listed in Appendix G of the Title V Operating Permit. One 275-gallon diesel tank was removed from the Intermediate Processing Center and the operating permit renewal.

Table 2

Sources of Minor Significance at the SECCRA Facility

Unit	**Location**	**Change in renewal if any**
250-gallon propane tank (FML001) for flare (C07) pilot	Enclosed Flare Propane Storage	
300 gallon waste oil tank	Engine No. 1 Bldg	size
300 gallon waste oil tank	Engine No. 3 Bldg	size
275 gallon waste oil tank	Maintenance Building	
385 gallon waste oil tank	Recycling Collection Center	
500 gallon on-road diesel tank	**Fuel Island**	location
275 gallon diesel tank	Maintenance Building	
500 gallon diesel tank	Maintenance Building	
Two 300 gallon diesel tanks	Mobile Refueling Unit	
575 gallon diesel tank (FML002)	for Emergency Generator Source ID 102	
300 gallon gasoline tank	**Fuel Island**	location
6,000 gallon water tank	Mobile Spraying Unit	size
14,000 gallon leachate tank	Pump House No.2	
6,000 gallon leachate tank	Pump House No.3	
4,000 gallon leachate tank	Pump House No. 4	addition
Two **330,000** gallon leachate tanks	Pump House No. 1	correction

500 gallon diesel tank for Kohler Generator (Source ID 111)	Pump House No. 1	addition
118,000 Btu/hr Space Heater	Maintenance Building	
205,000 Btu/hr Condensing Boiler	Reverse Osmois Treatment Plant	addition
50,000 Btu/hr intrared heater (natural gas)		addition
30,000 Btu/hr space heater (natural gas)		addition
800 gallon raw leachate process tank	Reverse Osmosis Treatment Plant	addition

3. Operating Limits

SECCRA takes no restrictions in operating hours for the landfill gas collection and control system. SECCRA is subject to daily allowances for waste filling per their solid waste permit. There are short and long term emission limits for the engines and flares.

4. Inspection

DEP performed an operating permit inspection for the TVOP renewal, a Plan Approval inspection for 15-0060G and full compliance inspection (report on file) on February 25, 2019. Follow-up records were received February 26 and May 1, 2019.

The Willa expansion was being filled. Due to high winds and fluctuations in the power produced, neither of the IC engines was operating. The flare was operating. At 11:00 am the flare temperature was 1522 °F [6]with a 658 scfm flow rate.

The Leachate Evaporators had been replaced by a reverse osmosis system. A "clean" and a "reject" water stream are produced. The "clean" stream is sent to a 3 million- gallon lagoon and then spayed on a hayfield. The "reject" stream is returned to the landfill. The new leachate treatment system has resulted in the addition or increase of several tanks and a condensing boiler to the Insignificant Sources list in Section G.

The 335 hp Kohler generator engine was observed with its own 500- gallon diesel tank. No other new sources were identified.

5. Emissions

5.0 Potential to Emit

The potential to emit from individual sources at the SECCRA facility, was re-evaluated by SECCRA under Plan Approval application 15-0060G, for a landfill expansion (Willa Expansion).

[6] The reading was taken after the flare was recently started up and does not reflect a 3-hour rolling average.

The potential to emit from individual sources at the facility, included in the renewed Operating Permit, is given in Table 3 along with the overall facility limit. Footnotes at the bottom of the table, indicate the source of the emissions calculation or limit. Emissions estimates from individual sources are not additive to the total facility emissions, so SECCRA will restrict some sources in operation. Bold entries in Table 3 are limits in the renewed Operating Permit.

