



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: November 19, 2024

Effective Date: November 19, 2024

Expiration Date: November 30, 2026

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 construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval 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 plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 42-00254A

Federal Tax Id - Plant Code: 93-3166316-1

Owner Information

Name: WB MCKEAN LLC
Mailing Address: 150 MONUMENT RD
SUITE 300
BALA CYNWYD, PA 19004-1702

Plant Information

Plant: MCKEAN RNG PLT/MCKEAN
Location: 42 McKean County 42920 Sergeant Township
SIC Code: 2813 Manufacturing - Industrial Gases

Responsible Official

Name: GUENAE L PRINCE
Title: CEO
Phone: (610) 909 - 1379 Email: guenael.prince@waga-energy.com

Plan Approval Contact Person

Name: PAUL BERTRAND
Title: PROJECT MGR
Phone: (469) 883 - 3737 Email: PAUL.BERTRAND@WAGA-ENERGY.COM

[Signature] _____
LORI L. MCNABB, NORTHWEST REGION AIR PROGRAM MANAGER



Plan Approval Description

This plan approval is for the authorization to construct and operate a Renewable Natural Gas (RNG) processing facility using Landfill Gas (LFG) from the Mckean County Landfill.



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Plan Approval Inventory List

Section B. General Plan Approval Requirements

- #001 Definitions
- #002 Future Adoption of Requirements
- #003 Plan Approval Temporary Operation
- #004 Content of Applications
- #005 Public Records and Confidential Information
- #006 Plan Approval terms and conditions.
- #007 Transfer of Plan Approvals
- #008 Inspection and Entry
- #009 Plan Approval Changes for Cause
- #010 Circumvention
- #011 Submissions
- #012 Risk Management
- #013 Compliance Requirement

Section C. Site Level Plan Approval Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

Section D. Source Level Plan Approval Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

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

Section E. Source Group Restrictions

- E-I: Restrictions
- E-II: Testing Requirements
- E-III: Monitoring Requirements
- E-IV: Recordkeeping Requirements
- E-V: Reporting Requirements
- E-VI: Work Practice Standards
- E-VII: Additional Requirements

Section F. Alternative Operating Scenario(s)

- F-I: Restrictions
- F-II: Testing Requirements
- F-III: Monitoring Requirements



SECTION A. Table of Contents

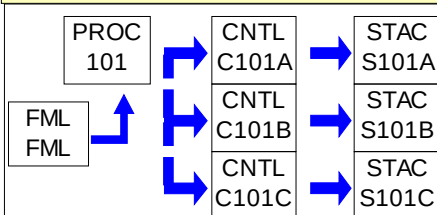
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	RENEWABLE NATURAL GAS PLANT	8.298 MMCF/HR	land Fill Gas
C101A	THERMAL OXIDIZER		
C101B	PROCESS (UTILITY) FLARE		
C101C	TRIM (UTILITY) FLARE		
FML	LAND FILL GAS		
S101A	STACK		
S101B	STACK		
S101C	STACK		

PERMIT MAPS

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

Words and terms that are not otherwise defined in this plan approval 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 § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval terms and conditions.**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) 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.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

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

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.
- (b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (c) The permittee fails to submit a report required by this plan approval.
- (d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

- (a) The permittee, 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 plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

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

#012 [25 Pa. Code § 127.12(9) & 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 facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:
 - (1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (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 the Environmental Protection Agency 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 plan approval 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.

#013 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

**SECTION C. Site Level Plan Approval 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 act.

002 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) 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.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) NA

(8) NA

(9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

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

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

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) A person responsible for any source specified in subsections (a)(1) -- (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

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

(3) Paving and maintenance of roadways.

**SECTION C. Site Level Plan Approval Requirements**

(4) 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 other means.

(d) NA

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 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:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]**Exceptions**

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
- (4) NA

007 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

This facility will be limited to CO emissions of 99 tpy on a 12-month rolling total.

II. TESTING REQUIREMENTS.**# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The Department shall reserve the right to require exhaust stack testing of any source(s) as deemed necessary to verify

**SECTION C. Site Level Plan Approval Requirements**

source emissions for purposes of determining malfunctions and/or compliance with any applicable requirements.

