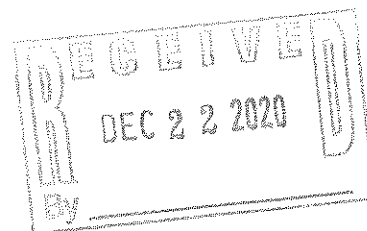


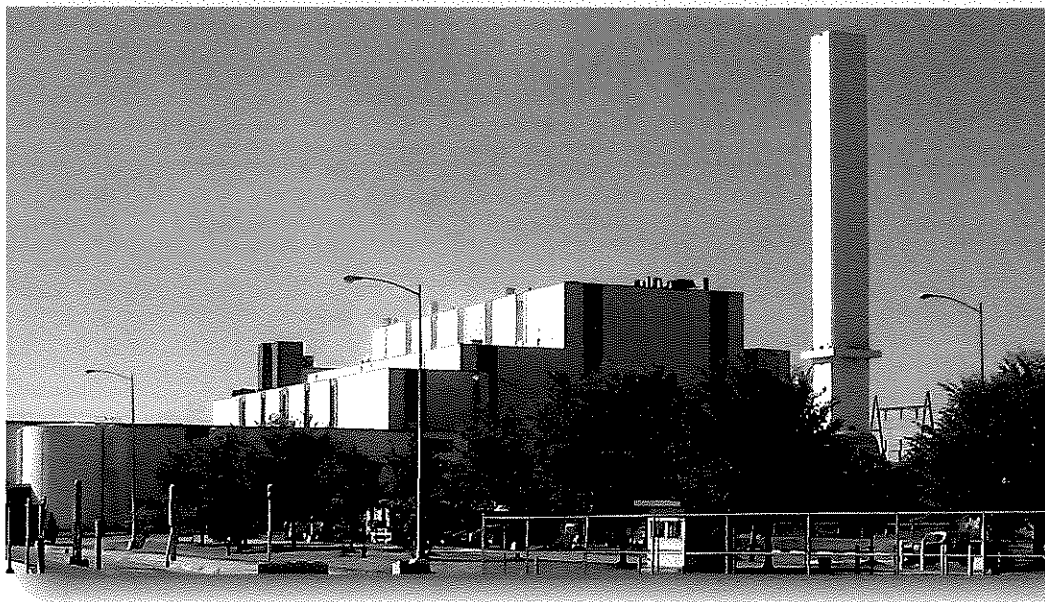
# COVANTA

Powering Today. Protecting Tomorrow.

ORIGINAL



## Covanta Delaware Valley, LP.



ORIGINAL

## Title V Operating Permit Renewal Application

Permit Number 23-00004

Facility Code: 76-0531017-1

2021





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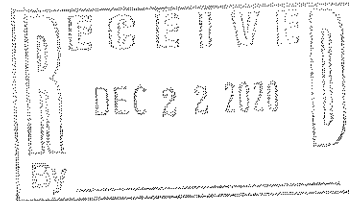
Covanta Delaware Valley, L.P.

10 Highland Avenue

Chester, PA 19013

Tel: 610.497.8100

Fax: 610.497.8042



December 18, 2020

Mr. James Rebarchak  
Southeast Region Air Program Manager  
Pennsylvania Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401

Subject: Covanta Delaware Valley, L.P.  
Delaware Valley Resource Recovery Facility (DVRRF)  
Title V Permit No. 23-00004  
Title V Permit Renewal Application

Dear Mr. Rebarchak:

Covanta Delaware Valley, L.P. respectfully submits three (3) copies of the Title V Permit renewal application pursuant to 25 Pa. Code §127. The renewal application is for the Delaware Valley Resource Recovery Facility (DVRRF) located at 10 Highland Avenue, Delaware County, Chester, Pennsylvania. The units are presently operating under DEP Title V Permit No. 23-00004.

The enclosed submittal is subdivided into the following sections:

- Notifications made to local municipal and county officials of the permit renewal application submittal and proof of receipt
- Title V Permit Renewal Application;
- Addendum 1 for the inclusion of NOX RACT Regulations DVRRF officially became subject to on Jan 1, 2017; and
- Air Pollution Control Act Compliance Review Form.

We request that the following issues be addressed during the renewal process:

- Section D. Source Level Requirements Source IDs: 101-106, Rotary Combustors 1-6, pgs. 22-86. We are requesting that the Source IDs and associated emission restrictions, testing, monitoring, and work practice requirements be grouped together since they are identical for all six units. That grouping of requirements is consistent with the Title V permits for the facilities operated by Covanta in the City of Harrisburg and York and Lancaster Counties as well as the Covanta Plymouth facility (permit excerpt attached).
- Section D.I.002(a) "A certification shall be supplied to the Department stating compliance with maximum allowable ambient concentrations with every stack test report". Inputs from the final stack report are utilized for the ambient analysis. The time to completion of the analysis typically extends beyond the due date of the stack test report. As such, we propose that the ambient analysis be retained



on site for inspection during the Department's annual Air Quality compliance review.

The following amendments were made to the Title V Application to reflect changes in DVRRF personnel and stack conditions observed during most recent annual stacktesting performed at the facility in July, 2020:

- Section 1.3 Contact Information - updated from Kim Bradford to Brandee Blasi, the new facility Environmental Compliance Specialist.
- Section 6.1 General Source Information Unit IDs: 101-106
  - k. Exhaust Flow Volume – updated listed volume from 45,092 SCFM to 68,914 SCFM.
- Section 9.1 General Stack/Vent Inform Unit IDs: S01, S03, and S05:
  - e. Exhaust Temp – updated listed temp from 270 to 285 deg F
  - f. Exhaust Volume – updated listed volume from 138,000 to 125,305 ACFM and 78,150 to 68,914 SCFM

We have reviewed the applicability of the Compliance Assurance Monitoring (CAM) requirements for Covanta Delaware Valley, L.P. as part of the prior Title V permit renewal applications. As stated in Section G of the permit, the Facility is exempt from this regulatory program.

With regard to the aforementioned Compliance Review Form, please note that emissions violations documented by the DVRRF Continuous Emissions Monitoring System, and submitted in quarterly emissions reports to the Department, are not included in the "Compliance Background" section of the Compliance Review Form. These violations are addressed through DEP's Consent Assessment of Civil Penalty (CACP) process.

Enclosed please find a check in the amount of seven hundred and fifty dollars (\$750.00), made payable to the "Commonwealth of Pennsylvania", as payment for the permit renewal application fee.

If you have any questions regarding the information provided, please contact me or Brandee Blasi (bblasi@covanta.com) at (610) 497-8100.

Sincerely,



Heather E. Needham  
Facility Manager

Attachments

cc: George Eckert (DEP Southeast Regional Office w/o attachments)  
Kevin McLemore (DEP Southeast Regional Office w/o attachments)  
Jane (Jing) Guo (DEP Southeast Regional Office w/o attachments)  
File- Delaware Valley Air Quality



Check Date:	Dec/08/2020	Supplier Number: 0000029683			Check No:	0000383893
Invoice Number	Invoice Date	Voucher ID	Gross Amount	Discount Taken	Late Charge	Paid Amount

051320	May/13/2020	00068413	750.00	0.00	0.00	750.00
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PERMIT 23-00004

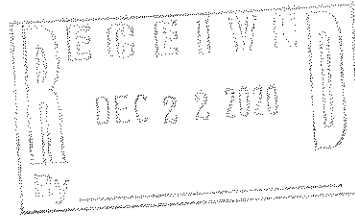
*Covanta Delaware Valley*  
**RECEIVED**  
 DEC 22 2020  
 BY 23-00004  
*TVOP Renewal*

**RECEIVED**  
 DEC 22 2020  
 BY

Check Number	Date	Total Gross Amount	Total Discounts	Total Late Charge	Total Paid Amount
0000383893	Dec/08/2020	\$750.00	\$0.00	\$0.00	\$750.00







UPS – Proof of Delivery

December 8, 2020

Ms. Linda F. Hill  
Director, Delaware County Planning Department  
Delaware County Courthouse & Government Center  
201 West Front Street  
Media, PA 19063

Subject: Covanta Delaware Valley, L.P.  
Delaware Valley Resource Recovery Facility (DVRRF)  
Title V Operating Permit No. 23-00004  
Notification of Permit Renewal Application

Dear Ms. Hill:

Covanta Delaware Valley, L.P. is providing this Municipal Notification, pursuant to Pa Code Section 127.413, to inform you that Covanta is submitting an application for renewal of its Title V Permit for the Delaware Valley Resource Recovery Facility (DVRRF) to the Pennsylvania Department of Environmental Protection (DEP). The facility's Title V Permit is due to expire on September 2, 2021. No modifications of the plant are taking place under this application. The application is being submitted in order to comply with Pennsylvania's Air Pollution Control Act, which was amended on July 9, 1992.

The permit application is for six (6) existing mass burn, rotary combustion units located at 10 Highland Avenue, Chester, Delaware County. The units operate under DEP Title V Operating Permit No. 23-00004 and Solid Waste Disposal and/or Processing Facility Permit No. 400593. The facility is operated and owned by Covanta Delaware Valley, L.P.

The City of Chester and County of Delaware may make comments to the DEP within thirty (30) days of receipt of this notification. This application will be submitted to the DEP before January 2, 2021. The DEP will accept comments from the public on the application. Comments may be submitted to:

Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401  
Attention: Mr. James Rebarchak  
Manager, Air Quality Program

If you have any questions regarding this matter, please contact me or Brandee Blasi at (610) 497-8100.

Sincerely,

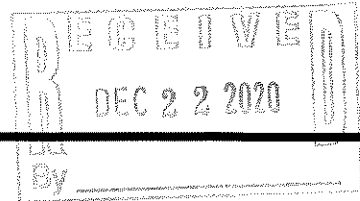
A handwritten signature in cursive script, appearing to read "Heather E. Needham".

