

**SCS ENGINEERS**

July 27, 2017  
File No. 02198081.00

Mr. Mark Wejkszner  
Air Program Manager  
Pennsylvania Department of Environmental Protection  
Northeast Region  
2 Public Square  
Wilkes-Barre, PA 18701-1906



Subject: Semi-Annual Title V Monitoring Report: January – June 2017  
IESI PA Bethlehem Landfill (Permit No. 48-00027)

Dear Mr. Wejkszner:

SCS Engineers (SCS) has prepared the enclosed Semi-Annual Title V Monitoring Report for the IESI PA Bethlehem Landfill. This report covers the period of January 1 through June 30, 2017 and was prepared in accordance with the facility's Title V Operating Permit.

If you have any questions regarding this report, please do not hesitate to contact Mr. Nick Rogers at the Landfill at 610-317-3200 or either of the undersigned at 703-471-6150.

Sincerely,

Ryan Christman, M.S.  
Staff Professional  
**SCS ENGINEERS**

Joshua G. Roth, P.E.  
Project Director  
**SCS ENGINEERS**

REC/JGR

cc: Nick Rogers/Don Hallock, IESI PA Bethlehem Landfill  
Lana Brown/Kurt Shaner, Waste Connections, Inc.

Enclosures

- S  
ROUTING
- Council
  - Manager *orig*
  - Asst. Mgr.
  - Zoning
  - Finance
  - Police
  - P. Works
  - P/C
  - P & R
  - EAC
  - Engineer
  - Solicitor
  - Planner
  - Landfill
  - EMC
  - Other





PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY  
SEMI-ANNUAL REPORT OF REQUIRED MONITORING  
(25 Pa. Code § 127.513)

|                     |   |                  |   |
|---------------------|---|------------------|---|
| Facility Name:      | IESI PA Bethlehem LD/Bethlehem Facility | Plant Name:      | IESI PA Bethlehem LD/Bethlehem Facility |
| Tax ID/Plant:       | 22-3575227-1                            | DEF Facility ID: | 549728                                  |
| Contact Person:     | Mr. Nick Rogers                         | Title:           | Compliance Manager                      |
| Operating Permit #: | 48-00027                                | Phone Number:    | (610) 317-3200                          |

For the period **January 1, 2017 – June 30, 2017**, IESI PA Bethlehem Landfill has been in continuous compliance with all applicable monitoring requirements of permit # 48-00027, determined by the method(s) of compliance specified in said permit, except for the following deviations:

| Sect./Cond. #  | Citation # | Source | Noncompliance | Monitoring Method(s) | Date | Duration | Corrective Action(s) |
|--|------------|--------|---------------|----------------------|------|----------|----------------------|
| <i>No instances of deviations from monitoring requirements as specified in the Title V Permit (Section C-III, D-III, E-III) occurred during this period.</i> |            |        |               |                      |      |          |                      |

Certification of Truth, Accuracy and Completeness

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

|         |                   |        |                             |
|---------|-------------------|--------|-----------------------------|
| Name:   | Lana Brown        | Title: | Regional Compliance Manager |
| Signed: | <i>Lana Brown</i> | Date:  | 7/26/17                     |

*This certification must be signed by a responsible official. Any certification submitted without a valid signature will be returned. The owner/operator shall identify any other material information needed in this certification to also comply with section 113(c)(2) of the Clean Air Act. If more spaces are needed, complete additional pages using the format shown in Addendum 1. This certification does not replace requirements pertaining to the submission of malfunction and CEM reports. DO NOT include that information on this form.*

