



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: May 13, 2022 Effective Date: May 13, 2025
Revision Date: April 14, 2025 Expiration Date: November 13, 2026
Revision Type: Extension

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. 09-0250

Federal Tax Id - Plant Code: 84-1973843-1

Owner Information

Name: MCGILL FAIRLESS HILLS, LLC
Mailing Address: 600 TYBURN RD
MORRISVILLE, PA 19067-3616

Plant Information

Plant: MCGILL FAIRLESS HILLS LLC
Location: 09 Bucks County 09002 Falls Township
SIC Code: 2875 Manufacturing - Fertilizers, Mixing Only

Responsible Official

Name: KATHERINE SULLIVAN
Title: PROJECT MANAGER
Phone: (919) 362 - 1161 Email: ksullivan@mcgillcompost.com

Plan Approval Contact Person

Name: KATHERINE SULLIVAN
Title: PROJECT MANAGER
Phone: (919) 362 - 1161 Email: ksullivan@mcgillcompost.com

[Signature] _____
JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



Plan Approval Description

(a) AUTH ID 1372806: This plan approval is for the installation of a new indoor composting facility with a biofilter as the add-on control device reducing odors emanating from the composting operation.

(b) AUTH ID 1509944: This is a minor modification of Plan Approval No. 09-0250 to expand the dimensions of the biofilter footprint and biofilter media to control odors.



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

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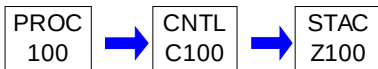
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
100	COMPOSTING OPERATION		
C100	BIOFILTER		
Z100	FUGITIVE EMISSIONS		

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(a)(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(a)(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 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:

- (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, as specified in 25 Pa. Code § 129.14.
- (7) - (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) 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:
 - (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.

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, 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 (3) minutes in any one (1) hour.
- (b) Equal to or greater than 60% at any time.

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

The opacity limitations of 25 Pa. Code § 123.41 shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission 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 sources specified in 25 Pa. Code § 123.1 (relating to prohibition of certain fugitive emissions).

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

- (a) The permittee shall limit facility-wide potential to emit VOC emissions to less than 25 tons per year, based on a 12-month rolling sum.

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

(b) The permittee shall limit facility-wide potential to emit HAP emissions as follows:

- (1) less than 25 tons per year, any combination HAP, based on a 12-month rolling sum.
- (2) less than 10 tons per year, any individual HAP, based on a 12-month rolling sum.

(c) Facility-wide emissions include emissions from all air emitting sources on site, which includes the source(s) listed in this plan approval, sources listed in subsequent permits and/or plan approvals issued to the permittee for this location, and all miscellaneous sources which may be exempt from plan approval requirements.

008 [25 Pa. Code §129.14]**Open burning operations**

No person may permit the open burning of material in the Southeast Air Basin except when 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.
- (g) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) If at any time DEP has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this plan approval 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 DEP 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 DEP at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.**# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

(a) The permittee shall monitor the facility on a daily basis when the site is staffed, 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).
- (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).

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

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the 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.

(c) DEP reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.**# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

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.
- (c) The corrective action taken, if necessary to abate the situation and prevent future occurrences.

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) De minimis increases 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 §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall maintain monthly records of facility-wide VOC emissions, including 12-month rolling sums.
- (b) The permittee shall maintain monthly records of the facility-wide total HAP and individual HAP emissions, including 12-month rolling sums.
- (c) Facility-wide emissions include emissions from all air emitting sources on site, which includes the source(s) listed in this plan approval, sources listed in subsequent permits and/or plan approvals issued to the permittee for this location, and all miscellaneous sources which may be exempt from plan approval requirements.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall record all odor complaints. The odor complaint log shall include date of incident, wind speed and direction on the day of the incident, investigation findings, and any corrective actions taken.

V. REPORTING REQUIREMENTS.**# 016 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by

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

improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

017 [25 Pa. Code §135.3]**Reporting**

If the permittee has been previously advised by the Department to submit a source report, the permittee 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.**# 018 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 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;

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

(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.

019 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall immediately, upon discovery, implement measures which may include the application for the installation of 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 plan approval/operating 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.

020 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The permittee shall ensure that all sources are operated and maintained in accordance with the facility's standard operating and maintenance procedures and good engineering and air pollution control practices.

(b) The sources listed in this plan approval shall be installed and operated in accordance with the plans submitted with the plan approval application (as approved herein).

