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| Source ID | Source Name           | Capacity/Throughput | Fuel/Material |
|-----------|-----------------------|---------------------|---------------|
| 700       | LFG TURBINE 1         | 48.000 MMBTU/HR     |               |
|           |                       | 48.000 MMBTU/HR     | Landfill Gas  |
| FML01     | LANDFILL GAS PIPELINE |                     |               |
| S01       | LFG TURBINE 1 STACK   |                     |               |

**PERMIT MAPS**

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

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

**#002 [25 Pa. Code § 121.7]****Prohibition of Air Pollution**

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

**#003 [25 Pa. Code § 127.512(c)(4)]****Property Rights**

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

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

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

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

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

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

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

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

**#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]****Transfer of Ownership or Operational Control**

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

- (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

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

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

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

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

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

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

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

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

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

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

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

**#009 [25 Pa. Code § 127.512(c)(2)]****Need to Halt or Reduce Activity Not a Defense**

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

**#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]****Duty to Provide Information**

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

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to determine compliance with the permit.

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

**#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]****Reopening and Revising the Title V Permit for Cause**

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

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

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

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

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

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

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

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

**#012 [25 Pa. Code § 127.543]****Reopening a Title V Permit for Cause by EPA**

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

**#013 [25 Pa. Code § 127.522(a)]****Operating Permit Application Review by the EPA**

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

R3\_Air\_Apps\_and\_Notices@epa.gov

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

**#014 [25 Pa. Code § 127.541]****Significant Operating Permit Modifications**

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

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

R3\_Air\_Apps\_and\_Notices@epa.gov

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

**#015 [25 Pa. Code §§ 121.1 & 127.462]****Minor Operating Permit Modifications**

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

R3\_Air\_Apps\_and\_Notices@epa.gov

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

**#016 [25 Pa. Code § 127.450]****Administrative Operating Permit Amendments**

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

R3\_Air\_Apps\_and\_Notices@epa.gov

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

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

**#017 [25 Pa. Code § 127.512(b)]****Severability Clause**

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

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

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

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

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

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



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

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

**#019 [25 Pa. Code §§ 127.14(b) & 127.449]****Authorization for De Minimis Emission Increases**

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

- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

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

- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

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

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
- (4) Space heaters which heat by direct heat transfer.

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

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

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

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

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

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

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

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

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

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

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

**#020 [25 Pa. Code §§ 127.11a & 127.215]****Reactivation of Sources**

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

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

**#021 [25 Pa. Code §§ 121.9 & 127.216]****Circumvention**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

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

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

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

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

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

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

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

**#026 [25 Pa. Code § 127.513]****Compliance Certification**

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

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

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

**#027 [25 Pa. Code § 127.3]****Operational Flexibility**

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

- (1) Section 127.14 (relating to exemptions)

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- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

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

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
    - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
    - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
  - (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
  - (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
  - (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

**SECTION B. General Title V Requirements**

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

**#029 [25 Pa. Code § 127.512(e)]****Approved Economic Incentives and Emission Trading Programs**

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

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

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

- (1) The applicable requirements are included and are specifically identified in this permit.
- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

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

- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
- (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
- (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

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

**#031 [25 Pa. Code §135.3]****Reporting**

(a) The permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active 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. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

**#032 [25 Pa. Code §135.4]****Report Format**

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

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

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

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning operations, as specified in 25 Pa. Code Section 129.14
- (g) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.
- (h) Sources and classes of sources other than those identified in (a) -- (g) above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (1) The emissions are of minor significance with respect to causing air pollution; and
  - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

**# 003 [25 Pa. Code §123.2]****Fugitive particulate matter**

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

**# 004 [25 Pa. Code §123.31]****Limitations**

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

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

The landfill gas-fired turbines subjected to this operating permit may not, at any time, result in visible emissions in excess of following:

- (1) Normal operation: 10% opacity.
- (2) Start-up or shut-down:
  - (i) Equal to or greater than 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour.

**SECTION C. Site Level Requirements**

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

[Compliance with this more stringent requirement also assure compliance with 25 Pa. Code § 123.41.]

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

The opacity limitations as per 25 Pa. Code Section 123.41 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 25 Pa. Code § 123.1(a)(1) - (8) (relating to prohibition of certain fugitive emissions).
- (4) When arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

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

Emissions of nitrogen oxides (NOx) from all sources at this facility, shall not exceed 40.33 tons per year, as a twelve (12) month rolling sum.