| Citation  | Permit Section  | Terms & Conditions Contained in the Permit   | Means of Determining Compliance Status   | Compliance with Terms & Conditions was:   |
|---|-----------------|--|--|---|
| [25 Pa. Code §123.43]<br>Measuring Techniques   | Section C, #009 | <p>Visible emissions may be measured using either of the following:</p> <p>(a) A device approved by the Department and maintained to provide accurate opacity measurements.</p> <p>(b) Observers, trained and qualified to measure plume opacity with the naked eye or with the air of any devices approved by the Department.</p>   | <p>Weekly inspections of visible emissions were conducted by site personnel in accordance with the permit.</p> | <p><input checked="" type="checkbox"/> Continuous<br/><input type="checkbox"/> Intermittent</p>             |
| [25 Pa. Code §127.511]<br>Monitoring and Related<br>Recordkeeping and<br>Reporting Requirements | Section C, #010 | <p><b>FUGITIVE, VISIBLE, AND MALODOR EMISSIONS</b></p> <p>(a) The permittee shall conduct weekly inspections of the facility perimeter, during daylight hours when the plant is in operation, to detect visible, fugitive, and malodor emissions as follows:</p> <p>(1) Visible emissions in excess of the limits states in Site Level Requirement, Condition #004.</p> <p>(2) Visible emissions may be measured according to the methods specified in Section C, Site Level Requirement, Condition #009, or alternatively, plant personnel who observe any visible emissions (i.e., emissions in excess of 0% opacity) will report the incident of visible emissions to the Department within four (4) hours of each incident and make arrangements for a certified observer to verify the opacity of the emissions.</p> <p>(3) The presence of fugitive emissions visible beyond the boundaries of the facility, as stated in Section C, Site Level Requirement, Condition #002.</p> <p>(4) The presence of malodor emissions beyond the boundaries of the facility, as stated in Section C, Site Level Requirement, Condition #003.</p> | <p>Permittee conducts regular (weekly at minimum) inspections in accordance with the permit.</p>               | <p><input checked="" type="checkbox"/> Continuous<sup>1</sup><br/><input type="checkbox"/> Intermittent</p> |

<sup>1</sup> On-site odors were detected in one instance during the regular monitoring conducted by the landfill in accordance with the Title V permit and during PADEP inspections. In this instance, the odor was of limited duration and did not constitute a malodor. PADEP conducted several site inspections during the period and did not observe any odors or malodors during these inspections.

| Citation   | Permit Section                                    | Terms & Conditions Contained in the Permit   | Means of Determining Compliance Status   | Compliance with Terms & Conditions was:  |
|--|---|--|--|--|
| [25 Pa. Code §127.512] Operating Permit Terms and Conditions                           | Section D, #007<br>(PORTABLE CRUSHING OPERATIONS) | (a) Any permittee which uses a wet scrubber, baghouse or dust suppression system to control emissions shall install, calibrate, maintain and operate the following monitoring devices: ...   | The permittee does not use a wet scrubber or baghouse to control emissions. The permittee does use a water spray dust suppression system as needed for control.<br><br>This source did not operate during the reporting period.                              | <input checked="" type="checkbox"/> Continuous<br><input type="checkbox"/> Intermittent              |
| [25 Pa. Code §127.511] Monitoring and Related Recordkeeping and Reporting Requirements | Section E, #006                                   | The owner/operator shall forecast, on an annual basis, both the potential and actual VOC emissions for the following year. Actual VOC emission estimates shall include current and scheduled collection system configurations for the forecast year. If the forecast indicates that the existing and scheduled landfill gas collection and control system is not sufficient to maintain emissions of VOC from the landfill below the threshold of 50 tons per year, additional collection and/or control shall be installed within three months of the forecast date to ensure that the VOC emissions do not exceed the 50 tons per year emission limit.   | The permittee projected VOC emissions for the following year to demonstrate that the GCCS is sufficient to maintain actual VOC emissions of less than 50 tons.   | <input checked="" type="checkbox"/> Continuous<br><input type="checkbox"/> Intermittent              |
| [25 Pa. Code §127.511] Monitoring and Related Recordkeeping and Reporting Requirements | Section E, #007                                   | (a) The permittee shall, on a continuous basis, monitor and record the operating temperature of the enclosed flare, in units of degrees Fahrenheit.<br><br>(b) The permittee shall ensure that the enclosed flare (control device) is equipped with all applicable monitoring equipment. Such equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's specifications at all times that the flare is in use.<br><br>(c) The enclosed flare shall maintain for each 3-hour period of operation based on rolling hourly data, an average combustion temperature of no more than 28 deg C (50.4 deg F) below the average combustion temperature during the most recent performance test in which compliance with the destruction/removal was demonstrated. If there has been no performance test, than a minimum temperature of 1,500 deg F (815.6 deg C) will be necessary. | The flare is equipped with all applicable monitoring equipment as required by the permit. Combustion temperature is measured and recorded, and is reviewed regularly to confirm that the combustion temperature is maintained in accordance with the permit. | <input checked="" type="checkbox"/> Continuous <sup>1</sup><br><input type="checkbox"/> Intermittent |

