

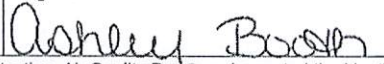


2700-FM-AQ0023 Rev. 1/2008 		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program		
Date(s) of Inspection: 08-11-2021	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input checked="" type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 35-00014 GP3-35-009 GP11-35-009	Expiration Date: 09-29-2020 02-04-2026 02-04-2026	Case #: N/A	PF ID #: 555989
Company Name: Keystone Sani Ldfl Inc.		Municipality: Dunmore Borough		County: Lackawanna		
Plant Name: Keystone Sani Ldfl Inc./Dunmore		Physical Location: 249 Dunham Drive, Dunmore		Federal ID — Plant Code #: 23-2637846-1		
Responsible Official: Joe Dexter (on permit) / Dominick DeNaples Jr.			Mailing Address: 249 Dunham Drive			
Title: Site Manager			Dunmore, PA 18512-2686			
Phone #(s): 570-343-5782			E-Mail Address: dominickd@kslco.com			
Mark (X) All Inspection Types That Apply To This Inspection:						
<input 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) (CTS # _____)	
<input checked="" 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 checked="" type="checkbox"/>	Announced			
Annual Compliance Certification Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A			Date Received: 01-29-2021			
AIMS Report Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A			Date Received: 02-26-2021			
Mark (X) All Activities That Apply:						
<input checked="" type="checkbox"/>	File Review	<input checked="" type="checkbox"/>	Pre-Inspection Briefing	<input checked="" type="checkbox"/>	Exit Interview/Briefing	
<input checked="" 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 <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A						
On Wednesday, August 11, 2021 I arrived at the Keystone Sanitary Landfill ("Facility") in Dunmore Borough, Lackawanna County at approximately 11:00AM and met with Dominick DeNaples Jr. (Site Manager), Brooke Reynolds (Air Quality Manager) and Mike Bair (Gas Management Supervisor) for an announced record review in preparation for a Full Compliance Evaluation ("FCE"), which will be conducted at a later date.						
The last FCE was conducted on 10/12/2018 and finalized on 10/25/2018. It should be noted that the Facility's current Title V ("TV") Operating Permit, 35-00014, expired on 9/29/2020. The Department had timely received a complete permit renewal application from the Facility on 3/27/2020; as such, the Facility is currently operating under Permit Shield. Further, prior to the last FCE the Department had received an Air Quality Plan Approval ("PA") application for the Phase III expansion project; PA 35-00014A has not yet been issued as coordination with the Department's Waste Management program is required for such project. Additionally, on 1/26/2021 the Department had received two (2) General Permit ("GP") renewal applications for the Facility's portable nonmetallic mineral processing plant and corresponding nonroad engines; GP3-35-009 and GP11-35-009 were then issued on 2/5/2021 and are valid through 2/4/2026. Since the last FCE, the Department had also received two (2) Request for Determination ("RFD") applications. RFD 35-0799 was received on 11/202018 and approved the Facility to						
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Company Representative: Dominick DeNaples		Title: Site Manager	Signature: 	Date: 9/16/21		
DEP Representative: Ashley Booth		Title: Air Quality Specialist	Signature: 	Date/Time: 09-13-2021 2:00PM		
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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operate the ammonia air stripper on a limited, as-needed basis; the RFD was issued by the Department on 12/31/2018. Further, RFD 35-0802 was received on 4/10/2019 and approved the Facility to modify the leachate treatment plant's moving bed biological reactor system to a stage 1 oxlc reactor; the RFD was issued by the Department on 4/30/2019. Additionally, all annual Title V emission fees and operating fees have been received since the last FCE.

Since the last FCE, the Department has not requested any stack/source tests; however, in a memorandum dated 10/11/2019, the Department's Source Testing Section deemed the Facility's results from the 8/29-30/2017 stack tests performed on Source IDs 103A & 105A acceptable as representative of emissions at the operating conditions during testing.