**II. TESTING REQUIREMENTS.****# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

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

Visible emissions may be measured using either of the following:

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

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

When manned, the permittee shall monitor the facility, once per operating day, for the following:

- (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
- (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and  
(the observer does not have to be Reference 9 certified)



**SECTION C. Site Level Requirements**

(3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

In the event of visible emissions originating from the site, the facility shall bring in a Reference Method 9 certified individual to evaluate if the facility is in compliance with the provisions of Condition #007 of this section.

(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) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

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

**IV. RECORDKEEPING REQUIREMENTS.****# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall calculate and maintain records of the total emissions of nitrogen oxides (NO<sub>x</sub>) from the facility, on a monthly basis and as a 12-month rolling sum.
- (b) The permittee shall keep the checklists used to document the leak checks conducted pursuant to Section C, Condition #019.

**# 012 [25 Pa. Code §127.441]****Operating permit 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.

The frequency of the required recordkeeping should be the same as for the required monitoring in Condition #010 of this section.

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

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

- (a) de minimus increases without notification to the Department.
- (b) de minimus increases with notification to the Department, via letter.
- (c) Increases resulting from a Request for Determination (RFD) to the Department.

**SECTION C. Site Level Requirements**

(d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

**V. REPORTING REQUIREMENTS.****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]

The deviation report required by Condition #025(b), of Section B, of this permit, is for monitoring deviations, only. This report shall be submitted to the Department, within six (6) months after permit issuance, and, at a frequency of at least every six (6) months thereafter.

**# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall submit the following reports:

(a) An annual compliance certification, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certification of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under Condition #26 of Section B, of the permit. The annual certificate of compliance shall be submitted to the Department in paper form and to the EPA Region III in electronic form at the following email address:

R3\_APD\_Permits@EPA.gov

(b) A semiannual deviation report, due by October 1st of each year, for the period covering January 1 through June 30 of the same year. Note, the Annual Certification of compliance fulfills the second reporting period (July 1 through December 31).

**# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department. 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 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

**SECTION C. Site Level Requirements**

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.

**VI. WORK PRACTICE REQUIREMENTS.****# 017 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code Section 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (c) Paving and maintenance of roadways.
- (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.

**# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee may not modify any air contaminant system identified in this Permit, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition #019(g), of Section B, of this permit.

**# 019 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall conduct leak checks on the landfill gas handling and processing equipment at a minimum of once weekly while operating. The leak checks shall be documented in a checklist.

**# 020 [25 Pa. Code §129.14]****Open burning operations**

No person may permit the open burning of material except the following:

- (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) A 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 solely for cooking food,
- (e) A fire set solely for recreational or ceremonial purposes.

**SECTION C. Site Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 021 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The aggregate of all pollutant emissions from the Pennsbury Power Plant (TVOP 09-00077) the Fairless Landfill (TVOP 09-00210), and the GROWS (TVOP 09-00007) and GROWS North Landfill area (Plan Approval 09-0007C), shall be considered in the Department's and EPA's future determinations of applicability for air programs including, but not limited to, the following:

- (1) Prevention of Significant Deterioration (PSD).
- (2) Non-attainment New Source Review (NNSR).
- (3) Accidental release prevention program requirements.

(b) Any increase in emissions from pollutant-emitting activities at any facility shall be combined and aggregated to determine whether an applicable requirement is triggered at the site.

**# 022 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.330]****Subpart GG - Standards of Performance for Stationary Gas Turbines  
Applicability and designation of affected facility.**

The landfill gas-fired turbines (Source ID(s): 700 and 701) at the Pennsbury Power Production Plant are subject to the applicable requirements of 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines).

**VIII. COMPLIANCE CERTIFICATION.**

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

**IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

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

**SECTION D. Source Level Requirements**

Source ID: 700

Source Name: LFG TURBINE 1

Source Capacity/Throughput: 48.000 MMBTU/HR

48.000 MMBTU/HR Landfill Gas

Conditions for this source occur in the following groups: GRP1

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

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

**SECTION E. Source Group Restrictions.**

Group Name: GRP1

Group Description: Landfill Gas Fired Combustion Turbines

Sources included in this group

| ID  | Name          |
|-----|---------------|
| 700 | LFG TURBINE 1 |

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the landfill gas-fired combustion turbine shall be operated to reduce the concentration of non-methane organic compounds (NMOC) entering the turbine by a minimum of 98%, by weight, or 20 ppmvd as hexane corrected to 3% oxygen.