III. MONITORING REQUIREMENTS.**# 009 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall conduct a weekly inspection of the facility during daylight hours while the facility is operating to detect the presence of visible air contaminant emissions, visible fugitive air contaminant emissions and malodorous air contaminant emissions in excess of applicable emission limits.
- (b) All visible air contaminant emissions, visible fugitive air contaminant emissions and malodorous air contaminant emissions observed to be in excess of an emission limit shall be reported to the manager of the facility at once.
- (c) Visible emissions may be measured according to the methods specified in Section C, Condition #009. Alternatively, personnel who observe visible emissions may report the incidence of visible emissions to the Department within two (2) hours of the incident and make arrangements for a certified observer to measure the visible emissions.

IV. RECORDKEEPING REQUIREMENTS.**# 011 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) All logs and required records shall be maintained on site for a minimum of five (5) years and shall be made available to the Department upon request.
- (b) The facility shall maintain site wide emissions calculations records on a 12-month rolling basis.

012 [25 Pa. Code §135.4]**Report format**

Source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

013 [25 Pa. Code §135.5]**Recordkeeping**

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with § § 135.3 and 135.21 (relating to reporting; and emission statements). These 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.

V. REPORTING REQUIREMENTS.**# 014 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The owner or operator shall notify the Department's Air Quality Program at 814-332-6940 during business hours or 800-

**SECTION C. Site Level Plan Approval Requirements**

541-2050 during non-business hours within twenty-four (24) hours of the discovery of any malfunction which results in, or may possibly be resulting in, the emission of air contaminants in excess of any applicable limitation specified herein. Following the telephone notification, a written notice must also be submitted to DEP as specified below.

(1) if the owner or operator is unable to provide notification by telephone to the appropriate Regional Office within twenty-four (24) hours of discovery of a malfunction due to a weekend or holiday, the notification shall be made to the Department by no later than 4 p.m. on the first business day for the Department following the weekend or holiday.

(2) Any malfunction that poses an imminent danger to the public health, safety, welfare, or environment shall be reported by telephone to the Department and the County Emergency Management. Agency immediately after the discovery of an incident. The owner or operator shall submit a written report of instances of such malfunctions to the Department within three (3) business days of the telephone report.

(3) Unless otherwise required by this plan approval, any other malfunctions shall be reported to the Department, in writing, within five (5) business days of malfunction discovery.

015 [25 Pa. Code §135.3]**Reporting**

(a) A person who owns or operates a source to which this chapter applies, and who has previously been 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 for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.

(b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report within 60 days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.

(c) A source owner or operator 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.**# 016 [25 Pa. Code §129.14]****Open burning operations**

(a) Air basins. No person may permit the open burning of material in an air basin.

(b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:

(1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.

(2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.

(3) The emissions interfere with the reasonable enjoyment of life or property.

(4) The emissions cause damage to vegetation or property.

(5) The emissions are or may be deleterious to human or animal health.

(c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

(1) 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.

**SECTION C. Site Level Plan Approval Requirements**

(2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(3) A fire set for the prevention and control of disease or pests, when approved by the Department.

(4) NA

(5) NA

(6) A fire set solely for recreational or ceremonial purposes.

(7) A fire set solely for cooking food.

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) NA

(3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:

(i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.

(ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.

(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of Solid Waste Management Act.]

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

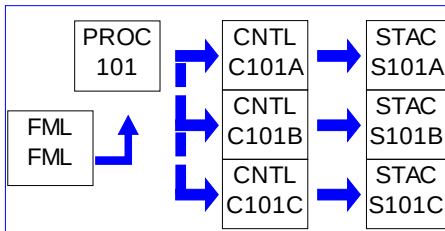
Source ID: 101

Source Name: RENEWABLE NATURAL GAS PLANT

Source Capacity/Throughput:

8.298 MMCF/HR

land Fill Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Pursuant to the best available technology requirements of 25 Pa. Code Sections 127.1 the permittee shall not permit the following air contaminant emissions from the exhaust of the Control Device associated with Source 101 in excess of the limitations listed below:

C101A:

- a. Nitrogen oxides (NO_x, expressed as NO₂) – 0.1 pounds per million Btu of heat input,
- b. Carbon monoxide (CO) – 0.2 pounds per million Btu of heat input,
- c. Sulfur oxides (SO_x, expressed as SO₂) – 0.5 pounds per hour,
- d. Total suspended particulate matter TSP (PM₁₀/PM_{2.5}) – 0.3 pounds per hour,
- e. Non-methane organic compounds (NMOC) – 20 ppmv and 1.5 pounds per hour.