Table 3
SECCRA Potential to Emit

Source Name	Source ID	VOC tons/ year	NOx tons/year	CO tons/ year	SOx tons/ year	PM10 tons/ year	PM2.5 tons/ year	HAP tons/ year
Emergency Generator (102 hp) (5)	102	0.06	0.80	0.17	0.05	0.056	0.056	-
MSW Landfill (North, South and Willa)	105	**2.97 * 1.98 **** (1)				24.35 (3)	24.35 (3)	1.69* 1.13** (3)
IC Engine/Generator Caterpillar G3616lE	C05	**5.54 (2)**	**7.76 (2)**	**37.7 (2)**	3.13 (3)	1.75 (3)	1.75 (3)	3.94 (3)
Enclosed Flare	C07	**0.33 (1)**	**9.42 (1)**	**31.54 (1)**	**13.58 (1)**	**2.63 (1)**	**2.63 (1)**	2.06 (3)
IC Engine/Generator G3520C	C08	**12.29 (1)**	**10.78 (1)**	**94.88 (1)**	5.35 (3)	2.98 (3)	2.98 (3)	7.37 (3)
C05, C07, C08 Combined Limit		**17.98 (1)**	**22.93 (1)**	**147.2 (1)**	**14.77 (1)**	**5.97 (1)**	**5.97 (1)**	13.37 (3)
Parts Washer	110	0.002 (4)	-	-	-	-	-	-
Emergency Generator (335 hp) (5)	111	0.21	2.6	0.56	0.17	0.18	0.18	-
						-	-	-
Total Sources		21.22*	26.33	147.93	15.51	31.11	31.11	15.06
Total Facility Limit (1)		**20.97* 19.98****	**23.31**	**147.28**	**14.80**	**30.32 (6)**	**8.44**	**15.06* 14.50****

* before closure ** after closure

(1) Plan Approval 15-0060G limit
(2) TVOP 15-00060 current limit (maintained from 8/16/2013 issuance)
(3) Calculated for Plan Approval 15-0060G
(4) Calculated by DEP for initial Title V (5/28/2013 issuance)
(5) Calculated by DEP from AP-42 Table 3.3-1 herein.
(6) PM limit for the facility is 99.9 ton/year

5.1 Actual Emissions

Table 4 indicates the actual emissions at the facility as reported in the Air Information Management System (AIMS), for the two most recent years.

Table 4
SECCRA Actual Emissions as Reported in AIMS

2017

Source Name (Source ID)	VOC tons/ year	NOx tons/y ear	CO tons/ year	SOx tons/ year	PM10 tons/ year	PM2.5 tons/ year	HAP Tons/year
Emergency Generator (102)	-	0.2	-	-	-	-	-
MSW Landfill (105)	1.10	-	0.20	-	4.8	0.50	0.60
IC Engine/Generator Caterpillar G36161E (C05)	1.5	3.5	14.4	0.60	0.30	0.30	1.5
Flare (C07)	-	1.7	0.60	1.80	0.80	0.80	0.10
IC Engine/Generator G3520C (C08)	3.40	4.6	24.9	1.0	0.50	0.50	3.4
Other	-	0.10	-	-	-	-	-
Total	6.0	10.10	40.10	3.40	6.40	2.1	5.6

2018

Source Name (Source ID)	VOC tons/ year	NOx tons/y ear	CO tons/ year	SOx tons/ year	PM10 tons/ year	PM2.5 tons/ year	HAP Tons/year
Emergency Generator (102)	-	0.40	0.10	-	-	-	-
MSW Landfill (105)	1.0	-	0.20	-	5.30	0.60	0.60
IC Engine/Generator Caterpillar G36161E (C05)	1.2	2.8	11.7	0.40	0.20	0.20	1.2
Flare (C07)	0.10	2.4	0.8	2.5	1.2	1.2	0.10
IC Engine/Generator G3520C (C08)	0.80	1.0	5.6	0.20	0.10	0.10	0.80
Other	-	0.20	0.10	0.10	-	-	-
Total	3.1	6.8	18.5	3.2	6.8	2.1	2.7

6. Testing

The facility was required pursuant to 25 Pa. Code Section 127.441 to perform stack testing on the C05 and C08 engines and on the enclosed flare C07, every 5 years or once within the life of the permit. Testing was required for the following pollutants: CO, NOx, VOC, NMOC, SO2 (C05, C08 only) and formaldehyde testing was also required for the C08 engine. Testing was

completed in August, 2017 and showed compliance with all the emissions limits in the Operating Permit for the individual sources.[7]

The testing conditions will be maintained with the renewal with modifications based on recent Department guidance to include only once in 5- year testing, electronic and hard copy submission of protocols and reports and 90 days submission for test protocols in advance of testing. SO2 testing will also be included for the flare.

