



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

Southwest Regional Office

Air Quality Program



*PLAN APPROVAL PERMIT # 65-00767C*

*WESTMORELAND SANI LDFL LLC*

Rostraver Township, Westmoreland County

Issue Date: January 8, 2024

Expiration Date: July 8, 2025



65-00767C

WESTMORELAND SANITARY LDFL LLC/BELLE VERNON



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

PLAN APPROVAL

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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. 65-00767C

Federal Tax Id - Plant Code: 36-4801207-1

Owner Information

Name: WESTMORELAND SANI LDFL LLC  
Mailing Address: 111 CONNER LN  
BELLE VERNON, PA 15012-4569

Plant Information

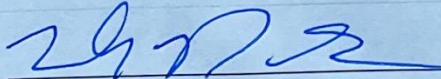
Plant: WESTMORELAND SANITARY LDFL LLC/BELLE VERNON  
Location: 65 Westmoreland County 65951 Rostraver Township  
SIC Code: 4953 Trans. & Utilities - Refuse Systems

Responsible Official

Name: BRIAN STEWART  
Title: VP ENGR  
Phone (412) 576 - 2236  
Email: bstewart@nobleenviro.com

Plan Approval Contact Person

Name: BRIAN STEWART  
Title: VP ENGR  
Phone: (412) 576 - 2236  
Email: bstewart@nobleenviro.com

[Signature]   
MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION



Plan Approval Description

This plan approval is for the construction of a 45,000 gallons per day (gpd) Leachate Evaporation System.



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Source ID	Source Name	Capacity/Throughput	Fuel/Material
113	LEACHATE EVAPORATION SYSTEM		
S113	LEACHATE EVAPORATION SYSTEM 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**

The permittee may not permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than those allowed under 25 Pa. Code §123.1.

**# 003 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from any process in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

**# 004 [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.

**# 005 [25 Pa. Code §123.21]****General**

(a) This section applies to sources except those subject to other provisions of this article, with respect to the control of sulfur compound emissions.

(b) No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**# 006 [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.

**# 007 [25 Pa. Code §123.42]****Exceptions**

The visible emission 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) n/a



## SECTION C. Site Level Plan Approval Requirements

### II. TESTING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.12b]

##### Plan approval terms and conditions.

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this plan approval may be in excess of the limitations specified in, or established pursuant to this plan approval or the permittee's operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

#### # 009 [25 Pa. Code §127.12b]

##### Plan approval terms and conditions.

Performance testing shall be conducted as follows:

- (a) The permittee shall submit one electronic copy of a pre-test protocol to the Department for review within 60 days of plan approval issuance. All proposed performance test methods shall be identified in the pre-test protocol and approved by the Department prior to testing.
- (b) The permittee shall notify the Regional Air Quality Manager and Division of Source Testing and Monitoring at least 15 days prior to any performance test so that an observer may be present at the time of the test. This notification may be sent by email. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (c) Pursuant to 40 CFR Part 60.8(a), a complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.
- (d) Pursuant to 25 Pa. Code Section 139.53(b), 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 non-compliance 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.
- (e) Pursuant to 25 Pa. Code § 139.3, all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (f) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.
- (g) All submittals shall be sent as an electronic submittal to [ra-epstacktesting@pa.gov](mailto:ra-epstacktesting@pa.gov), with a cc to [ra-epswstacktesting@pa.gov](mailto:ra-epswstacktesting@pa.gov).

### III. MONITORING REQUIREMENTS.

#### # 010 [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.

**SECTION C. Site Level Plan Approval Requirements****# 011 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

A facility-wide inspection shall be conducted at a minimum of once each day at the Facility by the Owner/Operator. The facility-wide inspection shall be conducted for the presence of the following:

- (a) Visible stack emissions;
- (b) Fugitive emissions; and
- (c) Potentially objectionable odors at the property line.

These observations are to ensure continued compliance with source-specific visible emission limitations, fugitive emissions prohibited under 25 Pa. Code §§123.1 or 123.2, and malodors prohibited under 25 Pa. Code §123.31. Observations for visible stack emissions shall be conducted during daylight hours and all observations shall be conducted for all sources in operation at the time of the facility-wide inspection. If visible stack emissions, fugitive emissions, or potentially objectionable odors are apparent, the Owner/Operator shall take corrective action. Records of each inspection shall be maintained in a log and at the minimum include the date, time, name and title of the observer, along with any corrective action taken as a result.

