

2700-FM-AQ0023 Rev. 1/2008 			INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program	
Date(s) of Inspection: 08-24-2021		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 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) (CTS #_____)
<input type="checkbox"/> Routine/Partial (RTPT)	<input checked="" type="checkbox"/> Follow-Up Inspection (Ref. Date: <u>08-11-2021</u>)	<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 checked="" 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 checked="" type="checkbox"/> Other: Surface Monitoring

Comments/Recommendations:

Enforcement since last FCE ☐ Yes ☒ No ☐ 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"). At the time of the Routine Partial ("RTPT") Inspection, the Facility was in compliance with the recordkeeping and reporting requirements within operating permits TV 35-00014, GP3-35-009, and GP11-35-009.

On Tuesday, August 24, 2021 I arrived at the Facility at approximately 10:00AM and again met with Dominick DeNaples Jr., Brooke Reynolds, and Mike Bair for an announced FCE. While on site I performed semi-annual surface methane monitoring using the FID unit. Weather conditions were partly cloudy and 72°F with SW winds of approximately 2 mph. All twenty-four (24) inspected well heads located on Logan were below the 500 ppm CH₄ emission limitation. Surface Methane Monitoring Field Sheet attached. Further, the Facility conducts quarterly surface monitoring to ensure that there are not any leaks occurring from the collection system. During my record review, it appeared that any methane concentrations found in exceedance of the 500 ppm CH₄ limitation had been addressed and corrected within the required time frame allowed by 40 CFR Part 60 Subpart WWW.

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
Company Representative: Dominick DeNaples, Jr.	Title: Site Manager
DEP Representative: Ashley Booth	Title: Air Quality Specialist

Signature:

Signature:

Date:
9-16-21

Date/Time:
09-14-2021 12:00PM

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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In addition to surface monitoring of the landfill, I observed all of the Facility's permitted sources including the methane gas boiler & leachate pre-treatment plant, five (5) enclosed flares, quarry operations, five (5) storage tanks, and five (5) of six (6) diesel-fired emergency generators. While I did not observe the three (3) permitted open flares, I was informed that there have not been any changes. I also observed the portable processing plant associated with GP3-35-009 and GP11-35-009.

At the time of inspection, I was advised that the boiler is primarily fired on natural gas but is also equipped and permitted to combust landfill gas; the generated heat is used in the leachate treatment process. Further, the leachate pre-treatment plant, which consists of the ammonia air stripper and carbon adsorber, is permitted to operate on an as-needed basis and, since the last FCE, was only utilized on several dates between 9/29/2020 and 10/26/2020 for a pilot project. It should also be noted that the Facility's leachate has historically been stored in open lagoons, which have been previously discussed with the Department; the Department's will review the current Best Available Technology ("BAT") requirements and address as necessary at the time of the renewed permit issuance.

I was advised that the Facility typically operates two (2) or three (3) flares daily with flare #4 (Source ID C111) as the primary flare, unless it is under maintenance; flares #2 (Source ID C103A), #3 (Source ID C105A), and #5 (Source ID C110) are then rotated on an as-needed basis. I was also advised that flare #1 (Source ID C106) and all three (3) open flares are utilized as auxiliary flares on an as-needed basis. At the time of inspection, enclosed flares #3, #4 and #5 were operating. I noted no visible flames nor visible emissions at any of the operating flares. Further, all operating flares were maintaining temperatures above the average combustion temperature achieved during the corresponding performance test. Based on the monitoring equipment, flares #3, #4, and #5 were operating at 1651°F, 1605°F, and 1621°F, respectively; further, the flares were operating with flow rates of 2,626 CFM, 3,190 CFM, and 2,231 CFM, respectively. I was advised that each flare is equipped with to utilize propane as an auxiliary fuel. Additionally, in the event of a change in temperature, flow rate, pressure, or flame-out each flare is equipped with interlocks that include automatic shutoffs and automatic pilot ignitions, which allow for a flare to be automatically shut down or started up, as needed.

During my inspection of the quarry operations, the primary plant was actively operating. I observed operative water sprays at various points on the primary crushing plant; while the secondary plant was not operating, I was advised that the dust suppression system is always operative while plant is in operation. I was also informed that the Facility keeps a sufficient quantity of spare nozzles and lines, should they require replacement. I did not verify the makes/models/engines of the inventoried equipment at either plant but was able to account for each type of equipment at the primary plant and discussed both inventory lists with the plant operator. I was informed that there have been no changes to either plant since the last FCE.

I observed five (5) of the six (6) emergency generators, which were not operating at the time of inspection. I was advised that the generators are only operated for emergency use, maintenance, and testing. I did not thoroughly inspect each plate/sticker on every individual generator/engine but was informed that there have been no changes to the units since the last FCE. I was advised that since the last FCE the Facility operated generators #1 (308 HP Generac) and #2 (535 HP Onan) for non-emergency use for 6.5 hours and 7.7 hours, respectively. At the time of inspection, the hour meters on the 308 HP Generac, 535 HP Onan, and 878 HP Detroit generators read 266.5 hours, 2,818.7 hours, and 500.99 hours, respectively. Further, the hour meters on the 605 HP Onan and 325 HP Kohler read 470.0 hours and 52.0 hours, respectively. Because the 580 HP McGraw-Edison generator is portable and not assigned to a specific area, I did not observe the associated hour meter. The Facility also has one (1) 15 KW natural gas-fired emergency generator that I did not observe. Based on the meter readings at the time of inspection and record review, the Facility appears to be in compliance with the 100 hour per year limit for maintenance and testing, as required by 40 CFR Part 63 Subpart ZZZZ.