In addition, testing was required for NOx, CO and VOC pursuant to 40 CFR Part 60 Subpart JJJJ for Source ID C08 every 8760 hours of operation or every three years, whichever comes first. This testing was performed on the following dates during the current permit term and showed compliance with emissions limitations in the operating permit[7] and in the Subpart:

June 4, 2014
May 3, 2016
August 9, 2017

Results for the 2017 testing are given in Appendix A.

7. Regulatory Review

7.0 Previously Evaluated Regulations

Commonwealth Regulations

The facility has previously been determined to be subject to facility-wide Commonwealth regulations pertaining to fugitive emissions, opacity, open burning, emissions reporting, restrictions on particulate matter and sulfur dioxide emissions, best available technology, and degreasing operations.[8] None of these regulations have been updated since the last renewal, although some of the standard conditions have been changed in wording (see Section G of the renewed Operating Permit.

Federal Regulations

Clean Diesel Rule

The EPA Clean Diesel Rule, codified under 40 CFR Section 80.510, was promulgated on June 29, 2004 and most recently amended for non-road diesel fuel on April 30, 2010. The rule requires that the sulfur content in non-road diesel, used by the IC emergency generator engines Source ID 102 and 111, shall be limited to 15 ppm.

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

40 CFR Part 63, Subpart ZZZZ has previously been determined to apply to the Emergency Generator (102 hp) (Source ID 102) and the IC Engine/Generator Caterpillar G3616lE (Source ID C05).[8] It also applies to the new emergency generator Emergency Generator (335 hp) (Source ID 111), see Section 7.1, Regulatory Updates.

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[7] Review by the Department's Source Test Group is pending for all tests except for June 4, 2014.
[8] Tina Vogler to James Rebarchak, Initial Title V Operating Permit, 15-00060, May 21, 2013

Standard of Performance for New Stationary Sources, Standards of Performance for Municipal Solid Landfills, 40 CFR Part 60, Subpart WWW and *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills: 40 CFR Part 63, Subpart AAAA*

Applicability of these regulations was addressed with Plan Approval 15-0060G for the Willa Expansion.[9] Requirements of the Subparts are being incorporated from the Plan Approval in this Operating Permit renewal (see Section 8)

At the time of the issuance of Plan Approval 15-0060G, emissions from the SECCRA landfill did not exceed 50 megagram per year NMOC. Pursuant to 40 CFR Section 60.72(b)(2), conditions related to a gas collection and control system become established once emissions exceed 50 megagrams NMOC per year. However, SECCRA agreed to comply with the requirements of 40 CFR Part 60 Subpart WWW as part of Best Available Technology (BAT). At the present time, emissions at the SECRRA facility do exceed 50 megagrams. References to the authority of BAT were removed from the Subpart WWW conditions upon incorporation of Plan Approval 15-0060G, since the expanded landfill is now regulated directly by the authority of Subpart WWW.

New Source Standards of Performance for Spark Ignition Engines Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ

As previously established[9], the requirements of Subpart JJJJ are not applicable to the IC Generator/Engine Source ID C05, pursuant to 40 CFR 60.4230(a)(4)(ii) since this lean burn engine, of horsepower rating between 500 and 1350 hp, was manufactured before January 1, 2008.

Also as previously established, the requirements of Subpart JJJJ are applicable to the IC Generator/Engine Source ID C08, pursuant to 40 CFR 60.4230(a)(4)(i) since this lean burn engine, of horsepower rating greater than 500 hp, was manufactured after July 1, 2007.