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

The permittee shall maintain the following comprehensive and accurate records:

- (a) Facility-wide emissions on a 12-month rolling basis for NO<sub>x</sub>, CO, SO<sub>x</sub>, VOC, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NH<sub>3</sub>, total HAPs, and CO<sub>2e</sub>.
- (b) Results of facility-wide inspections for visible stack emissions, fugitive emissions, and/or potentially objectionable odors including the date, time, name, and title of the observer, along with any corrective action taken as a result.
- (c) Copies of the manufacturer's recommended maintenance schedule for each air source and air cleaning device.
- (d) All maintenance performed on each source and air cleaning device.

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

All logs and required records shall be maintained on site, or at an alternative location acceptable to the Department, for a minimum of five years and shall be made available to the Department upon request.

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

In accordance with 25 Pa. Code § 135.3, the owner or operator of a facility shall submit to the Department via AES\*Online or AES\*XML at [www.depgreenport.state.pa.us/](http://www.depgreenport.state.pa.us/) by March 1st of each year, a facility inventory report for the preceding calendar year for all sources regulated under this plan approval. The inventory report shall include all emissions information for all sources operated during the preceding calendar year. Emissions data including, but not limited to, the following shall be reported:

- (i) NO<sub>x</sub>;
- (ii) CO;
- (iii) SO<sub>x</sub>;
- (iv) PM<sub>10</sub>;
- (v) PM<sub>2.5</sub>;
- (vi) VOC;
- (vii) Speciated HAP including, but not limited to, benzene, ethyl benzene, formaldehyde, n-hexane, toluene, isomers and mixtures of xylenes, and 2,2,4-trimethylpentane;
- (viii) Total HAP;
- (ix) CO<sub>2</sub>;

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

- (x) CH<sub>4</sub>; and  
(xi) N<sub>2</sub>O.

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

Malfunction reporting shall be conducted as follows:

(a) The Owner/Operator shall report each malfunction that occurs at this Facility that poses an imminent and substantial danger to the public health and safety or the environment or which it should reasonably believe may result in citizen complaints to the Department. For purpose of this condition a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or source to operate in a normal or usual manner that may result in an increase in the emission of air contaminants. Examples of malfunctions may include, but are not limited to: large dust plumes, heavy smoke, a spill or release that results in a malodor that is detectable outside the property of the person on whose land the source is being operated.

(b) When the malfunction poses an imminent and substantial danger to the public health and safety, potential harm to the environment, the permittee shall report the incident to the Department within one hour of discovery. The permittee shall also notify the Department within one hour, when corrective measures have been accomplished.

All other malfunctions that must be reported under subsection (a) shall be reported to the Department no later than the next business day.

(c) Initial reporting of the malfunction shall identify the following items to the extent known:

- (1) Name and location of the facility;
- (2) Nature and cause of the malfunction;
- (3) Time when the malfunction or breakdown was first observed;
- (4) Expected duration of increased emissions; and
- (5) Estimated rate of emissions.

(d) If requested by the Department, the permittee shall submit a full written report to the Department including final determinations of the items identified in (c) and the corrective measures taken on the malfunction. The report shall be submitted within 15 days of the Department's request or accomplishing corrective measures, whichever is later.

(e) Malfunctions shall be reported to the Department by e-mail (addresses will be provided by the Department) or at the following address:

PA DEP  
Office of Air Quality  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745  
412-442-4000

**VI. WORK PRACTICE REQUIREMENTS.****# 016 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall construct, operate, and maintain all air contamination sources and air cleaning devices authorized under this Plan Approval in accordance with the manufacturer's specifications and recommended maintenance schedules.