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.

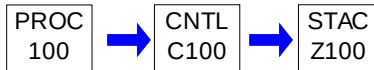
No compliance milestones exist.

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

Source ID: 100

Source Name: COMPOSTING OPERATION

Source Capacity/Throughput:

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

(a) The potential to emit VOC emissions from composting operations to the biofilter (post-control) is 19.29 tons per year, based on 50.1% reduction from the biofilter.

(b) The potential to emit HAP emissions from composting operations to the biofilter (post-control) is 3.18 tons per year, based on 56.0% reduction from the biofilter.

(c) The permittee shall limit the post-control ammonia (NH₃) emissions to 5.25 ppm, based on 95% reduction from the biofilter.

(d) The permittee shall limit the post-control hydrogen sulfide (H₂S) emissions to 0.3 ppm.

Throughput Restriction(s).**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall limit the amount of material processed to 170,000 tons of material per year, based on a 12-month rolling sum, in accordance with the PADEP Solid Waste Permit.

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

The permittee shall design the biofilter such that a minimal residence time of at least 57 seconds is achieved in order to result in the following reduction efficiencies for composting activities:

- (a) 50.1% reduction for VOC emissions
- (b) 97.9% reduction for N₂O emissions
- (c) 56.0% reduction for HAP emissions
- (d) 95.0% reduction for NH₃ emissions
- (e) 93.5% reduction for SO_x emissions.

Residence time (seconds) = media volume (ft³) / airflow rate (ft³/min) * 60 sec/min * media void percent.

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

The permittee shall conduct initial ambient air sampling within 180 days of completing all major repairs to duct work, biofilter beds, and other significant repair work and related equipment listed in this minor modification as follows:

- (a) The sampling shall be used to measure outlet concentrations (in ppm) of hydrogen sulfide (H₂S), ammonia (NH₃), total VOC and total HAP using EPA Method TO-15 and/or EPA Method TO-15 Modified, and/or ASTM D 5504, or equivalent as applicable. Sampling shall be conducted in accordance with the procedures of the most recent DEP Source Testing Manual, where applicable.

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

(b) Sampling shall be conducted at the ducting header to the biofilter and at points on top of the biofilter media bed surface exposed to the outdoor atmosphere.

(c) The measurements shall be used to calculate emission factors (in pound per wet ton of material) for post-control, total VOC and HAP emissions for the composting operation controlled by the biofilter.

(d) The permittee shall monitor and record information during the sampling activity necessary to determine post-control emission factors in pounds per wet ton of material, such as amount and type of material processed over the latest 30-day period, and flux densities of feedstock material.

(e) After the initial sampling, DEP recommends annual sampling for two (2) consecutive years, for a total of three (3) years, followed by once every five (5) years thereafter. Frequency may be revised based on DEP findings.

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

(a) At least ninety (90) days prior to the ambient air sampling, the permittee shall submit to DEP for approval the procedures for the sampling and a sketch with dimensions indicating the location of sampling areas and other data to ensure the collection of representative samples.

(b) At least thirty (30) days prior to sampling, the Regional Air Quality Manager, shall be informed of the date and time of the sampling.

(c) Within sixty (60) days after sampling, an electronic copy of the complete report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(d) 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. DEP may grant an extension for a reasonable cause.

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

The permittee shall continuously monitor the pressure differential across the biofilter header ducting on the discharge side of each exhaust fan using a photohelic or magnehelic gauge at all times.

[Note: The pressure drop readings taken during normal operations may be used to establish a minimum pressure drop value indicating when the biofilter media should be replaced. DEP reserves the right to include the minimum pressure drop value in an operating permit following evaluation of the data collected during normal operations.]

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

The permittee shall continuously monitor the temperature of processing bays (composting bays and curing bays) using temperature monitoring probes located vertically in the middle of compost piles that are more than half way complete in a bay.

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

The permittee shall monitor the following on a daily basis, when the site is staffed:

(a) Amount and type of feedstock material received

(b) Amount and type of feedstock material processed.

009 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall monitor the biofilter media bed depth on a monthly basis. The depth of the biofilter media bed is measured from the point where the air leaves the delivery piping to the top of the biofilter media bed surface exposed to the outdoor atmosphere.