Subpart JJJJ was most recently amended on August 30, 2016. The recent amendment has not changed the applicability determination for the IC Engine/Generators (Source IDs C05 and C08). The revision specified additional information to be reported with performance tests, pursuant to 40 CFR Section 60.4245, to include quality assurance and control data when using EPA test methods 18, 320 or ASTM D6348-03. The requirements are included in the renewal.

7.1 Updated Regulatory Analysis

Commonwealth Regulations

As stationary internal combustion engines rated at more than 1000 hp, the landfill gas fired engines C05 and C08 are subject to 25 Pa. Code Sections 129.203 and 129.204. The regulations require the calculation of the difference between allowable and actual emissions of NOx for the period May 1 – September 30 of each year. If actual emissions are greater than 0.50 ton, the

[9] Tina Vogler to James Rebarchak, SECCRA Plan Approval 15-0060G, Review Memo, December 12, 2012.

appropriate number of CAIR allowances must be surrendered in accordance with 25 Pa. Code Section 129.204.[10]

Federal Regulations

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

Subpart ZZZZ is applicable to the Emergency Generator (335 hp) engine (Source ID 111) as a stationary RICE operated at an area source of hazardous air pollutants (HAP[11]) pursuant to 40 CFR Section 63.6585. As existing CI RICE operated as emergency engines at an area source of HAP, Sources 102 and 111 have the same requirements, which were previously described.[8]

The 40 CFR Subpart ZZZZ was most recently amended since the last issuance of the Operating Permit on February 27, 2014. However, the amendment did not introduce any new requirements. On May 2, 2016, the US Court of Appeals for the District of Columbia vacated 40 CFR Sections 63.6585(f)(2)(ii) and (iii) pertaining to allowable operation for emergency demand response. In response to the vacatur, all references to operation under 40 CFR Sections 63.6585(f)(2)(ii) and (iii) were removed from the conditions in the Operating Permit. In addition, a condition was included indicated that if an engine operates in accordance with 40 CFR Sections 63.6585(f)(2)(ii) – (iii), it will not be considered an *emergency* engine and all conditions for *non-emergency* engines will apply.

7.2 Non-applicable Regulations

The following regulations are not applicable to sources at the SECCRA facility:

Commonwealth

Reasonably Available Control Technology (RACT) does not apply to the facility pursuant to 25 Pa. Code Section 129.91, as SECCRA is not a major source of VOC or NOx.

Federal

40 CFR Part 60 Subpart IIII (promulgated July 11, 2006, amended most recently January 30, 2013): Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

The compression ignition engines at the facility are the Emergency Generator (102 hp) (Source ID 102) and the Emergency Generator (335) (Source ID 111), Source ID was installed in April 2000. Source ID 111 is a 2003 Model Year. The commencement of construction of both engines therefore predates the applicable date of July 11, 2005 of 40 CFR Part 60 Subpart IIII, pursuant to 40 CFR section 60.4200(a)(2).

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[10] The engines operating in compliance with the NOx limitations of 0.70 g/bhp hr and 0.50 g/bhp -hr, will not require the surrender of NOx allowances, since the allowable NOx emission for a spark ignited engine of 3.0 g/bhp hr would be greater than the actual emissions.

[11] Pursuant to 40 CFR Section 63.6585(c) an area source of HAP emissions is a source that is not a major source. A major source of HAP is a site that emits or has the potential to emit any single HAP at a rate of 10 tons/year or a combination of HAPs at 25 tons/year. SECCRA is an area source of HAP.

40 CFR Part 63 Subpart JJJJJJ (promulgated March 21, 2011) *National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers*

There are no boilers, as defined in accordance with 40 CFR Section 63.11237, at the SECCRA facility. The maintenance building space heater produces heated air rather than steam or hot water and is therefore not defined as a boiler. All other heat for the facility is supplied by electricity.

Compliance Assurance Monitoring (CAM) rule, codified at 40 CFR Part 64. The rule applies to sources at facilities that are subject to Title V permitting, that meet all of the following requirements:

(1) the source is subject to an emission limitation
(2) the sources use a control device to achieve compliance with the emission limitation
(3) the source has annual pre-control emissions for an applicable pollutant that are 100% or greater than that required for the facility to be classified as a major source.