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

Air contamination sources and air cleaning devices authorized for construction and initial operation under this plan



## SECTION C. Site Level Plan Approval Requirements

approval include:

- Leachate Evaporation System: One (1) Pentair Hydrocarbon Recovery Unit; One (1) Cleaver Brooks, ProFire MTH 25.2, natural gas-fired burner, 25.2 MMBtu/hr; One (1) Heartland Water Technology, LM-HT Concentrator, Evaporator and Entrainment Separator, 45,000 gallons per day (gpd)

### # 018 [25 Pa. Code §127.12b]

#### Plan approval terms and conditions.

Upon determination by the permittee that the air contamination sources and air cleaning devices covered by this plan approval are in compliance with all conditions of the plan approval, the permittee shall contact the Department's technical reviewer and schedule the Initial Operating Permit Inspection.

### # 019 [25 Pa. Code §127.12b]

#### Plan approval terms and conditions.

Upon completion of the Initial Operating Permit Inspection and determination by the Department that the permittee is in compliance with all conditions of the plan approval, the permittee shall submit either an administrative amendment to incorporate PA-65-00767C and the existing High Btu Plant into Title V Operating Permit or update to a pending Title V Operating Permit application (as appropriate) for this Facility within 60 days, as applicable.

### # 020 [25 Pa. Code §127.12b]

#### Plan approval terms and conditions.

The permittee shall submit requests to extend the temporary operation periods at least 15 days prior to the expiration date of any authorized period of temporary operation.

## 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: 113

Source Name: LEACHATE EVAPORATION SYSTEM

Source Capacity/Throughput:

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

The Leachate Evaporation System shall be used only for processing landfill fluids.

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

Emissions of CO and NOx shall each not exceed 9 ppm at 8% O2.

**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Filterable PM emissions from the Heartland Water Technology, LM-HT Concentrator, Evaporator and Entrainment Separator shall not exceed an outlet concentration of 0.006 grains per dry standard cubic foot (gr/dscf).

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

The emissions from the leachate evaporation system (Source ID 113) shall not exceed the following on a lb/hr and 12-month rolling tpy basis:

Pollutant	lb/hr	tpy
CO	0.23	1.00
NOx	0.38	1.65
PM (Total)	1.70	7.45
PM10	1.70	7.45
PM2.5	1.70	7.45
SOx	0.03	0.12
VOC	0.16	0.72
HAP	0.05	0.22
NH3	0.02	0.08

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

The emissions of Radium-226 and Radium-228 from the leachate evaporation system shall not equal or exceed the Nuclear Regulatory Commission's (NRC) air discharge limits of 10 CFR Part 20, Appendix B, Table 2.

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

Compliance with 10 CFR 20, Subpart D - Radiation Dose Limits for Individual Members of the Public shall be demonstrated by determining the total effective dose equivalent and comparing against the annual dose limit in 10 CFR §20.1301 for each of the six (6) thermoluminescent dosimeter TLD radiation measure devices.

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

Visible emissions from the Leachate Evaporation System (Source ID 113) stack shall not exceed 10% at any time.



**SECTION D. Source Level Plan Approval Requirements****Fuel Restriction(s).****# 008 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

The 25.2 MMBtu/hr natural gas-fired burner shall fire only pipeline quality natural gas.

**Throughput Restriction(s).****# 009 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

The leachate evaporation system shall be limited to processing 45,000 gallons of landfill fluids per calendar day.

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

(a) The permittee shall conduct monthly sampling of the leachate prior to the hydrocarbon recovery unit (prior to the pre-treatment unit) and post hydrocarbon recovery unit (post pre-treatment unit) for VOC, Total Suspended Solids (TSS), Total Dissolved Solids (TDS), Gross Alpha, Gross Beta, Radium-226, Radium-228, Sulfur Compounds, and HAP Metals (Antimony (Sb), Arsenic (As), Beryllium (Be), Cadmium (Cd), Chromium (Cr), Cobalt (Co), Lead (Pb), Manganese (Mn), Mercury (Hg), Nickel (Ni), and Selenium (Se) concentration. The analysis shall be able to detect to a level adequate to demonstrate compliance with the emission limits and the NRC's air discharge limits of 10 CFR Part 20, Appendix B. Any change in the frequency of sampling shall be approved by the Department in writing prior to implementation by the permittee.

(b) The permittee shall submit a sampling and analysis protocol to the Department for review within 30 days of plan approval issuance to be approved by the Department in writing prior to sampling. The Heartland Water Technology, LM-HT Concentrator, Evaporator and Entrainment Separator (Source ID 113) shall not commence initial operation until the owner/operator receives all analytical results from initial leachate sampling event and the analytical results are received by the Department.