**SECTION D. Source Level Plan Approval Requirements****# 010 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The permittee shall monitor the ammonia concentration at each biofilter outlet twice per week.
- (b) After six (6) months of monitoring twice per week, and upon the permittee's request, DEP will determine the feasibility of decreasing the monitoring frequency to once per week.
- (c) DEP reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or DEP findings.

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

The permittee shall maintain a copy of the most recent air sampling test results in ppm for total, post-control VOC and HAP, ammonia, and hydrogen sulfide emissions. The permittee shall clearly indicate the resulting emission factors in pounds of pollutant per wet ton of material calculated for total VOC and HAP emissions.

012 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall maintain monthly records and 12-month rolling sums of the following:
- (1) Amount and type of feedstock material received
 - (2) Amount and type of feedstock material processed.
- (b) The permittee shall maintain waste analysis reports for all feedstock material accepted onsite for composting, in accordance with the PADEP Solid Waste Permit.

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall record the following operating parameters on the frequencies described below, when the site is staffed:

- (a) Carbon to nitrogen content of combined feedstock material received - quarterly
- (b) Bulk density of combined feedstock material received - quarterly
- (c) Moisture or humidity of material during blending - monthly
- (d) Moisture or humidity of the air above the processing bays - monthly
- (e) Moisture or humidity of the air entering the biofilter - monthly
- (f) Biofilter media moisture - daily
- (g) Processing bay temperatures - daily
- (h) Pressure drop across the biofilter header ducting on the discharge side of each exhaust fan - weekly.

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

The permittee shall record the biofilter media bed depth measurements on a monthly basis.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall keep the following records for composting operations, including the biofilter:

- (a) inspections, leak tests, and smoke tests, performed,
- (b) maintenance performed, including replacement of spent biofilter media,
- (c) any deficiencies, and
- (d) any corrective actions taken.

016 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain an onsite copy of an operation, inspection, and maintenance plan for the composting

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

operations including the biofilter system.

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The waste acceptance minimum requirements provided in the PADEP Solid Waste Permit (Permit No. 101727) shall be kept onsite at all times.

018 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall record all odor complaints. The odor complaint log shall include date of incident, wind speed and direction, humidity, temperature and precipitation on the day of the incident, investigation findings, and any corrective actions taken.

019 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain records of the total post-control emission calculations for VOC and HAP emissions from all composting activities, exiting the biofilter surface to the outdoor atmosphere on a monthly and 12-month rolling sum basis.

020 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain records of the ammonia concentration readings taken at each biofilter outlet.

V. REPORTING REQUIREMENTS.**# 021 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Within sixty (60) days after conducting the sampling, the permittee shall submit for approval, the proposed method of actual emission calculations for post-control VOC and HAP emissions from the biofilter, clearly indicating the proposed emission factor for each pollutant, as applicable, and all mass balance information, as applicable.

022 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within thirty (30) days after completion of construction of all major repairs to duct work, biofilter beds, and other significant repair work and related equipment listed in this minor modification, the permittee shall submit the design criteria of the biofilter, including the residence time calculations based the biofilter length and width of each segment and the height of the biofilter media bed.

023 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within 180 days after completion of construction of all major repairs to duct work, biofilter beds, and other significant repair work and related equipment listed in this minor modification, the permittee shall submit for approval a written standard operating procedure for the facility. The procedures shall include operation, inspection, and maintenance for all composting operations at the facility, including operation of the biofilter.

024 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within five (5) business days of the temporary reduction in the biosolids acceptance rate period ending, the permittee shall notify DEP of the following:

- (a) temporarily reduced biosolids acceptance rate in tons per week,
- (b) end date of the temporary reduction period,
- (c) anticipated schedule for increasing biosolids acceptance rate,
- (d) date normal acceptance rate is expected to resume,
- (e) final, normal biosolids acceptance rate.

**SECTION D. Source Level Plan Approval Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 025 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall accept only pre-approved feedstock material in accordance with PADEP Solid Waste Permit. The waste acceptance minimum requirements are provided in the PADEP Solid Waste Permit issued to the facility and shall be kept onsite.

026 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall add water to the biofilter media with a soaker hose (or irrigation system) on an as-needed basis, including when moisture is observed below levels outlined in the standard operating plan, when dry spots are observed during inspection, or during excessively hot atmospheric temperature conditions.

027 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain a biofilter media bed depth given in the design criteria submitted by the permittee and approved by DEP. The depth of the biofilter media bed is measured from the point where the air leaves the delivery piping to the top of the biofilter media bed surface exposed to the outdoor atmosphere. The specific biofilter design criteria remain as confidential material with DEP at this time.

