

SCS ENGINEERS

February 23, 2018
File No. 02217001.00

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

Subject: Title V Annual Compliance Certification Report – 2017
IESI PA Bethlehem Landfill (Permit # 48-00027)

Dear Mr. Wejkszner:

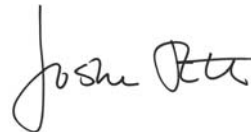
SCS Engineers is pleased to submit the Annual Compliance Certification report for the IESI PA Bethlehem Landfill.

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: US EPA, Region III

Enclosures

EXHIBIT

BLC 62





PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY
COMPLIANCE CERTIFICATION FORM
(25 Pa. Code § 127.513)


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

For the period of **January 1, 2017 through December 31, 2017**, **IESI PA Bethlehem Landfill** has been in continuous compliance with all applicable requirements of **Permit # 48-00027**, determined by the method(s) of compliance specified in said permit, except for the following potential deviations:

Sect./ Cond. #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Date(s) and Duration(s)	Corrective Action(s) and Comments
-N/A-						

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:	Mr. Don Hallock	Title:	District General Manager
Signed:		Date:	2/21/2018

*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 § 121.1] (Definitions)	Section B, #001	Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Property Rights)	Section B, #002	This permit does not convey property rights of any sort, or any exclusive privileges.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.446(a) and (c)] (Permit Expiration)	Section B, #003	This operating permit is issued for a fixed term of five years and shall expire on the date specified on Page 1 of this permit. The term and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided...	An application for renewal of the permit was submitted on October 3, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B, #004	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least 6 months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is...	An application for renewal of the permit was submitted on October 3, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.450(a)(4) & 127.464(a)] (Transfer of Ownership or Operational Control)	Section B, #005	(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if...	N/A. No change in ownership or operational control.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B, #006	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department...	Site access granted as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B, #007	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following...	Compliance with specific permit conditions is addressed on a condition-by-condition basis as each condition is set forth in Sections C through E.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.512(c)(2)] (Need to Halt or Reduce Activity Not a Defense)	Section B, #008	It shall not be defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B, #009	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit...	Requested information provided in reasonable timeframe.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.463, 127.512(c)(3) & 127.542] (Reopening and Revising the Title V Permit for Cause)	Section B, #010	(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification...	N/A. Permit not modified, revoked, reopened and reissued or terminated for cause.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.543] (Reopening a Title V Permit for Cause by EPA)	Section B, #011	As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures...	N/A. Permit not reopened and reissued, revoked or terminated for cause by EPA	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.541] (Significant Operating Permit Modifications)	Section B, #012	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications...	N/A. No significant permit modifications were completed during reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.1 & 127.462] (Minor Operating Permit Modifications)	Section B, #013	(a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462. (b) Unless precluded by the Clean Air Act...	N/A. No minor permit modifications were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.450] (Administrative Operating Permit Amendments)	Section B, #014	(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments...	N/A. No administrative operating permit amendments were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.512(b)] (Severability Clause)	Section B, #015	The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B, #016	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees)...	Fees paid as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B, #017	(a) This permit authorizes De Minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification...	Any De Minimis emission increases occurred in accordance with the permit and RFD submitted to the Department.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B, #018	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five years, if the source is reactivated in accordance with the requirements...	No sources reactivated during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B, #019	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B, #020	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection...	Reports are submitted to the appropriate address.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(c) & 127.463(3), Chapter 139; §§ 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B, #021	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures...	Emissions monitoring conducted in compliance with the Title V Permit and additional applicable requirements promulgated under the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B, #022	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit)...	Records maintained and provided if and when requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)] (Reporting Requirements)	Section B, #023	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional...	All reports were submitted as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B, #024	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certification of compliance with the terms and conditions in this permit...	Reporting completed and submitted to PADEP and EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.3] (Operational Flexibility)	Section B, #025	(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act ...	N/A. No changes made.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B, #026	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident...	N/A. IESI Bethlehem Landfill not currently subject to this requirement per the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(e)] (Approved Economic Incentives and Emission Trading Programs)	Section B, #027	No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)] (Permit Shield)	Section B, #028	(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code §121.1) as of the date of permit issuance if either of the following applies...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #001	(a) The permittee may not permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following...	No fugitive emissions were emitted from sources other than those listed in the permit. Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.2] (Fugitive Particulate Matter)	Section C, #002	The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C, Site Level Requirement, Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No instances of fugitive particulate matter which passed beyond the landfill's perimeter were observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C, #003	MALODOR EMISSIONS The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source...	IESI Bethlehem Landfill performs weekly odor monitoring, at a minimum. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent <i>[Reference also Section C #010, #012, & #013]</i>
[25 Pa. Code §123.41] (Limitations)	Section C, #004	(a) A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period...	Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.42] (Exceptions)	Section C, #005	(a) The limitations of SECTION C, Site Level Requirement, Condition #004 shall not apply to a visible emission in any of the following: (1) When the presence of uncombined water...	N/A. Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513] (Compliance Certification)	Section C, #006	The reporting period for the Certificate of Compliance required by Condition #24 of Section B shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1st.	An annual compliance certification was submitted to the PADEP by March 1.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ 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 §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #007	All sampling, testing and analyses performed in compliance with the requirements of any section of this permit shall be done in accordance with General Title V requirement #021.	Monitoring and testing procedures followed permit and CAA requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #008	(a) If required by the Department, the permittee shall perform a stack test, within the time frame specified by the Department. (b) All performance tests shall be conducted in accordance with 40 CFR Part 60, Section 60.754 and...	N/A. No stack test required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.43] (Measuring Techniques)	Section C, #009	(a) Visible emissions may be measured using either of the following: (1) A device approved by the Department and maintained to provide accurate opacity measurements. (2) Observers trained and qualified...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No visible emissions observed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #010	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall conduct weekly inspections of the facility, during daylight hours when the plant is in operation, to detect visible, fugitive and malodor emissions as follows...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No malodors were detected during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #011	All records, reports and analyses results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with General Title V Requirement #022, Section (b), and shall be made...	The permittee makes all records available to the Department within a reasonable time frame.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #012	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall, at the conclusion of each weekly inspection, record all occurrences of fugitive and visible emissions, and malodors which deviate from the limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #013	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) On a semi-annual basis, the permittee shall compile a report of all logged instances of deviation of the fugitive, visible and malodor emission limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No fugitive, visible or malodor exceedances were observed during regular reporting.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §135.21] (Emission Statements)	Section C, #014	(a) Except as provided in subsection (d), this section applies to stationary sources or facilities: (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious,...	Annual Emission Statement report submitted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.3] (Reporting)	Section C, #015	(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year...	N/A. No source report required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #016	(a) 25 Pa. Code 123.1(c) requires the person responsible for sources with fugitive emissions potential to take all reasonable actions to prevent particulate matter from becoming airborne...	Fugitive dust control measures implemented per 25 Pa. Code 123.1(c), as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #017	(a) A person responsible for any source specified in SECTION C, Site Level Requirement, Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not limited to, the following: (1) Use, where possible, of water or chemicals...	Water used on all roads and parking areas, as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #018	The active collection systems must meet the following: (a) Demonstrate that the siting of active collection wells, horizontal collectors, surface collectors, or other extraction devices is of sufficient density throughout...	Active LFG collection system designed and sited in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #019	Open storage (ponding or open top tanks) of leachate and/or condensate shall not be permitted except in an emergency.	No open storage of leachate or condensate at the IESI Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #020	Uncontrolled stripping of VOC from the leachate and/or condensate shall not be permitted.	No uncontrolled stripping of VOC from leachate or condensate at the IESI Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §129.14] (Open Burning Operations)	Section C, #021	(a) Air basins. No person may permit the open burning of material in an air basin. (b) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from...	Open burning is strictly prohibited at the IESI Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	Within thirty months from the start of waste placement in a cell, interim gas extraction components (vertical wells, horizontal collectors, or other acceptable collection device) shall be installed. Effective capture of landfill gas...	Extraction components of the LFG collection system installed and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	The permittee shall maintain and demonstrate that the active gas collection system has an overall collection efficiency which is based on at least 80% collection efficiency for the Phase IV landfill area and at least 75% collection efficiency for all other landfill areas.	Collection efficiency is maintained per the permit, estimated quarterly, and reported to PADEP on a quarterly basis.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	(a) The landfill shall submit to the Department a collection and control system plan, or submit a collection and control plan for an alternative design prepared by a professional engineer...	Collection and control system plan submitted to PADEP.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	The owner/operator shall forecast, on an annual basis, the landfill gas generation and collection for the following year. If the forecast indicates...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is monitored and recorded. The current LFG forecast indicates that the capacity of the existing IESI flare is sufficient to control collected LFG.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #001	(a) For paved roadways, the following records shall be maintained on-site and be made available to the Department upon request: (1) Daily log of time and location of any water flushing or vacuum sweeping conducted...	The permittee maintains records of water flushing, and other dust suppression activities per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #002	(a) The owner/operator shall comply with the fugitive emission standards established in this permit. All reasonable actions shall be taken to prevent particulate matter from becoming airborne. (1) All roadways shall be maintained.....	Dust suppression activities conducted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	Emission Limits for Diesel Engines: (a) Any diesel engine for which construction commenced on or after July 1, 1972 and best available technology requirements...	The permittee maintains records demonstrating that annual operating hours for the engine < 1,850 thus NOx and/or CO emissions controls not required. Vendor guarantees confirm that engine emissions are within applicable limits. The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	(a) For a new diesel-fired internal combustion engine installed in accordance with Condition #001 and which has a rated capacity equal to or less than 500 brake horsepower, vendor guarantees shall...	Vendor guarantees confirm that NOx emissions are within the applicable limit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	(a) The permittee shall maintain accurate records, which, at a minimum, shall include: (i) The number of hours per calendar year that each engine or piece of equipment operated using non-resettable hour meter. (ii) The amount of fuel used per calendar year in each engine or piece of equipment....	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	(a) Any applicant authorized to operate a diesel-fired internal combustion engine under this Operating Permit must comply with the terms and conditions of this permit...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	To ensure compliance with SECTION C, Site Level Requirement, Conditions #001, #002, & #004, the permittee shall operate a water spray dust suppression system per SECTION D, Condition #012.	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	The operation of a portable nonmetallic mineral processing plant shall not at any time result in the emission of: (a) Fugitive air contaminants in excess of the limitations specified in 25 Pa. Code §§123.1 and 123.2...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	(a) These sources are limited to the operation of the portable nonmetallic mineral processing plant which is located at the site for which this permit is issued (1) “Nonmetallic mineral processing plants”, as defined in 40 CFR §60.671...	This condition simply incorporates definitions from the relevant EPA standard.	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent N/A
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.672] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Standard for Particulate Matter)	Section D, #004	(a) The operation of a portable nonmetallic mineral processing plant shall no cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which (i) Contain particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf); and...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.675] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Test Methods and Procedures)	Section D, #005	(a) If required, the owner or operator shall determine compliance with the opacity standards in Condition #002(a) of this Section D using Method 9 and procedures in 40 CFR Part 60, §60.11. (b) If required to determining compliance with Condition #002(c) of this Section D, the owner or operator shall use Method 22 to determine fugitive emissions...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.675] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Test Methods and Procedures)	Section D, #006	(a) In conducting the performance tests required by 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods of Appendix A of 40 CFR Part 60 or other methods and procedures as approved by the Department or the Environmental Protection Agency...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #007	(a) Any permittee which uses a wet scrubber, baghouse, or dust suppression system to control emissions shall calibrate, maintain and operate the following monitoring devices: (1) A device for the continuous measurement of pressure loss...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #008	The permittee shall comply with applicable monitoring, recordkeeping and reporting requirements set forth in 25 Pa. Code Chapter 139 (relating to sampling and testing), the Air Pollution Control Act (35 P.S. §4001 et seq.), the Clean Air Act (U.S.C. §7401 et seq.), and...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #009	The permittee shall notify the Department, by telephone, within 24 hours of the discovery of any malfunction of a portable nonmetallic mineral processing plant or any malfunction of an associated air cleaning device...	N/A. This source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.676] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Reporting and Recordkeeping)	Section D, #010	(a) Each owner or operator seeking to comply with 60.670(d) shall submit to the Department and EPA the following information about the existing source being replaced and the replacement piece of equipment: (1) For crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck...	N/A. No replacement of equipment occurred during the period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.676] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Reporting and Recordkeeping)	Section D, #011	Pursuant to the federal New Source Performance Standards under 40 CFR §60.4, the permittee shall submit copies of all requests, reports, applications, submittals, and other communications to both EPA and appropriate Regional Office of the Department...	Where required, submittals made to both the PADEP and EPA in accordance with the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #012	Water spray dust suppression systems on portable nonmetallic mineral processing plants shall be operated on any an all occasions that the respective plant is operated...	N/A. This source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #013	The permittee shall keep on hand such equipment and materials as are necessary to take reasonable action (including, but not limited to the application of water, oil or chemicals) to prevent fugitive particulate matter...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #014	Any portable nonmetallic mineral processing plant and any associated air cleaning devices shall be (a) Operated in such a manner as not to cause air pollution...	N/A. This source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #015	This source consists of the following Crushers: (a) One (1) Fintech, Model #1107 Crusher. This source consists of the following Screens: (a) One (1) 4'x8' Two Deck Screen.	This condition simply defines the equipment associated with the plant.	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent N/A

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #016	Wherever a conflict occurs between this Operating Permit and any of the regulations listed below, the permittee shall, in all cases, meet the more stringent requirement...	Permittee maintains compliance with more stringent requirements, as necessary.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #001 (Source IDs 001, 002, 004, C002)	(a) In addition to the visible emission limitations of 25 Pa, Code, Section 123.41, the control device shall also be subject to the following additional limitation: (1) No flare shall produce visible flames...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No visible emissions observed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1975] (Subpart AAAA – NESHAP: MSW Landfills – How Do I Calculate the 3-hour Block Average Used to Demonstrate Compliance?)	Section E, #002 (Source IDs 001, 002, 004, C002)	Averages are calculated in the same way as they are calculated in 40 CFR part 60, subpart WWW, except that the data collected during the events listed in paragraphs (a), (b), (c), and (d) of this section are not included in any average computed under this subpart...	3-hr block averages calculated per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #003 (Source IDs 001, 002, 004, C002)	The following requirements are hereby established for the flare: (a) The flare must be an enclosed ground type which is shrouded with no visible flame shooting from the flare...	The flare is designed, equipped, and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #004 (Source IDs 001, 002, 004, C002)	Source tests shall be conducted on a new or modified flare within 120 days after start-up for: a) either reduction of NMOC by 98 weight percent or reduction of the outlet NMOC concentration to less than 20 parts per million by volume...	N/A. No new or modified flare.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.754] (Subpart WWW – NSPS for MSW Landfills – Test Methods and Procedures)	Section E, #005 (Source IDs 001, 002, 004, C002)	(a)(1) The landfill owner or operator shall calculate the NMOC emission rate using either the equation provided in paragraph (a)(1)(i) of this section or the equation provided in paragraph (a)(1)(ii) of this section. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for Lo, and 4,000 parts per million by volume as hexane for CNMOC...	N/A. The NMOC emission rate was estimated in accordance with the permit and NSPS prior to this reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Operating Permit Terms and Conditions)	Section E, #006 (Source IDs 001, 002, 004, C002)	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 schedule collection system configurations for the forecast year...	The permittee completed an annual forecast of VOC emissions for the following year in conjunction with the annual AIMS report.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #007 (Source IDs 001, 002, 004, C002)	(a) The permittee shall, on a continuous basis, monitor and record the operating temperature of the enclosed flare, in units of degrees Fahrenheit. (b) The permittee shall ensure that the enclosed flare (Control Device) is equipped with all applicable monitoring equipment...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #008 (Source IDs 001, 002, 004, C002)	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 using the EPA Landfill Gas Emissions Model (2.0 or latest version)...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is documented during routine landfill inspections. The permittee submits reports quarterly to PADEP documenting LFG generation rates and LFG collection.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (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 a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads subject to the provisions of the NSPS are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) A temperature monitoring device equipped with a continuous recorder and having an accuracy of 1 percent of the temperature being measured expressed in degrees Celsius or 0.5 C, whichever is greater...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(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...	N/A. The Permittee does not utilize an open flare for NSPS compliance.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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 provide information satisfactory to the Administrator...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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 provide information...	Alternate collection components and/or monitoring procedures are outlined in semi-annual NSPS operational reports, as appropriate.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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). Any...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #010 (Source IDs 001, 002, 004, C002)	Temperatures shall be recorded whenever the flare is in operation. The recording charts or an electronic version shall be made available to the Department upon request...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ See also regular NSPS operational reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §135.5] (Recordkeeping)	Section E, #011 (Source IDs 001, 002, 004, C002)	Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.758] (Subpart WWW – NSPS for MSW Landfills – Recordkeeping Requirements)	Section E, #012 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator of an MSW landfill subject to the provisions of 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #013 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(3)(iv)] If an action taken by the permittee during startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's...	N/A. All SSM events consistent with procedures specified in the SSM plan. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.402] (General Provisions)	Section E, #014 (Source IDs 001, 002, 004, C002)	An application, form, report or compliance certification submitted under this subchapter shall contain certification by a responsible official as to truth, accuracy and completeness...	All submissions of an application, form, report or compliance certification certified by a responsible official.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #015 (Source IDs 001, 002, 004, C002)	This landfill is subject to 40 CFR Part 60 Subpart WWW of the Standards of Performance for New Stationary Sources and shall comply...	All requests, reports, applications, etc., submitted to EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #016 (Source IDs 001, 002, 004, C002)	The permittee shall, on a quarterly basis, submit a report demonstrating that the collection/capture efficiency of the landfill gas collection system was in compliance during the preceding three months...	Collection efficiency of LFG system estimated quarterly and reported to PADEP.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)	Section E, #017 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator subject to the requirements of this subpart shall submit an initial design capacity report to the Administrator...	N/A. Initial design capacity report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Each owner or operator subject to the requirements of this subpart shall submit an NMOC emission rate report to the Administrator initially and annually thereafter, except as provided for in paragraphs...	NMOC emission rate estimated and the report submitted in accordance with the permit and NSPS prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Each owner or operator subject to the provisions of 60.752(b)(2)(i) shall submit a collection and control system design plan to the Administrator within one year of the first report, required under paragraph (b) of this section...	N/A. Submission of the collection and control system design plan was not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(d) Each owner or operator of a controlled landfill shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The administrator may request additional information as may be necessary...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator of a controlled landfill shall submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment...	N/A. No control equipment removal during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Each owner or operator of a landfill seeking to comply with 60.752(b)(2) using an active collection system designed in accordance with 60.752(b)(2)(ii) shall submit to the Administrator annual reports...	NSPS operational reports submitted semi-annually to PADEP and EPA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(g) Each owner or operator landfill seeking to comply with 60.752(b)(2)(i) shall include the following information with the initial performance test report required under 60.8: (1) A diagram of the collection system...	N/A. Initial report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1965] (Subpart AAAA – NESHAP: MSW Landfills – What is a Deviation?)	Section E, #018 (Source IDs 001, 002, 004, C002)	A deviation is defined in Sec. 63.1990. For purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of this section. (a) A deviation occurs when the control device operating parameter boundaries...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.752] (Subpart WWW – NSPS for MSW Landfills – Standards for Air Emissions from MSW Landfills)	Section E, #019 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...	N/A. Not required during the reporting period. Landfill is greater than 2.5 million Mg capacity and, thus, subject to the NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operation Standards for Collection and Control Systems)</p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002)</p>	<p>Each owner or operator of an MSW landfill gas collection and control system used to comply with the provisions of 60.752(b)(2)(ii) of this subpart shall:</p> <p>(a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill...</p>	<p>LFG collection and control system installed and operated in accordance with the permit and NSPS. A site plan showing updated LFG system layout submitted with semi-annual NSPS operational reports.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(b) Operate the collection system with negative pressure at each wellhead except under the following conditions:</p> <p>(1) A fire or increased well temperature. The owner or operator shall record instances...</p>	<p>The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operation Standards for Collection and Control Systems)</p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002) <i>continued...</i></p>	<p>(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well...</p>	<p>The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with NSPS default thresholds for oxygen/nitrogen and temperature or in accordance with approved HOVs for select operating wells. In other instances, wellheads are temporarily decommissioned due to declining flows in accordance with PADEP approved procedures¹. Under these procedures, exceedances of the NSPS pressure and oxygen levels are not deviations.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