C101B:

- a. Nitrogen oxides (NO_x, expressed as NO₂) – 0.068 pounds per million Btu of heat input,
- b. Carbon monoxide (CO) – 0.31 pounds per million Btu of heat input,
- c. Sulfur oxides (SO_x, expressed as SO₂) – 0.6 pounds per hour,
- d. Total suspended particulate matter TSP (PM₁₀/PM_{2.5}) – 1.2 pounds per hour,
- e. Non-methane organic compounds (NMOC) – 0.1 pounds per hour.

C101C:

- a. Nitrogen oxides (NO_x, expressed as NO₂) – 0.068 pounds per million Btu of heat input,
- b. Carbon monoxide (CO) – 0.31 pounds per million Btu of heat input,
- c. Sulfur oxides (SO_x, expressed as SO₂) – 3.5 pounds per hour,
- d. Total suspended particulate matter TSP (PM₁₀/PM_{2.5}) – 0.6 pounds per hour,
- e. Non-methane organic compounds (NMOC) – 0.03 pounds per hour.

002 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The visible emission limitations contained in 25 Pa. Code § 123.41 do not apply during periods of startup and shutdown of C101A, C101B, and C101C.

Operation Hours Restriction(s).**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) Control Device C101B shall not be operated more than 1,500 hours in any 12 consecutive month period.
- (b) The 1,500-hour limitation for Control Device C101B does not include time during shakedown and commissioning of the

**SECTION D. Source Level Plan Approval Requirements**

proposed renewable natural gas plant and therefore will not be counted towards the 1,500-hour limitation. Once the RNG facility RNG produces pipeline quality natural gas for sale and thereby commences commercial operation, the 1,500-hour limitation for Control Device C101B will become effective.

II. TESTING REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) Within 180 days after initial startup and twelve (12) to eighteen (18) months prior to the expiration of the facility's current operating permit (reoccurring), a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall determine the source's nitrogen oxide, carbon monoxide, sulfur oxide and non-methane organic compounds emission rates from Control Device C101A associated with Source 101 to verify compliance with the associated emission restrictions.

(1) The performance test shall consist of three (3) separate test runs and each run shall last at least in one (1) hour in duration.

(b) At least 90 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval in accordance with paragraph (h) of this condition. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

(c) At least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the Department in accordance with paragraph (h) of this condition. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department (Source Testing Section).

(d) A complete test report shall be submitted to the Department in accordance with paragraph (h) of this condition no later than 60 calendar days after completion of the onsite testing portion of an emission test program.

(e) A complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or noncompliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

(1) A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.

(2) Permit number(s) and condition(s) which are the basis for the evaluation.

(3) Summary of results with respect to each applicable permit condition.

(4) Statement of compliance or non-compliance with each applicable permit condition.

(f) All submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

(g) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

(h) The Department requires one electronic copy of all source test submissions (protocols and reports) to be sent to both the appropriate Regional Office and the PSIMS Administrator in Central Office (mail and email addresses are provided below). Do not send submissions to anyone else, except the U.S. EPA, unless specifically directed to do so. To minimize the potential for rescheduling of the test, all protocols must be received at least 90 days prior to testing. Test reports must be received no later than 60 days after the completion of testing, unless a more stringent regulatory requirement applies. Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

**SECTION D. Source Level Plan Approval Requirements**

Electronic copies of Protocols and Reports shall be emailed to the following:

Central Office - RA-EPstacktesting@pa.gov

Northwest Region - RA-EPNWstacktesting@pa.gov

Notifications and Supplemental Information shall be submitted to the following:

OnBase Submittal - <http://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>

(i) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(j) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

(k) 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.

III. MONITORING REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) Control Device C101A, C101B, and C101C Shall be equipped with a gas flow meter and record the flow once every 15 minutes and combustion temperature monitoring device that records the temperature on a continuous basis.

(b) Control Device C101A shall be equipped with an ultraviolet scanner with controller to confirm that a flame is present anytime that landfill gas is present.