Heather E. Needham  
Facility Manager

cc: James Rebarchak (Southeast DEP)  
File – Delaware Valley - Title V

Jing Guo (Southeast DEP)

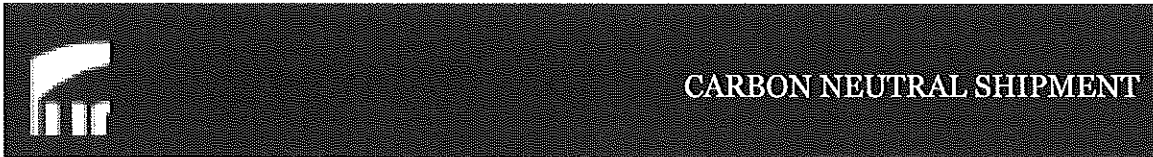




**Blasi, Brandee**

**From:** UPS Quantum View <pkginfo@ups.com>  
**Sent:** Wednesday, December 9, 2020 10:29 AM  
**To:** Blasi, Brandee  
**Subject:** UPS Delivery Notification, Tracking Number 1Z1VX7781396092647

\*\*\* Warning: External message - exercise caution.\*\*\*




**Hello, your package has been delivered.**

**Delivery Date:** Wednesday, 12/09/2020  
**Delivery Time:** 10:20 AM  
**Left At:** DOCK  
**Signed by:** DCCH

**COVANTA DELAWARE VALLEY**

**Tracking Number:** [1Z1VX7781396092647](#)  
DELAWARE COUNTY COURTHOUSE  
201 WEST FRONT STREET  
**Ship To:** DELAWARE COUNTY PLANNING DEPARTMENT  
MEDIA, PA 19063  
US  
**Number of Packages:** 1  
**UPS Service:** UPS Next Day Air Saver®  
**Package Weight:** 0.0 LBS



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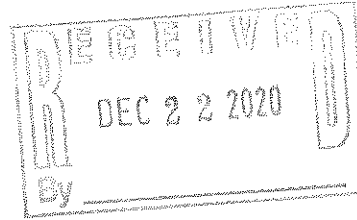
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December 8, 2020

Mr. Joseph W. Vasturia, PE  
Chief Executive Officer  
Delaware County Solid Waste Authority  
Rose Tree Park, Hunt Club Building  
1521 North Providence Road  
Media, PA 19063

Subject: Covanta Delaware Valley, L.P.  
Delaware Valley Resource Recovery Facility (DVRRF)  
Title V Operating Permit No. 23-00004  
Notification of Permit Renewal Application

Dear Mr. Vasturia:

Covanta Delaware Valley, L.P. is providing this Municipal Notification, pursuant to Pa Code Section 127.413, to inform you that Covanta is submitting an application for renewal of its Title V Permit for the Delaware Valley Resource Recovery Facility (DVRRF) to the Pennsylvania Department of Environmental Protection (DEP). The facility's Title V Permit is due to expire on September 2, 2021. No modifications of the plant are taking place under this application. The application is being submitted in order to comply with Pennsylvania's Air Pollution Control Act, which was amended on July 9, 1992.

The permit application is for six (6) existing mass burn, rotary combustion units located at 10 Highland Avenue, Chester, Delaware County. The units operate under DEP Title V Operating Permit No. 23-00004 and Solid Waste Disposal and/or Processing Facility Permit No. 400593. The facility is operated and owned by Covanta Delaware Valley, L.P.

The City of Chester and County of Delaware may make comments to the DEP within thirty (30) days of receipt of this notification. This application will be submitted to the DEP before January 2, 2021. The DEP will accept comments from the public on the application. Comments may be submitted to:

Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401  
Attention: Mr. James Rebarchak  
Manager, Air Quality Program

If you have any questions regarding this matter, please contact me or Brandee Blasi at (610) 497-8100.

Sincerely,

A handwritten signature in cursive script that reads "Heather E. Needham".

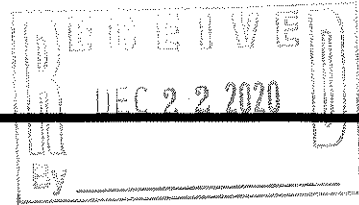
Heather E. Needham  
Facility Manager

cc: James Rebarchak (Southeast DEP)  
File – Delaware Valley - Title V

Jing Guo (Southeast DEP)

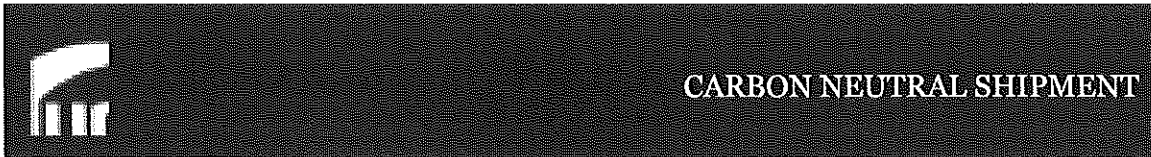


**Blasi,Brandee**



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**Sent:** Wednesday, December 9, 2020 10:12 AM  
**To:** Blasi,Brandee  
**Subject:** UPS Delivery Notification, Tracking Number 1Z1VX7781396265433

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**Hello, your package has been delivered.**

**Delivery Date:** Wednesday, 12/09/2020  
**Delivery Time:** 10:09 AM  
**Left At:** OFFICE  
**Signed by:** BEESE

**COVANTA DELAWARE VALLEY**

**Tracking Number:** **1Z1VX7781396265433**  
DEL. CO. SOLID WASTE AUTHORITY  
CEO  
**Ship To:** ROSE TREE PARK - HUNT CLUB  
1521 NORTH PROVIDENCE ROAD  
MEDIA, PA 19063  
US  
**Number of Packages:** 1  
**UPS Service:** UPS Next Day Air Saver®  
**Package Weight:** 0.0 LBS



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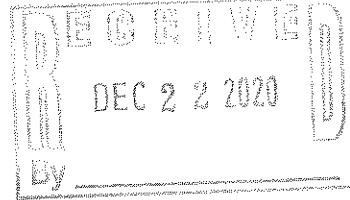
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1-800-742-7878

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December 8, 2020

Mr. Kenneth R. Schuster  
Solicitor, City of Chester  
City Hall  
1 Fourth Street  
Chester, PA 19013-4400

Subject: Covanta Delaware Valley, L.P.  
Delaware Valley Resource Recovery Facility (DVRRF)  
Title V Operating Permit No. 23-00004  
Notification of Permit Renewal Application

Dear Mr. Schuster:

Covanta Delaware Valley, L.P. is providing this Municipal Notification, pursuant to Pa Code Section 127.413, to inform you that Covanta is submitting an application for renewal of its Title V Permit for the Delaware Valley Resource Recovery Facility (DVRRF) to the Pennsylvania Department of Environmental Protection (DEP). The facility's Title V Permit is due to expire on September 2, 2021. No modifications of the plant are taking place under this application. The application is being submitted in order to comply with Pennsylvania's Air Pollution Control Act, which was amended on July 9, 1992.

The permit application is for six (6) existing mass burn, rotary combustion units located at 10 Highland Avenue, Chester, Delaware County. The units operate under DEP Title V Operating Permit No. 23-00004 and Solid Waste Disposal and/or Processing Facility Permit No. 400593. The facility is operated and owned by Covanta Delaware Valley, L.P.

The City of Chester and County of Delaware may make comments to the DEP within thirty (30) days of receipt of this notification. This application will be submitted to the DEP before January 2, 2021. The DEP will accept comments from the public on the application. Comments may be submitted to:

Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401  
Attention: Mr. James Rebarchak  
Manager, Air Quality Program

If you have any questions regarding this matter, please contact me or Brandee Blasi at (610) 497-8100.

Sincerely,

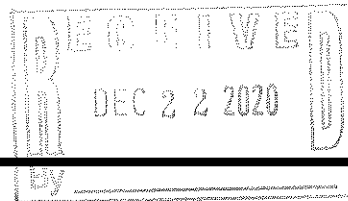
A handwritten signature in cursive script that reads "Heather E. Needham".

Heather E. Needham  
Facility Manager

cc: James Rebarchak (Southeast DEP)  
File – Delaware Valley - Title V

Jing Guo (Southeast DEP)

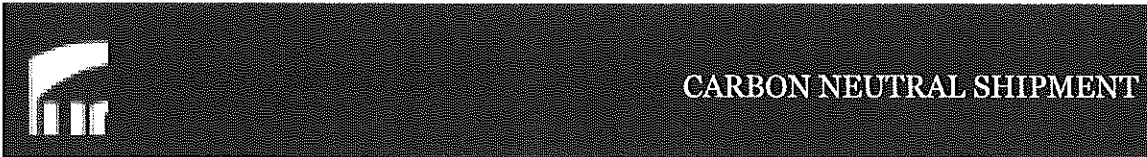




**Blasi,Brandee**

**From:** UPS Quantum View <pkginfo@ups.com>  
**Sent:** Wednesday, December 9, 2020 11:52 AM  
**To:** Blasi,Brandee  
**Subject:** UPS Delivery Notification, Tracking Number 1Z1VX7781398783825

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**Hello, your package has been delivered.**

**Delivery Date:** Wednesday, 12/09/2020  
**Delivery Time:** 11:46 AM  
**Left At:** INSIDE DELIV  
**Signed by:** ID Verified

**COVANTA DELAWARE VALLEY**

**Tracking Number:** 1Z1VX7781398783825  
**Ship To:** CITY OF CHESTER - CITY HALL  
1 FOURTH STREET  
CHESTER, PA 19013  
US  
**Number of Packages:** 1  
**UPS Service:** UPS Next Day Air Saver®  
**Package Weight:** 0.0 LBS



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FOR OFFICIAL USE ONLY  
Title V OP Number: \_\_\_\_\_  
Reviewed by: \_\_\_\_\_  
Date: \_\_\_\_\_

\$750.00  
ck#0000383813

**TITLE V OPERATING PERMIT APPLICATION**

RECEIVED  
DEC 22 2020  
By \_\_\_\_\_

**Section 1 - General Information**

**1.1 Application Type**

Type of permit for which application is made: (Check one)

- Initial
- Renewal      Operating Permit No. 23-00004
- Application Revision - provide date of original Title V Application or OP No.: \_\_\_\_\_

**1.2 Plant Information**

Federal Tax ID/Plant Code: 76-0531017-1      Firm Name: COVANTA DELAWARE VALLEY LP/DELAWARE VALLEY RES REC

Plant Name: COVANTA DELAWARE VALLEY CHESTER CITY FAC

NAICS Code: 562213      SIC Code: 4953

Description of NAICS Code: Solid Waste Combustors and Incinerators

Description of SIC Code: Trans. & Utilities - Refuse Systems

County: Delaware      Municipality: Chester

Latitude: 39° 49 31.0066      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

**1.3 Contact Information**

Name: BRANDEE BLASI      Title: ENV COMPLIANCE SPECIALIST

Address: 10 HIGHLAND AVE  
CHESTER, PA 19013-2231


Telephone Number: (610) 497-8100

Email Address: bblasi@covanta.com

**1.4 Certification of Truth, Accuracy and Completeness**

**Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.**

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

(Signed)       Date: December 18, 2020

Name (Typed): Heather E. Needham      Title: Facility Manager





### Section 3 - Site Inventory

Give a complete list of all air pollution sources, control equipment, emission points, and fuel material locations within this site.