(c) Within 180 days after initial startup, or on an alternative schedule as approved by the Department in writing, and at a minimum of once every five years thereafter, the permittee shall conduct EPA reference method stack testing for NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, Dioxins/Furans EPA Reference Method 23, and HAP Metals/EPA Reference Method 29 Metals (Antimony (Sb), Arsenic (As), Beryllium (Be), Cadmium (Cd), Chromium (Cr), Cobalt (Co), Lead (Pb), Manganese (Mn), Mercury (Hg), Nickel (Ni), and Selenium (Se) or alternative test methods as approved by the Department in writing, in accordance with 25 Pa Code Chapter 139 and applicable EPA reference methods. Leachate sampling as specified in part (a) shall be performed during the testing. The analysis shall be able to detect to a level adequate to demonstrate compliance with the emission limits. The frequency of such subsequent testing may be altered based on the test results and only with prior written approval from the Department.

(d) Within 180 days after initial startup, or on an alternative schedule as approved by the Department in writing, and at a minimum of once every quarter calendar year thereafter, the permittee shall conduct EPA reference method stack testing for PM<sub>10</sub> (filterable and condensable), PM<sub>2.5</sub> (filterable and condensable), Gross Alpha, Gross Beta, Radium-226, and Radium-228, or alternative test methods as approved by the Department in writing, in accordance with 25 Pa Code Chapter 139 and applicable EPA reference methods. The analysis shall be able to detect to a level adequate to demonstrate compliance with the emission limits and the NRC's air discharge limits of 10 CFR Part 20, Appendix B. The frequency of such subsequent testing may be altered based on the test results and only with prior written approval from the Department.

(e) Stack testing shall verify compliance with the NO<sub>x</sub>, CO, SO<sub>x</sub>, VOC, PM<sub>10</sub> (filterable and condensable), and PM<sub>2.5</sub> (filterable and condensable) emission limitations, as well as filterable solids and hydrocarbon removal efficiency.

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

The permittee shall conduct quarterly sampling of the leachate prior to the hydrocarbon recovery unit (i.e., prior to the pre-treatment unit) and post hydrocarbon recovery unit (i.e., post pre-treatment unit) for Per- and Polyfluoroalkyl Substances

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

(PFAS) concentration for one year in accordance with EPA Draft Method 1633. Any change in the frequency of sampling shall be approved by the Department in writing prior to implementation by the permittee.

**# 012 [25 Pa. Code §139.11]****General requirements.**

(1) Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

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

The permittee shall monitor the volumetric flowrate of leachate to the Leachate Evaporator System.

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

The permittee shall implement the radiological monitoring and testing plan titled "Westmoreland Sanitary Landfill – Leachate Evaporator Radiological Emissions Monitoring and Test Plan" (Radiological Monitoring Plan) - Revised 9/21 - and any subsequent revisions and/or supplements to the plan that have been approved by the Department in writing.

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

The permittee shall install and operate a minimum of four (4) outdoor perimeter air monitors and six (6) thermoluminescent dosimeter (TLD) radiation measurement devices as presented in the "Westmoreland Sanitary Landfill – Leachate Evaporator Radiological Emissions Monitoring and Test Plan" (Radiological Monitoring Plan) - Revised 9/21.

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

The leachate evaporation system shall operate at an evaporation zone temperature less than or equal to 1,000 degrees F.

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

The permittee shall continuously monitor the temperature of the leachate evaporation system and shall record the temperature hourly, at a minimum, when the source is operating.

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

Within 180 days of commencement of operation of the hydrocarbon recovery unit and at a minimum of once every twelve months thereafter, the permittee shall have an audit inspection performed by the hydrocarbon recovery unit manufacturer and leachate evaporation system manufacturer or an equivalently specialized third-party entity to evaluate the Pentair Hydrocarbon Recovery Unit and Heartland Water Technology, LM-HT Concentrator, Evaporator and Entrainment Separator performance, condition, and maintenance. The resulting audit inspection report shall be made available to the Department upon request.