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

The permittee shall ensure that emissions from the landfill gas-fired turbine shall not exceed the following:

- (a) Nitrogen Oxide (NOx): 42 ppmvd corrected to 15% oxygen.
- (b) Carbon Monoxide (CO): 100 ppmvd corrected to 15% oxygen.
- (c) Sulfur Dioxide (SO<sub>2</sub>): 30 ppmvd corrected to 15% oxygen.
- (d) Particulate Matter (PM): 0.0232 lb/MMBtu.

[Compliance with the SO<sub>2</sub> emission limit may be verified either through source testing or by compliance with the sulfur content limit in Condition #003. Compliance with the emission limits for NO<sub>x</sub>, NMOC and CO shall be verified through source testing as required in Conditions #005 and #006. Compliance with the PM limit shall be through stack testing, when requested by the Department.]

**Fuel Restriction(s).****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Pursuant to 40 CFR § 60.333(b), the permittee shall limit the sulfur content of the landfill gas fired in this landfill gas-fired turbine to 0.8% or less by weight.

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

The permittee shall ensure that the turbine shall burn landfill gas as the primary fuel only. Propane gas may be used to light off the turbine during startup only.

**II. TESTING REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Stack Testing Document Submission Procedures -

- (a) The permittee shall submit one paper copy plus one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (mail and email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

**SECTION E. Source Group Restrictions.**

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF Id under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) Mail all paper submissions to both the PSIMS Administrator and the Air Quality Program Manager for the Southeast Regional Office. Mailing addresses are provided below.

Central Office  
Pennsylvania Department of Environmental Protection  
Attn: PSIMS Administrator  
P.O. Box 8468  
Harrisburg, PA 17105-8468

Southeast Region  
Pennsylvania Department of Environmental Protection  
Attn: Air Quality Program Manager  
2 East Main Street  
Norristown, PA 19401

(d) Eliminate shading, color ink for data emphasis, small font size, and color saturation as the scanning to create an electronic file is done in black and white. Shading and color emphasis do not scan well and make the electronic copies difficult to read.

(e) Email all electronic submissions to both the PSIMS Administrator in Central Office and the Air Quality Program Manager for the Southeast Regional Office. Email addresses are provided below.

Central Office  
RA-EPstacktesting@pa.gov

Southeast Region  
RA-EPSEstacktesting@pa.gov

(f) The Department limits emails to 15 MB and PSIMS has a file size limitation of 100 MB for electronic files. Submit just one electronic file (convert any Microsoft Word or Excel files to an Adobe PDF format and combine them with the report or protocol), unless the submission contains CONFIDENTIAL information.

(g) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

**SECTION E. Source Group Restrictions.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall perform a stack test on one of the turbines (Source ID(s):700 or 701) using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later.

(b) If both turbines are operational at the time of the testing, the turbine tested shall be different than the last one tested, so as to alternate the turbine tested. However, the Department can specify the turbine to be tested. If only one turbine is operational at the time of the testing, that shall be the test turbine, even if it was tested for the last 5-year test.

The turbine shall be stack tested for NO<sub>x</sub>, NMOCs and CO. Stack testing for NO<sub>x</sub> shall be performed in accordance with the applicable methods specified in 40 CFR Section 60.335 (relating to test methods and procedures). Stack testing for NMOCs shall use either EPA Method 25 or EPA Methods 25A/18, or other methodologies approved by the Department. Stack testing for CO shall employ M10, or other Department approved methodology. All pollutants shall be tested in accordance with the applicable provisions of 25 Pa. Code Chapter 139.

The stack test for NO<sub>x</sub>, NMOCs and CO shall be performed while operating the unit at its maximum normal capacity, or other operating condition(s) as may be requested by the Department.

(c) When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(d) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples. Document submission shall be as specified in Condition #006 of this section.

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

(f) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), one paper copy plus one electronic copy of the complete test report, including all operating conditions, shall be submitted for approval to the Regional Air Quality Manager and to the Department's Central Office, in accordance with Condition #006 of this section.

(g) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

**III. MONITORING REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Pursuant to 40 CFR § 60.334(i)(3)(i)(D), if a sulfur content measurement exceeds 0.8% by weight, the permittee shall immediately begin daily monitoring of sulfur content, until an alternate frequency is permitted by the Department or pursuant to 40 CFR § 60.334(i)(3)(i).