For renewals, only list sources not included in current Title V Operating Permit or sources which are now subject to Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. If preprinted information is provided, correct and/or add any new sources as necessary. Note: one (1) of the following sections (5, 6 or 7) of the application must be completed for each new source listed here.

Unit ID	Company Designation	Unit Type	CAM
101	Rotary Combuster 1	Incinerator	
102	Rotary Combuster 2	Incinerator	
103	Rotary Combuster 3	Incinerator	
104	Rotary Combuster 4	Incinerator	
105	Rotary Combuster 5	Incinerator	
106	Rotary Combuster 6	Incinerator	
107	Vehicle Traffic On Roads	Process	
108	Cooling Tower	Process	
110	Lime Storage Silo	Process	
111	Ash Handling	Process	
112	Cold Degreasers (2)	Process	
113	Emergency Engine	Process	
114	Emergency Fire Pump Engine	Process	
C01A	Baghouse - Pulse Jet Fabric Filter	Control Device	
C02	Spray Dryer Absorber	Control Device	
C03	Baghouse - Pulse Jet Fabric Filter	Control Device	
C04	Spray Dryer Absorber	Control Device	
C05	Baghouse - Pulse Jet Fabric Filter	Control Device	
C06	Spray Dryer Absorber	Control Device	
C07	Baghouse - Pulse Jet Fabric Filter	Control Device	
C08	Spray Dryer Absorber	Control Device	
C09	Baghouse - Pulse Jet Fabric Filter	Control Device	
C10	Spray Dryer Absorber	Control Device	
C108	Cooling Tower Mist Eliminators	Control Device	
C11	Baghouse - Pulse Jet Fabric Filter	Control Device	
C12	Spray Dryer Absorber	Control Device	
S01	Combustor 1 Stack	Point of Air Emission	
S02	Combustor 2 Stack	Point of Air Emission	
S03	Combustor 3 Stack	Point of Air Emission	
S04	Combustor 4 Stack	Point of Air Emission	
S05	Combustor 5 Stack	Point of Air Emission	
S06	Combustor 6 Stack	Point of Air Emission	





**Section 4 - Source Group (Optional)**

**4.1 Source Group Definition**

Define groups of source(s) that are subject to one or more applicable requirements that apply to all source(s) in the group.

For renewals, only list source groups not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Group No.	Source ID (for source(s) in this group)
1	101, 102, 103, 104, 105, 106

**4.2 Applicable Requirements for Source Groups**

For renewals, only list group level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Describe and cite all applicable requirements pertaining to all source groups.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

Group No.	Citation No.	Citation Limitation	Limitation Used
1	25 Pa Code 129.97	180.0 ppm@7% O2 (24-Hr)	None



**5.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
Not Applicable			

**5.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML*	% Sulfur	% Ash	BTU Content (Units)
Not Applicable				

\*FML = Fuel Material Location

**5.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 5.1 of the application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel/SCC	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Thruput	Units/Time
Not Applicable						





















































**7.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
DUST	3-05-888-01	.00 Tons/hr	

**7.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)

\*FML = Fuel Material Location

**7.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Throughput	Units/Time

**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.  
Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

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**7.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
Non-Contact Cooling Water	03-06-007	0.00 gpm	

**7.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)

\*FML = Fuel Material Location

**7.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Throughput	Units/Time

**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

\_\_\_\_\_

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





**7.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
Pebble Lime	3-05-102	0.0 Lbs/Hr	

**7.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)
N/A				

\*FML = Fuel Material Location

**7.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Throughput	Units/Time
N/A						

**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used
N/A			

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials
1	Loading lime from delivery truck to silo	Pebble Lime
2	Slacking lime	Pebble Lime and Water
3	Inject slaked lime slurry into dry scrubber	Pebble Lime and Water

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

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**7.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
N/A			

**7.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)
N/A				

\*FML = Fuel Material Location

**7.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Throughput	Units/Time
N/A						

**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used
N/A			

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials
1	Load combined ash into transport vehicles	Combined Ash

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

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**7.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
SOLVENT	4-01-002-95	.00 Gal/hr	

**7.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)
N/A				

\*FML = Fuel Material Location

**7.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Throughput	Units/Time
N/A						



**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.  
Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

Water-based solvents

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials
1	Place parts in solvent cleaner and wash	Water-based solvent

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

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**7.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
Ultra-Low Sulfur Diesel Fuel	2-02-001-02	18.3 gal/hr	

**7.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)
N/A				

\*FML = Fuel Material Location

**7.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Throughput	Units/Time
N/A						

**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

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**7.4 Source Classification Code (SCC) Listing for Standard Operation**

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
Ultra-Low Sulfur Diesel Fuel	2-02-001-02	0	

**7.5 Maximum Fuel Physical Characteristics**

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)

\*FML = Fuel Material Location

**7.6 Limitations on Source Operation**

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: \_\_\_\_\_

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Throughput	Units/Time

**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

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**7.7 Source Applicable Requirements**

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

No changes from current Title V Operating Permit.

Fuel/Product	Citation Number	Citation Limitation	Limitation Used

**7.8 Raw Materials**

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

**7.9 Processing Steps**

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials

**7.10 Request for Confidentiality**

Do you request that the information on this page be considered kept confidential?

Yes       No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

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**8.2 Control Device Efficiencies for this Control Device:**

<b>Pollutant Name</b>	<b>CAS No.</b>	<b>Estimate Control Efficiency</b>	<b>Basis for Efficiency Estimate</b>
Total Suspended Particulate	TSP	>99%	Stk Tst (eff. calc'd using stack results)
Particulate Matter < 10 Microns	PM10	>99%	Stk Tst (eff. calc'd using stack results)
Parathion	T158	>99%	Stk Tst (eff. calc'd using stack results)
Polychlorinated Biphenyls (PCBs)	T166	>99%	No data available - PM10/TSP value used
2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)	T015	>99%	No data available - PM10/TSP value used
Lead	ELPB	>99%	No data available - PM10/TSP value used
Cadmium	ELCD	>99%	No data available - PM10/TSP value used
Chromium	ELCR	>99%	No data available - PM10/TSP value used
Arsenic	ELAS	>99%	No data available - PM10/TSP value used
Mercury	ELHG	>99%	No data available - PM10/TSP value used
Nickel	ELNI	>99%	No data available - PM10/TSP value used
Benzo(a)pyrene	CC29	>99%	No data available - PM10/TSP value used

















**Section 9 - Stack/Flue Information (duplicate this section as needed)**

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

**9.1 General Stack/Vent Information**

a. Unit ID: S01                      b. Company Designation: COMBUSTOR 1 STACK

c. Discharge Type: VERTICAL: UNOBSTRUCTED OPENING

d. Diameter (ft): 5.5                      Height (ft): 308                      Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 285 deg F                      Exhaust % Moisture: 22                      Exhaust Velocity (m/Sec): 29.51

f. Exhaust Volume: 125,305                      ACFM                      Exhaust Volume: 68,914                      SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:                       Yes                       No

i. Used by Sources: C01A

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

a. Unit ID: S02                      b. Company Designation: COMBUSTOR 2 STACK

c. Discharge Type: VERTICAL: UNOBSTRUCTED OPENING

d. Diameter (ft): 5.5                      Height (ft): 308                      Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 270 deg F                      Exhaust % Moisture: 22                      Exhaust Velocity (m/Sec): 29.51

f. Exhaust Volume: 138,000                      ACFM                      Exhaust Volume: 78,150                      SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:                       Yes                       No

i. Used by Sources: C03

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

**Section 9 - Stack/Flue Information (duplicate this section as needed)**

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

**9.1 General Stack/Vent Information**

a. Unit ID: S03                      b. Company Designation: COMBUSTOR 3 STACK

c. Discharge Type: VERTICAL: UNOBSTRUCTED OPENING

d. Diameter (ft): 5.5                      Height (ft): 308                      Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 285 deg F                      Exhaust % Moisture: 22                      Exhaust Velocity (m/Sec): 29.51

f. Exhaust Volume: 125,305                      ACFM                      Exhaust Volume: 68,914                      SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:                       Yes                       No

i. Used by Sources: C05

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

a. Unit ID: S04                      b. Company Designation: COMBUSTOR 4 STACK

c. Discharge Type: VERTICAL: UNOBSTRUCTED OPENING

d. Diameter (ft): 5.5                      Height (ft): 308                      Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 270 deg F                      Exhaust % Moisture: 22                      Exhaust Velocity (m/Sec): 29.51

f. Exhaust Volume: 138,000                      ACFM                      Exhaust Volume: 78,150                      SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:                       Yes                       No

i. Used by Sources: C07

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant



**Section 9 - Stack/Flue Information (duplicate this section as needed)**

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

**9.1 General Stack/Vent Information**

a. Unit ID: S110                      b. Company Designation: LIME STORAGE STACK

c. Discharge Type: VERTICAL: UNOBSTRUCTED OPENING

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 68 deg F    Exhaust % Moisture: 10    Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: 4,000    ACFM                      Exhaust Volume: 3,614    SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:         Yes                       No

i. Used by Sources: 110

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

a. Unit ID: S113                      b. Company Designation: EMERGENCY ENGINE STACK

c. Discharge Type: \_\_\_\_\_

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 1113 deg F    Exhaust % Moisture: 3    Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: 1,178    ACFM                      Exhaust Volume: 385    SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:         Yes                       No

i. Used by Sources: 113

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: \_\_\_\_\_

Horizontal Collection Method: \_\_\_\_\_

Reference Point: \_\_\_\_\_

**Section 9 - Stack/Flue Information (duplicate this section as needed)**

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

**9.1 General Stack/Vent Information**

a. Unit ID: S114                      b. Company Designation: EMERGENCY FIRE PUMP ENGINE STACK

c. Discharge Type: \_\_\_\_\_

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 1113 deg F Exhaust % Moisture: 3 Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: 1,178 ACFM                      Exhaust Volume: 385 SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:             Yes                       No

i. Used by Sources: 114

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: \_\_\_\_\_

Horizontal Collection Method: \_\_\_\_\_

Reference Point: \_\_\_\_\_

a. Unit ID: Z01                      b. Company Designation: ROAD DUST EMISSIONS

c. Discharge Type: FUGITIVE EMISSIONS

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 68 deg F Exhaust % Moisture: 5 Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: 1 ACFM                      Exhaust Volume: 1 SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:             Yes                       No

i. Used by Sources: 107

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

**Section 9 - Stack/Flue Information (duplicate this section as needed)**

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

**9.1 General Stack/Vent Information**

a. Unit ID: Z108                      b. Company Designation: COOLING TOWER FUGITIVES

c. Discharge Type: FUGITIVE EMISSIONS

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 70 deg F    Exhaust % Moisture: 99                      Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: 86,808    ACFM                                      Exhaust Volume: 868    SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:             Yes                       No

i. Used by Sources: C108

j. Latitude: 39° 49 31.0066                                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

a. Unit ID: Z111                      b. Company Designation: ASH HANDLING FUGITIVES

c. Discharge Type: FUGITIVE EMISSIONS

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 68 deg F    Exhaust % Moisture: 5                      Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: 1    ACFM                                      Exhaust Volume: 1    SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:             Yes                       No

i. Used by Sources: 111

j. Latitude: 39° 49 31.0066                                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: North American Datum of 1983

