



January 26, 2017

CERTIFIED MAIL NO. 9171 9690 0935 0108 1305 69

Mr. Mark Reider
Environmental Manager
Lancaster County Solid Waste Management Authority
1299 Harrisburg Avenue
Lancaster, PA 17603

Re: Technical Deficiency Letter
Plan Approval No. 36-05081B
APS ID #882056, AUTH ID #1092525
Manor Township, Lancaster County

Dear Mr. Reider:

The Department of Environmental Protection (DEP) has reviewed the above referenced application and has identified the following significant technical deficiencies. Pa Code Title 25 Chapter 127, Subchapter E New Source Review and 40 CFR Parts 51 & 52 includes information that will aid you in responding to the deficiency listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth the Department's preferred means of satisfying the applicable regulatory requirements.

Technical Deficiencies

1. The facility needs to update the LandGEM Model with consistent values for the methane generation rate constant (k), the potential methane generation capacity (L_0), and the annual waste disposal rates (M_i), based on site specific real time data for both the Creswell and Frey Farm areas in determining the overall estimated methane generation flow rate [Pa. Code Section 127.12(a)(2)].
2. The facility needs to recalculate the fugitive PM and PM10 emissions associated with the landfill operations at the site. In lieu of AP-42 factors the facility should determine fugitive emissions from vehicle traffic based on the average vehicle trips and average vehicle weight. Construction activities at the site are not required to be part of the operating emissions [Pa. Code Section 127.12(a)(2)].
3. The Creswell-Frey Farm Landfill is considered a "support facility" for the operation of the two landfill gas-fired engine generator sets at the landfill that are owned and operated by EPP Renewable Energy, LLC. Although each facility has its own Title V operating permit the Authority is required to take into account emissions from both sites when addressing applicability to PSD, Nonattainment New Source Review (NNSR), or any other Federal regulations. The Department requests that you submit a reevaluation of PSD and/or NNSR

Technical Deficiencies

applicability based on the total emission from the landfill [Pa. Code Section 127.12(a)(2)].

4. Please provide both annual and short-term limits for the facility's flare in relation to the emissions of PM, NO_x, CO, and HCl [Pa. Code Section 127.12(a)(2)].

Please submit a response fully addressing the significant technical deficiency as set forth above within 30 calendar days or DEP may deny the application.

If you believe that a stated deficiency is not significant, instead of submitting a response to that deficiency, you have the option of asking DEP to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please keep in mind that if you fail to respond, your application may be denied.

Should you have any questions regarding the identified deficiencies, you may contact me at 717-705-4149, or rmillard@pa.gov and refer to APS No. 882056 and Authorization No. 1092525 to discuss your concerns or to schedule a meeting.

The meeting must be scheduled within the 30-day period allotted for your reply, unless otherwise extended by DEP. You may also follow your application through the review process via *eFACTS on the Web* at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,



Rick Millard
Air Quality Program

cc: Permits/SC Region 36-05081B, B5
Lancaster District Office
Permits