¹ See also regular NSPS operational reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<i>continued...</i>		(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system design and operated in compliance in compliance with 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit and NSPS. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and NSPS and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action shall be taken...	NSPS monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)	Section E, #021 (Source IDs 001, 002, 004, C002)	(a) Except as provided in 60.752(b)(2)(i)(B), the specified methods in paragraphs (a)(1) through (a)(6) of this section shall be used to determine whether the gas collection system is in compliance with 60.752(b)(2)(ii)...	Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit and NSPS (and documented in semi-annual NSPS operational reports).	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) For purposes of compliance with 60.753(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.752(b)(2)(i). Each well shall...	Wells installed and operated in accordance with NSPS schedule and approved design plan. A site plan showing the GCCS layout, system expansion, etc., reported in semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(c) The following procedures shall be used for compliance with the surface methane operational standard as provided in 60.753(d). (1) After installation of the collection system...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices...	SEM is conducted in accordance with NSPS methods and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) The provisions of this subpart apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction, shall not exceed 5 days for collection systems...	Records maintained of all SSM events; summary of SSM events documented in semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.759] (Subpart WWW – NSPS for MSW Landfills – Specifications for Active Collection Systems)	Section E, #022 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with 60.752(b)(2)(i) shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas...	Active LFG collection system designed, sited, and constructed in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall construct the gas collection devices using the following equipment or procedures: (1) The landfill gas extraction components...	Active LFG collection system constructed and equipped in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ See also regular NSPS operational reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(c) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall convey landfill gas to a control system in compliance with 60.752(b)(2)(iii) through collection header pipe(s). The gas mover equipment shall be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment...	Active collection system conveys LFG to a control system via a header pipe in accordance with the permit and the NSPS. Gas mover equipment of the LFG system is sized in accordance with the permit and to meet or exceed NSPS requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 61 NESHAPs §40 CFR 61.12] (Subpart A – General Provisions – Compliance with Standards and Maintenance Requirements)	Section E, #023 (Source IDs 001, 002, 004, C002)	In accordance with 40 CFR 61.12(c), the owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice...	Each stationary source is operated and maintained in accordance with the permit and to meet or exceed NESHAP requirements for good air pollution control practices. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of stationary source operation and maintenance.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #024 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(1)(i) and (ii)] (a) During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires the operator reduce emissions from the affected source to the greatest extent...	All SSM events consistent with procedures specified in the SSM plan to be consistent with safe and good air pollution control practices. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

February 27, 2019
File No. 02219002.01

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

Subject: Title V Annual Compliance Certification – 2018
Bethlehem Landfill (Title V Permit No. 48-00027)

Dear Mr. Wejkszner

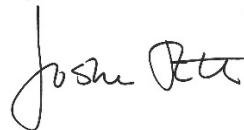
SCS Engineers (SCS) is pleased to submit the Annual Compliance Certification report for the Bethlehem Landfill.

If you have any questions regarding this report, please do not hesitate to contact Mr. David Pannucci at the landfill at (610) 317-3200 or either of the undersigned at (703) 471-6150.

Sincerely,



Ryan Christman, M.S.
Project Professional
SCS Engineers



Joshua G. Roth, P.E.
Vice President
SCS Engineers

cc: US EPA, Region III

Enclosures





PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY
COMPLIANCE CERTIFICATION FORM
(25 Pa. Code § 127.513)

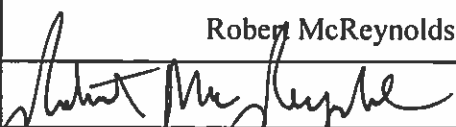
Plant Name:	IESI PA Bethlehem LD/Bethlehem Facility	Owner/Operator:	IESI PA Bethlehem Ldfl Corp
Tax ID/Plant:	22-3575227-1	DEP Facility ID:	549728
Contact Person:	Mr. David Pannucci	Title:	Regional Engineer
Operating Permit #:	48-00027	Phone Number:	(610) 317-3200

For the period of January 1, 2018 through December 31, 2018, IESI PA Bethlehem LD/Bethlehem Facility has been in continuous compliance with all applicable requirements of Permit # 48-00027, determined by the method(s) of compliance specified in said permit, except for the following potential deviations:

Sect./ Cond. #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Date(s) and Duration(s)	Corrective Action(s) and Comments
-See Addendum 1-						

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:	Robert McReynolds	Title:	Division Vice President
Signed:		Date:	2/27/19

*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.*



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

ADDENDUM 1

For the period **01/01/2018 – 12/31/2018**, **IESI PA Bethlehem LD/Bethlehem Facility** 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 potential deviations:

Sect./ Cond #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Dates and Durations	Corrective Action(s)
Section B, #007	25 Pa.Code 127.25, 127.44, & 127.512(c)(1)	General Requirements	The permittee operated an air contamination source in a manner inconsistent with good engineering practices – specifically, intermediate cover did not appear compliant and repairs not adequately documented.	Monthly cover integrity monitoring	Intermittent during the period	The permittee revised its site inspection log to better address and document corrective actions. In April, the permittee began bringing in additional approved clean fill and ensuring the intermediate cover is restored to the required 12” or more. The permittee also utilized additional temporary labor to clean up visible flagging and blown litter. This incident was previously addressed in the PADEP’s May 7, 2018 letter, and reported in the landfill’s semi-annual deviation report dated July 30, 2018.
Section C, #009, #010(a)(2)	25 Pa. Code §123.43, §127.511	Site Level Requirements	The permittee failed to notify the Department of a visible emission event within 4 hours, and arrangements were not made for a certified observer to verify the opacity of the emissions.	Weekly inspections of the facility perimeter	April 2, 2018 (appx. 1.4 hours)	Upon discovery of the visible emissions, corrective actions were implemented immediately to correct a flare malfunction in accordance with the site’s SSM Plan. This included conducting an auto-tune of the automatic flare louvers. Subsequent reprogramming of the flare was also completed in an effort to eliminate the flare louver malfunctions from recurring. This incident was previously addressed in the PADEP’s May 7, 2018 letter, and reported in the landfill’s semi-annual deviation report dated July 30, 2018.



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

ADDENDUM 1 (continued)

For the period **01/01/2018 – 12/31/2018**, **IESI PA Bethlehem LD/Bethlehem Facility** 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 potential deviations:

Sect./ Cond #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Dates and Durations	Corrective Action(s)
Section E, #009(f), #021(c)	40 CFR §60.755 and §60.756	Group 01, Landfill	During the 4 th quarter methane surface emissions monitoring event, monitoring was conducted in general accordance with 40 CFR §60.755(c); however, the initial 10-day recheck was conducted on the eleventh day after the initial exceedance.	Portable analyzer in accordance with 40 CFR §60.755(d)	December 28, 2018	Completed. The initial and one month re-monitoring events were completed and demonstrated that the remedial actions taken had successfully reduced the surface methane levels to within the NSPS threshold. This was previously reported in the landfill's semi-annual deviation report dated January 29, 2019.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code § 121.1] (Definitions)	Section B, #001	Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S § 4003) and 25 Pa. Code § 121.1	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Property Rights)	Section B, #002	This permit does not convey property rights of any sort, or any exclusive privileges.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.446(a) and (c)] (Permit Expiration)	Section B, #003	This operating permit is issued for a fixed term of five years and shall expire on the date specified on Page 1 of this permit. The term and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided...	An application for renewal was submitted on October 3, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B, #004	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least 6 months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is...	An application for renewal was submitted on October 3, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.450(a)(4) & 127.464(a)] (Transfer of Ownership or Operational Control)	Section B, #005	(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if...	N/A. No change in ownership or operational control.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B, #006	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department...	Site access granted as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B, #007	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following...	Compliance with specific permit conditions is addressed on a condition-by-condition basis as each condition is set forth in Sections C through E.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent ¹

¹ See Addendum 1.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.512(c)(2)] (Need to Halt or Reduce Activity Not a Defense)	Section B, #008	It shall not be defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B, #009	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit...	Requested information provided in reasonable timeframe.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.463, 127.512(c)(3) & 127.542] (Reopening and Revising the Title V Permit for Cause)	Section B, #010	(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification...	N/A. Permit not modified, revoked, reopened and reissued or terminated for cause.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.543] (Reopening a Title V Permit for Cause by EPA)	Section B, #011	As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures...	N/A. Permit not reopened and reissued, revoked or terminated for cause by EPA	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.541] (Significant Operating Permit Modifications)	Section B, #012	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications...	N/A. No significant permit modifications were completed during reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.1 & 127.462] (Minor Operating Permit Modifications)	Section B, #013	(a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462. (b) Unless precluded by the Clean Air Act...	N/A. No minor permit modifications were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.450] (Administrative Operating Permit Amendments)	Section B, #014	(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments...	The permittee submitted an administrative amendment on December 3, 2018 to incorporate the applicable conditions of Plan Approval 48-00027A into the operating permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.512(b)] (Severability Clause)	Section B, #015	The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B, #016	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees)...	Fees paid as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B, #017	(a) This permit authorizes De Minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification...	No De Minimis emissions increases occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B, #018	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five years, if the source is reactivated in accordance with the requirements...	No sources reactivated during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B, #019	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B, #020	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection...	Reports are submitted to the appropriate address.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(c) & 127.463(3), Chapter 139; §§ 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B, #021	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures...	Emissions monitoring conducted in compliance with the Title V Permit and additional applicable requirements promulgated under the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B, #022	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit)...	Records maintained and provided if and when requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)] (Reporting Requirements)	Section B, #023	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional...	All reports were submitted as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B, #024	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certification of compliance with the terms and conditions in this permit...	Reporting completed and submitted to PADEP and EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.3] (Operational Flexibility)	Section B, #025	(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act ...	N/A. No changes made.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B, #026	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident...	N/A. Bethlehem Landfill not currently subject to this requirement per the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(e)] (Approved Economic Incentives and Emission Trading Programs)	Section B, #027	No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.	N/A. No permit revisions occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)] (Permit Shield)	Section B, #028	(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code §121.1) as of the date of permit issuance if either of the following applies...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #001	(a) The permittee may not permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following...	No fugitive emissions were emitted from sources other than those listed in the permit. Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.2] (Fugitive Particulate Matter)	Section C, #002	The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C, Site Level Requirement, Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No instances of fugitive particulate matter which passed beyond the landfill's perimeter were observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C, #003	MALODOR EMISSIONS The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source...	Bethlehem Landfill performs weekly odor monitoring, at a minimum. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent <i>[Reference also Section C #010, #012, & #013]</i>
[25 Pa. Code §123.41] (Limitations)	Section C, #004	(a) A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period...	Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.42] (Exceptions)	Section C, #005	(a) The limitations of SECTION C, Site Level Requirement, Condition #004 shall not apply to a visible emission in any of the following: (1) When the presence of uncombined water...	N/A. Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513] (Compliance Certification)	Section C, #006	The reporting period for the Certificate of Compliance required by Condition #24 of Section B shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1st.	An annual compliance certification was submitted to the PADEP by March 1.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ On-site odors were detected in several instances during the regular monitoring conducted by the landfill in accordance with the Title V permit and during PADEP inspections. In each instance, the odors were of limited duration and did not constitute a malodor. Off-site LFG odors were detected in one instance during regular odor patrols. In this instance, the odor was of limited duration and intensity and did not constitute a malodor.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #007	All sampling, testing and analyses performed in compliance with the requirements of any section of this permit shall be done in accordance with General Title V requirement #021.	Monitoring and testing procedures followed permit and CAA requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #008	(a) If required by the Department, the permittee shall perform a stack test, within the time frame specified by the Department. (b) All performance tests shall be conducted in accordance with 40 CFR Part 60, Section 60.754 and...	N/A. No stack test required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.43] (Measuring Techniques)	Section C, #009	(a) Visible emissions may be measured using either of the following: (1) A device approved by the Department and maintained to provide accurate opacity measurements. (2) Observers trained and qualified...	Weekly inspections of visible emissions were conducted by site personnel in accordance with the permit.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent ^{1,2}
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #010	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall conduct weekly inspections of the facility, during daylight hours when the plant is in operation, to detect visible, fugitive and malodor emissions as follows...	The permittee conducts regular (weekly at a minimum) inspections in accordance with the permit.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent ^{1,2}
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #011	All records, reports and analyses results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with General Title V Requirement #022, Section (b), and shall be made...	The permittee makes all records available to the Department within a reasonable time frame.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ During one instance, on April 2, 2018, visible emissions were observed at the flare station during a malfunction of the automatic louvers but were not measured in accordance with Section C, #009(a) or (b). While the landfill did not notify the Department within 4 hours or make arrangements for a certified observer to verify the opacity, the event was corrected in accordance with the SSM Plan in less than 4 hours.

² In one instance during the reporting period, visible emissions at the flare were observed during a routine PADEP inspection. Visible emission readings were taken by a certified observer per EPA Method 9 and confirmed that no exceedances of the visible emission standards occurred.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #012	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall, at the conclusion of each weekly inspection, record all occurrences of fugitive and visible emissions, and malodors which deviate from the limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #013	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) On a semi-annual basis, the permittee shall compile a report of all logged instances of deviation of the fugitive, visible and malodor emission limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.21] (Emission Statements)	Section C, #014	(a) Except as provided in subsection (d), this section applies to stationary sources or facilities: (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious,...	Annual Emission Statement report submitted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.3] (Reporting)	Section C, #015	(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year...	N/A. No source report required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #016	(a) 25 Pa. Code 123.1(c) requires the person responsible for sources with fugitive emissions potential to take all reasonable actions to prevent particulate matter from becoming airborne...	Fugitive dust control measures implemented per 25 Pa. Code 123.1(c), as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #017	(a) A person responsible for any source specified in SECTION C, Site Level Requirement, Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not limited to, the following: (1) Use, where possible, of water or chemicals...	Water used on all roads and parking areas, as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #018	The active collection systems must meet the following: (a) Demonstrate that the siting of active collection wells, horizontal collectors, surface collectors, or other extraction devices is of sufficient density throughout...	Active LFG collection system designed and sited in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