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

(a) Pursuant to 40 CFR § 60.334(e), the permittee shall monitor, on an annual basis, the landfill gas used as fuel for this turbine to determine the nitrogen content.

(b) The landfill gas shall be analyzed by on-line process gas chromatograph, or an alternate method or frequency approved by the Department or pursuant to 40 CFR 60, Subpart GG, to determine nitrogen content of the fuel.

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

The permittee shall monitor the following parameters for the landfill gas-fired turbine:



**SECTION E. Source Group Restrictions.**

(a) Monthly amount of landfill gas and propane fired in the turbine.

(1) The average flow rate of the landfill gas for each area the landfill gas is coming from (whether it is the GROWS, GROWS North or Fairless landfill) and the duration of the flow from a particular landfill area shall be monitored on a monthly basis in addition to the total quantity of landfill gas to the turbine.

The permittee shall install the necessary instrumentation, or use a Department-approved calculation method for determining the origin of the landfill gas fired in the turbine.

(2) The average methane content of the landfill gas fired in the turbine on a monthly basis from the combination of all the landfills.

(3) Problems encountered with the quality of gas, such as a low flow rate, low methane content or excessive moisture. The date of the problem(s), the type and the landfill area the gas was coming from shall be monitored.

(b) Twelve (12) month rolling total amount of landfill gas and propane fired in the turbine.

(c) Hours of operation each month.

(d) Monthly emissions of NO<sub>x</sub>, CO, NMOC, SO<sub>2</sub>, and PM.

(e) Twelve (12) month rolling total emissions of NO<sub>x</sub>, CO, NMOC, SO<sub>2</sub>, and PM.

**# 010 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

(a) Pursuant to the Department's letter dated July 23, 2007 and to 40 CFR § 60.334(i)(3)(i)(B), the permittee shall monitor the landfill gas used as fuel for this turbine, on an annual basis to determine the sulfur content.

(b) Pursuant to 40 CFR § 60.334(i)(3)(i) (A) and (D), if the sulfur in the landfill gas exceeds 0.8%, by weight, the permittee shall maintain records of the sulfur content daily for a 30-day period. If there is no exceedance during the 30-day period, the permittee shall maintain records of the sulfur content at six (6) month intervals for twelve (12) months.

**IV. RECORDKEEPING REQUIREMENTS.**

**# 011 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

(i) The permittee shall maintain records of the following parameters for the landfill gas-fired turbine:

(a) Monthly amount of landfill gas and propane fired in the turbine.

(1) The average flow rate of the landfill gas for each area the landfill gas is coming from (whether it is the GROWS, GROWS North or Fairless landfill) and the duration of the flow from a particular landfill area shall be recorded on a monthly basis in addition to the total quantity of landfill gas to the turbine.

(2) The average methane content of the landfill gas fired in the turbine on a monthly basis from the combination of all the landfills shall be recorded.

(3) Problems encountered with the quality of gas, such as a low flow rate, low methane content or excessive moisture. The date of the problem(s), the type and the landfill area the gas was coming from shall be recorded.

(b) Twelve (12) month rolling total amount of landfill gas and propane fired in the turbine.

(c) Hours of operation each month.

(d) Monthly emissions of NO<sub>x</sub>, CO, NMOC, SO<sub>2</sub>, and PM.

(e) Twelve (12) month rolling total emissions of NO<sub>x</sub>, CO, NMOC, SO<sub>2</sub>, and PM.

**SECTION E. Source Group Restrictions.**

(f) The fuel heating value, on at least a monthly basis.

The above information shall be available on site for the Department's inspection upon request.

(b) The permittee shall calculate the emissions from the turbine as approved in Plan Approval 09 0077A. This would include use of the monthly amount of landfill gas with its heat content and the emissions factors in lb/MMBtu from the most recently approved stack test for NO<sub>x</sub>, CO and NMOC and from the AP-42 for PM. SO<sub>2</sub> would be calculated from the sulfur content of the landfill gas and mass balance. Emissions may be calculated in another manner, if approved by the Department. The methodology for calculating the emissions shall be reviewed after each stack test is approved.

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

The permittee shall maintain annual records of the composition of the nitrogen in the landfill gas used in the turbine. The permittee may perform the recordkeeping at a frequency other than annually if approved by the Department and allowance is claimed for fuel bound nitrogen pursuant to 40 CFR 60, Subpart GG.