(c) On a quarterly bases, the permittee shall conduct routine leak monitoring of equipment designed to operate under positive pressure to verify there are no leaks greater than 500 ppmv as propane (or 1,375 ppmv as methane) at a distance of 0.5 inches. Monitoring shall be conducted using a detector type instrument meeting the specifications and performance criteria contained in 40 CFR, Part 60, Appendix A, Section 3, EPA Method 21.

IV. RECORDKEEPING REQUIREMENTS.**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The facility shall keep records of the following information and shall be kept for a minimum of five (5) years and made available to the Department upon request:

(a) The emission of nitrogen oxides, carbon monoxides, sulfur oxides, particulate matter, and non-methane organic compounds from Control Devices C101A, C101B, and C101C on a monthly basis.

(b) The combustion temperature of C101A, C101B, and C101C on a continuous basis.

(c) The process gas flow and natural gas flow of C101A.

**SECTION D. Source Level Plan Approval Requirements**

- (d) The treated gas, off-spec gas, waste gas, and natural gas flow rate of source C101B.
- (e) The land fill gas flow rate of source C101C.
- (f) Records shall be kept and maintained of the routine leak monitoring required in Section D, #005(c) for a period of five (5) years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) Control Device C101A shall be designed, operated and maintained such that there are no visible flames during normal operation.
- (b) Control Devices C101B and C101C shall be designed in accordance with 40 CFR §60.18.
- (c) Control Devices C101A, C101B and C101C shall be equipped with a continuous pilot ignition system.
- (d) The thermal oxidizer (C101A) shall maintain, for each 3-hour period of operation, 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 NMOC emission limitation was established. If there has been no test, a minimum of temperature of 1,500°F is necessary. The thermal oxidizer may be operated at temperatures below 1,500°F provided that testing has demonstrated compliance with the NMOC standard at the lower temperature. Under no circumstance may the thermal oxidizer operate at less than 1,200°F.
- (e) The thermal oxidizer shall be equipped with an automatic pilot ignition source using an auxiliary fuel.
- (f) The thermal oxidizer shall be operated with a flame present at all times.
- (g) The thermal oxidizer shall be equipped with an automatic shut-off mechanism designed to immediately stop the flow of gases when a flame-out occurs. During the restart or start-up, the thermal oxidizer will be designed to provide sufficient flow of auxiliary fuel to the burner such that unburned landfill gases are not emitted to the atmosphere.
- (h) The flue gas temperature of the thermal oxidizer shall be measured and recorded in the combustion zone as per the manufacturer's specifications. The temperature in the combustion zone should be used to determine compliance with the minimum temperature requirement.
- (i) C101B and C101C shall be equipped with a flame sensing device and automatic shutoff valve designed to close immediately when a flame is not detected.
- (j) The facility shall not operate Source 101 without the simultaneous operation of the Control Devices at any time.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
101	RENEWABLE NATURAL GAS PLANT		
Emission Limit			Pollutant
0.200	Lbs/MMBTU	From C101A	CO
0.310	Lbs/MMBTU	From C101B or C101C	CO
0.068	Lbs/MMBTU	From C101B or C101C: NOx, expressed as NO2	NOX
0.100	Lbs/MMBTU	From C101A: NOx, expressed as NO2	NOX
0.500	Lbs/Hr	From C101A: SOx, expressed as SO2	SOX
0.600	Lbs/Hr	From C101B: SOx, expressed as SO2	SOX
3.500	Lbs/Hr	From C101C: SOx, expressed as SO2	SOX
0.300	Lbs/Hr	From C101A: PM10 and PM2.5	TSP
0.600	Lbs/Hr	From C101C: PM10 and PM2.5	TSP
1.200	Lbs/Hr	From C101B: PM10 and PM2.5	TSP
0.030	Lbs/Hr	From C101C: Non-methan organic compounds NMOC	VOC
0.100	Lbs/Hr	From C101B: Non-methan organic compounds NMOC	VOC
1.500	Lbs/Hr	From C101A: Non-methan organic compounds NMOC	VOC
20.000	PPMV	From C101A: Non-methan organic compounds NMOC	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
99.000 Tons/Yr	Site wide based on a 12-month rolling total.	CO



SECTION H. Miscellaneous.



***** End of Report *****