The landfill (Source ID 105) has pre-control emissions of VOC of less than 25 tons/year[12] and therefore CAM does not apply.

Clean Air Interstate Rule (CAIR) as codified in 40 CFR Chapter 97 and 25 Pa. Code Chapter 145 Subchapter D (Pennsylvania's CAIR SIP) and *Acid Rain Program, Title IV* codified in 40 CFR Chapter 72 do not apply to the generators at the facility as the CAIR and Acid Rain Program regulations define affected *units* or *electric generating units* as devices combusting fossil fuel, which does not include landfill gas fuel.

8. Incorporation of Plan Approval 15-0060G

Summary

On July 18, 2019[13], the Department received a request that Plan Approval 15-0060G for the Willa expansion be incorporated the renewal issuance. The SECCRA MSW Landfill will then comprise the original North and South Cells and the Willa expansion and be identified as Source ID 105.

Besides authorization of the landfill expansion, Plan Approval 15- 0060G authorized changes to the short- term limits for the Enclosed Flare (C07) as well as annual (12-month rolling basis) emissions for the facility and Sources C07 and C08 and the group of sources C05, C07 and C08. The new annual facility, C07and C08 and the C05, C07 and C08 group emissions are given in Table 3 and the new short- term limits for Source C07 in Table 5.

[12] Tina Vogler to James Rebarchak, SECCRA Plan Approval 15-0060G, Review Memo, December 12, 2012. Estimates of uncontrolled VOC emissions are given as 19.81 tons/year after closure and 19.76 tons/year before closure.

[13] The original submission on on June 4, 2018 was incomplete.

Table 5
Short-Term Limits Sources C07
with Incorporation of Plan Approval 15-0060G

Emissions, lb/hr				
VOC	NOx	CO	SOx	PM, PM10, PM2.5
0.075	2.15	7.20	3.10	0.60

Inspection
A Plan Approval inspection was conducted on February 25, 2019, with follow-up records received on February 26 and May 1, 2019. The landfill appeared to be constructed and operating as specified by Plan Approval 15-0060G.

Testing
No stack testing was required for the Plan Approval. The permittee was however, required to demonstrate the site-specific VOC and VOC/NMOC ratio in the landfill gas by analysis of landfill gas sample, within 180 days of issuance of the revised Plan Approval and subsequently within 5 years of the last test. Demonstrations were performed in March, 2014 and February, 2019. The ratio of VOC/NMOC were an average of 18.8% and 15.8% in the respective tests, which compared favorably with the ratio of VOC/NMOC of 39% used in emissions calculations for the Plan Approval.[13] The condition for the demonstration will be maintained with the incorporation of the Plan Approval.

Regulatory Review
As a municipal solid landfill that commenced construction or modification on or after May 30, 1991, and having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, the Willa landfill is subject to the *Standard of Performance for New Stationary Sources, Standards of Performance for Municipal Solid Landfills, 40 CFR Part 60, Subpart WWW* and *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills: 40 CFR Part 63, Subpart AAAA* pursuant to 40 CFR Section 60.750(a) and 40 CFR Section 63.1935(a)(3).

The initial NMOC emission rate report, submitted in accordance with 40 CFR Section 60.752(b)(1)(i), indicated that the annual emissions from the landfill were 94.5 megagrams. Since the NMOC emission rate is greater than 50 Megagrams, the permittee was required to install a landfill collection and control system in accordance with 40 CFR Section 60.752(b)(2).

Applicable requirements of 40 CFR Part 60 Subpart WWW and 40 CFR Part 63 Subpart AAAA, were included in the Operating Permit with the incorporation of the Plan Approval.

Publication
Notice of the Intent to Issue Plan Approval 15-0060G and amend the facility Operating Permit was published in the Pennsylvania Bulletin on September 17, 2011 and in the *Daily Local News,* a newspaper of general circulation in the county of Chester on July 16, 17, and 18, 2012. Therefore, there is no publication requirement for the administrative amendment application.

