



INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection: 4-25-17	TV <input type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 48-001 AP22	Expiration Date: 4/30/19	Case #: -	PF ID #: 718881
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Company Name: Bethlehem Renewable Energy Lower Saucon Twp	Municipality: Lower Saucon Twp	County: Northampton S
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Plant Name: BRE	Physical Location: 2305 Applebutter Rd	Federal ID - Plant Code#: 68-0600938
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Responsible Official: Mark S. Kumm	Mailing Address: 1300 N. 17th St.
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Title: Chief Op. Officer	Address: Ste 1500
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Phone #(s): 703-253 1800	City/State/Zip: Arlington, VA 22209
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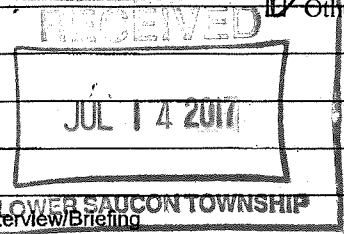
- ROUTING**
- Council
 - Manager
 - Asst. Mgr.
 - Zoning
 - Finance
 - Police
 - P. Works
 - P/C
 - P & R
 - FAC
 - Engineer
 - Solicitor
 - Planner
 - Landfill
 - EMC
 - Other NB

Mark (X) All Inspection Types That Apply To This Inspection:

<input checked="" type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)
<input type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:
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AIMS Report Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:
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Mark (X) All Activities That Apply:

<input type="checkbox"/> File Review	<input type="checkbox"/> Pre-Inspection Briefing	<input type="checkbox"/> Exit Interview/Briefing
<input type="checkbox"/> Pre-Inspection Observations	<input type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

On 4/25/17 I conducted a routine partial (RTPT) inspection at Bethlehem Renewable Energy (BRE). Mr Matt Bardzilouskas, AQ Compliance Specialist and Ms. Amy Faulch Solid Waste Supervisor were also present on behalf of the Department. Mr. Ken Minton + Mr Ryan Brunier were present on behalf of BRE.

We conducted a site tour and it was noted that the turbine was operating with one compressor (B) at 1073 scfm landfill gas (LFG) producing 1706kW. Following the site tour the equipment was observed through a FLIR camera to examine for leaks. No leaks were detected at this time.

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report	Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Company Representative: KEN MINTON	Title: SITE MANAGER	Signature: <i>Ken Minton</i>	Date: 5/18/17
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DEP Representative: Jessica Wagoner	Title: AQS	Signature: <i>Jessica Wagoner</i>	Date/Time: 5/18/17
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This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.



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Also while using FLIR, a Flame Ionization Detector was in use. Upon arrival a reading was taken in the parking lot, it was 0.79ppm. While in the area of the turbine the FID read between 2-4ppm.

A light, persistent landfill gas odor was detected in the area between the turbine and the compressor building.

Records

Monthly LFG fired & LMRS - record reviewed and appears complete.

Hours of operation - record reviewed, tracked monthly.

Emissions - record reviewed and appears complete.

Daily Operations Report (gas quality, LFG flow, energy production & hours) - logs maintained & appear complete.

Maintenance log - log maintained & appear complete.

SSM records - maintained on site & submitted to IESI BRE operators under the IESI SSM plan.

Annual tune-up - completed 4/2017. Have not performed check with portable analyzer yet, waiting until compressor A is on-line and turbine is at full load.

Act 124 - sign installed.

Following the inspection an odor patrol was conducted in the area of BRE, no LFG odors were detected.

The permit (condition #10) states the permittee shall on a daily basis sample the LFG for nitrogen & sulfur content. At this time the H₂S sensor is down and the facility is using a handheld to measure H₂S on days staff is on site. The last reading was taken 4/2017 and was 320ppm.

Mr. Minton informed this inspector that a request was

Company - plant name:

BRE

Initials of representative interviewed:

KJM

Date:

5/18/17

through Dec 2017

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submitted to the Department to lower the sampling frequency a few months ago. I informed Mr. Minton that I'd check the status of the request following this inspection in order to determine compliance with Permit condition 10. The request was rec'd by the Department 11/15/16 & is under review.

On May 18, 2017 I returned to BRE to complete a full compliance evaluation (FRE) that began on 4/27/17 as a RTPT inspection. At this time I reviewed the daily log sheets from Sept 2016 to April 2017.

I reviewed the electronic daily log that is completed monthly and the handwritten daily log that is completed when staff is on-site. When completing the electronic log the H₂S ^{reading} from the handheld that is on the handwritten daily log is entered.

Handheld readings are only taken when staff is on-site. BRE believes the handheld reading is more accurate than the sensor H₂S readings so that is the reading they log.
~~A reading taken~~

The log is then completed using the following example. A handheld reading taken Friday is used Sat & Sun because no one is on-site. Then when staff return Monday a new reading is taken. BRE has completed ~~the~~ log using this method ~~at~~ when the H₂S sensor was also in use. Daily samples were collected by the sensor but the data from the handheld is recorded.

Because BRE maintains no record in this manner I could not determine when the H₂S sensor went down by the record review.

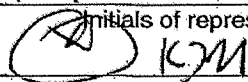
Mr. Minton stated the H₂S sensor went down ~Jan 13, 2017, after BRE requested a lower sampling frequency.

I informed Mr. Minton that a sample is required

Company - plant name:

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Date:

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Any day the turbine is operating, and once the Department completes its review of the request, BRE # will need to follow that sampling schedule and if it continues to be daily, they will need to collect samples each day the turbine is operating.

This concludes this inspection as no air quality violations were noted.

Company -- plant name:

BRE

Initials of representative interviewed:

(X) KM

Date:

5/18/17

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