It should be noted that since the last FCE the Facility has not added nor modified any sources; however, the owner and operator of the gas-to-electric cogeneration plant (Source ID 101), Keystone Recovery, Inc., permitted under TV 35-00024, permanently ceased operations on May 31, 2020. I was advised that the Facility is still supplying approximately 4,200-4,500 CFM of landfill gas ("LFG") to PEI Power Corp for use in their main boiler; PEI Power Corp's most recent FCE is scheduled for 8/31/2021. Further, the approximate 2,400 CFM of excess LFG that previously supplied Keystone Recovery, Inc. is currently being burned off in the Facility's flare(s) until a new end-user is established.

During my record review I verified that the Facility had submitting the following reports since the last FCE: Quarterly Landfill Gas & Surface Monitoring Reports, Semiannual NSPS, SSMP, & Deviation/Exceedance Reports, Annual Title V Compliance Certifications, and Annual Emission Inventory ("AIMS") Reports. All necessary reports have been submitted and received by the Department, as required. Further, the Facility has not reported any deviations from their permit requirements since their last FCE.

To satisfy recordkeeping requirements within TV 35-00014, the Facility had prepared the following records for my review: Visual emission ("VE")/fugitive emission ("FE")/malodor inspection logs, surface treatment records & invoices, disposal acceptance records, sample homeowner manifests & Form U documents, LFG generation & collection forecast reports, LFG generation, combustion & collection efficiency reports, flare monitoring recordings, Facility-wide forecasted emissions calculations, ammonia air stripper/carbon adsorber logs & emission calculations, oil purchase receipts, and generator operation & maintenance logs. I had reviewed records dated 2018 through present; prior records were reviewed at the last FCE and are available upon request.

Based on the Facility's emission inspection logs the Facility maintains a log of FE & malodor inspections and a separate log of VE inspections. The Facility has a certified VE observer on site, John Burke, whose current certification is valid 4/20/2021-10/20/2021. Overall, records indicate that the Facility conducts emission inspections daily and has not noted any excess emissions since the last FCE.

Additionally, I was advised that there are two (2) continuous technicians on site that conduct daily inspections of the disposal areas and random header readings; the Facility also conducts quarterly surface monitoring to ensure that there are no LFG leaks occurring within the collection system. Based on my review of surface monitoring reports, it appears that any methane concentrations in exceedance of the required operating value have been addressed and corrected within the required time frame allowed by 40 CFR Part 60 Subpart WWW.

Based on the Facility's surface treatment records & invoices, the Facility appears to be recording the necessary information. They utilize water sprays, an on-site water truck, and a rented street sweeper to treat all lots, roadways, and haul roads. They maintain water use reports and street sweeping invoices.

The Facility maintains records of the maximum design capacity and daily records of disposal acceptance records, which are used to calculate daily, monthly, quarterly, and annual totals, and daily averages. I reviewed the Facility's disposal acceptance records dated 2018 through June 2021. Overall, the Facility's disposal acceptance has been within the specified limitations. The 2021 year-to-date total was 892,094.47 tons with a daily average of 5,869 tons/day, as of June 2021. I was informed that the Facility does not acceptant refrigerants nor any other ozone depleting substances; further, they accept only small quantities of asbestos waste from homeowner within the state and drop offs must be scheduled several days in advance to ensure the disposal area is adequately prepared. Further, the Facility maintains a plot map of all collectors/wellheads and asbestos disposal areas, based on GPS coordinates. They also maintain records of collector installations and decommissions as well as homeowner manifests and Form U documents for residential waste drop offs, which include asbestos-containing disposals.

The Facility maintains records of LFG generation, LFG combustion and amount of LFG sent to their end-user(s). I reviewed the Facility's annual LFG generation and collection forecast report(s); based on the 2021 data, the forecasted potential LFG generation was 15,011 CFM while the projected actual LFG generation is 8,852 CFM. As such, the existing and scheduled LFG collection and control system appears to be sufficient to incinerate the collected gases. Further, I reviewed the Facility's monthly collection efficiency reports dated January 2019 through June 2021. Based on the data from June 2021, the Facility generated a total of 471 MMCF LFG and combusted 243,947 MMBTU LFG; as such, the calculated heat value of LFG was 518 BTU/CF. The adjusted total flow rate of LFG was 11,127 SCFM with an average collection efficiency of 75%. Upon review of the most recent quarterly report for the 2nd Quarter 2021, the average monthly collection efficiency was

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78%.