[Compliance with this condition also assures compliance with 40 CFR § 60.334(e).]

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

(a) Pursuant to the Department's letter dated July 23, 2007, the permittee shall maintain records of all sampling of the composition of the sulfur in the landfill gas used in the turbine.

(b) Pursuant to 40 CFR § 60.334(i)(3)(i) (A) and (D), if the sulfur in the landfill gas exceeds 0.8%, by weight, the permittee shall maintain records of the sulfur content daily for a 30-day period. If there is no exceedance during the 30-day period, the permittee shall maintain records of the sulfur content at six (6) month intervals for twelve (12) months.

**# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of any annual adjustments and/or tuneups performed on the turbines as required in Condition #016.

**V. REPORTING REQUIREMENTS.****# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall notify the Department within 24 hours of becoming aware of the sulfur content of the landfill gas exceeding the 0.8% by weight limit.

**VI. WORK PRACTICE REQUIREMENTS.****# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall perform an annual adjustment and/or tune-up on this landfill gas-fired turbine, which shall include the following:

(a) Inspection, adjustment, cleaning or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer;

(b) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub>, and to the extent practicable minimize emissions of CO;

(c) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer; and

(d) Sampling of the final NO<sub>x</sub> and CO emission rates. This sampling shall be conducted with portable metering equipment in accordance with applicable manufacturers' calibration and operating procedures.

**SECTION E. Source Group Restrictions.****# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain and operate devices to measure and record the flow of landfill gas to the turbine.

**VII. ADDITIONAL REQUIREMENTS.****# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) For any turbine core replacement of a turbine compression engine the permittee shall provide:

(i) Thirty (30) days prior written notice to the Department of a planned turbine core replacement, or

(ii) Seven (7) days written notice to the Department for replacement necessitated by an equipment failure, natural disaster or other unplanned event.

(b) The written notice shall:

(i) Identify the location, the manufacturer, model, and serial number of the turbine compression engine, the manufacturer, model, and serial number of the turbine core to be installed, or which has been installed, in the turbine compression engine and the air contaminant emission rates which will exist following the turbine core replacement, including oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO) and volatile organic compounds (VOCs).

(ii) Also contain a certification from the permittee that any turbine core to be installed has been manufactured by either the existing turbine manufacturer or other manufacturer and will be a lower emitting turbine core or, if the core will be replaced with an identical core, that a lower emitting core is not available. Existing turbine manufacturers shall include companies that maintain the turbine cores of the existing turbines at the facility. If the permittee decides to install a turbine core obtained from a manufacturer other than the existing turbine manufacturer, the notice shall contain a certification, signed by a "responsible official" as defined in 25 Pa. Code § 121.1 (relating to definitions), that the permittee has examined the turbine cores that are available from all such manufacturers and will install, or has installed, the lowest emitting turbine core available from any manufacturer.

(iii) Be accompanied by a vendor-provided guarantee of the achievable air contaminant emission rates of the new turbine core. If such a guarantee is not available, the notice shall include certification that the permittee attempted to obtain such guarantee and an explanation as to why the vendor will not provide such a guarantee. All certifications shall be signed by a responsible official and shall acknowledge that the certifying party is aware of the penalties for unsworn falsification to governmental authorities as established under 18 Pa.C.S. § 4904. The certification shall also state that based on information and belief formed after reasonable inquiry, that the information in the notice are true, accurate and complete.

(c) A turbine core is a "Lower Emitting Turbine Core" if it is commercially available, has the same operating characteristics as the core being removed and the rate of NO<sub>x</sub> emissions, expressed as either parts per million by volume dry basis ("ppmvd") or pounds per hour ("lb/hr") would be lower than the rates of emission achievable by any commercially available alternative turbine core when the respective turbine was operating at the same level of performance. If the horsepower, firing rate and operating speed of the core being removed falls within the ranges of horsepower, firing rate, and operating speed for the Lower Emitting Turbine Core, the Lower Emitting Turbine Core is considered to have the same operating characteristics as the core being removed. A turbine core is an "Identical Turbine Core" if the rate of NO<sub>x</sub> emissions is no higher than the emission rates of the turbine core being replaced when the respective turbine is operating at the same level of performance.