Horizontal Collection Method: Geographic coordinate determination method based on interpolation - map

Reference Point: Plant entrance (general) - The general entrance to a plant

**Section 9 - Stack/Flue Information (duplicate this section as needed)**

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

**9.1 General Stack/Vent Information**

a. Unit ID: Z112                      b. Company Designation: DEGREASER FUGITIVES

c. Discharge Type: \_\_\_\_\_

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: 68 deg F Exhaust % Moisture: 10 Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: 1 ACFM                      Exhaust Volume: 1 SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:         Yes                       No

i. Used by Sources: 112

j. Latitude: 39° 49 31.0066                      Longitude: -75° 23 40.1579

Horizontal Reference Datum: \_\_\_\_\_

Horizontal Collection Method: \_\_\_\_\_

Reference Point: \_\_\_\_\_

a. Unit ID: \_\_\_\_\_                      b. Company Designation: \_\_\_\_\_

c. Discharge Type: \_\_\_\_\_

d. Diameter (ft): \_\_\_\_\_ Height (ft): \_\_\_\_\_ Base Elevation (ft): \_\_\_\_\_

e. Exhaust Temperature: \_\_\_\_\_ Exhaust % Moisture: \_\_\_\_\_ Exhaust Velocity : \_\_\_\_\_

f. Exhaust Volume: \_\_\_\_\_ ACFM                      Exhaust Volume: \_\_\_\_\_ SCFM

g. Distance to Nearest Property Line (ft): \_\_\_\_\_

h. Weather Cap?:         Yes                       No

i. Used by Sources: \_\_\_\_\_

j. Latitude: \_\_\_\_\_                      Longitude: \_\_\_\_\_

Horizontal Reference Datum: \_\_\_\_\_

Horizontal Collection Method: \_\_\_\_\_

Reference Point: \_\_\_\_\_



**Section 10 - Fuel Material Location (FML) Information (Optional)**

see page 105



**Section 11 - Compliance Plan for the Facility**

- |   | <b>Yes</b>                          | <b>No</b>                |
|---|-------------------------------------|--------------------------|
| 11.1 Will your facility be in compliance with all applicable requirements at the time of permit issuance and continue to comply with these requirements during the permit duration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11.2 Will your facility be in compliance with all applicable requirements presently scheduled to take effect during the term of the permit?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11.3 Will these requirements be met by the regulatory required dates?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

If you checked "No" in Part 11.1, 11.2 or 11.3, answer the following questions:

11.4 Identify applicable requirement(s) for which compliance is not or will not be achieved:

Source ID No.	Citation No.
N/A	

11.4.1 Briefly describe how compliance with this/these applicable requirement(s) will be achieved:

N/A

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11.4.2. Provide a detailed schedule of compliance for the noncomplying sources or activities identified in this section of the application. Include an enforceable sequence of corrective actions with milestone and projected compliance dates.

Date	Action/Milestone
N/A	

11.4.3. Indicate the submittal frequency for the progress report (s):     N/A    

11.4.4. Starting date for the submittal of the progress report(s):     N/A



**12.4 Source Classification Code (SCC) Listing for Alternative Operation**

Give a complete listing of all fuels burned, products produced by a process or waste incinerated for this alternative operating scenario.

Fuel	Associated SCC	Max Throughout Rate	Firing Sequence

**12.5 Alternative Fuel Physical Characteristics**

Give a complete listing of all fuels physical characteristics for this alternative operating scenario.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)

**12.6 Alternative Process/Product Description**

a. Briefly describe the change(s) in raw materials and/or process methods used in this operating scenario, if applicable:

b. Provide and briefly describe the process SCC associated with this alternative operating scenario:

Process SCC:

SCC Description:

c. Alternative Product(s):







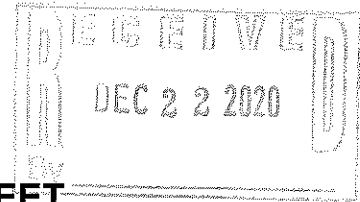








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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY



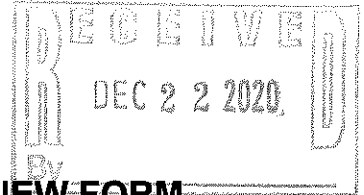
## ADDENDUM 1 METHOD OF COMPLIANCE WORKSHEET

<b>SECTION A. APPLICABLE REQUIREMENT</b>	
Federal Tax ID	76-0531017-1
Firm Name	Covanta Delaware Valley, LP
Plant Code	76-0531017-1
Plant Name	Covanta Delaware Valley, LP
Applicable Requirement for: (check only one)	
<input type="checkbox"/> Entire Site	
<input type="checkbox"/> Group of Sources	Group ID <u>1</u>
<input type="checkbox"/> Single Source	Unit ID _____
<input type="checkbox"/> Alternative Operating Scenario	Scenario Name _____
Citation No.	25 Pa Code 129.97
Compliance Method Based Upon	<input checked="" type="checkbox"/> Applicable Requirement <input type="checkbox"/> CAM <input type="checkbox"/> Other
Method of Compliance Type: [check all that apply and complete all appropriate section(s)]	
<input checked="" type="checkbox"/> Monitoring	<input type="checkbox"/> Testing <input checked="" type="checkbox"/> Reporting
<input checked="" type="checkbox"/> Record Keeping	<input type="checkbox"/> Work Practice Standard
<b>SECTION B. MONITORING</b>	
Monitoring Device Type (stack test, CEM, etc.)	CEMS
Monitoring Device Location	Stack
Describe all parameters being monitored along with the frequency and duration of monitoring each parameter. NOX concentration and O2	
How will data be reported?	Quarterly CEMS EDR
<b>SECTION C. TESTING</b>	
Reference Test Method Description	None
Reference Test Method Citation	Chapter 139, Subchapter C
<b>SECTION D. RECORD KEEPING</b>	
Describe what parameters will be recorded and the frequency of recording. 24-hour Avg	
<b>SECTION E. REPORTING</b>	
Describe what is to be reported and the frequency of reporting. Quarterly	
Reporting Start Date	1/1/2017
<b>SECTION F. WORK PRACTICE STANDARD</b>	
Describe any work practice standard(s).	





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 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 BUREAU OF AIR QUALITY



**AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM**

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

**Type of Compliance Review Form Submittal (check all that apply)**

- |  |   |
|--|---|
| <input type="checkbox"/> Original Filing           | Date of Last Compliance Review Form Filing: |
| <input checked="" type="checkbox"/> Amended Filing | <u>11/25/2015</u>                           |

**Type of Submittal**

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> New Plan Approval          | <input type="checkbox"/> New Operating Permit | <input checked="" type="checkbox"/> Renewal of Operating Permit |
| <input type="checkbox"/> Extension of Plan Approval | <input type="checkbox"/> Change of Ownership  | <input type="checkbox"/> Periodic Submission (@ 6 mos)          |
| <input type="checkbox"/> Other: _____               |   |   |

**SECTION A. GENERAL APPLICATION INFORMATION**

**Name of Applicant/Permittee/("applicant")**  
 (non-corporations-attach documentation of legal name)

Covanta Delaware Valley, LP

**Address**      10 Highland Avenue  
                     Chester, PA 19013

**Telephone**    (610) 497-8150      **Taxpayer ID#**    76-0531017

**Permit, Plan Approval or Application ID#**    23-00004

**Identify the form of management under which the applicant conducts its business (check appropriate box)**

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Individual          | <input type="checkbox"/> Syndicate                      | <input type="checkbox"/> Government Agency                      |
| <input type="checkbox"/> Municipality        | <input type="checkbox"/> Municipal Authority            | <input type="checkbox"/> Joint Venture                          |
| <input type="checkbox"/> Proprietorship      | <input type="checkbox"/> Fictitious Name                | <input type="checkbox"/> Association                            |
| <input type="checkbox"/> Public Corporation  | <input type="checkbox"/> Partnership                    | <input type="checkbox"/> Other Type of Business, specify below: |
| <input type="checkbox"/> Private Corporation | <input checked="" type="checkbox"/> Limited Partnership |   |

**Describe below the type(s) of business activities performed.**

The Delaware Valley Resource Recovery Facility (DVERRF), operated by Covanta Delaware Valley, LP, houses six (6) rotary municipal waste combustors, each having the capacity to generate up to 161,000 lbs of steam/hr. The facility generates approximately 90 net megawatts of electricity per hour for internal use and to be sold on the electrical grid. The ash residue generated from the combustion of the waste is transported to Delaware County's Rolling Hills Landfill located in Berks County, PA, where it is used beneficially as alternative daily cover.

**SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"**

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
Covanta Delaware Valley, L.P.	10 Highland Avenue, Chester, PA 19013	N/A	76-0531017	Same

**SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"**

**Pennsylvania Facilities.** List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
Covanta Delaware Valley, LP	10 Highland Avenue, Chester, PA 19013	Delaware County, City of Chester	(610) 497-8150	Operator of the DVRRF
Covanta Lancaster	1911 River Road, Bainbridge, PA 17502	Lancaster County, Conoy Township	(717) 426-4938	Facility Operator
Covanta Harrisburg	1670 South 19 <sup>th</sup> Street, Harrisburg, PA 17104	Dauphin County, City of Harrisburg	(717) 236-0958	Facility Operator
Covanta Plymouth	1155 Conshohoken Road, Conshohocken, PA 19428	Montgomery County, Plymouth Township	(610) 940-6000	Covanta Facility
Covanta York	2651 Blackbridge Road, York, PA 17406	York County, Manchester Township	(717) 843-2902	Facility Operator
Covanta 58 <sup>th</sup> Street Transfer Station	2209 South 58 <sup>th</sup> Street, Philadelphia, PA 19143	City of Philadelphia	(215) 729-3770	Covanta Facility
Covanta Metals Management	500 Middle Drive, Fairless Hills, PA 19030	Bucks County, Falls Township	(215) 295-3792	Covanta Facility

Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.

Name	Business Address
Covanta ARC, LLC	445 South Street, Morristown, NJ 07960
Covanta Delaware Valley II, LLC	445 South Street, Morristown, NJ 07960
Delaware County Solid Waste Authority	1521 North Providence Road, Media, PA 19063


**List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).**

Name	Business Address
Heather E. Needham Covanta Delaware Valley, L.P. Facility Manager	10 Highland Avenue, Chester, PA 19013

**Plan Approvals or Operating Permits.** List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
DVRRF	23-00004	10 Highland Avenue, Chester PA 19013	09/02/2016	09/02/2021

**Compliance Background.** (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
						\$
	See attached					\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date
	See attached			

**CONTINUING OBLIGATION.** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.



**VERIFICATION STATEMENT**

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.



Signature

December 18, 2020

Date

Heather E. Needham

Name (Print or Type)

Facility Manager

Title



**Form HW-C Compliance History-Delaware Valley**  
**10 Highland Ave Chester, PA 19013**

**Enforcement Actions**

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
8/31/2017	Delco	TV-23-00004	PADEP	CACP	Excess emissions on 2Q14 - 2Q16	Paid and Closed	\$31,267.00
1/30/2019	Delco	TV-23-00004	PADEP	CACP	Excess Emissions 3Q2016 & 1Q2017	Paid and Closed	\$1,250.00
6/4/2020	Delco	TV-23-00004	PADEP	NOV	Emissions caused due to Plant June 4 & 5, 2020	Corrective Action Plan provided to PADEP. No penalty has been assessed against the facility for this incident at this time.	\$0.00



**Form HW-C Compliance History - Harrisburg  
1670 South 19th Street Harrisburg, PA 17104**

**Enforcement Actions**

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders; adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
11/28/2019	Harrisburg	Title V- 22-05007	PADEP	CACP	Excess emissions in 2Q 2015-1Q 2017	Paid and Closed	\$42,129.65

**Form HW-C Compliance History - Lancaster County RRF**  
**1911 River Road Bainbridge, PA 17502**

**Enforcement Actions**

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
4/5/2018	Lancaster County RRF, Bainbridge, PA	Title V- 36-05013	PADEP	CACP	1Q2010-1Q2017 Excess Emissions, CEMS availability	Closed	\$ 42,196.23

**Form HW-C Compliance History-Plymouth  
1155 Conshohocken Road Conshohocken, PA 19428**

**Enforcement Actions**

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
6/21/2016	Plymouth	Title V- 46-00010	PADEP	NOV	May 2015 VOC annual test was determined to be invalid by PADEP due to errors by consultant.	Abatement Plan submitted to PADEP. Closed out as part of a CACP issued in October (see below). Closed	-
7/13/2016	Plymouth	Title V- 46-00010	PADEP	NOV	Unauthorized releases of: cooling water discharge; oil release; and an inspection identifying a leaking hydrant.	Response report with event details and remedial actions was submitted to PADEP 8/2/16. No further action required. Closed	-
10/18/2016	Plymouth	Title V- 46-00010	PADEP	CACP	CEMS exceedances for 4Q10, 3Q12 through 2Q14, 3Q15 thru 2Q16 and non-compliance for 2015 VOC stack test	CACP executed and penalty paid. Closed	\$ 14,024.00
6/21/2017	Plymouth	Title V- 46-00010	PADEP	NOV	Failure to maintain records for silo pressure drop.	Open	-
6/22/2017	Plymouth	Title V- 46-00010	PADEP	CACP	CEMS violation for 3Q16 and 1Q17	Closed	\$ 2,812.00
9/8/2017	Plymouth	Title V- 46-00010	PADEP	NOV	Late Submittal of EPA Semi-Annual AQ Report	Open	-
12/7/2017	Plymouth	Title V- 46-00010	PADEP	CACP	Late Submittal of CEMS EDR for 2Q17	CACP executed and penalty paid. Closed	\$ 2,556.00
5/14/2018	Plymouth	Title V- 46-00010	PADEP	CACP	CEMS violation for 4Q2016 and 3Q-4Q2017	Paid and closed	\$ 10,607.00
8/29/2018	Plymouth	Title V- 46-00010	PADEP	CACP	CEMS violation for 1Q2018	Closed	\$ 27,883.00
4/30/2019	Plymouth	Title V- 46-00010	PADEP	CACP	CEMS violation 2Q, 3Q and 4Q 2018	Closed	\$ 17,514.00
10/11/2019	Plymouth	Title V- 46-00010	PADEP	NOV	Excess emissions events 1Q, 2Q 2019 and CEMS violations	Closed	\$ 2,142.00
10/17/2019	Plymouth	Title V- 46-00010	PADEP	NOV	Emissions caused due to Plant trip	Open - Corrective Action Plan due to PADEP within 15 days of date of letter. Follow-up Corrective Action letter (addressing both October odor NOV's) submitted to PADEP on 1/31/20	-
10/24/2019	Plymouth	Title V- 46-00010	PADEP	NOV	Odor complaint	Open	-
12/23/2019	Plymouth	Title V- 46-00010	PADEP	NOV	Odor complaint	Open	-
6/15/2020	Plymouth	Title V- 46-00010	PADEP	NOV	Emissions caused due to Plant trip	Open	-
9/4/2020	Plymouth	Title V- 46-00010	PADEP	CACP	Operating Permit and CEMS violation 3Q and 4Q 2019 and 2Q 2020	Open - The facility is scheduled to have a negotiation meeting with PADEP on October 7th to reduce penalty assessed.	-
9/22/2020	Plymouth	Title V- 46-00010	PADEP	NOV	Odor complaint - Malodor	Open - Provide a written response back to PADEP indicating that Covanta was not the source of the odor on this day.	-

**Form HW-C Compliance History-York  
2651 Backbridge Road York, PA 17406**

**Enforcement Actions**

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
1/17/2018	York	Title V-67-05006	PADEP	CACP	CEMS penalties for 4Q09 and 1Q16	CACP executed and penalty paid. Closed	\$9,148.00
12/5/2019	York	Title V-67-05006	PADEP	Consent Order	CEMS penalties for 2Q2017 - 1Q2018	Paid and closed	\$9,561.00
12/16/2019	York	Title V-67-05006	PADEP	Consent Order	CEMS penalties for 2Q2016 - 1Q2017	Paid and closed	\$8,396.00



**Form HW-C Compliance History- Fairless Hills**

**Enforcement Actions**

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

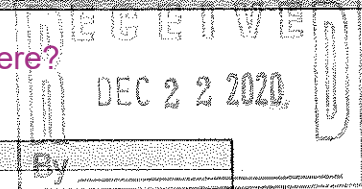
Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
7/8/2015	Fairless Hills		PADEP	NOV/CACP	Construction/operation without a Solid Waste Permit approval.	CACP executed 7/21/2015	\$100,000
10/9/2018	Fairless Hills	Solid Waste	PADEP	NOV/CACP	Improper storage of materials	Paid and closed	\$5,250



**SECTION E. Source Group Restrictions.**

Group Name: 1  
 Group Description: combustors  
 Sources included in this group

WHY attaching 46-00010 conditions here?



ID	Name
001	MWI UNIT 1
002	MWI UNIT 2

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §123.42]

**Exceptions**

The visible emission limitations of 25 Pa. Code §123.41 shall not apply in either 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 sources specified in Condition #002 of Section C of this permit.

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.****(a) Nitrogen Oxides (NOx) emission limitations**

(1) NOx emissions per combustor, expressed as NO2, shall not exceed

- (i) \* [Additional authority of this NOx emission limit is also derived from 25 Pa. Code §§129.97(f) and 129.100(a)(3).] 180 ppmvd averaged daily corrected to 7% oxygen;

(ii) 477.4 tons in any 12 consecutive month period.

(2) The NOx limit (in ppmvd) applies at all times when municipal wastes are combusted, including during periods of start-up, shutdown, and malfunction provided that the duration of the start-up or shut-down shall not exceed three (3) hours per occurrence.

(3) Compliance with the nitrogen oxides emission limit shall be determined by using the continuous emission monitoring system (CEMS) approved by the Department for measuring NOx and calculating a 24-hour daily arithmetic average emission concentration using EPA Reference Method 19, section 12.4.1.

**(b) Volatile organic compounds (VOC) emission limitations**

(1) VOC emissions expressed as total hydrocarbon, shall not exceed 2.68 lbs/hr per combustor.

(2) Compliance with the VOC lbs/hr emission limit shall be based on the average of three (3) consecutive test runs performed annually and in accordance with Testing Requirements for this source.

**(c) Dioxin/furan emission limitation**

(1)\* Total dioxin/furan emissions from each combustor shall not exceed 30 nanograms per dry standard cubic meter, corrected to 7% oxygen.

(2) Compliance with the dioxin/furan emission limitation shall be based on the average of three (3) consecutive test runs performed annually and in accordance with Testing Requirements for this source.

**(d) Sulfur dioxide (SO2) emission limitations**

(1)\* SO2 emissions, per combustor, shall not exceed 29 ppmv, or shall be reduced by not less than 75% of the pre-controlled SO2 emission concentration (by weight or volume), corrected to 7% oxygen on a dry basis, whichever is less stringent. [Compliance with this limit deemed compliance with 25 Pa. Code §123.21.]

**SECTION E. Source Group Restrictions.**

(2) Compliance with the SO<sub>2</sub> emission limit (concentration or percent reduction) shall be determined by using the Department approved CEM system for measuring SO<sub>2</sub> and calculating a 24-hour geometric average emission concentration or a 24-hour geometric average percent reduction. The EPA Reference Method 19, section 12.4.3, shall be used to calculate the daily geometric average sulfur dioxide emission concentration.