[13] Estimates of VOC emissions will be conservatively calculated by using the ratio VOC/NMOC ratio of 39%.

9. Changes to Title V Operating Permit/Plan Approval 15-00060 with Incorporation

Changes made to the Title V Operating Permit with the renewal and to the Plan Approval with the incorporation are listed in Section G of the renewal.

Major changes to with the Operating Permit renewal are;
*Including the conditions of 40 CFR Part 60 Subpart WWW and 40 CFR Part 63 Subpart AAAA
*removal of the Leachate Evaporators and associated conditions
*Inclusion of facility-wide emissions limits and C05, C07 and C08 group limits
*Inclusion of current guidelines for stack test document submission
* Inclusion of the 335 hp Emergency Generator and associated conditions

Major changes to the Plan Approval Conditions are:
*removal of the references to Best Available Technology from the conditions originating in 40 CFR Part 60 Subpart WWW.

10. Publication

The notice of intent to issue was published in the Pa. Bulletin on June 22, 2019 and in the *Daily Local News,* a newspaper of general circulation, on June 11, 12, and 13, 2019.

11. Comments

(a) DEP received no comments from the public.
(b) DEP received an email from the Environmental Protection Agency (EPA) on June 25, 2019, indicating that it had no comments on a draft emailed on June 6, 2019.
(c) DEP received the following comments from the company, in response to a draft emailed on June 6, 2019. DEP's response is included beneath each comment.

Comment #1
Section C
Condition #012
The daily visible emissions monitoring procedure and methodology is not defined in this permit. Below is proposed language to define the bounds of daily visible emissions monitoring:

(b) Daily visible emissions (VE) observations will be made for the facility. If any VEs are observed from a stack, then SECCRA will conduct VE observations and record the results of those observations in accordance with U.S. EPA Reference Method 22 (Method 22) as described below:
i. The permittee shall conduct 10-minute observations using Method 22 and demonstrate that the sum of the occurrences of any visible emissions is not in excess of 5 percent of the observation period (i.e., 30 seconds per 10-minute period).
ii. If the sum of the occurrence of any visible emissions is greater than 30 seconds during the initial 10-minute observation, immediately conduct a 30-minute observation.
iii. If the sum of the occurrence of visible emissions is greater than 5 percent of the observation period (i.e., 90 seconds per 30 minute period) the permittee shall either:
(1) document and adjust the operation of the facility and demonstrate within 24 hours that the sum of the occurrence of visible emissions observed under Method 22 is equal to or less than 5 percent during a 30 minute observation (i.e., 90 seconds) or
(2) conduct additional VE observations using U.S. EPA Reference Method 9 .

Response #1
The intent of DEP in the visible monitoring condition is for a facility to make observations to assure visible emissions will not be emitted in excess of the limitations in 25 Pa. Code 123.41 (≥20% opacity for 3 min every hour or 60% opacity at any time). This assurance may be obtained in a few minutes observation, or a longer time might be required, depending on the source and method of operation. Facilities are encouraged to develop their own monitoring procedures. However, DEP does not wish to constrain a facility to a certain monitoring procedure. The significant part of the visible emissions monitoring condition is to investigate and perform corrective action when operation of a source outside 25 Pa. Code Section 123.41 is imminent. A facility should obtain an understanding of its sources more than the procedures used for monitoring.

The condition remains as written.

Comment #2
Section C
Condition #027
This requirement needs to be deleted. While appropriate for a plan approval, it is not appropriate for an operating permit. 127.14 allows for such changes with notification to the Department, and does not require written approval.

Response #2
The condition has been removed. It was inadvertently retained with the incorporation of the Plan Approval.

Comment #3
Section D, Source ID 105.
Condition #008(b)
Area is not defined in the permit. Please update this sentence to be: "The permanent landfill gas collection system shall be in place within 5 years of initial solid waste placement in a cell or group of cells." This is consistent with Item (c) directly below.