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 C, #019	Open storage (ponding or open top tanks) of leachate and/or condensate shall not be permitted except in an emergency.	No open storage of leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #020	Uncontrolled stripping of VOC from the leachate and/or condensate shall not be permitted.	No uncontrolled stripping of VOC from leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §129.14] (Open Burning Operations)	Section C, #021	(a) Air basins. No person may permit the open burning of material in an air basin. (b) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from...	Open burning is strictly prohibited at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	Within thirty months from the start of waste placement in a cell, interim gas extraction components (vertical wells, horizontal collectors, or other acceptable collection device) shall be installed. Effective capture of landfill gas...	Extraction components of the LFG collection system installed and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	The permittee shall maintain and demonstrate that the active gas collection system has an overall collection efficiency which is based on at least 80% collection efficiency for the Phase IV landfill area and at least 75% collection efficiency for all other landfill areas.	Collection efficiency is maintained per the permit, estimated quarterly, and reported to PADEP on a quarterly basis.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	(a) The landfill shall submit to the Department a collection and control system plan, or submit a collection and control plan for an alternative design prepared by a professional engineer...	Collection and control system plan submitted to PADEP.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	The owner/operator shall forecast, on an annual basis, the landfill gas generation and collection for the following year. If the forecast indicates...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is monitored and recorded. The current LFG forecast indicates that the capacity of the existing flare is sufficient to control collected LFG.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #001	(a) For paved roadways, the following records shall be maintained on-site and be made available to the Department upon request: (1) Daily log of time and location of any water flushing or vacuum sweeping conducted...	The permittee maintains records of water flushing, and other dust suppression activities per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #002	(a) The owner/operator shall comply with the fugitive emission standards established in this permit. All reasonable actions shall be taken to prevent particulate matter from becoming airborne. (1) All roadways shall be maintained.....	Dust suppression activities conducted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	Emission Limits for Diesel Engines: (a) Any diesel engine for which construction commenced on or after July 1, 1972 and best available technology requirements...	The permittee maintains records demonstrating that annual operating hours for the engine < 1,850 thus NOx and/or CO emissions controls not required. Vendor guarantees confirm that engine emissions are within applicable limits. The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	(a) For a new diesel-fired internal combustion engine installed in accordance with Condition #001 and which has a rated capacity equal to or less than 500 brake horsepower, vendor guarantees shall...	Vendor guarantees confirm that NOx emissions are within the applicable limit. The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	(a) The permittee shall maintain accurate records, which, at a minimum, shall include: (i) The number of hours per calendar year that each engine or piece of equipment operated using non-resettable hour meter. (ii) The amount of fuel used per calendar year in each engine or piece of equipment....	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 008 – CAT C9D1 ENGINE - GP9-48-001 [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	(a) Any applicant authorized to operate a diesel-fired internal combustion engine under this Operating Permit must comply with the terms and conditions of this permit...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	To ensure compliance with SECTION C, Site Level Requirement, Conditions #001, #002, & #004, the permittee shall operate a water spray dust suppression system per SECTION D, Condition #012.	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	The operation of a portable nonmetallic mineral processing plant shall not at any time result in the emission of: (a) Fugitive air contaminants in excess of the limitations specified in 25 Pa. Code §§123.1 and 123.2...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	(a) These sources are limited to the operation of the portable nonmetallic mineral processing plant which is located at the site for which this permit is issued (1) "Nonmetallic mineral processing plants", as defined in 40 CFR §60.671...	This condition simply incorporates definitions from the relevant EPA standard.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.672] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Standard for Particulate Matter)	Section D, #004	(a) The operation of a portable nonmetallic mineral processing plant shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which (i) Contain particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf); and...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.675] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Test Methods and Procedures)	Section D, #005	(a) If required, the owner or operator shall determine compliance with the opacity standards in Condition #002(a) of this Section D using Method 9 and procedures in 40 CFR Part 60, §60.11. (b) If required to determine compliance with Condition #002(c) of this Section D, the owner or operator shall use Method 22 to determine fugitive emissions...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.675] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Test Methods and Procedures)	Section D, #006	(a) In conducting the performance tests required by 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods of Appendix A of 40 CFR Part 60 or other methods and procedures as approved by the Department or the Environmental Protection Agency...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #007	(a) Any permittee which uses a wet scrubber, baghouse, or dust suppression system to control emissions shall calibrate, maintain and operate the following monitoring devices: (1) A device for the continuous measurement of pressure loss...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #008	The permittee shall comply with applicable monitoring, recordkeeping and reporting requirements set forth in 25 Pa. Code Chapter 139 (relating to sampling and testing), the Air Pollution Control Act (35 P.S. §4001 et seq.), the Clean Air Act (U.S.C. §7401 et seq.), and...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #009	The permittee shall notify the Department, by telephone, within 24 hours of the discovery of any malfunction of a portable nonmetallic mineral processing plant or any malfunction of an associated air cleaning device...	N/A. This source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.676] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Reporting and Recordkeeping)	Section D, #010	(a) Each owner or operator seeking to comply with 60.670(d) shall submit to the Department and EPA the following information about the existing source being replaced and the replacement piece of equipment: (1) For crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck...	N/A. No replacement of equipment occurred during the period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.676] (Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants – Reporting and Recordkeeping)	Section D, #011	Pursuant to the federal New Source Performance Standards under 40 CFR §60.4, the permittee shall submit copies of all requests, reports, applications, submittals, and other communications to both EPA and appropriate Regional Office of the Department...	Where required, submittals made to both the PADEP and EPA in accordance with the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #012	Water spray dust suppression systems on portable nonmetallic mineral processing plants shall be operated on any an all occasions that the respective plant is operated...	N/A. This source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #013	The permittee shall keep on hand such equipment and materials as are necessary to take reasonable action (including, but not limited to the application of water, oil or chemicals) to prevent fugitive particulate matter...	The source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #014	Any portable nonmetallic mineral processing plant and any associated air cleaning devices shall be (a) Operated in such a manner as not to cause air pollution...	N/A. This source did not operate during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #015	This source consists of the following Crushers: (a) One (1) Fintech, Model #1107 Crusher. This source consists of the following Screens: (a) One (1) 4'x8' Two Deck Screen.	This condition simply defines the equipment associated with the plant.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #016	Wherever a conflict occurs between this Operating Permit and any of the regulations listed below, the permittee shall, in all cases, meet the more stringent requirement...	Permittee maintains compliance with more stringent requirements, as necessary.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #001 (Source IDs 001, 002, 004, C002)	(a) In addition to the visible emission limitations of 25 Pa, Code, Section 123.41, the control device shall also be subject to the following additional limitation: (1) No flare shall produce visible flames...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No visible emissions observed.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1975] (Subpart AAAA – NESHAPE: MSW Landfills – How Do I Calculate the 3-hour Block Average Used to Demonstrate Compliance?)	Section E, #002 (Source IDs 001, 002, 004, C002)	Averages are calculated in the same way as they are calculated in 40 CFR part 60, subpart WWW, except that the data collected during the events listed in paragraphs (a), (b), (c), and (d) of this section are not included in any average computed under this subpart...	3-hr block averages calculated per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ In two instances during the reporting period, visible emissions were observed at the flare. In one instance, on April 2, 2018, visible emissions were observed but not measured because they were immediately corrected. In the second instance, visible emissions at the flare were observed by PADEP personnel during a routine PADEP inspection. Visible emission readings were taken by a certified observer per EPA Method 9 and confirmed that no exceedances of the visible emission standards occurred.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #003 (Source IDs 001, 002, 004, C002)	The following requirements are hereby established for the flare: (a) The flare must be an enclosed ground type which is shrouded with no visible flame shooting from the flare...	The flare is designed, equipped, and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #004 (Source IDs 001, 002, 004, C002)	Source tests shall be conducted on a new or modified flare within 120 days after start-up for: a) either reduction of NMOC by 98 weight percent or reduction of the outlet NMOC concentration to less than 20 parts per million by volume...	N/A. No new or modified flare.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.754] (Subpart WWW – NSPS for MSW Landfills – Test Methods and Procedures)	Section E, #005 (Source IDs 001, 002, 004, C002)	(a)(1) The landfill owner or operator shall calculate the NMOC emission rate using either the equation provided in paragraph (a)(1)(i) of this section or the equation provided in paragraph (a)(1)(ii) of this section. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for Lo, and 4,000 parts per million by volume as hexane for CNMOC...	N/A. The NMOC emission rate was estimated in accordance with the permit and NSPS prior to this reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Operating Permit Terms and Conditions)	Section E, #006 (Source IDs 001, 002, 004, C002)	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 schedule collection system configurations for the forecast year...	The permittee completed an annual forecast of VOC emissions for the following year in conjunction with the annual AIMS report.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #007 (Source IDs 001, 002, 004, C002)	(a) The permittee shall, on a continuous basis, monitor and record the operating temperature of the enclosed flare, in units of degrees Fahrenheit. (b) The permittee shall ensure that the enclosed flare (Control Device) is equipped with all applicable monitoring equipment...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #008 (Source IDs 001, 002, 004, C002)	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 using the EPA Landfill Gas Emissions Model (2.0 or latest version)...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is documented during routine landfill inspections. The permittee submits reports quarterly to PADEP documenting LFG generation rates and LFG collection.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (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 a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads subject to the provisions of the NSPS are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) A temperature monitoring device equipped with a continuous recorder and having an accuracy of 1 percent of the temperature being measured expressed in degrees Celsius or 0.5 C, whichever is greater...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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...	N/A. The Permittee does not utilize an open flare for NSPS compliance.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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 provide information satisfactory to the Administrator...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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 provide information...	Alternate collection components and/or monitoring procedures are outlined in semi-annual NSPS operational reports, as appropriate.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(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). Any...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent ¹
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #010 (Source IDs 001, 002, 004, C002)	Temperatures shall be recorded whenever the flare is in operation. The recording charts or an electronic version shall be made available to the Department upon request...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §135.5] (Recordkeeping)	Section E, #011 (Source IDs 001, 002, 004, C002)	Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.758] (Subpart WWW – NSPS for MSW Landfills – Recordkeeping Requirements)	Section E, #012 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator of an MSW landfill subject to the provisions of 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ See also regular NSPS operational reports from the period. During the 4th quarter surface methane emissions monitoring event, the initial re-monitoring per 40 CFR §60.755(c)(4)(ii) was conducted 11 days after the initial exceedance.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 63 NESHAP §40 CFR 63.1980]</p> <p>(Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)</p>	<p>Section E, #013</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(3)(iv)]</p> <p>If an action taken by the permittee during startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's...</p>	<p>N/A. All SSM events consistent with procedures specified in the SSM plan. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.402]</p> <p>(General Provisions)</p>	<p>Section E, #014</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>An application, form, report or compliance certification submitted under this subchapter shall contain certification by a responsible official as to truth, accuracy and completeness...</p>	<p>All submissions of an application, form, report or compliance certification certified by a responsible official.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.511]</p> <p>(Monitoring and Related Recordkeeping and Reporting Requirements)</p>	<p>Section E, #015</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>This landfill is subject to 40 CFR Part 60 Subpart WWW of the Standards of Performance for New Stationary Sources and shall comply...</p>	<p>All requests, reports, applications, etc., submitted to EPA per permit requirements.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.511]</p> <p>(Monitoring and Related Recordkeeping and Reporting Requirements)</p>	<p>Section E, #016</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>The permittee shall, on a quarterly basis, submit a report demonstrating that the collection/capture efficiency of the landfill gas collection system was in compliance during the preceding three months...</p>	<p>Collection efficiency of LFG system estimated quarterly and reported to PADEP.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)</p>	<p>Section E, #017 (Source IDs 001, 002, 004, C002)</p>	<p>Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator subject to the requirements of this subpart shall submit an initial design capacity report to the Administrator...</p>	<p>N/A. Initial design capacity report submitted prior to the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(b) Each owner or operator subject to the requirements of this subpart shall submit an NMOC emission rate report to the Administrator initially and annually thereafter, except as provided for in paragraphs...</p>	<p>NMOC emission rate estimated and the report submitted in accordance with the permit and NSPS prior to the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(c) Each owner or operator subject to the provisions of 60.752(b)(2)(i) shall submit a collection and control system design plan to the Administrator within one year of the first report, required under paragraph (b) of this section...</p>	<p>N/A. Submission of the Subpart WWW collection and control system design plan was not required during the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(d) Each owner or operator of a controlled landfill shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The administrator may request additional information as may be necessary...</p>	<p>N/A. Landfill actively receiving MSW; not yet at closure.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(e) Each owner or operator of a controlled landfill shall submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment...</p>	<p>N/A. No control equipment removal during the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(f) Each owner or operator of a landfill seeking to comply with 60.752(b)(2) using an active collection system designed in accordance with 60.752(b)(2)(ii) shall submit to the Administrator annual reports...</p>	<p>NSPS operational reports submitted semi-annually to PADEP and EPA.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(g) Each owner or operator landfill seeking to comply with 60.752(b)(2)(i) shall include the following information with the initial performance test report required under 60.8: (1) A diagram of the collection system...</p>	<p>N/A. Initial report submitted prior to the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1965] (Subpart AAAA – NESHAP: MSW Landfills – What is a Deviation?)	Section E, #018 (Source IDs 001, 002, 004, C002)	A deviation is defined in Sec. 63.1990. For purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of this section. (a) A deviation occurs when the control device operating parameter boundaries...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.752] (Subpart WWW – NSPS for MSW Landfills – Standards for Air Emissions from MSW Landfills)	Section E, #019 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...	N/A. Not required during the reporting period. Landfill is greater than 2.5 million Mg capacity and, thus, subject to the NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operation Standards for Collection and Control Systems)	Section E, #020 (Source IDs 001, 002, 004, C002)	Each owner or operator of an MSW landfill gas collection and control system used to comply with the provisions of 60.752(b)(2)(ii) of this subpart shall: (a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill...	LFG collection and control system installed and operated in accordance with the permit and NSPS. A site plan showing updated LFG system layout submitted with semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Operate the collection system with negative pressure at each wellhead except under the following conditions: (1) A fire or increased well temperature. The owner or operator shall record instances...	The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operation Standards for Collection and Control Systems)</p> <p><i>continued...</i></p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002)</p> <p><i>continued...</i></p>	(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well...	The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with NSPS default thresholds for oxygen/nitrogen and temperature or in accordance with approved HOVs for select operating wells. In other instances, wellheads are temporarily decommissioned due to declining flows in accordance with PADEP approved procedures ¹ . Under these procedures, exceedances of the NSPS pressure and oxygen levels are not deviations.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit and NSPS. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and NSPS and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action shall be taken...	NSPS monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ See also regular NSPS operational reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 60 NSPS §40 CFR 60.755]</p> <p>(Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)</p>	<p>Section E, #021</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(a) Except as provided in 60.752(b)(2)(i)(B), the specified methods in paragraphs (a)(1) through (a)(6) of this section shall be used to determine whether the gas collection system is in compliance with 60.752(b)(2)(ii)...</p>	<p>Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit and NSPS (and documented in semi-annual NSPS operational reports).</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(b) For purposes of compliance with 60.753(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.752(b)(2)(i). Each well shall...</p>	<p>Wells installed and operated in accordance with NSPS schedule and approved design plan. A site plan showing the GCCS layout, system expansion, etc., reported in semi-annual NSPS operational reports.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(c) The following procedures shall be used for compliance with the surface methane operational standard as provided in 60.753(d).</p> <p>(1) After installation of the collection system...</p>	<p>SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.</p>	<p><input type="checkbox"/> Continuous</p> <p><input checked="" type="checkbox"/> Intermittent¹</p>
		<p>(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices...</p>	<p>SEM is conducted in accordance with NSPS methods and the permit.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(e) The provisions of this subpart apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction, shall not exceed 5 days for collection systems...</p>	<p>Records maintained of all SSM events; summary of SSM events documented in semi-annual NSPS operational reports.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

¹ See also regular NSPS operational reports from the period. During the 4th quarter surface methane emissions monitoring event, the initial re-monitoring per 40 CFR §60.755(c)(4)(ii) was conducted 11 days after the initial exceedance.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.759] (Subpart WWW – NSPS for MSW Landfills – Specifications for Active Collection Systems)</p>	<p>Section E, #022 (Source IDs 001, 002, 004, C002)</p>	<p>(a) Each owner or operator seeking to comply with 60.752(b)(2)(i) shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas...</p>	<p>Active LFG collection system designed, sited, and constructed in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(b) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall construct the gas collection devices using the following equipment or procedures: (1) The landfill gas extraction components...</p>	<p>Active LFG collection system constructed and equipped in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(c) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall convey landfill gas to a control system in compliance with 60.752(b)(2)(iii) through collection header pipe(s). The gas mover equipment shall be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment...</p>	<p>Active collection system conveys LFG to a control system via a header pipe in accordance with the permit and the NSPS. Gas mover equipment of the LFG system is sized in accordance with the permit and to meet or exceed NSPS requirements.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 61 NESHAPs §40 CFR 61.12] (Subpart A – General Provisions – Compliance with Standards and Maintenance Requirements)</p>	<p>Section E, #023 (Source IDs 001, 002, 004, C002)</p>	<p>In accordance with 40 CFR 61.12(c), the owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice...</p>	<p>Each stationary source is operated and maintained in accordance with the permit and to meet or exceed NESHAP requirements for good air pollution control practices. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of stationary source operation and maintenance.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)</p>	<p>Section E, #024 (Source IDs 001, 002, 004, C002)</p>	<p>[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(1)(i) and (ii)] (a) During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires the operator reduce emissions from the affected source to the greatest extent...</p>	<p>All SSM events consistent with procedures specified in the SSM plan to be consistent with safe and good air pollution control practices. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

February 28, 2020
File No. 02219002.02

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

Subject: Title V Annual Compliance Certification – 2019
Bethlehem Landfill (Title V Permit No. 48-00027)

Dear Mr. Wejkszner

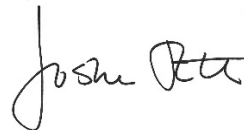
SCS Engineers (SCS) is pleased to submit the Annual Compliance Certification report for the Bethlehem Landfill covering the 2019 calendar year.

If you have any questions regarding this report, please do not hesitate to contact Mr. David Pannucci at the landfill at (610) 317-3200 or either of the undersigned at (703) 471-6150.