(3) The EPA Reference Method 19, section 12.5.4, shall be used to determine the daily geometric average percent reduction in the potential sulfur dioxide emission concentration.

**(e) Hydrochloric acid (HCl) emission limits**

(1)\* HCl emissions, per combustor, shall be less than 29 ppmv, or shall be reduced by no less than 95% of the pre-controlled HCl emission concentration (by weight or volume), corrected to 7% oxygen, dry basis, whichever is less stringent.

(2) Compliance with the HCl emission limit (concentration or percent reduction) shall be determined by using the Department approved CEMS for measuring HCl and calculating a 24-hour arithmetic average emission concentration or a 24-hour arithmetic average percent reduction.

**(f) Ambient impact analysis**

Compliance with the maximum annual ambient concentrations listed below shall be demonstrated using the data from each stack test from each combustor and the dispersion modeling techniques used in the plan approval application as approved by the Department. Ambient air quality analysis shall be redone if there is a modification in emission limits or for any parameter that exceeds the applicable stack test limitation during any stack test series. The Department may require the permittee to resume full modeling if the Department determines that a decrease in either volumetric flow rate and/or stack temperature has a significant adverse impact on the ambient concentration. A certification shall be supplied to the Department stating compliance with maximum allowable annual ambient concentrations with every stack test report.

PCDD & PCDF, expressed as 2,3,7,8 TCDD equivalents 0.30 x 10E-7

Arsenic and Compounds 0.23 x 10E-3

Beryllium and Compounds 0.42 x 10E-3

Cadmium and Compounds 0.56 x 10E-3

Nickel and Compounds 0.33 x 10E-2

Hexavalent Chromium and Compounds 0.83 x 10E-4

Lead and Compounds 0.09

Mercury and Compounds 0.024

Hydrogen Chloride 7.0

Benzo(a)pyrene 0.59 x 10E-3

(g) The following stack emission limitations for arsenic and compounds and toxic metals (per combustor) shall not be exceeded:

(1) Emission concentration, measured in ug/dscm and corrected to 7% oxygen:

Total PCDD and PCDF 30

Arsenic and Compounds 7.2

Beryllium and Compounds 0.2

\*Cadmium and Compounds 15.8

Nickel and Compounds 25.0

Hexavalent Chromium and Compounds 2.3

\*Lead and Compounds 166.0

\*Mercury and Compounds 50.0 or 85% reduction (by weight), whichever is less stringent.

(2) Emission rate, measured in lbs/hr at 105,000 dscfm and corrected to 7% oxygen.

Arsenic and Compounds 0.0024

Beryllium and Compounds 0.0000673

Cadmium and Compounds 0.00532

**SECTION E. Source Group Restrictions.**

Nickel and Compounds 0.0084  
 Hexavalent Chromium and Compounds 0.000774  
 Lead and Compounds 0.0559  
 Mercury and Compounds 0.211

(3) Compliance with the above emission limitations shall be based on the average of three (3) consecutive test runs.

(h)\* Visible air contaminants from each combustor shall not be emitted in such a manner that the opacity of the emissions is equal to or greater than 10% for a period or periods aggregating more than three (3) minutes in any one (1) hour; or equal to or greater than an opacity of 30% at any time.

(i) Visible emissions from combustion ash

(1) The permittee shall not cause to be discharged to the atmosphere visible emissions of combustion ash from the ash conveying system (including conveyor transfer points) in excess of 5 percent of the observation period (i.e., 9 minutes per 3-hour period).

(2) The visible emission limit does not cover visible emissions discharged inside buildings or enclosures, and during the maintenance and repair of ash handling systems.

(j) The ammonia slip concentration from the SNCR system shall not exceed 10 ppmv, corrected to 7% oxygen, dry basis. Compliance with this limit is based on the average of three (3) consecutive test runs.

(i) Carbon monoxide (CO) emissions limit

(1)\* CO emissions per combustor shall not exceed 100 ppmvd, calculated as a 4-hour block arithmetic average, corrected to 7% oxygen on a dry basis.

(2) The CO limit applies at all times when municipal wastes are combusted, except during periods of start-up, and shutdown. Provided that the duration of the start-up or shut-down shall not exceed three (3) hours per occurrence. During periods of startup or shutdown, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR § 60.59b(d)(7).

(3) Compliance with this CO limit in ppmvd shall be determined using a four (4) hour block arithmetic average. The four (4) hour block arithmetic average shall be calculated from one (1) hour arithmetic averages expressed in ppmv, corrected to 7% oxygen (dry basis).

(k)\* Particulate matter (PM) emissions, discharged to the atmosphere from each combustor, shall not exceed 0.011 gr/dscf (25 mg/dscm), corrected to 7% oxygen. Compliance with this emission limit shall be based on the average of three (3) consecutive test runs performed annually and in accordance with Testing Requirements for this source.

(l) Start-up commences when municipal waste is added into an empty combustor and does not include any warm-up period when the combustor is combusting only a fossil fuel, or any other auxiliary fuel, approved by the Department, and no municipal waste is being combusted.

(m) Shutdown commences with the cessation of charging municipal waste for the purpose of shutting down the combustor. After the initiation of shutdown, the selected parameters that define normal process operation for the facility are when the dry inlet O<sub>2</sub> is less than or equal to 15.5% and the steam flow is greater than or equal to 60,000 pounds/hr. If either of these conditions is not met, and the facility has ceased feeding MSW into the combustor, the combustor shall be coded as "process down".

**Fuel Restriction(s).**

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Only No. 2 fuel oil shall be fired as auxiliary fuel in the combustors.

**SECTION E Source Group Restrictions.****Throughput Restriction(s).****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) No more than 10%, by weight, of the total amount of waste accepted per month at the facility shall be municipal-like residual waste. The municipal-like residual waste accepted at the facility shall be approved by the Department's Waste Management, and documented in accordance with the conditions of the Department's Waste Management Permit No. 400558.

(b) Each combustor shall not be operated at a steam load level greater than 110% of the maximum steam load measured during the most recent dioxin/furan performance test, except during the annual dioxin/furan or mercury performance test and the two (2) weeks preceding the annual dioxin/furan or mercury performance test, no steam load limit is applicable. The averaging time is a 4-hour block arithmetic average steam load. The steam load limit may be waived in writing by the Department for the purpose of evaluating system performance, testing new technology or control technologies, diagnostic testing, or related activities for the purpose of improving facility performance or advancing the state-of-the-art for controlling facility emissions. The combustor unit load limit continues to apply, and remains enforceable, until and unless the Department grants the waiver.

(c) Only the municipal waste and municipal like residual waste approved by Waste Management of the Department, Permit No. 400588, shall be combusted in the incinerators.

**Control Device Efficiency Restriction(s).****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) Air emissions from each combustor are controlled by individual selective non-catalytic reduction (SNCR) system to reduce NOx emissions, acid gas scrubbers (quench reactor) to control acid gases, a carbon adsorption process (PAC injection) to control emissions of toxic pollutants, and a baghouse to control particulate matter emissions.

(b) The flue gas temperature, measured at the baghouse inlet and calculated in 4-hour block arithmetic averages, shall not exceed 17°C (30°F) above the maximum demonstrated baghouse inlet temperature as defined in 40 CFR §60.51b. The baghouse inlet temperature limit may be waived in writing by the Department for the purpose of evaluating system performance, testing new technology or control technologies, diagnostic testing, or related activities for the purpose of improving facility performance or advancing the state-of-the-art for controlling facility emissions. The temperature limits continue to apply, and remain enforceable, until and unless

(1) the Department grants the waiver; or

(2) during the annual dioxin/furan or mercury performance test, and the two (2) weeks preceding the annual dioxin/furan or mercury performance test, when no baghouse inlet temperature limitations are applicable.

(c) The combustion gases in the combustion chamber shall be maintained at a temperature greater than 1800°F, for at least one (1) second. To verify compliance, a temperature sensor shall be located at the furnace roof position approved by the Department. The temperature at this location shall be maintained at greater than 1100°F (a Department approved reference temperature which corresponds to 1800°F) for at least one second. The combustor(s) auxiliary burners shall be manually or automatically controlled to maintain the combustion gases temperature at the aforementioned condition whenever refuse is being combusted.

(d) The carbon mass feed rate shall be averaged over a block 8-hour period, and the 8-hour block average must equal to or exceed the level(s) documented during the most recent annual performance tests, except during the annual dioxin/furan or mercury performance test and the 2 weeks preceding the annual dioxin/furan or mercury performance test, no limit is applicable for average mass carbon feed rate. The limit for average mass carbon feed rate may be waived in accordance with permission granted by the Department for the purpose of evaluating system performance, testing new technology or control technologies, diagnostic testing, or related activities for the purpose of improving facility performance or advancing the state-of-the-art for controlling facility emissions.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 139.]