Response #3
DEP can agree to the change and has removed the word "area" from the second sentence in Condition #008(b).

Comment #4
Section D, Source ID 105
Condition #011 (c)
Please replace with "of gas sample collection."

DEP can agree to the change and has replaced the words "of completion of the field work" with "of gas sample collection" in Condition #011 (c).

Comment #5
Section D, Source ID 105
Condition #022(e)(2)
This section is included in the Willa Plan Approval No. 15-0060G and has been removed in all other instances when incorporated into this draft permit. Please remove this section to be consistent with the incorporation of the Willa Plan Approval.

Response #5
The condition has been removed. It was inadvertently retained with the incorporation of the Plan Approval.

Comment #6
Section D, Source ID C05
Condition #007
Recommend adding any repetitive stack test conditions to Section E. Condition #007 of this section is common to Engine 1 (Source ID C05), Engine 3 (Source ID C08), and the Enclosed Flare (Source ID C07), with the exception that Item (c) includes formaldehyde for Engine 3 and potentially may not include SO2 for the Enclosed Flare. Please see the comment under the Enclosed Flare section for more information about the inclusion of SO2.

Response #6
The Operating Permit was revised to include all the repetitive stack test conditions in Section E.

Comment #7
Section D, Source ID C05
Condition #007I
Correct III to (iii).

Response #7
The correction has been made for C05 and C07 and C08 as well.

Comment #8
Section D, Source ID C07
Condition #004I
Testing for SO2 was not previously required for the Enclosed Flare. This is potentially a copy/paste error. If so, please remove SO2 from this section.

Response #8
Testing for SO2 was not previously performed on the flare. So compliance with the SOx limit in the permit has not been demonstrated. DEP is requesting the compliance demonstration and will accept testing for SO2 to represent SOx.[14]

[14] The AP-42 Section 1.3-2 (5/10) reports that more than 95%of the SOx from fuel burning is converted to SO2.

12. Recommendation

I recommend that the Operating Permit TVOP 15-00060 be renewed for the Southeastern Chester County Refuse Authority (SECCRA) with the incorporation of Plan Approval 15-0060G.

Appendix
SECCRA Stack Test Results

IC Engine/Generator
Caterpillar G3616lE
Source ID C05
August 10, 2017

Pollutant	Unit of Measure	Average Emissions	Limit[1]	Compliance Status[2]
CO	g/bhp-hr	2.54	3.4	Pass
NOx	g/bhp-hr	0.61	0.7	Pass
VOC	g/bhp-hr	< 0.002	0.50	Pass
NMOC	ppmvd as hexane @ 3% O_2	< 0.26	20	Pass
SO_2	ppmvd	14.1	500	Pass

(1) Per Title V Operating Permit No. 15-00060 and Plan Approval No. 15-0060G.
(2) Compliance status contingent upon PADEP approval.

IC Engine/Generator G3520C
Source ID C08
August 9, 2017

Pollutant	Unit of Measure	Average Emissions	Limit[1]	Compliance Status[2]
CO	g/bhp-hr	2.42	4.40	Pass
NOx	g/bhp-hr	0.45	0.50	Pass
VOC[3]	g/bhp-hr	0.334	0.57	Pass
NMOC	ppmvd as hexane @ 3% O_2	< 0.27	20	Pass
SO_2	ppmvd	14.0	500	Pass
Formaldehyde	g/bhp-hr	0.332	0.436	Pass

(1) Per Title V Operating Permit No. 15-00060 and Plan Approval No. 15-0060G.
(2) Compliance status contingent upon PADEP approval.
(3) The measured VOC g/bhp-hr includes the measured formaldehyde.