(d) After a turbine core has been replaced, the permittee shall perform NO<sub>x</sub> and CO emissions testing as established in Conditions #005 and #006 for the respective turbine compressor engine(s) within ninety (90) days of completing the replacement. Stack testing for CO shall employ M10, or other Department approved methodology. Stack testing for NO<sub>x</sub> shall be performed in accordance with methods specified in 40 CFR § 60.335 (relating to test methods and procedures) and in accordance with 25 Pa Code, Chapter 139 (relating to sampling and testing) for NO<sub>x</sub> and CO.

(e) A Plan Approval may be required for one or more of the following:

(i) if emission test results exceed the emission limits specified in this operating permit.

**SECTION E. Source Group Restrictions.**

(ii) the replacement of the turbine core includes parts other than the turbine core itself.

(3) a turbine core replacement occurring more than fifteen (15) years since the last replacement.

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



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this permit.

**SECTION G. Emission Restriction Summary.**

| Source Id       | Source Description          |           |  |
|-----------------|-----------------------------|-----------|--|
| 700             | LFG TURBINE 1               |           |  |
| Emission Limit  |                             | Pollutant |  |
| 100.000 PPMV    | dry basis @ 15% O2          | CO        |  |
| 20.000 PPMV     | dry basis as hexane @ 3% O2 | NMOC      |  |
| 42.000 PPMV     | dry basis @ 15% O2          | NOX       |  |
| 30.000 PPMV     | dry basis @ 15% O2          | SOX       |  |
| 0.023 Lbs/MMBTU | particulate matter          | TSP       |  |

**Site Emission Restriction Summary**

| Emission Limit |                      | Pollutant |
|----------------|----------------------|-----------|
| 40.330 Tons/Yr | 12-month rolling sum | NOX       |

**SECTION H. Miscellaneous.**

(a) The facility contains a second turbine of capacity 48 MMBtu/hr (Source ID No. 701), which has been inactive since October, 2018. No deactivation or maintenance plan was submitted to DEP. In accordance with 25 Pa. Code Section 127.11a, the source requires a plan approval before reactivation is allowed.

(b) The Department has determined that the emissions from the following activities, including those indicated as site level requirements in Section C, of this permit, do not require additional limitations, monitoring or recordkeeping:

- (1) Oil/Water Separator (capacity: 1500 gallon)
- (2) LFG Hydrocarbon Storage Tank (capacity: 250 gallon)
- (3) Water heater for Fire Water Tank
- (4) Bearing Lube System

(c) The following operating permits and plan approvals serve as the basis for this Title V Operating Permit (APS ID: 810496, Auth ID: 973863):

(1) The Synthetic Minor State Only Operating Permit 09-00077 (APS ID: 346304, Auth ID: 581666) was issued to Exelon Generation Co., LLC (Pennsbury), formerly PECO Energy to incorporate conditions from the previously-issued facility VOC and NOx Reasonably Available Control Technology (RACT) Operating Permit No. 09-0077.

(2) The Synthetic Minor State Only Operating Permit 09-00077 (APS ID: 346304, Auth ID: 804048) incorporated conditions from the existing BAQ GPA/GP No. 09-328-001GP.

(3) Plan Approval 09-0077A (APS ID: 786444, Auth ID: 935688) established a new facility-wide NOx emission limit (e.g., 40.33 tpy) and revised the testing requirement for the onsite LFG combustion turbines.

(4) TVOP 09-00077 (APS ID: 810496, Auth ID: 973863) incorporates the conditions from Plan Approval 09-0077A.

(5) APS ID 810496, Auth ID 1235012. The TVOP is renewed. May 2020.

The following changes were made with the renewal.

Condition numbers refer to the February 1, 2014 issuance. Current issuance condition numbers are in brackets [ ].

**Cover Page**

The Responsible Official was changed to Joseph Dick and the Permit Contact to Chandra Copplin

**Section A**

Source ID No. 701 was removed from the Inventory List and Permit Maps because it has been inactive for more than one year. Details are in Section G.

**Section C**

The following standard conditions were revised in the following manner to conform to current Department guidelines:

Condition #002(f) – added the regulatory reference for open burning

Condition #003 - the regulatory reference for fugitive particulate matter was included.

Condition #005 [#006]– the regulatory reference for the visible emissions was included

Condition #007 [#008]– (a) reference to Section A sources was removed so that all sources in the permit are subject to testing. (b) Requirement to use to DEP's Source Testing Manual, in the testing, if applicable, was included.