Sincerely,



Ryan Christman, EIT, M.S.
Project Professional
SCS Engineers



Joshua G. Roth, P.E.
Vice President
SCS Engineers

cc: US EPA, Region III

Enclosure





PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY
COMPLIANCE CERTIFICATION FORM
(25 Pa. Code § 127.513)


Plant Name:	Bethlehem LD/Bethlehem Facility	Owner/Operator:	Bethlehem LDFL Co.
Tax ID/Plant:	22-3575227-1	DEP Facility ID:	549728
Contact Person:	Mr. David Pannucci	Title:	Regional Engineer
Operating Permit #:	48-00027	Phone Number:	(610) 317-3200

For the period of January 1, 2019 through December 31, 2019, Bethlehem LD/Bethlehem Facility has been in continuous compliance with all applicable requirements of Permit # 48-00027, determined by the method(s) of compliance specified in said permit, except for the following potential deviations:

Sect./ Cond. #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Date(s) and Duration(s)	Corrective Action(s) and Comments
-See Addendum 1-						

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:	Astor Lawson	Title:	District Manager
Signed:		Date:	2/27/2020

*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.*



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

ADDENDUM 1

For the period **01/01/2019 – 12/31/2019**, **Bethlehem LD/Bethlehem Facility** 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 potential deviations:

Sect./ Cond #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Dates and Durations	Corrective Action(s)
Section E, Condition #016, Section B, #008	25 Pa. Code §127.511 25 Pa. Code §§127.25, 127.444, 127.512(c)(1)	Source Group 01	The first quarter 2019 quarterly collection/capture efficiency report required by this condition was submitted to the Department within thirty-one (31) days of the close of the quarter.	N/A	May 1, 2019 (1 day)	Completed. The landfill calculated its capture/collection efficiency on a monthly basis to demonstrate compliance with the collection efficiency requirement in Section D, Condition #001. Process improvements have been made to ensure timely reporting is conducted per the permit.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code § 121.1] (Definitions)	Section B, #001	Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Prohibition of Air Pollution)	Section B, #002	No person may permit air pollution as that term is defined in the act.	The permittee does not permit air pollution as that term is defined in the act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Property Rights)	Section B, #003	This permit does not convey property rights of any sort, or any exclusive privileges.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.446(a) and (c)] (Permit Expiration)	Section B, #004	This operating permit is issued for a fixed term of five years and shall expire on the date specified on Page 1 of this permit. The term and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided...	An application for renewal was submitted on October 3, 2017. A renewed Title V permit was issued on February 28, 2019.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B, #005	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least 6 months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is...	An application for renewal was submitted on October 3, 2017. A renewed Title V permit was issued on February 28, 2019.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.450(a)(4) & 127.464(a)] (Transfer of Ownership or Operational Control)	Section B, #006	(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if...	N/A. No change in ownership or operational control.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B, #007	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department...	Site access granted as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B, #008	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following...	Compliance with specific permit conditions is addressed on a condition-by-condition basis as each condition is set forth in Sections C through E.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent ¹
[25 Pa Code § 127.512(c)(2)] (Need to Halt or Reduce Activity Not a Defense)	Section B, #009	It shall not be defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B, #010	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit...	Requested information provided in reasonable timeframe.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.463, 127.512(c)(3) & 127.542] (Reopening and Revising the Title V Permit for Cause)	Section B, #011	(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification...	N/A. Permit not modified, revoked, reopened and reissued or terminated for cause.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.543] (Reopening a Title V Permit for Cause by EPA)	Section B, #012	As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures...	N/A. Permit not reopened and reissued, revoked or terminated for cause by EPA	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.522(a)] (Operating Permit Application Review by the EPA)	Section B, #013	The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of Title V permit application to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail inbox:...	N/A. The permittee was not required to provide a copy of the permit application to the EPA during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ See Addendum 1.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.541] (Significant Operating Permit Modifications)	Section B, #014	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications...	N/A. No significant permit modifications were completed during reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.1 & 127.462] (Minor Operating Permit Modifications)	Section B, #015	(a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462. (b) Unless precluded by the Clean Air Act...	N/A. No minor permit modifications were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.450] (Administrative Operating Permit Amendments)	Section B, #016	(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments...	N/A. No administrative amendments were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.512(b)] (Severability Clause)	Section B, #017	The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B, #018	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees)...	Fees paid as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B, #019	(a) This permit authorizes De Minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification...	No De Minimis emissions increases occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B, #020	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five years, if the source is reactivated in accordance with the requirements...	No sources reactivated during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B, #021	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B, #022	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection...	Reports are submitted to the appropriate address.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(c) & 127.463(3), Chapter 139; §§ 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B, #023	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures...	Emissions monitoring conducted in compliance with the Title V Permit and additional applicable requirements promulgated under the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B, #024	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit)...	Records maintained and provided if and when requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)] (Reporting Requirements)	Section B, #025	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional...	All reports were submitted as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B, #026	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certification of compliance with the terms and conditions in this permit...	Reporting completed and submitted to PADEP and EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.3] (Operational Flexibility)	Section B, #027	(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act ...	N/A. No changes made.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B, #028	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident...	N/A. Bethlehem Landfill not currently subject to this requirement per the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(e)] (Approved Economic Incentives and Emission Trading Programs)	Section B, #029	No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.	N/A. No permit revisions occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)] (Permit Shield)	Section B, #030	(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code §121.1) as of the date of permit issuance if either of the following applies...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #001	(a) The permittee may not permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following...	No fugitive emissions were emitted from sources other than those listed in the permit. Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.2] (Fugitive Particulate Matter)	Section C, #002	The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C, Site Level Requirement, Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No instances of fugitive particulate matter which passed beyond the landfill's perimeter were observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C, #003	MALODOR EMISSIONS The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source...	Bethlehem Landfill performs weekly odor monitoring, at a minimum. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent [Reference also Section C #010, #012, & #013]

¹ On-site and off-site odors were noted in a limited number of instances during the regular monitoring conducted by the landfill in accordance with the Title V permit. In each instance, the odor did not constitute a malodor.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §123.41] (Limitations)	Section C, #004	(a) A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period...	Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.42] (Exceptions)	Section C, #005	(a) The limitations of SECTION C, Site Level Requirement, Condition #004 shall not apply to a visible emission in any of the following: (1) When the presence of uncombined water...	N/A. Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating permit terms and conditions)	Section C, #006	The carbon monoxide (CO) emissions from this facility shall be limited to 99.9 tons per years (12 month rolling sum).	Annual emissions reporting. Carbon monoxide emissions did not exceed 99.9 tons during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #007	All sampling, testing and analyses performed in compliance with the requirements of any section of this permit shall be in accordance with Section B – General Title Requirement #023.	Monitoring and testing procedures followed permit and CAA requirements	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #008	(a) If required by the Department, the permittee shall perform a stack test, within the time frame specified by the Department. (b) All performance tests shall be conducted in accordance with 40 CFR Part 60, Section 60.754 and...	N/A. No stack test required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.43] (Measuring techniques)	Section C, #009	(a) Visible emissions may be measured using either of the following: (1) A device approved by the Department and maintained to provide accurate opacity measurements. (2) Observers trained and qualified...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #010	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall conduct weekly inspections of the facility, during daylight hours when the plant is in operation, to detect visible, fugitive and malodor emissions as follows...	The permittee conducts regular (weekly at a minimum) inspections in accordance with the permit. Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #011	All records, reports and analyses results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with Section B – General Title V Requirement #024, and shall be made available to the Department upon written or verbal request at a reasonable time.	The permittee makes all records available to the Department within a reasonable time frame.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #012	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall, at the conclusion of each weekly inspection, record all occurrences of fugitive and visible emissions, and malodors which deviate from the limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #013	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) On a semi-annual basis, the permittee shall compile a report of all logged instances of deviation of the fugitive, visible and malodor emission limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513] (Compliance certification)	Section C, #014	The reporting period for the Certificate of Compliance required by Section B – Condition #25, shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1 st .	An annual compliance certification was submitted to the PADEP by March 1.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.21] (Emission Statements)	Section C, #015	(a) Except as provided in subsection (d), this section applies to stationary sources or facilities: (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious,...	Annual Emission Statement report submitted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.3] (Reporting)	Section C, #016	(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year...	N/A. No source report required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #017	(a) A person responsible for any source specified in SECTION C, Site Level Requirement, Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following: (1) Use, where possible, of water or chemicals...	Water used on all roads and parking areas, as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #018	(a) 25 Pa. Code 123.1(c) requires the person responsible for sources with fugitive emissions potential to take all reasonable actions to prevent particulate matter from becoming airborne...	Fugitive dust control measures implemented per 25 Pa. Code 123.1(c), as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #019	The active collection systems must meet the following: (a) Demonstrate that the siting of active collection wells, horizontal collectors, surface collectors, or other extraction devices is of sufficient density throughout...	Active LFG collection system designed and sited in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #020	Uncontrolled stripping of VOC from the leachate and/or condensate shall not be permitted.	No uncontrolled stripping of VOC from leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating permit terms and conditions)	Section C, #021	Open storage (ponding or open top tanks) of leachate and/or condensate shall not be permitted except in an emergency.	No open storage of leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §129.14] (Open Burning Operations)	Section C, #022	(a) Air basins. No person may permit the open burning of material in an air basin. (b) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from...	Open burning is strictly prohibited at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §121.7] (Prohibition of air pollution)	Section C, #023	The permittee shall not permit air pollution as that term is defined in the Pennsylvania Air Pollution Control Act.	The permittee does not permit air pollution as it is defined in the Pennsylvania Air Pollution Control Act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	The permittee shall maintain and demonstrate that the active gas collection system has an overall collection efficiency which is based on at least 80% collection efficiency for the Phase IV landfill area and at least 75% collection efficiency for all other landfill areas.	Collection efficiency is maintained per the permit, as demonstrated by regular calculations.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	(a) The landfill shall submit to the Department a collection and control system (GCCS) design plan (Revised July 2018), or submit a collection and control plan for an alternative design prepared by a professional engineer...	Collection and control system plan submitted to PADEP. The plan was most recently updated in December 2018 to address requirements of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	Within thirty months from the start of waste placement in a cell, interim gas extraction components (vertical wells, horizontal collectors, or other acceptable collection device) shall be installed. Effective capture of landfill gas...	Gas extraction components of the LFG collection system installed and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	The owner/operator shall forecast, on an annual basis, the landfill gas generation and collection for the following year. If the forecast indicates...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is monitored and recorded. The current LFG forecast indicates that the capacity of the existing flare is sufficient to control collected LFG.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #001	(a) For paved roadways, the following records shall be maintained on-site and be made available to the Department upon request: (1) Daily log of time and location of any water flushing or vacuum sweeping conducted...	The permittee maintains records of water flushing, and other dust suppression activities per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #002	(a) The owner/operator shall comply with the fugitive emission standards established in this permit. All reasonable actions shall be taken to prevent particulate matter from becoming airborne. (1) All roadways shall be maintained.....	Dust suppression activities conducted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 755884 – PORTABLE CRUSHING OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #016	Wherever a conflict occurs between this Operating Permit and any of the regulations listed below, the permittee shall, in all cases, meet the more stringent requirement...	Permittee maintains compliance with more stringent requirements, as necessary.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #001 (Source IDs 001, 002, 004, C002)	(a) In addition to the visible emission limitations of 25 Pa. Code, Section 123.41, the control device shall also be subject to the following additional limitation: (1) No flare shall produce visible flames...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1975] (Subpart AAAA – NESHAP: MSW Landfills – How Do I Calculate the 3-hour Block Average Used to Demonstrate Compliance?)	Section E, #002 (Source IDs 001, 002, 004, C002)	Averages are calculated in the same way as they are calculated in 40 CFR part 60, subpart WWW, except that the data collected during the events listed in paragraphs (a), (b), (c), and (d) of this section are not included in any average computed under this subpart...	3-hr block averages are calculated per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #003 (Source IDs 001, 002, 004, C002)	The following requirements are hereby established for the flare: (a) The flare must be an enclosed ground type which is shrouded with no visible flame shooting from the flare...	The flare is designed, equipped, and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #004 (Source IDs 001, 002, 004, C002)	Source tests shall be conducted on a new or modified flare within 120 days after start-up for: a) either reduction of NMOC by 98 weight percent or reduction of the outlet NMOC concentration to less than 20 parts per million by volume...	N/A. No new or modified flare during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.754] (Subpart WWW – NSPS for MSW Landfills – Test Methods and Procedures)	Section E, #005 (Source IDs 001, 002, 004, C002)	(a)(1) The landfill owner or operator shall calculate the NMOC emission rate using either the equation provided in paragraph (a)(1)(i) of this section or the equation provided in paragraph (a)(1)(ii) of this section. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for Lo, and 4,000 parts per million by volume as hexane for CNMOC...	N/A. The NMOC emission rate was estimated in accordance with the permit and NSPS prior to this reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Operating Permit Terms and Conditions)	Section E, #006 (Source IDs 001, 002, 004, C002)	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 schedule collection system configurations for the forecast year...	The permittee completes an annual forecast of VOC emissions for the following year in conjunction with the annual AIMS report.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #007 (Source IDs 001, 002, 004, C002)	(a) The permittee shall, on a continuous basis, monitor and record the operating temperature of the enclosed flare, in units of degrees Fahrenheit. (b) The permittee shall ensure that the enclosed flare (Control Device) is equipped with all applicable monitoring equipment...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #008 (Source IDs 001, 002, 004, C002)	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 using the EPA Landfill Gas Emissions Model (2.0 or latest version)...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is documented during routine landfill inspections.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (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 a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads subject to the provisions of the NSPS are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) A temperature monitoring device equipped with a continuous recorder and having an accuracy of 1 percent of the temperature being measured expressed in degrees Celsius or 0.5 C, whichever is greater...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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...	N/A. The Permittee does not utilize an open flare for NSPS compliance.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(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 provide information satisfactory to the Administrator...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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 provide information...	Alternate collection components and/or monitoring procedures are outlined in semi-annual NSPS operational reports, as appropriate.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(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). Any...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #010 (Source IDs 001, 002, 004, C002)	Temperatures shall be recorded whenever the flare is in operation. The recording charts or an electronic version shall be made available to the Department upon request...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §135.5] (Recordkeeping)	Section E, #011 (Source IDs 001, 002, 004, C002)	Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.758] (Subpart WWW – NSPS for MSW Landfills – Recordkeeping Requirements)	Section E, #012 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator of an MSW landfill subject to the provisions of 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #013 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(3)(iv)] If an action taken by the permittee during startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's...	N/A. All SSM events consistent with procedures specified in the SSM plan. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.402] (General Provisions)	Section E, #014 (Source IDs 001, 002, 004, C002)	An application, form, report or compliance certification submitted under this subchapter shall contain certification by a responsible official as to truth, accuracy and completeness...	All submissions of an application, form, report or compliance certification certified by a responsible official.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #015 (Source IDs 001, 002, 004, C002)	This landfill is subject to 40 CFR Part 60 Subpart WWW of the Standards of Performance for New Stationary Sources and shall comply...	All requests, reports, applications, etc., submitted to EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #016 (Source IDs 001, 002, 004, C002)	The permittee shall, on a quarterly basis, submit a report demonstrating that the collection/capture efficiency of the landfill gas collection system was in compliance during the preceding three months...	Collection efficiency of LFG system estimated quarterly and reported to PADEP.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent ¹
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)	Section E, #017 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator subject to the requirements of this subpart shall submit an initial design capacity report to the Administrator...	N/A. Initial design capacity report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Each owner or operator subject to the requirements of this subpart shall submit an NMOC emission rate report to the Administrator initially and annually thereafter, except as provided for in paragraphs...	NMOC emission rate estimated and the report submitted in accordance with the permit and NSPS prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Each owner or operator subject to the provisions of 60.752(b)(2)(i) shall submit a collection and control system design plan to the Administrator within one year of the first report, required under paragraph (b) of this section...	N/A. Submission of the Subpart WWW collection and control system design plan was not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ See addendum 1.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(d) Each owner or operator of a controlled landfill shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The administrator may request additional information as may be necessary...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator of a controlled landfill shall submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment...	N/A. No control equipment removal during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Each owner or operator of a landfill seeking to comply with 60.752(b)(2) using an active collection system designed in accordance with 60.752(b)(2)(ii) shall submit to the Administrator annual reports...	NSPS operational reports submitted semi-annually to PADEP and EPA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(g) Each owner or operator landfill seeking to comply with 60.752(b)(2)(i) shall include the following information with the initial performance test report required under 60.8: (1) A diagram of the collection system...	N/A. Initial report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1965] (Subpart AAAA – NESHAP: MSW Landfills – What is a Deviation?)	Section E, #018 (Source IDs 001, 002, 004, C002)	A deviation is defined in Sec. 63.1990. For purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of this section. (a) A deviation occurs when the control device operating parameter boundaries...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.752] (Subpart WWW – NSPS for MSW Landfills – Standards for Air Emissions from MSW Landfills)	Section E, #019 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...	N/A. Not required during the reporting period. Landfill is greater than 2.5 million Mg capacity and, thus, subject to the NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operation Standards for Collection and Control Systems)</p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002)</p>	<p>Each owner or operator of an MSW landfill gas collection and control system used to comply with the provisions of 60.752(b)(2)(ii) of this subpart shall:</p> <p>(a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill...</p>	<p>LFG collection and control system installed and operated in accordance with the permit and NSPS. A site plan showing updated LFG system layout submitted with semi-annual NSPS operational reports.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
		<p>(b) Operate the collection system with negative pressure at each wellhead except under the following conditions:</p> <p>(1) A fire or increased well temperature. The owner or operator shall record instances...</p>	<p>The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operation Standards for Collection and Control Systems)</p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002) <i>continued...</i></p>	<p>(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well...</p>	<p>The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with NSPS default thresholds for oxygen/nitrogen and temperature or in accordance with approved HOVs for select operating wells. In other instances, wellheads are temporarily decommissioned due to declining flows in accordance with PADEP approved procedures¹. Under these procedures, exceedances of the NSPS pressure and oxygen levels are not deviations.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