**SECTION E Source Group Restrictions.**

- (a) The permittee shall perform an annual stack test, using the Department-approved procedures, to demonstrate compliance with the emission limits or emission reductions for the combustor, all procedures and test methods, if not specified below, shall be in accordance with Department's Source Testing Manual, Revision No. 8, or source testing procedures approved by the Department.
- (b) The amount of waste incinerated during a stack test shall be an adequate representation of the waste load to be processed by the facility.
- (c) All annual stack tests shall consist of a minimum of three test runs conducted under representative full load operating conditions for the following pollutants:
- (1) Particulate matter, PM and PM10 (including particle sizing), using EPA Method 5
  - (2) Sulfur dioxides (SO<sub>2</sub>), using EPA Reference Method 19
  - (3) Carbon monoxide (CO), using EPA Reference Method 10, 10A, or 10B
  - (4) visible emissions, using EPA Reference Method 9
  - (5) Nitrogen oxides (NO<sub>x</sub>), using EPA Reference Method 19
  - (6) Hydrogen chloride (HCl), using EPA Reference Method 26 or 26A
  - (7) Polycyclic aromatic hydrocarbon (PAH) compounds, including benzo(a)pyrene, using method approved by DEP;
  - (8) VOC (expressed as total hydrocarbons), using EPA Reference Method 25A;
  - (9) arsenic and compounds (expressed as arsenic), using method approved by DEP;
  - (10) cadmium and compounds (expressed as cadmium), using EPA Reference Method 29;
  - (11) hexavalent chromium and compounds (expressed as chromium), using EPA Reference Method 29;
  - (12) nickel and compounds (expressed as nickel), using method approved by DEP;
  - (13) lead and compounds (expressed as lead), using EPA Reference Method 29;
  - (14) beryllium and compounds (expressed as beryllium), using method approved by DEP;
  - (15) mercury and compounds (expressed as mercury), using EPA Reference Method 29;
  - (16) zinc and compounds (expressed as zinc), using method approved by DEP;
  - (17) PCDD and PCDF (expressed as total dioxin and furan, as specified in 40 CFR Part 60, Subpart Cb), using EPA Reference Method 23;
  - (18) ammonia slip concentration, using method approved by DEP
  - (19) fugitive ash emissions, using EPA Reference Method 22
- (d) The following operating parameters shall be measured and re-established during each annual performance test:
- (1) maximum baghouse inlet temperature
  - (2) minimum carbon injection rate in pounds per hour
  - (3) the carbon injection system primary indicator(s) of the carbon mass feed rate (e.g., screw feeder setting)
  - (4) the maximum demonstrated municipal waste combustor unit load level.
- (e) The permittee may use CEM Relative Accuracy Test Audits (RATA) in lieu of stack testing for HCl, SO<sub>2</sub>, NO<sub>x</sub>, CO, and opacity.
- (f) The EPA Reference Method 1 shall be used to select sampling site and number of traverse points.
- (g) The EPA Reference Method 3, 3A or 3B, or as an alternative ASME PTC-19-10-1981—part10, as applicable, shall be used for gas analysis.
- (h) An oxygen measurement shall be obtained simultaneously with each test run.
- (i) The testing procedures submitted to the Department for approval shall include, at a minimum, the following:
- (1) amount of waste to be combusted;
  - (2) composition and classification of waste;
  - (3) Btu content of waste.
- (j) The permittee shall conduct semiannual test for the following pollutants if any of the pollutants exceed 80% of the emission standards during the tests:

**SECTION E Source Group Restrictions.**

- (1) PM and PM-10
- (2) arsenic and compounds
- (3) toxic metals and compounds
- (4) PAH (including benzo(A)pyrene)
- (5) visible emissions
- (6) ammonia reagent slip

Testing frequency may be revert to annual basis should all tested PM10, and toxic metals remain less than 80% of the permitted standards for a consecutive 24-month period and the permittee notifies the Department in advance.

(k) At least 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.

(l) 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.

(m) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

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

**III. MONITORING REQUIREMENTS.**

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall continuously monitor and record the following:

- (1) The combustion chamber temperature
- (2) The baghouse inlet temperature
- (3) The carbon injection rate
- (4) The steam load

(b) The permittee shall continuously monitor and record the following using the Department approved CEMS:

- (1) Opacity
- (2) CO emissions in ppmv
- (3) NOx emissions in ppmv
- (4) SO2 emissions in ppmv
- (5) HCL emissions in ppmv
- (6) O2 in percent

(c) The continuous monitoring system shall be operated and maintained to achieve the following data availability standards:

- (1) CO and temperatures: 100% valid hours/day, where a valid hour is defined as greater than or equal to 90% valid readings (54 minutes);
- (2) oxygen (O2), and opacity: greater than or equal to 95% valid hours/day, where a valid hour is defined as greater than or equal to 75% valid readings (45 minutes); and
- (3) HCl, SO2, and NOx: greater than or equal to 90% valid hours/month, where a valid hour is defined as greater than or equal to 75% valid readings (45 minutes).

(d) The permittee shall operate, calibrate, and maintain a continuous emission monitoring system and record the output of the system for measuring the O2 content of the flue gas at each location where CO, SO2, or NOx emissions are monitored and shall comply with the test procedures and methods specified below:

- (1) the span value of the O2 monitor shall be 25% O2;



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- (2) the monitor shall conform to performance specification 3 in Appendix B of 40 CFR 60, except for section 2.3, (relative accuracy requirement);
- (3) the quality assurance procedures of Appendix F of 40 CFR 60 shall apply to the monitor, except for 5.1.1 (relative accuracy test audit).
- (e) The permittee shall record all CEM emissions consistent with the Department's CEM manual.

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

(a) The permittee shall maintain the following records for each combustor:

(1) The calendar date of each record.

(2) The emission concentrations and parameters measured by CEMS and CMS as specified below.

(i) All 1-hour average SO<sub>2</sub>, NO<sub>x</sub>, CO, and HCl emission concentrations, steam load measurements, baghouse inlet temperatures, and opacity.(ii) All 1-day geometric average SO<sub>2</sub> emission concentrations and all 1-day geometric average percent reductions in SO<sub>2</sub> emissions.(iii) All 1-day arithmetic average NO<sub>x</sub> and HCl emission concentrations and all 1-day block average percent reductions in HCl emissions.

(iv) All 4-hour block arithmetic average steam load levels and baghouse inlet temperatures.

(3) Identification of the calendar dates when any of the average emission concentrations, percent reductions, operating parameters, or the opacity levels recorded are above or below the applicable limits, with reasons for such exceedances and a description of corrective actions taken.

(4) The following operating parameter records:

(i) The average carbon mass feed rate (in pounds per hour) estimated during annual performance tests, with supporting calculations.

(ii) The average carbon mass feed rate (in pounds per hour) estimated for each hour of operation, with supporting calculations.

(iii) The total carbon usage for each calendar quarter estimated, with supporting calculations.

(iv) Carbon injection system operating parameter data for the parameter(s) that are the primary indicator(s) of carbon feed rate (e.g., screw feeder speed) averaged over a block 8-hour period.

(4) Identification of the calendar dates and times (hours) for which valid hourly data have not been obtained, or continuous automated sampling systems were not operated, including reasons for not obtaining the data and a description of corrective actions taken:

(i) SO<sub>2</sub> emissions data;(ii) NO<sub>x</sub> emissions data;(iii) NO<sub>x</sub> emissions data;

(iv) Municipal waste combustor unit load data;

(v) Baghouse inlet temperature data; and

(vi) HCl emissions data.

(5) Identification of each occurrence that SO<sub>2</sub>, NO<sub>x</sub>, CO, and HCl emissions data, or operational data (i.e., steam load, and baghouse inlet temperature) have been excluded from the calculation of average emission concentrations or parameters,

**SECTION E Source Group Restrictions.**

and the reasons for excluding the data.

(6) The results of daily drift tests and quarterly accuracy determinations for SO<sub>2</sub>, NO<sub>x</sub>, CO, and HCl continuous emission monitoring systems.

(7) The test reports documenting the results of all annual performance tests along with supporting calculations:

(i) The results of all annual performance tests conducted to determine compliance with the PM, cadmium, lead, mercury, dioxins/furans, VOC, ammonia slip concentration, and fugitive ash emission limits.

(ii) For all annual dioxin/furan performance tests, the maximum demonstrated steam load and maximum demonstrated baghouse inlet temperature.

(8) Identification of the calendar dates when the average carbon mass feed rates recorded were less than either of the hourly carbon feed rates estimated during the annual performance tests, with reasons for such feed rates and a description of corrective actions taken.

(9) Identification of the calendar dates when the carbon mass feed rates in lb/hr (averaged over a block 8-hour period) recorded were less than the hourly carbon feed rates estimated during the annual performance tests, with reasons for such feed rates and a description of corrective actions taken.

(b) The following records shall be maintained for operators and operator training.

(1) Records showing the names of the municipal waste combustor chief facility operator, shift supervisors, and control room operators who have been provisionally certified by the American Society of Mechanical Engineers or an equivalent State-approved certification program as required including the dates of initial and renewal certifications and documentation of current certification.

(2) Records showing the names of the municipal waste combustor chief facility operator, shift supervisors, and control room operators who have been fully certified by the American Society of Mechanical Engineers or an equivalent State-approved certification program as required including the dates of initial and renewal certifications and documentation of current certification.

(3) Records showing the names of the municipal waste combustor chief facility operator, shift supervisors, and control room operators who have completed the EPA municipal waste combustor operator training course or a State-approved equivalent course as required including documentation of training completion.

(4) Records of when a certified operator is temporarily off site:

(i) If the certified chief facility operator and certified shift supervisor are off site for more than 12 hours, but for 2 weeks or less, and no other certified operator is on site, record the dates that the certified chief facility operator and certified shift supervisor were off site.

(ii) When all certified chief facility operators and certified shift supervisors are off site for more than 2 weeks and no other certified operator is on site, keep records of four items:

(A) Time of day that all certified persons are off site.

(B) The conditions that cause those people to be off site.

(C) The corrective actions taken to ensure a certified chief facility operator or certified shift supervisor is on site as soon as practicable.

(D) Copies of the written reports submitted every 4 weeks that summarize the actions taken to ensure that a certified chief facility operator or certified shift supervisor will be on site as soon as practicable.

(5) Records showing the names of persons who have completed a review of the operating manual including the date of the initial review and subsequent annual reviews.

(c) The permittee shall calculate emissions for all pollutants with emission limits on a monthly basis and 12-month rolling

**SECTION E. Source Group Restrictions.**

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(d) All records specified shall be maintained onsite in either paper copy or computer-readable format.

**V. REPORTING REQUIREMENTS.**

**# 009 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

(a) The permittee shall submit semiannual reports with the following information:

(1) A summary of the following data collected for all pollutants and parameters required.

(i) A list of the particulate matter, opacity, cadmium, lead, mercury, dioxins/furans, HCl, and fugitive ash emission levels achieved during the performance tests.

(ii) A list of the highest emission level recorded through CEMS or CMS for SO<sub>2</sub>, NO<sub>x</sub>, CO, and HCl, opacity, steam load level, and baghouse inlet temperature.

(iii) Periods when valid data were not obtained.

(A) The total number of hours per calendar quarter and hours per calendar year that valid data for SO<sub>2</sub>, NO<sub>x</sub>, CO, HCl, steam load, or baghouse inlet temperature data were not obtained based on the data recorded.

(B) For each continuously monitored pollutant or parameter, the hours of valid emissions data per calendar quarter and per calendar year expressed as a percent of the hours per calendar quarter or year that the combustor was operating and combusting municipal solid waste.

(iv) Periods when the total number of hours that valid data for SO<sub>2</sub>, NO<sub>x</sub>, CO, HCl, steam load, and baghouse inlet temperature were excluded from the calculation of average emission concentrations or parameters based on the data recorded.