Condition #009 [#010] – regulatory references were included for the odors, visible and fugitive emissions.

Condition #013 – The condition pertaining to the availability of records, was removed since it is in Section B Condition #024(c).

Condition #014 – The Condition pertaining to the accidental release program was removed since it is in Section B Condition #028.

**SECTION H. Miscellaneous.**

Condition #015 [#016]– The condition pertaining to malfunction, emergencies and incidents reporting was replaced with a generic Commonwealth-wide reporting condition. Some of the requirements are different namely 1-hour reporting rather than immediate reporting is required for emissions posing an imminent danger, 3-business days are allowed rather than 2 for follow-up reporting.

Condition #016 [#014] – The Section B reference was corrected to correspond to re-ordering of Section B conditions.

Condition #017[#015] - The Section B reference was updated.

Conditions #018 and #019 – The Conditions pertaining to annual source reporting were removed since they are in Section B #031.

Condition #20 [#017] - The regulatory reference was added to the work practice condition to prevent airborne particulates.

Condition #021 [#018] – The source identification of Section A or G was removed to cover all sources in the permit. The Section B reference was updated.

Additional Restriction [#004] The condition prohibiting malodors pursuant to 25 Pa. Code section 123.31 was included.

Section D, Source ID No. 700

Condition #002 -Testing for CO and for PM, upon request of the Department, was added to the note.

Condition #005 - The stack testing condition was revised to conform to new Department guidelines for stack testing to include: once in 5 calendar year testing (rather than once in 5 years or once within the life of the permit), provision of a single protocol for recurring procedural stack testing, inclusion of test methodology for NMOCs, provision of 90 days pre-test submission for protocols.

Condition #005(b) - The following requirements were added to the condition.

Since one of the turbines is not operational currently, the test turbine was specified as the operational turbine even if the test turbine is not alternated. The test turbine shall alternate over the 5-year tests if both turbines are operational. However the Department may select the test turbine. The once in 10year requirement for testing the turbine was removed

\*a notation was added indicating that the turbines may be operated during the stack test at conditions requested by the Department.

\*CO was added to the pollutants to be tested.

Condition #009 [#010(a), #010(b)]

A monitoring condition for sulfur content was added to correspond to the recordkeeping condition in #012 [#013]

Condition #010(vi) [#011(vi)]

"on at least a monthly basis" was added to the recordkeeping condition for fuel heating value.

Condition #011(b) - the calculation procedure in the plan approval was described.

Additional Testing Condition [#006] – New Department Guidelines for submission of stack testing documents were included.

#013[#014] The reference was corrected.

Condition #017(d) [#018(d)] Test methodology was added for CO.

Section G

A statement was added specifying that the inactive source could not be operated without submission and approval of a Plan Approval..

"system" was added to the lube oil source for clarity.

(6) APS ID 1018012 AUTH ID 1317359 The permit is amended for a change in ownership to WM Renewable Energy.

The following changes were made with the amendment. Condition Numbers refer to the May, 2020 issuance. Corresponding



**SECTION H. Miscellaneous.**

conditions in the current issuance are in [brackets].

**Cover Page**

Change in Responsible official to Randall Beck

Change in Permit Contact to Rick Hart

**Section C****Condition #011**

The keeping of checklists to document leak checks on the landfill gas handling and processing equipment was added.

**Condition #016(b)**

The Department's Waste Program was added as a recipient for malfunction, emergency and incident notices, in response to the Waste Program's request.

**Condition #019**

The leak checks were specified as needing to be done at the minimum once weekly while operating and to be documented in a checklist.

**Additional Requirements****Condition [#022]**

The requirement to aggregate pollutant emissions from the Pennsbury Power Plant with the GROWS and Fairless landfills in future projects relating to Prevention of Significant Deterioration, New Source Review or accidental release prevention, was added since the GROWS-Pennsbury-Fairless complex meets the single source criteria.

**Section D [E]****Condition #007**

The phrase "of sulfur content" was added to the monitoring requirement for clarity.

**Condition #009 and #011**

Additional data collection and recording was added at the request of the Department's Waste Program to include:

- \*the landfill origin , flow rate and duration of the landfill gas combusted in the turbine on a monthly basis
- \*the monthly average methane content of the landfill gas fired in the turbine
- \*problems encountered with the quality or quantity of the landfill gas sent to be fired in the turbine.

A note was included indicating that the above information would be available on site for the Department's inspection on request.



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

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