¹ See also regular NSPS operational reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<i>continued...</i>		(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit and NSPS. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and NSPS and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action shall be taken...	NSPS monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)	Section E, #021 (Source IDs 001, 002, 004, C002)	(a) Except as provided in 60.752(b)(2)(i)(B), the specified methods in paragraphs (a)(1) through (a)(6) of this section shall be used to determine whether the gas collection system is in compliance with 60.752(b)(2)(ii)...	Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit and NSPS (and documented in semi-annual NSPS operational reports).	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) For purposes of compliance with 60.753(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.752(b)(2)(i). Each well shall...	Wells installed and operated in accordance with NSPS schedule and approved design plan. A site plan showing the GCCS layout, system expansion, etc., reported in semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(c) The following procedures shall be used for compliance with the surface methane operational standard as provided in 60.753(d). (1) After installation of the collection system...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices...	SEM is conducted in accordance with NSPS methods and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) The provisions of this subpart apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction, shall not exceed 5 days for collection systems...	Records maintained of all SSM events; summary of SSM events documented in semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.759] (Subpart WWW – NSPS for MSW Landfills – Specifications for Active Collection Systems)	Section E, #022 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with 60.752(b)(2)(i) shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas...	Active LFG collection system designed, sited, and constructed in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall construct the gas collection devices using the following equipment or procedures: (1) The landfill gas extraction components...	Active LFG collection system constructed and equipped in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(c) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall convey landfill gas to a control system in compliance with 60.752(b)(2)(iii) through collection header pipe(s). The gas mover equipment shall be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment...	Active collection system conveys LFG to a control system via a header pipe in accordance with the permit and the NSPS. Gas mover equipment of the LFG system is sized in accordance with the permit and to meet or exceed NSPS requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 61 NESHAPs §40 CFR 61.12]</p> <p>(Subpart A – General Provisions – Compliance with Standards and Maintenance Requirements)</p>	<p>Section E, #023</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>In accordance with 40 CFR 61.12(c), the owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice...</p>	<p>Each stationary source is operated and maintained in accordance with the permit and to meet or exceed NESHAP requirements for good air pollution control practices. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of stationary source operation and maintenance.</p>	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 63 NESHAP §40 CFR 63.1980]</p> <p>(Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)</p>	<p>Section E, #024</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(1)(i) and (ii)]</p> <p>(a) During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires the operator reduce emissions from the affected source to the greatest extent...</p>	<p>All SSM events consistent with procedures specified in the SSM plan to be consistent with safe and good air pollution control practices. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.</p>	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(Operating permit terms and conditions)</p>	<p>Section E, #025</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>The permittee shall comply with the requirements of NSPS Subpart WWW until the more stringent requirements of NSPS Subpart XXX apply pursuant to 40 CFR §60.462(b)(2)(ii). At that time, compliance with the more stringent NSPS Subpart XXX shall be deemed compliance with NSPS Subpart WWW for purposes of compliance with 40 CFR Part 63, Subpart AAAA.</p>	<p>The permittee currently complies with the operational requirements of NSPS Subpart WWW and portions of NSPS Subpart XXX, as applicable. The landfill became subject to NSPS Subpart XXX on September 25, 2017 with the commencement of construction of the Southeast Realignment expansion. As such, the landfill submitted a Subpart XXX initial design capacity and initial NMOC emission rate report on December 21, 2017 and submitted a Subpart XXX GCCS design plan submitted on December 20, 2018. The landfill will become subject to the operational requirements of Subpart XXX on June 21, 2020.</p>	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(40 CFR §60.762 – Standards for air emissions from municipal solid waste landfills)</p>	<p>Section E, #026</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...</p>	<p>Subpart XXX initial design capacity submitted on December 21, 2017.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(b) Each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, must either comply with paragraph (b)(2) of the section or calculate an NMOC emission rate of the landfill using the procedures specified in §60.764. The NMOC emission rate must...</p> <p>(1) N/A – NMOC emission rate greater than 34 megagrams per year</p> <p>(2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either:</p> <p>(i) submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in §60.767...</p> <p>(ii) install and start up a collection and control system that captures the gas generated within the landfill as required...</p>	<p>Subpart XXX collection and control system design plan submitted on December 20, 2018. The landfill is not subject to the operational requirements of 40 CFR §60.762(b)(2)(ii) until June 21, 2020.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(c) For purposes of obtaining an operating permit under Title V of the Clean Air Act, the owner or operator of an MSW landfill subject to the subpart with a design capacity less than 2.5 million megagrams or 2.5 million cubic meters is not subject to the requirement to obtain an operating permit for the landfill under part 70 or 71 of this chapter, unless the landfill is otherwise subject to either part 70 or 71.</p>	<p>N/A. The landfill's design capacity exceeds 2.5 million megagrams or 2.5 million cubic meters.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(d) When an MSW landfill subject to this subpart is closed as defined in this subpart, the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of this chapter for the landfill if the landfill is not otherwise...</p>	<p>N/A. Landfill actively receiving MSW; not yet at closure.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR Part §60.760 – Applicability, designation of affected source, and delegation of authority)	Section E, #027 (Source IDs 001, 002, 004, C002)	(a) The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction, or modification after July 17, 2014. Physical or operational changes made to an MSW landfill solely to comply with subparts Cc, Cf, or WWW of this part are not considered construction, reconstruction, or modification for the purposes of this section.	The landfill became subject to 40 CFR Part 60, Subpart XXX on September 25, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) The following authorities are retained by the Administrator and are not transferred to the state: §60.764(a)(5).	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Activities required by or conducted pursuant to a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), or state remedial action are not considered construction, reconstruction, or modification for purposes of this subpart.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.765 – Compliance Provisions)	Section E, #028 (Source IDs 001, 002, 004, C002)	(a) Except as provided in §60.767(c)(2), the specified methods in paragraphs (a)(1) through (6) of this section must be used to determine whether the gas collection system is in compliance with §60.762(b)(2)(ii). (1) For the purposes of calculation the maximum...	N/A. Landfill not yet subject to the compliance provisions of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.763 – Operational standards for collection and control systems)	Section E, #029 (Source IDs 001, 002, 004, C002)	Each owner or operator of an MSW landfill with a gas collection and control system used to comply with the provisions of §60.762(b)(2) must: (a) Operate the collection system such that gas is collected from each...	N/A. Landfill not yet subject to the operational standards of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	<p>(a) Design capacity report. Each owner or operator subject to the requirements of this subpart must submit an initial design capacity report to the Administrator.</p> <p>(1) Submission. The initial design capacity report fulfills the requirements of the notification of the date construction is commenced as required by §60.7(a)(1) and must be submitted no later than:</p> <p>(i) November 28, 2016 for landfill that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016; or</p> <p>(ii) Ninety days after the date of commenced construction, modification, or reconstruction for landfills that commence construction, modification, or reconstruction after August 29, 2016.</p> <p>(2) ...</p>	Subpart XXX initial design capacity report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		<p>(b) NMOC emission rate report. Each owner or operator subject to the requirements of this subpart must submit an NMOC emission rate report following the procedure specified in paragraph (i)(2) of this section to the Administrator initially and annually thereafter, except as provided for in paragraph (b)(1)(ii) of this section. The Administrator may...</p> <p>(1) The NMOC emission rate report must contain...</p> <p>(i) The initial NMOC emission rate report may be combined with the initial design capacity report required...</p> <p>(A) November 28, 2016, for landfills that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016, or</p> <p>(B) Ninety days after the date of commenced construction, modification...</p>	Subpart XXX initial NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		<p>(c) Collection and control system design plan. Each owner or operator subject to the provision of §60.762(b)(2) must submit a collection and control system design plan...</p>	Subpart XXX collection and control system design plan submitted on December 20, 2018.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(40 CFR §60.767 – Reporting Requirements)</p>	<p>Section E, #030</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(d) Revised design plan. The owner or operator who has already been required to submit a design plan under paragraph (c) of this section must submit a revised design plan to the Administrator for approval as follows:</p> <p>(1) At least 90 days before expanding operations to an area not covered by the previously approved design plan.</p> <p>(2) Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator according to paragraph (c) of this section.</p>	N/A. Revised design plan not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		<p>(f) Closure report. Each owner or operator of a controlled landfill must submit a closure report to the Administrator within 30 days of waste acceptance cessation. The Administrator may...</p>	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		<p>(g) Annual report. The owner or operator of a landfill seeking to comply with §60.762(b)(2) using an active collection system designed in accordance with §60.762(b)(2)(ii) must submit to the Administrator, following the procedure specified in paragraph (i)(2) of this section, annual reports...</p>	N/A. Landfill not yet subject to the reporting requirements of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		<p>(h) Initial performance test report. Each owner or operator seeking to comply with §60.762(b)(2)(iii) must include the following information with the initial performance test report required under §60.8</p>	N/A. Initial performance test report not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		<p>(i) Electronic reporting. The owner or operator must submit reports electronically according to paragraphs (i)(1) and (2) of this section.</p> <p>(1) Within 60 days after the date of completing...</p> <p>(2) Each owner or operator required to submit reports...</p>	N/A. Landfill not yet subject to the electronic reporting requirements of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(j) Corrective action and the corresponding timeline. The owner or operator must submit according to paragraphs (j)(1) and (j)(2) of this section. (1) For corrective action that is required according...	N/A. Landfill not yet subject to corrective action reporting.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(k) Liquids addition. The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meter that has employed leachate recirculation or added liquids...	N/A. Landfill not yet subject to liquids addition reporting.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(l) Tier 4 notification. (1) The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must provide a notification of the date(s) upon which it intends to demonstrate site-specific surface methane emissions are below 500 parts per million methane, based on...	N/A. Tier 4 testing not applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.768 – Recordkeeping requirements)	Section E, #031 (Source IDs 001, 002, 004, C002)	(a) Except as provided in §60.767(c)(2), each owner or operator of an MSW landfill subject to the provision of §60.762(b)(2)(ii) and (iii) must keep for at least 5 years...	Landfill maintains applicable records in accordance with NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.766 – Monitoring of operations)	Section E, #032 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with §60.762(b)(2)(ii)(C) for an active gas collection system must install a sampling port and a thermometer, other temperature measuring device, or an access port...	N/A. Landfill not yet subject to the monitoring requirements of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.764 – Test methods and procedures)	Section E, #033 (Source IDs 001, 002, 004, C002)	(a)(1) NMOC Emission Rate. The landfill owner or operator must calculate the NMOC emission rate using either Equation 1 provided in paragraph (a)(1)(i) of this section or Equation 2 provided in...	NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.769 – Specifications for active collection systems)	Section E, #034 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with §60.762(b)(2)(i) must site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless...	GCCS design plan submitted on December 20, 2018. This plan demonstrates that the GCCS meets the applicable specifications per Subpart XXX. The landfill will become subject to the operational requirements of NSPS Subpart XXX on June 21, 2020.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

February 22, 2021
File No. 02219002.04

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

Subject: Title V Annual Compliance Certification – 2020
Bethlehem Landfill (Title V Permit No. 48-00027)

Dear Mr. Wejkszner

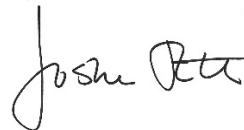
SCS Engineers (SCS) is pleased to submit the Annual Compliance Certification report for the Bethlehem Landfill covering the 2020 calendar year.

If you have any questions regarding this report, please do not hesitate to contact Mr. David Pannucci at the landfill at (610) 317-3200 or either of the undersigned at (703) 471-6150.

Sincerely,



Ryan Christman, EIT, M.S.
Project Professional
SCS Engineers



Joshua G. Roth, P.E.
Vice President
SCS Engineers

cc: US EPA, Region III

Enclosure





PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY
COMPLIANCE CERTIFICATION FORM
(25 Pa. Code § 127.513)


Plant Name:	Bethlehem LD/Bethlehem Facility	Owner/Operator:	Bethlehem LDFL Co.
Tax ID/Plant:	22-3575227-1	DEP Facility ID:	549728
Contact Person:	Mr. David Pannucci	Title:	Regional Engineer
Operating Permit #:	48-00027	Phone Number:	(610) 317-3200

For the period of January 1, 2020 through December 31, 2020, Bethlehem LD/Bethlehem Facility has been in continuous compliance with all applicable requirements of Permit # 48-00027, determined by the method(s) of compliance specified in said permit, except for the following potential deviations:

Sect./ Cond. #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Date(s) and Duration(s)	Corrective Action(s) and Comments
--No instances of deviations from any permit requirements occurred during the reporting period--						

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:	Astor Lawson	Title:	District Manager
Signed:		Date:	2/22/2021

*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 § 121.1] (Definitions)	Section B, #001	Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S § 4003) and 25 Pa. Code § 121.1	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Prohibition of Air Pollution)	Section B, #002	No person may permit air pollution as that term is defined in the act.	The permittee does not permit air pollution as that term is defined in the act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Property Rights)	Section B, #003	This permit does not convey property rights of any sort, or any exclusive privileges.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.446(a) and (c)] (Permit Expiration)	Section B, #004	This operating permit is issued for a fixed term of five years and shall expire on the date specified on Page 1 of this permit. The term and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided...	N/A. Application for Title V renewal not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B, #005	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least 6 months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is...	N/A. Application for Title V renewal not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.450(a)(4) & 127.464(a)] (Transfer of Ownership or Operational Control)	Section B, #006	(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if...	N/A. No change in ownership or operational control.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B, #007	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department...	Site access granted as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B, #008	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following...	Compliance with specific permit conditions is addressed on a condition-by-condition basis as each condition is set forth in Sections C through E.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.512(c)(2)] (Need to Halt or Reduce Activity Not a Defense)	Section B, #009	It shall not be defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B, #010	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit...	Requested information provided in reasonable timeframe.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.463, 127.512(c)(3) & 127.542] (Reopening and Revising the Title V Permit for Cause)	Section B, #011	(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification...	N/A. Permit not modified, revoked, reopened and reissued or terminated for cause.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.543] (Reopening a Title V Permit for Cause by EPA)	Section B, #012	As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures...	N/A. Permit not reopened and reissued, revoked or terminated for cause by EPA	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.522(a)] (Operating Permit Application Review by the EPA)	Section B, #013	The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of Title V permit application to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail inbox:...	N/A. The permittee was not required to provide a copy of the permit application to the EPA during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.541] (Significant Operating Permit Modifications)	Section B, #014	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications...	N/A. No significant permit modifications were completed during reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.1 & 127.462] (Minor Operating Permit Modifications)	Section B, #015	(a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462. (b) Unless precluded by the Clean Air Act...	N/A. No minor permit modifications were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.450] (Administrative Operating Permit Amendments)	Section B, #016	(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments...	N/A. No administrative amendments were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.512(b)] (Severability Clause)	Section B, #017	The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B, #018	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees)...	Fees paid as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B, #019	(a) This permit authorizes De Minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification...	No De Minimis emissions increases occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B, #020	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five years, if the source is reactivated in accordance with the requirements...	No sources reactivated during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B, #021	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B, #022	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection...	Reports are submitted to the appropriate address.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.441(c) & 127.463(3), Chapter 139; §§ 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B, #023	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures...	Emissions monitoring conducted in compliance with the Title V Permit and additional applicable requirements promulgated under the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B, #024	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit)...	Records maintained and provided if and when requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)] (Reporting Requirements)	Section B, #025	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional...	All reports were submitted as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B, #026	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certification of compliance with the terms and conditions in this permit...	Reporting completed and submitted to PADEP and EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.3] (Operational Flexibility)	Section B, #027	(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act ...	N/A. No changes made.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B, #028	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident...	N/A. Bethlehem Landfill not currently subject to this requirement per the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(e)] (Approved Economic Incentives and Emission Trading Programs)	Section B, #029	No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.	N/A. No permit revisions occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)] (Permit Shield)	Section B, #030	(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code §121.1) as of the date of permit issuance if either of the following applies...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #001	(a) The permittee may not permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following...	No fugitive emissions were emitted from sources other than those listed in the permit. Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.2] (Fugitive Particulate Matter)	Section C, #002	The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C, Site Level Requirement, Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No instances of fugitive particulate matter which passed beyond the landfill's perimeter were observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C, #003	MALODOR EMISSIONS The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source...	Bethlehem Landfill performs weekly odor monitoring, at a minimum. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent <i>[Reference also Section C #010, #012, & #013]</i>
[25 Pa. Code §123.41] (Limitations)	Section C, #004	(a) A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period...	Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.42] (Exceptions)	Section C, #005	(a) The limitations of SECTION C, Site Level Requirement, Condition #004 shall not apply to a visible emission in any of the following: (1) When the presence of uncombined water...	N/A. Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ On-site odors and off-site odors were detected in a limited number of instances during the regular monitoring conducted by the landfill in accordance with the Title V permit. Additionally, off-site odors were reported in a limited number of instances by surrounding residents. In several of these instances, follow-up off-site odor investigations were conducted by PADEP personnel and no malodors were identified.

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 C, #006	The carbon monoxide (CO) emissions from this facility shall be limited to 99.9 tons per years (12 month rolling sum).	Annual emissions reporting. Carbon monoxide emissions did not exceed 99.9 tons during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #007	All sampling, testing and analyses performed in compliance with the requirements of any section of this permit shall be in accordance with Section B – General Title Requirement #023.	Monitoring and testing procedures followed permit and CAA requirements	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #008	(a) If required by the Department, the permittee shall perform a stack test, within the time frame specified by the Department. (b) All performance tests shall be conducted in accordance with 40 CFR Part 60, Section 60.754 and...	N/A. No stack test required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.43] (Measuring techniques)	Section C, #009	(a) Visible emissions may be measured using either of the following: (1) A device approved by the Department and maintained to provide accurate opacity measurements. (2) Observers trained and qualified...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #010	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall conduct weekly inspections of the facility, during daylight hours when the plant is in operation, to detect visible, fugitive and malodor emissions as follows...	The permittee conducts regular (weekly at a minimum) inspections in accordance with the permit. Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #011	All records, reports and analyses results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with Section B – General Title V Requirement #024, and shall be made available to the Department upon written or verbal request at a reasonable time.	The permittee makes all records available to the Department within a reasonable time frame.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #012	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall, at the conclusion of each weekly inspection, record all occurrences of fugitive and visible emissions, and malodors which deviate from the limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #013	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) On a semi-annual basis, the permittee shall compile a report of all logged instances of deviation of the fugitive, visible and malodor emission limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513] (Compliance certification)	Section C, #014	The reporting period for the Certificate of Compliance required by Section B – Condition #25, shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1 st .	An annual compliance certification was submitted to the PADEP by March 1.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.21] (Emission Statements)	Section C, #015	(a) Except as provided in subsection (d), this section applies to stationary sources or facilities: (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious,...	Annual Emission Statement report submitted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.3] (Reporting)	Section C, #016	(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year...	N/A. No source report required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #017	(a) A person responsible for any source specified in SECTION C, Site Level Requirement, Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following: (1) Use, where possible, of water or chemicals...	Water used on all roads and parking areas, as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #018	(a) 25 Pa. Code 123.1(c) requires the person responsible for sources with fugitive emissions potential to take all reasonable actions to prevent particulate matter from becoming airborne...	Fugitive dust control measures implemented per 25 Pa. Code 123.1(c), as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #019	The active collection systems must meet the following: (a) Demonstrate that the siting of active collection wells, horizontal collectors, surface collectors, or other extraction devices is of sufficient density throughout...	Active LFG collection system designed and sited in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