During my inspection the portable processing plant and corresponding nonroad engines associated with GP3-35-009 and GP11-35-009 were actively operating with the presence of water sprays. Though GP3-35-009 permits the operation of one (1) McCloskey J50 crusher, one (1) McCloskey ST80 stockpiling conveyors, and two (2) McCloskey J50 integrated conveyors, I only observed the McCloskey Crusher and McCloskey ST80 conveyor. Additionally, due to safety I did not verify sticker/plate placement on the equipment's associated engines. However, I was advised that there have not been any additions nor withdrawals of equipment/engines, changes to the operations of the equipment nor materials processed since the last FCE, which would require notification to the Department.

During my inspection the underground gasoline storage tank (Source ID 019) contained gasoline but was not being filled nor emptied. As such, I was unable to verify that the delivery tank, return line, nor vapor balance line were vapor tight. Based on notes from the last FCE, the inspector was previously informed that the underground tank is equipped with a submerged fill pipe and both the pressure and vacuum valves on the tank are set to release at 3-to-5 PSI. Additionally, the two (2) above-ground diesel storage tanks (Source ID 022) both contained diesel fuel but were not being filled nor emptied at the time of inspection. I was advised that neither tank is equipped with a vapor loss control device; however, due to the low vapor pressure of diesel fuel in combination with the 10,000-gallon and 12,000-gallon tank capacities,

Company – plant name:
Keystone Sani Ldfl Inc./Dunmore

Initials of representative interviewed:
DDJ / BR / MB

Date:
08-24-2021

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It does not appear that these tanks require such device(s). Further, the underground oil storage tanks (Source IDs 020 & 021) contained hydraulic oil and motor oil but were not being filled nor emptied at the time of inspection. I was advised that neither tank is equipped with a meter to monitor daily oil usage; instead, the Facility calculates usage based on deliveries and tank capacities. The Facility only utilizes the gasoline, diesel, hydraulic oil, and motor oil for onsite equipment and does not sell to outside companies. I was advised that there have been no changes to any of the storage tanks since the last FCE.

Through the duration of my inspection I observed several speed-limit signs, actively operating water spray(s) and water truck(s), and trucks utilizing the tire wash station prior to leaving the Facility. I noted no uncovered trucks on site nor any tracking of earth or other material.

Overall, I did not note any visible emissions, fugitive emissions nor odors during this inspection. Further, based on my observations, discussions, and record review the Facility appears to be operating and maintaining all sources in a manner consistent with good operating and maintenance practices.

In combination with the RTPT inspection conducted on August 11, 2021 this inspection concludes the Full Compliance Evaluation for Keystone Sani Ldfl Inc./Dunmore. At the time of this inspection, the Facility is in compliance of all conditions within Title V Operating Permit 35-00014, GP3-35-009, and GP11-35-009. No violations noted. Nothing else follows.

CB

Company – plant name:
Keystone Sani Ldfl Inc./DunmoreInitials of representative interviewed:
DDJ / BR / MBDate:
08-24-2021

Surface Methane Monitoring
Calibration Form



Site: Keystone Sani Ldfl Inc/Dunmore

Date: 8-24-2021

Model: TVA-1000

Serial #: 000040149883

Weather: Partly Cloudy, 72°F

Wind: ~2 mph SW

Zero Accepted (Y/N): Y

Span Accepted (Y/N): Y

Response Time (450 ppm)

T₁: 3.38 sec

T₂: 3.25 sec

Avg Response: 3.55 sec

T₃: 4.02 sec

Ok if response is <30 sec

Calibration Precision (500 ppm)

R₁: 498 ppm

R₂: 499 ppm

R₃: 498 ppm

$$\frac{|500-R_1| + |500-R_2| + |500-R_3|}{3(500)} \times 100 = \underline{0.33} \%$$

Ok if deviation is <10%

Calibrated by: Ashley Booth, AQS

Surface Methane Monitoring Field Sheet



Landfill/Source	Keystone Sanitary Landfill Inc.	Inspection Date	8-24-2021
Specialist	Ashley Booth	Date Instrument was last calibrated	8-24-2021
Background Location	Main Office Parking Lot, KSL	Background Value (FID Reading ppm)	-2.76 ppm

Time	Location	FID Reading ppm	Comment
~10:45AM	Logan, Well #52	-2.51	N/A
	Logan, Well #58A	-2.71	
	Logan, Well #53	-0.71	
	Logan, Well #59A	-2.67	
	Logan, Well #54	-2.80	
	Logan, Well #60A	-2.78	
	Logan, Well #49	-2.66	
	Logan, Well #48	-2.73	
	Logan, Well #39	-1.93	
	Logan, Well #40	-2.73	
	Logan, Well #41	-2.74	
	Logan, Well #25	-2.76	
	Logan, Well #26	-1.08	
	Logan, Well #24	-2.77	
	Logan, Well #23	-1.97	
	Logan, Well #21	-2.60	
	Logan, Well #20	-2.70	
	Logan, Well #56	107	
	Logan, Well #57	-2.63	
	Logan, Well #18	-2.76	

		Logan, Well #37	-1.95		
		Logan, Well #36	-2.73		
		Logan, Well #51	-2.59		
~11:45AM		Logan, Well #57A	-1.97	N/A	