I was advised that each flare is equipped with monitoring equipment that continuously monitor and record the temperature and gas flow rates at each flare in 15-minute increments. The data from the enclosed flares is logged onto SD cards and integrated into a SCADA system; the data from the open flares is also logged onto SD cards, but is not integrated into the SCADA system. I reviewed example records of temperatures and gas flows for each flare between the dates of 9/7/2017 and 8/11/2021. Based on my review of the recorded data, it appears that each flare has achieved and maintained, at minimum, the average combustion temperature achieved during the corresponding performance test.

I reviewed the Facility's potential and actual VOC emissions records dated October 2018 through June 2021. Since the last FCE, the highest 12-month rolling sum of VOC emissions, 20.12 TPY, occurred in February 2020. The calculated maximum potential VOC emissions for 2021 is 23.82 TPY, with a forecasted actual VOC emission of 22.55 TPY. As of June 2021, the facility-wide VOC emissions are 19.32 TPY, based on a 12-month rolling sum. Overall, the Facility's VOC emissions have been well-below the specified limitation of 50 TPY.

During my inspection I was advised that, since the last FCE, the ammonia stripper and carbon adsorber only operated on several dates between 9/29/2020 and 10/26/2020 for a pilot project. Based on my record review, the Facility had maintained records of pressure drop, wastewater pH, flow rate, and bed temperatures during the period that the ammonia stripper and carbon adsorber were operative. Further, as of June 2021 the 12-month rolling sum of VOC and NH₃ emissions for the ammonia stripper/carbon adsorber were 0.000 TPY and 0.013 TPY, respectively. Maintenance on the ammonia stripper, carbon adsorber, and corresponding measuring equipment has not been necessary since the last FCE.

I was advised that the underground oil storage tanks are not equipped with meters to monitor the daily oil usage; instead, the Facility calculates usage based on deliveries and tank capacities. I reviewed the Facility's purchase quantities for each tank from 2019 through 2021. As of June 2021, the Facility has purchased 6,000 gallons of hydraulic oil and 8,000 gallons of motor oil.

Per TV 35-00014 Section H, the six (6) diesel-fired generators are regulated under 40 CFR Part 63 Subpart ZZZZ. I was advised that the generators are typically only operated for emergency use, maintenance, and testing. The Facility is recording all meter readings whenever generators are operated. Since the last FCE Generator #1 (308 HP Generac) and Generator #2 (535 HP Onan) operated for non-emergency use for 6.5 hours (260 to 266.5 hr.) and 7.7 hours (2811 to 2818.7), respectively. Based on the Facility's generator maintenance logs, it appears that the engines are being maintained as required. The last annual servicing was conducted on 8/4/2020 and the next is scheduled to be conducted within the next few weeks. Further, I was provided with a certification that specified that the diesel on site meets the 15-ppm sulfur limitation.

Further, to satisfy recordkeeping requirements within GP11-35-009, the Facility had prepared the following records for my review: operation hours, fuel usage, GPS coordinates and relocation dates of each engine. The Facility is maintaining daily records of the numbers of hours that each engine is operated as well as the amount of fuel used for each unit. The Facility is also maintaining records of dates and GPS coordinates in which each engine/equipment is relocated. I reviewed the Facility's daily logs, dated 10/23/2018 through 7/13/2021, for the portable crushing plant, operating under GP3-35-009 & GP11-35-009. Prior records were reviewed at the last FCE and are available upon request.

At the time of this Routine Partial ("RTPT") Inspection the Facility is in compliance with the recordkeeping and reporting requirements within operating permits TV 35-00014, GP3-35-009, and GP11-35-009. Full Compliance Evaluation will be completed upon review of sources and semiannual surface monitoring. No visible emissions, fugitive emissions, nor malodors were observed during my inspection. No violations noted. Nothing else follows.

OB

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