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 C, #020	Uncontrolled stripping of VOC from the leachate and/or condensate shall not be permitted.	No uncontrolled stripping of VOC from leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating permit terms and conditions)	Section C, #021	Open storage (ponding or open top tanks) of leachate and/or condensate shall not be permitted except in an emergency.	No open storage of leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §129.14] (Open Burning Operations)	Section C, #022	(a) Air basins. No person may permit the open burning of material in an air basin. (b) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from...	Open burning is strictly prohibited at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §121.7] (Prohibition of air pollution)	Section C, #023	The permittee shall not permit air pollution as that term is defined in the Pennsylvania Air Pollution Control Act.	The permittee does not permit air pollution as it is defined in the Pennsylvania Air Pollution Control Act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	The permittee shall maintain and demonstrate that the active gas collection system has an overall collection efficiency which is based on at least 80% collection efficiency for the Phase IV landfill area and at least 75% collection efficiency for all other landfill areas.	Collection efficiency is maintained per the permit, as demonstrated by regular calculations.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	(a) The landfill shall submit to the Department a collection and control system (GCCS) design plan (Revised July 2018), or submit a collection and control plan for an alternative design prepared by a professional engineer...	Collection and control system plan submitted to PADEP. The plan was most recently updated in December 2018 to address requirements of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	Within thirty months from the start of waste placement in a cell, interim gas extraction components (vertical wells, horizontal collectors, or other acceptable collection device) shall be installed. Effective capture of landfill gas...	Gas extraction components of the LFG collection system installed and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	The owner/operator shall forecast, on an annual basis, the landfill gas generation and collection for the following year. If the forecast indicates...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is monitored and recorded. The current LFG forecast indicates that the capacity of the existing flare is sufficient to control collected LFG.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #001	(a) For paved roadways, the following records shall be maintained on-site and be made available to the Department upon request: (1) Daily log of time and location of any water flushing or vacuum sweeping conducted...	The permittee maintains records of water flushing, and other dust suppression activities per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #002	(a) The owner/operator shall comply with the fugitive emission standards established in this permit. All reasonable actions shall be taken to prevent particulate matter from becoming airborne. (1) All roadways shall be maintained.....	Dust suppression activities conducted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #001 (Source IDs 001, 002, 004, C002)	(a) In addition to the visible emission limitations of 25 Pa, Code, Section 123.41, the control device shall also be subject to the following additional limitation: (1) No flare shall produce visible flames...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1975] (Subpart AAAA – NESHAP: MSW Landfills – How Do I Calculate the 3-hour Block Average Used to Demonstrate Compliance?)	Section E, #002 (Source IDs 001, 002, 004, C002)	Averages are calculated in the same way as they are calculated in 40 CFR part 60, subpart WWW, except that the data collected during the events listed in paragraphs (a), (b), (c), and (d) of this section are not included in any average computed under this subpart...	3-hr block averages are calculated per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #003 (Source IDs 001, 002, 004, C002)	The following requirements are hereby established for the flare: (a) The flare must be an enclosed ground type which is shrouded with no visible flame shooting from the flare...	The flare is designed, equipped, and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #004 (Source IDs 001, 002, 004, C002)	Source tests shall be conducted on a new or modified flare within 120 days after start-up for: a) either reduction of NMOC by 98 weight percent or reduction of the outlet NMOC concentration to less than 20 parts per million by volume...	N/A. No new or modified flare during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.754] (Subpart WWW – NSPS for MSW Landfills – Test Methods and Procedures)	Section E, #005 (Source IDs 001, 002, 004, C002)	(a)(1) The landfill owner or operator shall calculate the NMOC emission rate using either the equation provided in paragraph (a)(1)(i) of this section or the equation provided in paragraph (a)(1)(ii) of this section. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for Lo, and 4,000 parts per million by volume as hexane for CNMOC...	N/A. The NMOC emission rate was estimated in accordance with the permit and NSPS prior to this reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Operating Permit Terms and Conditions)	Section E, #006 (Source IDs 001, 002, 004, C002)	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 schedule collection system configurations for the forecast year...	The permittee completes an annual forecast of VOC emissions for the following year in conjunction with the annual AIMS report.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #007 (Source IDs 001, 002, 004, C002)	(a) The permittee shall, on a continuous basis, monitor and record the operating temperature of the enclosed flare, in units of degrees Fahrenheit. (b) The permittee shall ensure that the enclosed flare (Control Device) is equipped with all applicable monitoring equipment...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #008 (Source IDs 001, 002, 004, C002)	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 using the EPA Landfill Gas Emissions Model (2.0 or latest version)...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is documented during routine landfill inspections.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (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 a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads subject to the provisions of the NSPS are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) A temperature monitoring device equipped with a continuous recorder and having an accuracy of 1 percent of the temperature being measured expressed in degrees Celsius or 0.5 C, whichever is greater...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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...	N/A. The Permittee does not utilize an open flare for NSPS compliance.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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 provide information satisfactory to the Administrator...	N/A	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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 provide information...	Alternate collection components and/or monitoring procedures are outlined in semi-annual NSPS operational reports, as appropriate.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	(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). Any...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #010 (Source IDs 001, 002, 004, C002)	Temperatures shall be recorded whenever the flare is in operation. The recording charts or an electronic version shall be made available to the Department upon request...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §135.5] (Recordkeeping)	Section E, #011 (Source IDs 001, 002, 004, C002)	Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.758] (Subpart WWW – NSPS for MSW Landfills – Recordkeeping Requirements)	Section E, #012 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator of an MSW landfill subject to the provisions of 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #013 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(3)(iv)] If an action taken by the permittee during startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's...	N/A. All SSM events consistent with procedures specified in the SSM plan. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.402] (General Provisions)	Section E, #014 (Source IDs 001, 002, 004, C002)	An application, form, report or compliance certification submitted under this subchapter shall contain certification by a responsible official as to truth, accuracy and completeness...	All submissions of an application, form, report or compliance certification certified by a responsible official.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #015 (Source IDs 001, 002, 004, C002)	This landfill is subject to 40 CFR Part 60 Subpart WWW of the Standards of Performance for New Stationary Sources and shall comply...	All requests, reports, applications, etc., submitted to EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #016 (Source IDs 001, 002, 004, C002)	The permittee shall, on a quarterly basis, submit a report demonstrating that the collection/capture efficiency of the landfill gas collection system was in compliance during the preceding three months...	Collection efficiency of LFG system estimated quarterly and reported to PADEP.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)	Section E, #017 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator subject to the requirements of this subpart shall submit an initial design capacity report to the Administrator...	N/A. Initial design capacity report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Each owner or operator subject to the requirements of this subpart shall submit an NMOC emission rate report to the Administrator initially and annually thereafter, except as provided for in paragraphs...	N/A. NMOC emission rate estimated and the report submitted in accordance with the permit and NSPS prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Each owner or operator subject to the provisions of 60.752(b)(2)(i) shall submit a collection and control system design plan to the Administrator within one year of the first report, required under paragraph (b) of this section...	N/A. Submission of the Subpart WWW collection and control system design plan was not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(d) Each owner or operator of a controlled landfill shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The administrator may request additional information as may be necessary...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator of a controlled landfill shall submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment...	N/A. No control equipment removal during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)</p>	<p>Section E, #017 (Source IDs 001, 002, 004, C002)</p>	<p>(f) Each owner or operator of a landfill seeking to comply with 60.752(b)(2) using an active collection system designed in accordance with 60.752(b)(2)(ii) shall submit to the Administrator annual reports...</p>	<p>NSPS operational reports submitted semi-annually to PADEP and EPA.</p>	<p><input checked="" type="checkbox"/> Continuous¹ <input type="checkbox"/> Intermittent</p>
		<p>(g) Each owner or operator landfill seeking to comply with 60.752(b)(2)(i) shall include the following information with the initial performance test report required under 60.8: (1) A diagram of the collection system...</p>	<p>N/A. Initial report submitted prior to the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1965] (Subpart AAAA – NESHAP: MSW Landfills – What is a Deviation?)</p>	<p>Section E, #018 (Source IDs 001, 002, 004, C002)</p>	<p>A deviation is defined in Sec. 63.1990. For purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of this section. (a) A deviation occurs when the control device operating parameter boundaries...</p>	<p>N/A.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.752] (Subpart WWW – NSPS for MSW Landfills – Standards for Air Emissions from MSW Landfills)</p>	<p>Section E, #019 (Source IDs 001, 002, 004, C002)</p>	<p>(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...</p>	<p>N/A. Initial design capacity report submitted prior to the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operational Standards for Collection and Control Systems)</p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002)</p>	<p>Each owner or operator of an MSW landfill gas collection and control system used to comply with the provisions of 60.752(b)(2)(ii) of this subpart shall:</p> <p>(a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill...</p>	<p>LFG collection and control system installed and operated in accordance with the permit and NSPS. A site plan showing updated LFG system layout submitted with semi-annual NSPS operational reports.</p>	<p><input checked="" type="checkbox"/> Continuous¹ <input type="checkbox"/> Intermittent</p>
		<p>(b) Operate the collection system with negative pressure at each wellhead except under the following conditions:</p> <p>(1) A fire or increased well temperature. The owner or operator shall record instances...</p>	<p>The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.</p>	<p><input checked="" type="checkbox"/> Continuous¹ <input type="checkbox"/> Intermittent</p>
		<p>(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well...</p>	<p>The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with NSPS default thresholds for oxygen/nitrogen and temperature or in accordance with approved HOVs for select operating wells. In other instances, wellheads are temporarily decommissioned due to declining flows in accordance with PADEP approved procedures. Under these procedures, exceedances of the NSPS pressure and oxygen levels are not deviations.</p>	<p><input checked="" type="checkbox"/> Continuous^{1,2} <input type="checkbox"/> Intermittent</p>

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

² See also regular NSPS reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operational Standards for Collection and Control Systems)</p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002) <i>continued...</i></p>	(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit and NSPS. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and NSPS and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action shall be taken...	NSPS monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)</p>	<p>Section E, #021 (Source IDs 001, 002, 004, C002)</p>	(a) Except as provided in 60.752(b)(2)(i)(B), the specified methods in paragraphs (a)(1) through (a)(6) of this section shall be used to determine whether the gas collection system is in compliance with 60.752(b)(2)(ii)...	Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit and NSPS (and documented in semi-annual NSPS operational reports).	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
		(b) For purposes of compliance with 60.753(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.752(b)(2)(i). Each well shall...	Wells installed and operated in accordance with NSPS schedule and design plan. A site plan showing the GCCS layout, system expansion, etc., reported in semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent

¹ See also regular NSPS operational reports from the period.

² The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)</p>	<p>Section E, #021 (Source IDs 001, 002, 004, C002)</p>	<p>(c) The following procedures shall be used for compliance with the surface methane operational standard as provided in 60.753(d). (1) After installation of the collection system...</p>	<p>SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.</p>	<p><input checked="" type="checkbox"/> Continuous¹ <input type="checkbox"/> Intermittent</p>
		<p>(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices...</p>	<p>SEM is conducted in accordance with NSPS methods and the permit.</p>	<p><input checked="" type="checkbox"/> Continuous¹ <input type="checkbox"/> Intermittent</p>
		<p>(e) The provisions of this subpart apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction, shall not exceed 5 days for collection systems...</p>	<p>Records maintained of all SSM events; summary of SSM events documented in semi-annual NSPS operational reports.</p>	<p><input checked="" type="checkbox"/> Continuous¹ <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.759] (Subpart WWW – NSPS for MSW Landfills Specifications for Active Collection Systems)</p>	<p>Section E, #022 (Source IDs 001, 002, 004, C002)</p>	<p>(a) Each owner or operator seeking to comply with 60.752(b)(2)(i) shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas...</p>	<p>Active LFG collection system designed, sited, and constructed in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.</p>	<p><input checked="" type="checkbox"/> Continuous¹ <input type="checkbox"/> Intermittent</p>

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 60 NSPS §40 CFR 60.755]</p> <p>(Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)</p>	<p>Section E, #022</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(b) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall construct the gas collection devices using the following equipment or procedures:</p> <p>(1) The landfill gas extraction components...</p>	<p>Active LFG collection system constructed and equipped in accordance with the permit and to meet or exceed NSPS requirements. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.</p>	<p><input checked="" type="checkbox"/> Continuous¹</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(c) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall convey landfill gas to a control system in compliance with 60.752(b)(2)(iii) through collection header pipe(s). The gas mover equipment shall be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment...</p>	<p>Active collection system conveys LFG to a control system via a header pipe in accordance with the permit and the NSPS. Gas mover equipment of the LFG system is sized in accordance with the permit and to meet or exceed NSPS requirements.</p>	<p><input checked="" type="checkbox"/> Continuous¹</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 61 NESHAPs §40 CFR 61.12]</p> <p>(Compliance with standards and maintenance requirements)</p>	<p>Section E, #023</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>In accordance with 40 CFR 61.12(c), the owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice...</p>	<p>Each stationary source is operated and maintained in accordance with the permit and to meet or exceed NESHAP requirements for good air pollution control practices. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of stationary source operation and maintenance.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 63 NESHAP §40 CFR 63.1980]</p> <p>(Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)</p>	<p>Section E, #024</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(1)(i) and (ii)]</p> <p>(a) During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires the operator reduce emissions from the affected source to the greatest extent...</p>	<p>All SSM events consistent with procedures specified in the SSM plan to be consistent with safe and good air pollution control practices. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating permit terms and conditions)</p>	<p>Section E, #025 (Source IDs 001, 002, 004, C002)</p>	<p>The permittee shall comply with the requirements of NSPS Subpart WWW until the more stringent requirements of NSPS Subpart XXX apply pursuant to 40 CFR §60.462(b)(2)(ii). At that time, compliance with the more stringent NSPS Subpart XXX shall be deemed compliance with NSPS Subpart WWW for purposes of compliance with 40 CFR Part 63, Subpart AAAAA.</p>	<p>The landfill became subject to NSPS Subpart XXX on September 25, 2017 with the commencement of construction of the Southeast Realignment expansion. As such, the landfill submitted a Subpart XXX initial design capacity and initial NMOC emission rate report on December 21, 2017 and submitted a Subpart XXX GCCS design plan submitted on December 20, 2018. The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. For the period of January through June 2020, the landfill complied with all requirements of NSPS Subpart WWW and portions of NSPS Subpart XXX, as applicable. Following June 2020, the landfill complied with all provisions of NSPS Subpart XXX.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.762 – Standards for air emissions from municipal solid waste landfills)</p>	<p>Section E, #026 (Source IDs 001, 002, 004, C002)</p>	<p>(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...</p>	<p>Subpart XXX initial design capacity submitted on December 21, 2017.</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(40 CFR §60.762 – Standards for air emissions from municipal solid waste landfills)</p>	<p>Section E, #026</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(b) Each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, must either comply with paragraph (b)(2) of the section or calculate an NMOC emission rate for the landfill using the procedures specified in §60.764. The NMOC emission rate must...</p> <p>(1) N/A – NMOC emission rate greater than 34 megagrams per year</p> <p>(2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either:</p> <p>(i) submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in §60.767...</p> <p>(ii) install and start up a collection and control system that captures the gas generated within the landfill as required...</p>	<p>Subpart XXX collection and control system design plan submitted on December 20, 2018. The landfill became subject to the operational requirements of 40 CFR §60.762(b)(2)(ii) on June 21, 2020.</p>	<p><input checked="" type="checkbox"/> Continuous¹</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(c) For purposes of obtaining an operating permit under Title V of the Clean Air Act, the owner or operator of an MSW landfill subject to the subpart with a design capacity less than 2.5 million megagrams or 2.5 million cubic meters is not subject to the requirement to obtain an operating permit for the landfill under part 70 or 71 of this chapter, unless the landfill is otherwise subject to either part 70 or 71.</p>	<p>N/A. The landfill's design capacity exceeds 2.5 million megagrams or 2.5 million cubic meters.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(d) When an MSW landfill subject to this subpart is closed as defined in this subpart, the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of this chapter for the landfill if the landfill is not otherwise...</p>	<p>N/A. Landfill actively receiving MSW; not yet at closure.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(40 CFR Part §60.760 – Applicability, designation of affected source, and delegation of authority)</p>	<p>Section E, #027</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(a) The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction, or modification after July 17, 2014. Physical or operational changes made to an MSW landfill solely to comply with subparts Cc, Cf, or WWW of this part are not considered construction, reconstruction, or modification for the purposes of this section.</p>	<p>The landfill became subject to 40 CFR Part 60, Subpart XXX on September 25, 2017.</p>	<p><input checked="" type="checkbox"/> Continuous¹</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(b) The following authorities are retained by the Administrator and are not transferred to the state: §60.764(a)(5).</p>	<p>N/A</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(c) Activities required by or conducted pursuant to a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), or state remedial action are not considered construction, reconstruction, or modification for purposes of this subpart.</p>	<p>N/A</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(40 CFR §60.765 – Compliance Provisions)</p>	<p>Section E, #028</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(a) Except as provided in §60.767(c)(2), the specified methods in paragraphs (a)(1) through (6) of this section must be used to determine whether the gas collection system is in compliance with §60.762(b)(2)(ii).</p> <p>(1) For the purposes of calculation the maximum...</p>	<p>Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit and NSPS (and documented in semi-annual NSPS operational reports).</p>	<p><input checked="" type="checkbox"/> Continuous¹</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(b) For purposes of compliance with 60.763(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.767(c). Each well...</p>	<p>Wells installed and operated in accordance with NSPS schedule and design plan. A site plan showing the GCCS layout, system expansion, etc., reported in semi-annual NSPS operational reports.</p>	

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.765 – Compliance Provisions)	Section E, #028 (Source IDs 001, 002, 004, C002)	(c) The following procedures must be used for compliance with the surface methane operational standard as provided in 60.763(d). (1) After installation of the collection system...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section or §60.764(a)(6) must comply with the following instrumentation specifications and procedures for...	SEM is conducted in accordance with NSPS methods and the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) The provisions of this subpart apply at all times, including periods of startup, shutdown or malfunction. During periods of startup, shutdown, and malfunction, you must comply with the work practice specified in §60.763(e) in lieu of the compliance provisions in §60.765.	Records maintained of all SSM events; summary of SSM events documented in semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.763 – Operational standards for collection and control systems)	Section E, #029 (Source IDs 001, 002, 004, C002)	Each owner or operator of an MSW landfill with a gas collection and control system used to comply with the provisions of §60.762(b)(2) must: (a) Operate the collection system such that gas is collected from each...	LFG collection and control system installed and operated in accordance with the permit and NSPS. A site plan showing updated LFG system layout submitted with semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Operate the collection system with negative pressure at each wellhead except under the following conditions: (1) A fire or increased well temperature. The owner or operator shall record instances...	The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.763 – Operational standards for collection and control systems)	Section E, #029 (Source IDs 001, 002, 004, C002)	(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well. A higher operating value demonstration must be submitted to the Administrator for approval and must include supportin data demonstrating that the elevated...	The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with NSPS default thresholds for temperature.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent
		(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.762(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit and NSPS. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and NSPS and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action must be taken...	NSPS monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