Pollutant	Unit of Measure	Average Emissions	Limit[1]	Compliance Status[2]
CO	lb/MMBtu	0.01	0.2	Pass
CO	lb/hr	0.44	7.2	Pass
NOx	lb/MMBtu	0.03	0.06	Pass
NOx	lb/hr	1.07	2.15	Pass
VOC	lb/hr	< 0.03	0.075	Pass
NMOC	ppmvd as hexane @ 3% O_2	< 0.4	20	Pass
NMOC	RE[3]	> 98.79	98	Pass

(1) Per Title V Operating Permit No. 15-00060 and Plan Approval No. 15-0060G.
(2) Compliance status contingent upon PADEP approval.
(3) NMOC reduction efficiency.

Note: For NMOC the limit is 20 ppmvd as hexane @ 3% O_2 or 98% reduction efficiency.

Average flare temperature during the 3-hour test period was 1604 °F

SOUTHEASTERN CHESTER COUNTY REFUSE AUTHORITY

SECCRA Community Landfill
Predicted Waste Receipts based on Percent Change and Available Capacity
Analysis current as of 2/2/22

Year	*No. of Years from Datum [1]*	*Waste Receipts (tons) [2]*	*Beg. Yr. Available Capacity (tons) [4]*	*Predicted Receipts (tons) [3]*	*End Yr. Available Capacity (tons) [5]*
1989	1	58,384			
1990	2	60,444			
1991	3	58,338			
1992	4	64,418			
1993	5	65,717			
1994	6	67,279			
1995	7	60,965			
1996	8	73,469			
1997	9	77,152			
1998	10	87,315			
1999	11	97,637			
2000	12	104,858			
2001	13	105,219			
2002	14	118,702			
2003	15	116,756			
2004	16	122,888			
2005	17	120,838			
2006	18	122,772			
2007	19	121,185			
2008	20	112,313			
2009	21	105,288	***Projected increase after 2021***		
2010	22	104,051		***1.00%***	
2011	23	106,413			
2012	24	102,187			
2013	25	103,869			
2014	26	106,963			
2015	27	107,365			
2016	28	107,579			
2017	29	107,082			
2018	30	113,928			
2019	31	123,156			
2020	32	125,891			
2021	33	130,541			
2022	34		1,854,689	132,027	1,722,662
2023	35		1,722,662	133,347	1,589,315
2024	36		1,589,315	134,681	1,454,634
2025	37		1,454,634	136,028	1,318,606
2026	38		1,318,606	137,388	1,181,219
2027	39		1,181,219	138,762	1,042,457
2028	40		1,042,457	140,149	902,307
2029	41		902,307	141,551	760,757
2030	42		760,757	142,966	617,790
2031	43		617,790	144,396	473,394
2032	44		473,394	145,840	327,554
2033	45		327,554	147,298	180,256
2034	46		180,256	148,771	31,485
2035	47		31,485	31,485	0

Notes

[1] Datum year = 1988.

[2] Waste Receipts for calendar year by SECCRA.

[3] Predicted Receipts based on an analysis of the percent change from year to year.
It is anticipated that receipts after 2022 will continue to increase at a 1.0% rate. This is consistent with SECCRA's cash flow plan.

[4] An analysis by SECCRA of airspace consumed as of 12/23/21, yields available tons of 1,854,689

[5] Capacity remaining in subsequent years is the available capacity in the previous year minus the predicted receipts of the current year.

TABLE 1

NORTH

GRAPHIC SCALE

50 0 25 50 100 200

(IN FEET)
1 inch = 50 ft.

C-44
C-41
C-42
C-43
EW-130
EW-132
EW-131
EW-133
V-13S
EW-148
PHASE 4
EW-135R
EW-134
V-9S
V-10S
V-11S
V-12S
EW-136
EW-207R
42

SEDIMENTATION
BASIN 2
493.7

466.4

459.8

W.L.
463.3

SEDIMENTATION
BASIN 3

W.L.
487.4

SOUTHEASTERN CHESTER COUNTY REFUSE AUTHORITY
SECCRA COMMUNITY LANDFILL
LONDON GROVE TOWNSHIP CHESTER COUNTY PENNSYLVANIA
LANDFILL-GAS-TO-ENERGY PLANT AREA