028 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall replace biofilter media as needed, including when there is a reduction in contact depth and general observation of media bed degradation.

029 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The permittee shall reduce odor emissions from composting activities by routing all areas with "dirty" air to the biofiltration system at all times.

(b) The permittee shall reduce fugitive particulate matter from composting activities through the use of wet suppression equipment such as water hose, soaker hose, or spigot on the biofilter and irrigation system on the primary and final screens.

030 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) At all times, the permittee shall operate and maintain composting process equipment and the biofilter odor control device and all associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available which may include, but is not limited to, monitoring results, review of standard operating and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(b) The permittee shall maintain on site copies of the facility's standard operating and maintenance procedures for composting process equipment and the biofilter.

031 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall prepare and implement a written standard operating procedure for the composting operations at the facility, including operation of the biofilter. The plan must contain the following operation, inspection, and maintenance items:

(a) Composting process and biofilter operating parameters to be monitored and/or inspected to determine compliance, along with established operating levels or ranges, as applicable, for each composting process unit and the biofilter.

(b) A monitoring and/or inspection schedule for each affected composting process unit and the biofilter.

(c) Procedures for the proper operation and maintenance of each composting process unit and the biofilter used to achieve compliance with the malodor regulation.

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

(d) Corrective actions to be taken when composting process units or biofilter operating parameters deviate from the value or range established in paragraph (a) of this condition, including procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

(e) A maintenance schedule for each composting process unit and the biofilter that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance, or consistent with acceptable practices within the industry, if manufacturer specifications are not available.

(f) Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable requirements.

032 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall implement an inspection and maintenance plan for the biofilter, including but not limited to the following:

- (a) Inspection of the biofilter irrigation or wet suppression system for proper operation.
- (b) Inspection of the extraction fans to include greasing of bearings, belt inspection and cleaning of housing per manufacturer's recommendations.
- (c) Smoke test the biofilter on a quarterly basis to determine side or manifold air leakage.
- (d) General observation that the biofilter is maintained in good operating condition.
- (e) Inspection of the biofilter media bed for breakdown or degradation.
- (f) General observation of the biofilter media.

033 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall implement an inspection and maintenance plan for the composting process equipment, including but not limited to the following:

- (a) Inspection of all supply fan ductwork, header ducting, and fans on a quarterly basis for potential leaks.
- (b) Maintain on site leak repair kits designed to allow continuous operation of the biofilters while addressing the leaks.
- (c) Inspection of the extraction fans to include greasing of bearings, belt inspection and cleaning of housing per manufacturer's recommendations.
- (d) General observation that process equipment is maintained in good operating condition.

034 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within 180 days after completion of construction of all major repairs to duct work, biofilter beds, and other significant repair work and related equipment listed in this minor modification, the permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored that ensures compliance with the odor regulation. DEP reserves the right to modify operating, monitoring, or inspection parameters depending on data collected to establish values.

035 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall keep all doors and windows closed and/or shut when practicable.
- (b) Doors and windows may be opened during times of waste acceptance and loading and unloading operations, for example, when trucks enter and/or leave the building, during times of maintenance and inspection, and during other times as needed for operational purposes.
- (c) The permittee shall keep doors and windows closed when the facility is not staffed.

036 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall maintain and operate the Blue Planet ACF-32 counteractant odor control process.
- (b) The permittee shall maintain and operate the ECOLO AMC odor control misting system.

**SECTION D. Source Level Plan Approval Requirements****VII. ADDITIONAL REQUIREMENTS.****# 037 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Source ID 100 contains the following process equipment and activities:

Outdoor stockpile areas

Blending

Thirteen (13) primary processing bays

Screening (electric) and conveying

Seven (7) curing bays for final processing

Loaders



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
100	COMPOSTING OPERATION
Emission Limit	
5.250 PPM/Yr	Ammonia
3.180 Tons/Yr	Hazardous Air Pollutants
0.300 PPMV	Hydrogen Sulfide
19.290 Tons/Yr	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
24.900 Tons/Yr	any combination HAP, based on a 12-month rolling sum	Hazardous Air Pollutants
9.900 Tons/Yr	any individual HAP, based on a 12-month rolling sum	Hazardous Air Pollutants
24.900 Tons/Yr	based on a 12-month rolling sum	VOC



SECTION H. Miscellaneous.



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