² Several landfill gas extraction points were unable to be safely monitored in November and December due to ongoing temporary capping construction activities in the Phase IV area. The landfill submitted a variance request to the Department on November 25, 2020. This variance request was approved by the Department on January 20, 2021.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(a) Design capacity report. Each owner or operator subject to the requirements of this subpart must submit an initial design capacity report to the Administrator. (1) Submission. The initial design capacity report fulfills the requirements of the notification of the date construction is commenced as required by §60.7(a)(1) and must be submitted no later than: (i) November 28, 2016 for landfill that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016; or (ii) Ninety days after the date of commenced construction, modification, or reconstruction for landfills that commence construction, modification, or reconstruction after August 29, 2016. (2) ...	Subpart XXX initial design capacity report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) NMOC emission rate report. Each owner or operator subject to the requirements of this subpart must submit an NMOC emission rate report following the procedure specified in paragraph (i)(2) of this section to the Administrator initially and annually thereafter, except as provided for in paragraph (b)(1)(ii) of this section. The Administrator may... (1) The NMOC emission rate report must contain... (i) The initial NMOC emission rate report may be combined with the initial design capacity report required... (A) November 28, 2016, for landfills that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016, or (B) Ninety days after the date of commenced construction, modification...	Subpart XXX initial NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(c) Collection and control system design plan. Each owner or operator subject to the provision of §60.762(b)(2) must submit a collection and control system design plan...	Subpart XXX collection and control system design plan submitted on December 20, 2018.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Revised design plan. The owner or operator who has already been required to submit a design plan under paragraph (c) of this section must submit a revised design plan to the Administrator for approval as follows: (1) At least 90 days before expanding operations to an area not covered by the previously approved design plan. (2) Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator according to paragraph (c) of this section.	N/A. Revised design plan not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Closure report. Each owner or operator of a controlled landfill must submit a closure report to the Administrator within 30 days of waste acceptance cessation. The Administrator may...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Equipment removal report. Each owner or operator of a controlled landfill must submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment. (1) The equipment removal report must contain the following items: (i) A copy of the closure report submitted...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(40 CFR §60.767 – Reporting Requirements)</p>	<p>Section E, #030</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(g) Annual report. The owner or operator of a landfill seeking to comply with §60.762(b)(2) using an active collection system designed in accordance with §60.762(b)(2)(ii) must submit to the Administrator, following the procedure specified in paragraph (i)(2) of this section, annual reports...</p>	<p>NSPS operational reports submitted semi-annually to PADEP and EPA.</p>	<p><input checked="" type="checkbox"/> Continuous¹</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(h) Initial performance test report. Each owner or operator seeking to comply with §60.762(b)(2)(iii) must include the following information with the initial performance test report required under §60.8</p>	<p>N/A. Initial performance test report not required during the reporting period. Initial performance test report submitted to PADEP in 2004.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(i) Electronic reporting. The owner or operator must submit reports electronically according to paragraphs (i)(1) and (2) of this section.</p> <p>(1) Within 60 days after the date of completing...</p> <p>(2) Each owner or operator required to submit reports...</p>	<p>Reporting conducted in accordance with NSPS Subpart XXX. The EPA has not yet established templates for NSPS operational reports on the US EPA's Central Data Exchange (CDX).</p>	<p><input checked="" type="checkbox"/> Continuous¹</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(j) Corrective action and the corresponding timeline. The owner or operator must submit according to paragraphs (j)(1) and (j)(2) of this section.</p> <p>(1) For corrective action that is required according...</p>	<p>N/A. No root cause analyses or corrective action analyses required during the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
		<p>(k) Liquids addition. The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meter that has employed leachate recirculation or added liquids...</p>	<p>N/A. The landfill does not employ leachate circulation.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(l) Tier 4 notification. (1) The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must provide a notification of the date(s) upon which it intends to demonstrate site-specific surface methane emissions are below 500 parts per million methane, based on...	N/A. Tier 4 testing not applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.768 – Recordkeeping requirements)	Section E, #031 (Source IDs 001, 002, 004, C002)	(a) Except as provided in §60.767(c)(2), each owner or operator of an MSW landfill subject to the provision of §60.762(b)(2)(ii) and (iii) must keep for at least 5 years...	Landfill maintains applicable records in accordance with NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.766 – Monitoring of operations)	Section E, #032 (Source IDs 001, 002, 004, C002)	Except as provided in §60.762(c)(2): (a) Each owner or operator seeking to comply with 60.762(b)(2)(ii)(C) for an active gas collection system must install a sampling port and a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads subject to the provisions of the NSPS are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Each owner or operator seeking to comply with §60.762(b)(2)(iii) using an enclosed combustor must calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment: (1) A temperature monitoring device equipped...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) Each owner or operator seeking to comply with 60.762(b)(2)(iii) using a non-enclosed flare must install, calibrate, maintain, and operate according to the manufacturer's specifications the following...	N/A. The Permittee does not utilize an open flare for NSPS compliance.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.766 – Monitoring of operations)	Section E, #032 (Source IDs 001, 002, 004, C002)	(d) Each owner or operator seeking to demonstrate compliance with §60.762(b)(2)(iii) using a device other than a non-enclosed flare or an enclosed combustor or a treatment system must provide...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator seeking to install a collection system that does not meet the specifications in §60.769 or seeking to monitor alternative parameters to those required by §§60.763 through 60.766 must provide information...	N/A. The permittee has not installed an alternate collection system and does not monitor parameters alternate to those established in 40 CFR §§60.763 – 60.766.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Each owner or operator seeking to demonstrate compliance with the 500 parts per million surface methane operational standard in §60.763(d) must monitor surface concentrations of methane according to the procedures in §60.765(c) and the instrument...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) Each owner or operator seeking to demonstrate compliance with §60.762(b)(2)(iii) using a landfill gas treatment system must maintain and operate all monitoring systems associated with the treatment system in accordance with the site-specific treatment system monitoring plan required in...	N/A. The landfill owner/operator did not control landfill gas with a treatment system during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(h) The monitoring requirements of paragraphs (b), (c) (d) and (g) of this subsection apply at all times the affected source is operating, except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality...	Monitoring is conducted in accordance with NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.764 – Test methods and procedures)	Section E, #033 (Source IDs 001, 002, 004, C002)	(a)(1) NMOC Emission Rate. The landfill owner or operator must calculate the NMOC emission rate using either Equation 1 provided in paragraph (a)(1)(i) of this section or Equation 2 provided in...	NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.769 – Specifications for active collection systems)	Section E, #034 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with §60.762(b)(2)(i) must site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless...	GCCS design plan submitted on December 20, 2018. This plan demonstrates that the GCCS meets the applicable specifications per Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. Prior to this, the operational requirements of Subpart WWW applied.

January 29, 2022
File No. 02219002.04

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

Subject: Title V Annual Compliance Certification – 2020
Bethlehem Landfill (Title V Permit No. 48-00027)

Dear Mr. Wejkszner

SCS Engineers (SCS) has prepared the enclosed Annual Compliance Certification report for the Bethlehem Landfill covering the 2021 calendar year.

If you have any questions regarding this report, please do not hesitate to contact Mr. David Pannucci at the landfill at (610) 317-3200 or either of the undersigned at (703) 471-6150.

Sincerely,



Christopher Woloszyn, EIT
Senior Project Professional
SCS Engineers



Joshua G. Roth, P.E.
Vice President
SCS Engineers

cc: US EPA, Region III
Astor Lawson
David Pannucci

Enclosure





PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY
COMPLIANCE CERTIFICATION FORM
(25 Pa. Code § 127.513)

Plant Name:	Bethlehem LD/Bethlehem Facility	Owner/Operator:	Bethlehem LDFL Co
Tax ID/Plant:	22-3575227-1	DEP Facility ID:	549728
Contact Person:	Mr. David Pannucci	Title:	Regional Engineer
Operating Permit #:	48-00027	Phone Number:	(610) 317-3200

For the period of January 1, 2021 through December 31, 2021, Bethlehem LD/Bethlehem Facility has been in continuous compliance with all applicable requirements of Permit # 48-00027, determined by the method(s) of compliance specified in said permit, except for the following potential deviations:

Sect./ Cond. #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Date(s) and Duration(s)	Corrective Action(s) and Comments
--No instances of deviations from any permit requirements occurred during the reporting period--						

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:	Astor Lawson	Title:	District Manager
Signed:		Date:	1/26/2022

*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 § 121.1] (Definitions)	Section B, #001	Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Prohibition of Air Pollution)	Section B, #002	No person may permit air pollution as that term is defined in the act.	The permittee does not permit air pollution as that term is defined in the act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Property Rights)	Section B, #003	This permit does not convey property rights of any sort, or any exclusive privileges.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.446(a) and (c)] (Permit Expiration)	Section B, #004	This operating permit is issued for a fixed term of five years and shall expire on the date specified on Page 1 of this permit. The term and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided...	N/A. Application for Title V renewal not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B, #005	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least 6 months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is...	N/A. Application for Title V renewal not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.450(a)(4) & 127.464(a)] (Transfer of Ownership or Operational Control)	Section B, #006	(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if...	N/A. No change in ownership or operational control.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B, #007	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department...	Site access granted as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B, #008	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following...	Compliance with specific permit conditions is addressed on a condition-by-condition basis as each condition is set forth in Sections C through E.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.512(c)(2)] (Need to Halt or Reduce Activity Not a Defense)	Section B, #009	It shall not be defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B, #010	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit...	Requested information provided in reasonable timeframe.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.463, 127.512(c)(3) & 127.542] (Reopening and Revising the Title V Permit for Cause)	Section B, #011	(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification...	N/A. Permit not modified, revoked, reopened and reissued or terminated for cause.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.543] (Reopening a Title V Permit for Cause by EPA)	Section B, #012	As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures...	N/A. Permit not reopened and reissued, revoked or terminated for cause by EPA	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.522(a)] (Operating Permit Application Review by the EPA)	Section B, #013	The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of Title V permit application to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail inbox:...	N/A. The permittee was not required to provide a copy of the permit application to the EPA during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.541] (Significant Operating Permit Modifications)	Section B, #014	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications...	N/A. No significant permit modifications were completed during reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 121.1 & 127.462] (Minor Operating Permit Modifications)	Section B, #015	(a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462. (b) Unless precluded by the Clean Air Act...	N/A. No minor permit modifications were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.450] (Administrative Operating Permit Amendments)	Section B, #016	(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments...	N/A. No administrative amendments were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.512(b)] (Severability Clause)	Section B, #017	The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B, #018	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees)...	Fees paid as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B, #019	(a) This permit authorizes De Minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification...	No De Minimis emissions increases occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B, #020	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five years, if the source is reactivated in accordance with the requirements...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B, #021	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B, #022	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection...	Reports are submitted to the appropriate address.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(c) & 127.463(3), Chapter 139; §§ 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B, #023	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures...	Emissions monitoring conducted in compliance with the Title V Permit and additional applicable requirements promulgated under the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B, #024	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit)...	Records maintained and provided if and when requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)] (Reporting Requirements)	Section B, #025	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional...	All reports were submitted as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B, #026	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certification of compliance with the terms and conditions in this permit...	Reporting completed and submitted to PADEP and EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.3] (Operational Flexibility)	Section B, #027	(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act ...	N/A. No changes made.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B, #028	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident...	N/A. Bethlehem Landfill not currently subject to this requirement per the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code § 127.512(e)] (Approved Economic Incentives and Emission Trading Programs)	Section B, #029	No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.	N/A. No permit revisions occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)] (Permit Shield)	Section B, #030	(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code §121.1) as of the date of permit issuance if either of the following applies...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #001	(a) The permittee may not permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following...	No fugitive emissions were emitted from sources other than those listed in the permit. Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.2] (Fugitive Particulate Matter)	Section C, #002	The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C, Site Level Requirement, Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No instances of fugitive particulate matter which passed beyond the landfill's perimeter were observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C, #003	MALODOR EMISSIONS The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source...	Bethlehem Landfill performs weekly odor monitoring, at a minimum. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent <i>[Reference also Section C #010, #012, & #013]</i>
[25 Pa. Code §123.41] (Limitations)	Section C, #004	(a) A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period...	Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ On-site and off-site odors were noted in a limited number of instances during the regular monitoring conducted by the landfill in accordance with the Title V permit. In each instance, the odor did not constitute a malodor. During the monitoring period PADEP conducted several site inspections, no off-site malodors were noted in PADEP 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 §123.42] (Exceptions)	Section C, #005	(a) The limitations of SECTION C, Site Level Requirement, Condition #004 shall not apply to a visible emission in any of the following: (1) When the presence of uncombined water...	N/A. Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating permit terms and conditions)	Section C, #006	The carbon monoxide (CO) emissions from this facility shall be limited to 99.9 tons per years (12 month rolling sum).	Annual emissions reporting. Carbon monoxide emissions did not exceed 99.9 tons during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #007	All sampling, testing and analyses performed in compliance with the requirements of any section of this permit shall be in accordance with Section B – General Title Requirement #023.	Monitoring and testing procedures followed permit and CAA requirements	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #008	(a) If required by the Department, the permittee shall perform a stack test, within the time frame specified by the Department. (b) All performance tests shall be conducted in accordance with 40 CFR Part 60, Section 60.754 and...	N/A. No stack test required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.43] (Measuring techniques)	Section C, #009	(a) Visible emissions may be measured using either of the following: (1) A device approved by the Department and maintained to provide accurate opacity measurements. (2) Observers trained and qualified...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #010	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall conduct weekly inspections of the facility, during daylight hours when the plant is in operation, to detect visible, fugitive and malodor emissions as follows...	The permittee conducts regular (weekly at a minimum) inspections in accordance with the permit. Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #011	All records, reports and analyses results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with Section B – General Title V Requirement #024, and shall be made available to the Department upon written or verbal request at a reasonable time.	The permittee makes all records available to the Department within a reasonable time frame.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #012	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall, at the conclusion of each weekly inspection, record all occurrences of fugitive and visible emissions, and malodors which deviate from the limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #013	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) On a semi-annual basis, the permittee shall compile a report of all logged instances of deviation of the fugitive, visible and malodor emission limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513] (Compliance certification)	Section C, #014	The reporting period for the Certificate of Compliance required by Section B – Condition #25, shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1 st .	An annual compliance certification was submitted to the PADEP by March 1.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.21] (Emission Statements)	Section C, #015	(a) Except as provided in subsection (d), this section applies to stationary sources or facilities: (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious,...	Annual Emission Statement report submitted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.3] (Reporting)	Section C, #016	(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year...	N/A. No source report required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #017	(a) A person responsible for any source specified in SECTION C, Site Level Requirement, Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following: (1) Use, where possible, of water or chemicals...	Water used on all roads and parking areas, as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #018	(a) 25 Pa. Code 123.1(c) requires the person responsible for sources with fugitive emissions potential to take all reasonable actions to prevent particulate matter from becoming airborne...	Fugitive dust control measures implemented per 25 Pa. Code 123.1(c), as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