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

The permittee shall maintain the following comprehensive and accurate records:

- (a) Volumetric flowrate of leachate to the Leachate Evaporation System on a daily, monthly, and 12-month rolling total basis.
- (b) Hours of operation of the Leachate Evaporation System on a monthly and 12-month rolling total basis.
- (c) Natural gas fuel consumption on a monthly and 12-month rolling total basis.
- (d) Waste heat consumption on a monthly and 12-month rolling total basis;

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

- (e) Temperature of the Leachate Evaporation System evaporation zone on an hourly basis at a minimum when the source is operating;
- (f) The date and detailed description of any maintenance conducted on the Leachate Evaporation System; and
- (g) Records of annual tune-ups/inspections on the burner which shall, at a minimum, include the following:
- (i) The concentrations of CO and NO<sub>x</sub> in the effluent stream in parts per million by volume and lb/hr equivalent rate, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the burner;
  - (ii) A description of any corrective actions taken as part of the tune-up; and
  - (iii) The date(s) the annual tune-up/inspection was conducted.
- (h) Records of weekly air monitoring analytical data;
- (i) Records of quarterly TLD area monitor analytical data;
- (j) Records of monthly leachate sampling results for VOC, TSS, TDS, Gross Alpha, Gross Beta, Radium-226, Radium-228, Sulfur Compounds, and HAP Metals (Antimony (Sb), Arsenic (As), Beryllium (Be), Cadmium (Cd), Chromium (Cr), Cobalt (Co), Lead (Pb), Manganese (Mn), Mercury (Hg), Nickel (Ni), and Selenium (Se));
- (k) Calculations comparing weekly air monitoring results of Radium-226 and Radium-228 to the Nuclear Regulatory Commission's (NRC) air discharge limits of 10 CFR Part 20, Appendix B. and a statement whether weekly air monitoring results are in compliance with the NRC air discharge limits; and
- (l) Calculations comparing monthly leachate sampling results for Radium-226 and Radium-228 to the Nuclear Regulatory Commission's (NRC) air discharge limits of 10 CFR Part 20, Appendix B. The calculations shall utilize control efficiencies determined by the initial and quarterly stack testing results for Radium-226 and Radium-228 as applicable.

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

All logs and required records shall be maintained on site, or at an alternative location acceptable to the Department, for a minimum of five years and shall be made available to the Department upon request.

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

The permittee shall submit quarterly reports of the results of onsite radiological air monitoring and stack testing. The results shall include:

- A comparison to the NRC air discharge limits of 10 CFR Part 20, Appendix B for Radium-226 and Radium-228 and a statement as to whether the results are in compliance with the NRC air discharge limits;
- A comparison to the NRC rule of unity and a statement as to whether the results are in compliance with the NRC rule of unity; and
- An ongoing list comparing NRC rule of unity values to past values.

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

The permittee shall submit initial leachate sampling results to the Department within seven (7) days of receipt. Subsequent leachate sampling results shall be submitted to the Department monthly.

**VI. WORK PRACTICE REQUIREMENTS.****# 023 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall conduct an annual tune-up/inspection on the 25.2 MMBtu/hr natural gas-fired burner. At a minimum the tune-up/inspection shall consist of the following:

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly;

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

(d) Optimize total emissions of CO and NOx. This optimization should be consistent with the manufacturer's specifications, if available; and

(e) Measure the concentrations in the effluent stream of CO and NOx in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO and NOx analyzer as long as it is calibrated and operated according to the manufacturer's recommendations.

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

The permittee shall maintain the air contamination source and air cleaning device in accordance with the manufacturer's recommendations. The maintenance schedule for this equipment and records of all maintenance activities performed on this equipment shall be maintained on-site and be made available to the Department upon request.

**# 025 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

If, at any time, the results from the radiological air monitoring and stack testing analyses indicate exceedance of NRC air discharge limits of 10 CFR Part 20, Appendix B or the limits of 10 CFR Part 20, Subpart D, the facility shall shutdown operation of the leachate evaporator and immediately notify the Department.

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

The permittee shall have a trained operator on site at all times of leachate evaporation system (Source ID 113) operation. The permittee shall maintain proof of operator training.

**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.**

No emission restrictions listed in this section of the permit.



**SECTION H. Miscellaneous.**





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

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