<sup>1</sup> See also regular NSPS operational report for the reporting period.

| Citation  | Permit Section  | Terms & Conditions Contained in the Permit  | Means of Determining Compliance Status   | Compliance with Terms & Conditions was:   |
|---|---|---|--|---|
| <p>[25 Pa. Code §127.511]<br/>Monitoring and Related Recordkeeping and Reporting Requirements</p>                   | <p>Section E, #008</p>  | <p>The permittee shall, on a monthly basis, determine the total amount of landfill gas generated by the landfill and the total amount of landfill gas combusted by the flare. The total volume of landfill gas generated shall be determined by using the EPA Landfill Gas Emissions Model (2.0 or latest version) by inputting actual waste landfilling rates and actual landfill gas (NMOC) concentrations.<br/><br/>Except as provided in 60.752(b)(2)(i)(B),<br/>(a) Each owner or operator seeking to comply with 60.752(b)(2)(ii)(A) for an active gas collection system shall install a sampling port and...<br/>(b) Each owner or operator seeking to comply with 60.752(b)(2)(iii) using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment...<br/>(c) Each owner or operator seeking to comply with 60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment...<br/>(d) Each owner or operator seeking to demonstrate compliance with 60.752(b)(2)(iii) using a device other than an open flare or an enclosed combustor shall...<br/>(e) Each owner or operator seeking to install a collection system that does not meet the specifications in 60.759 or seeking to monitor alternative parameters to those required by 60.753 through 60.756 shall...<br/>(f) Each owner or operator seeking to demonstrate compliance with 60.755(c), shall monitor surface concentrations of methane according to the instrument specifications and procedures provided in 60.755(d)...</p> | <p>LFG generation estimates and LFG flow combusted documented in quarterly reports.</p>  | <p><input checked="" type="checkbox"/> Continuous<br/><input type="checkbox"/> Intermittent</p>             |
| <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.756] Monitoring of Operations</p> | <p>Section E, #009<br/>(LANDFILL OPERATIONS, LANDFILL SURFACE AND ROADWAY, LEACHATE STORAGE, LANDFILL GAS COLLECTION/ REPLACEMENT FLARE</p> | <p>Each wellhead is equipped with the required sampling, temperature, and pressure measuring devices and is monitored monthly (at a minimum) in accordance with the permit.<br/><br/>The enclosed flare is operated and equipped with the required monitoring devices and a data logger to record monitoring data in accordance with the permit.<br/><br/>N/A – The permittee does not use an open flare for landfill gas control.<br/><br/>N/A – The permittee does not use a device other than an enclosed ground flare for landfill gas control.<br/><br/>N/A – The permittee has not installed an alternate collection system and does not seek to monitor alternative parameters.<br/><br/>Surface concentrations are monitored quarterly (at a minimum) in accordance with the permit.</p>  | <p>Each wellhead is equipped with the required sampling, temperature, and pressure measuring devices and is monitored monthly (at a minimum) in accordance with the permit.<br/><br/>The enclosed flare is operated and equipped with the required monitoring devices and a data logger to record monitoring data in accordance with the permit.<br/><br/>N/A – The permittee does not use an open flare for landfill gas control.<br/><br/>N/A – The permittee does not use a device other than an enclosed ground flare for landfill gas control.<br/><br/>N/A – The permittee has not installed an alternate collection system and does not seek to monitor alternative parameters.<br/><br/>Surface concentrations are monitored quarterly (at a minimum) in accordance with the permit.</p> | <p><input checked="" type="checkbox"/> Continuous<sup>1</sup><br/><input type="checkbox"/> Intermittent</p> |

<sup>1</sup> See also regular NSPS operational report for the reporting period.