(2) The summary of data reported shall also provide the types of data specified in paragraph (a)(1) above for the calendar year preceding the year being reported, in order to provide the Department with a summary of the performance of the combustors over a 2-year period.

(3) The summary of data including the information above shall highlight any emission or parameter levels that did not achieve the emission or parameter limits.

(4) Documentation of periods when all certified chief facility operators and certified shift supervisors are off site for more than 12 hours.

(b) The permittee shall submit a semiannual report that includes the following information for any recorded pollutant or parameter that does not comply with the limit.

(1) Information recorded for SO<sub>2</sub>, NO<sub>x</sub>, CO, HCl, opacity, steam load level, baghouse inlet temperature, and opacity.

(2) For each date recorded and reported as required, the SO<sub>2</sub>, NO<sub>x</sub>, CO, HCl, opacity, steam load level, inlet temperature, or opacity data recorded.

(3) Document any PM, cadmium, lead, mercury, dioxins/furans, and fugitive ash emission levels that were above the applicable pollutant limits, a copy of the test report documenting the emission levels and the corrective actions taken.

(4) The information recorded for the carbon injection system operating parameter(s) that are the primary indicator(s) of carbon mass feed rate.

(5) The carbon feed rate data recorded for each operating date reported.

(6) The semiannual reports shall be submitted according to the schedule specified below.

**SECTION E. Source Group Restrictions.**

- (i) The report shall be submitted by August 1st following the first half calendar year, if the data reported were collected during the first half calendar year.
- (ii) The report shall be submitted by February 1st following the second half calendar year, if the data reported were collected during the second half calendar year.
- (c) All reports required shall be submitted as a paper copy, postmarked on or before the February 1 or August 1, and maintained onsite as a paper copy for a period of 5 years.
- (d) The permittee may send EPA reports, compliance certifications (if required) electronically to R3\_APD\_Permits@epa.gov. Any such electronic submissions must include the name of facility, city of the facility, and TVOP number.

**VI. WORK PRACTICE REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.****\* Operator Training**

(a) Each chief facility operator and shift supervisor shall obtain and maintain a current provisional operator certification from either the American Society of Mechanical Engineers [QRO-1-1994 (incorporated by reference—see 40 CFR §60.17 of subpart A of this part)] or a State certification program.

(b) Each chief facility operator and shift supervisor shall have completed full certification or shall have scheduled a full certification exam with either the American Society of Mechanical Engineers [QRO-1-1994 (incorporated by reference—see 40 CFR §60.17 of subpart A of this part)] or a State certification program.

(c)(1) The permittee shall not allow the combustors to be operated at any time unless one of the following persons is on duty and at the facility:

(A) A fully certified chief facility operator,

(B) A provisionally certified chief facility operator who is scheduled to take the full certification exam within 6 months,

(C) A fully certified shift supervisor, or a provisionally certified shift supervisor who is scheduled to take the full certification exam within 6 months.

(2) If both the certified chief facility operator and certified shift supervisor are unavailable, a provisionally certified control room operator on site at the municipal waste combustion unit may fulfill the certified operator requirement. Depending on the length of time that a certified chief facility operator and certified shift supervisor are away, the permittee must meet one of following three criteria:

(i) When the certified chief facility operator and certified shift supervisor are both off site for 12 hours or less, and no other certified operator is on site, the provisionally certified control room operator may perform the duties of the certified chief facility operator or certified shift supervisor.

(ii) When the certified chief facility operator and certified shift supervisor are off site for more than 12 hours, but for two weeks or less, and no other certified operator is on site, the provisionally certified control room operator may perform the duties of the certified chief facility operator or certified shift supervisor without notice to, or approval by, the Department. However, the permittee must record the period when the certified chief facility operator and certified shift supervisor are off site and include that information in the annual report as specified under 40 CFR §60.59b(g)(5).

(iii) When the certified chief facility operator and certified shift supervisor are off site for more than two weeks, and no other certified operator is on site, the provisionally certified control room operator may perform the duties of the certified chief facility operator or certified shift supervisor without approval by the Department. However, the permittee must take two actions:

(A) Notify the Department in writing. In the notice, state what caused the absence and what actions are being taken by the permittee to ensure that a certified chief facility operator or certified shift supervisor is on site as expeditiously as practicable.

**SECTION E. Source Group Restrictions.**

(B) Submit a status report and corrective action summary to the Department every four weeks following the initial notification. If the Department provides notice that the status report or corrective action summary is disapproved, the municipal waste combustion unit may continue operation for 90 days, but then must cease operation. If corrective actions are taken in the 90-day period such that the Department withdraws the disapproval, municipal waste combustion unit operation may continue.

(3) A provisionally certified operator who is newly promoted or recently transferred to a shift supervisor position or a chief facility operator position at the municipal waste combustion unit may perform the duties of the certified chief facility operator or certified shift supervisor without notice to, or approval by, the Department for up to six months before taking the ASME QRO certification exam.

(d) The permittee shall develop and update on a yearly basis a site-specific operating manual that shall, at a minimum, address the elements of municipal waste combustor unit operation specified below.

- (1) A summary of the applicable standards under this Operating Permit;
- (2) A description of basic combustion theory applicable to a municipal waste combustor unit;
- (3) Procedures for receiving, handling, and feeding municipal solid waste;
- (4) Municipal waste combustor unit startup, shutdown, and malfunction procedures;
- (5) Procedures for maintaining proper combustion air supply levels;
- (6) Procedures for operating the municipal waste combustor unit within the standards established under this subpart;
- (7) Procedures for responding to periodic upset or off-specification conditions;
- (8) Procedures for minimizing particulate matter carryover;
- (9) Procedures for handling ash;
- (10) Procedures for monitoring municipal waste combustor unit emissions; and
- (11) Reporting and recordkeeping procedures.

(e) The permittee shall establish an annual training program to review the operating manual with each person who has responsibilities affecting the operation of the combustors including, but not limited to, chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers.

(f) The operating manual required shall be kept in a readily accessible location for all persons required to undergo training. The operating manual and records of training shall be available for inspection by the EPA or its delegated enforcement agency upon request.

(g) As per 40 CFR §60.58b(m)(4), the carbon injection system operational indicator used to provide additional verification of carbon injection system operation, including basis for selecting the indicator and operator response to the indicator alarm, shall be included in the site-specific operating manual required under 40 CFR §60.54b(e).

**# 011 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

**(a) Combustors**

(1) Each combustor shall be equipped with an automatic alarm and interlock system to stop the solid waste charging grates if any of the following conditions occur:

- (i) the combustor temperature measured at the furnace roof, at the Department approved location, drops below 900°F, (a Department approved reference temperature which corresponds to 1600°F), for a 15-minute period;
- (ii) the CO emissions exceed 500 ppmv corrected to 7% oxygen on a dry basis for a 15-minute period; (This requirement is waived during the startup period.)
- (iii) the flue gas oxygen (as measured at the oxygen monitor upstream of the control device) level drops below 3% (wet basis) for a 15-minute period; and
- (iv) the opacity of the exhaust gases is equal to or greater than 10% for a period of 15 minutes.

(2) No solid waste shall be charged into the combustor(s) until equilibrium has been attained in the furnace zones and the temperature of the combustion gases reach 1800°F for one (1) second of retention time. All control equipment shall be

**SECTION E. Source Group Restrictions.**

operational and functioning properly prior to the introduction of solid waste into the combustor(s).

(3) The permittee shall replace all rooftop temperature thermocouples on a quarterly basis with those that have been certified in accordance with National Institute of Standards and Testing (NIST). The permittee shall perform a new alternative location verification and retention test in the event that furnace combustion gas flow rates change significantly from any previous alternate location verification test, or at the Department's request.

(4) During the process of all planned shut downs of the combustor(s), auxiliary burners shall be used to ensure that the temperature of the combustion gases does not drop below 1600°F while any waste material is still being incinerated. All control equipment shall be operational and functioning properly until all of the solid waste is incinerated.

**(b) Tipping floor**

(1) The tipping area air shall be used as primary combustion air in the combustor(s).

(2) Unacceptable waste and visible unapproved residual waste as defined by 25 Pa. Code Section 287.1 of the Bureau of Waste Management Regulations shall be removed from the refuse pit for proper off-site disposal.

(3) Whenever the combustor(s) is in operation, the tipping area shall be operated at a negative pressure as determined by the operation of the induced draft fan.

(4) All waste that can be airborne or spilled shall be transported in or out of this facility in closed containers or tarped trucks.

(5) Open storage of solid waste outside of a building is prohibited.

**(c) Air Pollution control devices**

(1) The urea feed system and the injection system shall be modulated by interfacing with the NOx CEMS to assure NOx concentrations below the NOx emission limit.

(2) All air pollution control devices shall be operated and maintained in accordance with manufacturers' specifications and good air pollution control practices.

(3) A sufficient spare parts inventory shall be maintained to provide the timely repair or replacement of parts as reasonably anticipated.

(4) The permittee shall estimate the total carbon usage of the plant (pounds) for each calendar quarter by two independent methods, according to the procedures below.

(i) The weight of carbon delivered to the plant.

(ii) Estimate the average carbon mass feed rate in pounds per hour for each hour of operation for each combustor based on the average mass feed rate in pounds per hour during the most recent performance test, and sum the results for both combustors at the plant for the total number of hours of operation during the calendar quarter.

**(d) Ash removal equipment**

(1) The ash removal equipment, including the ash extractors and fly ash conveyors, shall be enclosed.

(2) The ash shall be loaded in an enclosed area or handled wet.

**VII. ADDITIONAL REQUIREMENTS.**

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) Words and terms that are not otherwise defined in Condition #001 of Section B of this permit shall have the meanings set forth in 40 CFR §§60.31b or 60.51b.

**SECTION E. Source Group Restrictions.**

(b) The permittee shall comply with the following for the combustors, whichever is more stringent:

(1) the Department's Air Quality Compliance Assurance Policy for Municipal Waste Incinerators (CAP for MWI), finalized and signed by the Department on July 12, 1989 (updated on May 24, 1996), and its latest amendments if any, except where otherwise provided in this permit; and

(2) the State Implementation Plan (SIP) approved by the USEPA on August 20, 2001 (Federal Register /Vol. 66, No. 161).

(c) The conditions, marked with \* in Section E, indicate compliance with this streamlined permit condition assures compliance with Clean Air Act (CAA) Section 111(d)/129 State Plan approved by EPA with the effective date(s) specified in 40 CFR §62.9642.

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





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