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 C, #019	The active collection systems must meet the following: (a) Demonstrate that the siting of active collection wells, horizontal collectors, surface collectors, or other extraction devices is of sufficient density throughout...	Active LFG collection system designed and sited in accordance with the permit. As reported in semi-annual operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #020	Uncontrolled stripping of VOC from the leachate and/or condensate shall not be permitted.	No uncontrolled stripping of VOC from leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating permit terms and conditions)	Section C, #021	Open storage (ponding or open top tanks) of leachate and/or condensate shall not be permitted except in an emergency.	No open storage of leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §129.14] (Open Burning Operations)	Section C, #022	(a) Air basins. No person may permit the open burning of material in an air basin. (b) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from...	Open burning is strictly prohibited at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §121.7] (Prohibition of air pollution)	Section C, #023	The permittee shall not permit air pollution as that term is defined in the Pennsylvania Air Pollution Control Act.	The permittee does not permit air pollution as it is defined in the Pennsylvania Air Pollution Control Act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	The permittee shall maintain and demonstrate that the active gas collection system has an overall collection efficiency which is based on at least 80% collection efficiency for the Phase IV landfill area and at least 75% collection efficiency for all other landfill areas.	Collection efficiency is maintained per the permit, as demonstrated by regular calculations.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	(a) The landfill shall submit to the Department a collection and control system (GCCS) design plan (Revised July 2018), or submit a collection and control plan for an alternative design prepared by a professional engineer...	Collection and control system plan submitted to PADEP. The plan was most recently updated in December 2018 to address requirements of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	Within thirty months from the start of waste placement in a cell, interim gas extraction components (vertical wells, horizontal collectors, or other acceptable collection device) shall be installed. Effective capture of landfill gas...	Gas extraction components of the LFG collection system installed and operated in accordance with the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	The owner/operator shall forecast, on an annual basis, the landfill gas generation and collection for the following year. If the forecast indicates...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is monitored and recorded. The current LFG forecast indicates that the capacity of the existing flare is sufficient to control collected LFG.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #001	(a) For paved roadways, the following records shall be maintained on-site and be made available to the Department upon request: (1) Daily log of time and location of any water flushing or vacuum sweeping conducted...	The permittee maintains records of water flushing, and other dust suppression activities per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #002	(a) The owner/operator shall comply with the fugitive emission standards established in this permit. All reasonable actions shall be taken to prevent particulate matter from becoming airborne. (1) All roadways shall be maintained.....	Dust suppression activities conducted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #001 (Source IDs 001, 002, 004, C002)	(a) In addition to the visible emission limitations of 25 Pa. Code, Section 123.41, the control device shall also be subject to the following additional limitation: (1) No flare shall produce visible flames...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 63 NESHAP for Source Categories §40 CFR 63.1975]</p> <p>(Subpart AAAA – NESHAP: MSW Landfills – How Do I Calculate the 3-hour Block Average Used to Demonstrate Compliance?)</p>	<p>Section E, #002</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>Averages are calculated in the same way as they are calculated in 40 CFR part 60, subpart WWW, except that the data collected during the events listed in paragraphs (a), (b), (c), and (d) of this section are not included in any average computed under this subpart...</p>	<p>3-hour block averages are calculated per permit requirements.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(Operating Permit Terms and Conditions)</p>	<p>Section E, #003</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>The following requirements are hereby established for the flare:</p> <p>(a) The flare must be an enclosed ground type which is shrouded with no visible flame shooting from the flare...</p>	<p>The flare is designed, equipped, and operated in accordance with the permit.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(Operating Permit Terms and Conditions)</p>	<p>Section E, #004</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>Source tests shall be conducted on a new or modified flare within 120 days after start-up for: a) either reduction of NMOC by 98 weight percent or reduction of the outlet NMOC concentration to less than 20 parts per million by volume...</p>	<p>N/A. No new or modified flares during the reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[40 CFR Part 60 NSPS §40 CFR 60.754]</p> <p>(Subpart WWW – NSPS for MSW Landfills – Test Methods and Procedures)</p>	<p>Section E, #005</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(a)(1) The landfill owner or operator shall calculate the NMOC emission rate using either the equation provided in paragraph (a)(1)(i) of this section or the equation provided in paragraph (a)(1)(ii) of this section. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for Lo, and 4,000 parts per million by volume as hexane for CNMOC...</p>	<p>N/A. The NMOC emission rate was estimated in accordance with the permit and NSPS prior to this reporting period.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.511]</p> <p>(Operating Permit Terms and Conditions)</p>	<p>Section E, #006</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>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 schedule collection system configurations for the forecast year...</p>	<p>The permittee completes an annual forecast of VOC emissions for the following year in conjunction with the annual AIMS report.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #007 (Source IDs 001, 002, 004, C002)	(a) The permittee shall, on a continuous basis, monitor and record the operating temperature of the enclosed flare, in units of degrees Fahrenheit. (b) The permittee shall ensure that the enclosed flare (Control Device) is equipped with all applicable monitoring equipment...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #008 (Source IDs 001, 002, 004, C002)	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 using the EPA Landfill Gas Emissions Model (2.0 or latest version)...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is documented during routine landfill inspections.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (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 a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads subject to the provisions of the NSPS are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) A temperature monitoring device equipped with a continuous recorder and having an accuracy of 1 percent of the temperature being measured expressed in degrees Celsius or 0.5 C, whichever is greater...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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...	N/A. The Permittee does not utilize an open flare for NSPS compliance.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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 provide information satisfactory to the Administrator...	N/A	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(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 provide information...	Alternate collection components and/or monitoring procedures are outlined in semi-annual operational reports, as appropriate.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	(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). Any...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #010 (Source IDs 001, 002, 004, C002)	Temperatures shall be recorded whenever the flare is in operation. The recording charts or an electronic version shall be made available to the Department upon request...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §135.5] (Recordkeeping)	Section E, #011 (Source IDs 001, 002, 004, C002)	Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.758] (Subpart WWW – NSPS for MSW Landfills – Recordkeeping Requirements)	Section E, #012 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator of an MSW landfill subject to the provisions of 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #013 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(3)(iv)] If an action taken by the permittee during startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's...	N/A. All SSM events consistent with procedures specified in the SSM plan. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10. NESHAP Subpart AAAA was amended in March 2020. These amendments became effective September 27, 2021 and removed the requirement to maintain an SSM plan and associated SSM reporting and recordkeeping.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.402] (General Provisions)	Section E, #014 (Source IDs 001, 002, 004, C002)	An application, form, report or compliance certification submitted under this subchapter shall contain certification by a responsible official as to truth, accuracy and completeness...	All submissions of an application, form, report or compliance certification certified by a responsible official.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #015 (Source IDs 001, 002, 004, C002)	This landfill is subject to 40 CFR Part 60 Subpart WWW of the Standards of Performance for New Stationary Sources and shall comply...	All requests, reports, applications, etc., submitted to EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #016 (Source IDs 001, 002, 004, C002)	The permittee shall, on a quarterly basis, submit a report demonstrating that the collection/capture efficiency of the landfill gas collection system was in compliance during the preceding three months...	Collection efficiency of LFG system estimated quarterly and reported to PADEP.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)	Section E, #017 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator subject to the requirements of this subpart shall submit an initial design capacity report to the Administrator...	N/A. Initial design capacity report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Each owner or operator subject to the requirements of this subpart shall submit an NMOC emission rate report to the Administrator initially and annually thereafter, except as provided for in paragraphs...	N/A. NMOC emission rate estimated and the report submitted in accordance with the permit and NSPS prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Each owner or operator subject to the provisions of 60.752(b)(2)(i) shall submit a collection and control system design plan to the Administrator within one year of the first report, required under paragraph (b) of this section...	N/A. Submission of the Subpart WWW collection and control system design plan was not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(d) Each owner or operator of a controlled landfill shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The administrator may request additional information as may be necessary...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator of a controlled landfill shall submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment...	N/A. No control equipment removal during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)	Section E, #017 (Source IDs 001, 002, 004, C002)	(f) Each owner or operator of a landfill seeking to comply with 60.752(b)(2) using an active collection system designed in accordance with 60.752(b)(2)(ii) shall submit to the Administrator annual reports...	Reports submitted semi-annually to PADEP and EPA.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) Each owner or operator landfill seeking to comply with 60.752(b)(2)(i) shall include the following information with the initial performance test report required under 60.8: (1) A diagram of the collection system...	N/A. Initial report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1965] (Subpart AAAA – NESHAP: MSW Landfills – What is a Deviation?)	Section E, #018 (Source IDs 001, 002, 004, C002)	A deviation is defined in Sec. 63.1990. For purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of this section. (a) A deviation occurs when the control device operating parameter boundaries...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.752] (Subpart WWW – NSPS for MSW Landfills – Standards for Air Emissions from MSW Landfills)	Section E, #019 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...	N/A. Initial design capacity report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operational Standards for Collection and Control Systems)	Section E, #020 (Source IDs 001, 002, 004, C002)	Each owner or operator of an MSW landfill gas collection and control system used to comply with the provisions of 60.752(b)(2)(ii) of this subpart shall: (a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill...	LFG collection and control system installed and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Operate the collection system with negative pressure at each wellhead except under the following conditions: (1) A fire or increased well temperature. The owner or operator shall record instances...	The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well...	The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with NSPS default thresholds for oxygen/nitrogen and temperature or in accordance with approved HOVs for select operating wells. In other instances, wellheads are temporarily decommissioned due to declining flows in accordance with PADEP approved procedures. Under these procedures, exceedances of the NSPS pressure and oxygen levels are not deviations.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

² See also regular reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operational Standards for Collection and Control Systems)	Section E, #020 (Source IDs 001, 002, 004, C002) <i>Continued...</i>	(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit and NSPS. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and NSPS and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action shall be taken...	NSPS monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)	Section E, #021 (Source IDs 001, 002, 004, C002)	(a) Except as provided in 60.752(b)(2)(i)(B), the specified methods in paragraphs (a)(1) through (a)(6) of this section shall be used to determine whether the gas collection system is in compliance with 60.752(b)(2)(ii)...	Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit and NSPS (and documented in semi-annual NSPS operational reports).	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
		(b) For purposes of compliance with 60.753(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.752(b)(2)(i). Each well shall...	Wells installed and operated in accordance with NSPS schedule and design plan.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent

¹ See also regular operational reports from the period.

² The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)	Section E, #021 (Source IDs 001, 002, 004, C002)	(c) The following procedures shall be used for compliance with the surface methane operational standard as provided in 60.753(d). (1) After installation of the collection system...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices...	SEM is conducted in accordance with applicable methods and the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) The provisions of this subpart apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction, shall not exceed 5 days for collection systems...	Records maintained of all SSM events; summary of SSM events documented in semi-annual NSPS operational reports. NESHAP Subpart AAAA was amended in March 2020. These amendments became effective September 27, 2021 and removed the requirement to maintain an SSM plan and associated SSM reporting and recordkeeping.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.759] (Subpart WWW – NSPS for MSW Landfills Specifications for Active Collection Systems)	Section E, #022 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with 60.752(b)(2)(i) shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas...	Active LFG collection system designed, sited, and constructed in accordance with the permit. As reported in semi-annual operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)	Section E, #022 (Source IDs 001, 002, 004, C002)	(b) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall construct the gas collection devices using the following equipment or procedures: (1) The landfill gas extraction components...	Active LFG collection system constructed and equipped in accordance with the permit. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall convey landfill gas to a control system in compliance with 60.752(b)(2)(iii) through collection header pipe(s). The gas mover equipment shall be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment...	Active collection system conveys LFG to a control system via a header pipe in accordance with the permit. Gas mover equipment of the LFG system is sized in accordance with the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 61 NESHAP §40 CFR 61.12] (Compliance with standards and maintenance requirements)	Section E, #023 (Source IDs 001, 002, 004, C002)	In accordance with 40 CFR 61.12(c), the owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice...	Each stationary source is operated and maintained in accordance with the permit and to meet or exceed NESHAP requirements for good air pollution control practices. As reported in semi-annual operational reports, operational data supports the effectiveness of stationary source operation and maintenance.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #024 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(1)(i) and (ii)] (a) During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires the operator reduce emissions from the affected source to the greatest extent...	All SSM events consistent with procedures specified in the SSM plan to be consistent with safe and good air pollution control practices. SSM records are regularly reviewed and summary reports submitted, as necessary, in accordance with 40 CFR 63.10. NESHAP Subpart AAAA was amended in March 2020. These amendments became effective September 27, 2021 and removed the requirement to maintain an SSM plan and associated SSM reporting and recordkeeping.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating permit terms and conditions)	Section E, #025 (Source IDs 001, 002, 004, C002)	The permittee shall comply with the requirements of NSPS Subpart WWW until the more stringent requirements of NSPS Subpart XXX apply pursuant to 40 CFR §60.462(b)(2)(ii). At that time, compliance with the more stringent NSPS Subpart XXX shall be deemed compliance with NSPS Subpart WWW for purposes of compliance with 40 CFR Part 63, Subpart AAAA.	The landfill became subject to NSPS Subpart XXX on September 25, 2017 with the commencement of construction of the Southeast Realignment expansion. As such, the landfill submitted a Subpart XXX initial design capacity and initial NMOC emission rate report on December 21, 2017 and submitted a Subpart XXX GCCS design plan submitted on December 20, 2018. The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020. For the period of January through June 2020, the landfill complied with all requirements of NSPS Subpart WWW and portions of NSPS Subpart XXX, as applicable. Following June 2020, the landfill complied with all provisions of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.762 – Standards for air emissions from municipal solid waste landfills)	Section E, #026 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...	Subpart XXX initial design capacity submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.762 – Standards for air emissions from municipal solid waste landfills)	Section E, #026 (Source IDs 001, 002, 004, C002)	(b) Each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, must either comply with paragraph (b)(2) of the section or calculate an NMOC emission rate for the landfill using the procedures specified in §60.764. The NMOC emission rate must... (1) N/A – NMOC emission rate greater than 34 megagrams per year (2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either: (i) submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in §60.767... (ii) Install and start up a collection and control system that captures the gas generated within the landfill as required...	Subpart XXX collection and control system design plan submitted on December 20, 2018. The landfill became subject to the operational requirements of 40 CFR §60.762(b)(2)(ii) on June 21, 2020.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) For purposes of obtaining an operating permit under Title V of the Clean Air Act, the owner or operator of an MSW landfill subject to the subpart with a design capacity less than 2.5 million megagrams or 2.5 million cubic meters is not subject to the requirement to obtain an operating permit for the landfill under part 70 or 71 of this chapter, unless the landfill is otherwise subject to either part 70 or 71.	N/A. The landfill's design capacity exceeds 2.5 million megagrams or 2.5 million cubic meters.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(d) When an MSW landfill subject to this subpart is closed as defined in this subpart, the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of this chapter for the landfill if the landfill is not otherwise...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR Part §60.760 – Applicability, designation of affected source, and delegation of authority)	Section E, #027 (Source IDs 001, 002, 004, C002)	(a) The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction, or modification after July 17, 2014. Physical or operational changes made to an MSW landfill solely to comply with subparts Cc, Cf, or WWW of this part are not considered construction, reconstruction, or modification for the purposes of this section.	The landfill became subject to 40 CFR Part 60, Subpart XXX on September 25, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) The following authorities are retained by the Administrator and are not transferred to the state: §60.764(a)(5).	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Activities required by or conducted pursuant to a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), or state remedial action are not considered construction, reconstruction, or modification for purposes of this subpart.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.765 – Compliance Provisions)	Section E, #028 (Source IDs 001, 002, 004, C002)	(a) Except as provided in §60.767(c)(2), the specified methods in paragraphs (a)(1) through (6) of this section must be used to determine whether the gas collection system is in compliance with §60.762(b)(2)(ii). (1) For the purposes of calculation the maximum...	Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit (and documented in semi-annual operational reports).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) For purposes of compliance with 60.763(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.767(c). Each well...	Wells installed and operated in accordance with permit and design plan. A site plan showing the GCCS layout, system expansion, etc., reported in semi-annual operational reports.	

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.765 – Compliance Provisions)	Section E, #028 (Source IDs 001, 002, 004, C002)	(c) The following procedures must be used for compliance with the surface methane operational standard as provided in 60.763(d). (1) After installation of the collection system...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section or §60.764(a)(6) must comply with the following instrumentation specifications and procedures for...	SEM is conducted in accordance with applicable EPA methods and the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) The provisions of this subpart apply at all times, including periods of startup, shutdown or malfunction. During periods of startup, shutdown, and malfunction, you must comply with the work practice specified in §60.763(e) in lieu of the compliance provisions in §60.765.	Records maintained of all SSM events; summary of SSM events documented in semi-annual operational reports. NESHAP Subpart AAAAA was amended in March 2020. These amendments became effective September 27, 2021 and removed the requirement to maintain an SSM plan and associated SSM reporting and recordkeeping.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.763 – Operational standards for collection and control systems)	Section E, #029 (Source IDs 001, 002, 004, C002)	Each owner or operator of an MSW landfill with a gas collection and control system used to comply with the provisions of §60.762(b)(2) must: (a) Operate the collection system such that gas is collected from each...	LFG collection and control system installed and operated in accordance with the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Operate the collection system with negative pressure at each wellhead except under the following conditions: (1) A fire or increased well temperature. The owner or operator shall record instances...	The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAAA. In accordance with Subpart AAAAA, the permittee began compliance with the revised requirements of Subpart AAAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.763 – Operational standards for collection and control systems)	Section E, #029 (Source IDs 001, 002, 004, C002)	(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well. A higher operating value demonstration must be submitted to the Administrator for approval and must include supporting data demonstrating that the elevated...	The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with applicable operational standards for temperature.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.762(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action must be taken...	Monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	<p>(a) Design capacity report. Each owner or operator subject to the requirements of this subpart must submit an initial design capacity report to the Administrator.</p> <p>(1) Submission. The initial design capacity report fulfills the requirements of the notification of the date construction is commenced as required by §60.7(a)(1) and must be submitted no later than:</p> <p>(i) November 28, 2016 for landfill that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016; or</p> <p>(ii) Ninety days after the date of commenced construction, modification, or reconstruction for landfills that commence construction, modification, or reconstruction after August 29, 2016.</p> <p>(2) ...</p>	Subpart XXX initial design capacity report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		<p>(b) NMOC emission rate report. Each owner or operator subject to the requirements of this subpart must submit an NMOC emission rate report following the procedure specified in paragraph (i)(2) of this section to the Administrator initially and annually thereafter, except as provided for in paragraph (b)(1)(ii) of this section. The Administrator may...</p> <p>(1) The NMOC emission rate report must contain...</p> <p>(i) The initial NMOC emission rate report may be combined with the initial design capacity report required...</p> <p>(A) November 28, 2016, for landfills that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016, or</p> <p>(B) Ninety days after the date of commenced construction, modification...</p>	Subpart XXX initial NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(c) Collection and control system design plan. Each owner or operator subject to the provision of §60.762(b)(2) must submit a collection and control system design plan...	Subpart XXX collection and control system design plan submitted on December 20, 2018.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Revised design plan. The owner or operator who has already been required to submit a design plan under paragraph (c) of this section must submit a revised design plan to the Administrator for approval as follows: (1) At least 90 days before expanding operations to an area not covered by the previously approved design plan. (2) Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator according to paragraph (c) of this section.	N/A. Revised design plan not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Closure report. Each owner or operator of a controlled landfill must submit a closure report to the Administrator within 30 days of waste acceptance cessation. The Administrator may...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Equipment removal report. Each owner or operator of a controlled landfill must submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment. (1) The equipment removal report must contain the following items: (i) A copy of the closure report submitted...	N/A. Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(g) Annual report. The owner or operator of a landfill seeking to comply with §60.762(b)(2) using an active collection system designed in accordance with §60.762(b)(2)(ii) must submit to the Administrator, following the procedure specified in paragraph (i)(2) of this section, annual reports...	Reports submitted semi-annually to PADEP and EPA.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(h) Initial performance test report. Each owner or operator seeking to comply with §60.762(b)(2)(iii) must include the following information with the initial performance test report required under §60.8	N/A. Initial performance test report not required during the reporting period. Initial performance test report submitted to PADEP in 2004.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(i) Electronic reporting. The owner or operator must submit reports electronically according to paragraphs (i)(1) and (2) of this section. (1) Within 60 days after the date of completing... (2) Each owner or operator required to submit reports...	Reporting conducted in accordance with NSPS Subpart XXX. The EPA has not yet established templates for NSPS operational reports on the US EPA's Central Data Exchange (CDX).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(j) Corrective action and the corresponding timeline. The owner or operator must submit according to paragraphs (j)(1) and (j)(2) of this section. (1) For corrective action that is required according...	N/A. No root cause analyses or corrective action analyses required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(k) Liquids addition. The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meter that has employed leachate recirculation or added liquids...	N/A. The landfill does not employ leachate circulation.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(l) Tier 4 notification. (1) The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must provide a notification of the date(s) upon which it intends to demonstrate site-specific surface methane emissions are below 500 parts per million methane, based on...	N/A. Tier 4 testing not applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.768 – Recordkeeping requirements)	Section E, #031 (Source IDs 001, 002, 004, C002)	(a) Except as provided in §60.767(c)(2), each owner or operator of an MSW landfill subject to the provision of §60.762(b)(2)(ii) and (iii) must keep for at least 5 years...	Landfill maintains applicable records in accordance with NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.766 – Monitoring of operations)	Section E, #032 (Source IDs 001, 002, 004, C002)	Except as provided in §60.762(c)(2): (a) Each owner or operator seeking to comply with 60.762(b)(2)(ii)(C) for an active gas collection system must install a sampling port and a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Each owner or operator seeking to comply with §60.762(b)(2)(iii) using an enclosed combustor must calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment: (1) A temperature monitoring device equipped...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) Each owner or operator seeking to comply with 60.762(b)(2)(iii) using a non-enclosed flare must install, calibrate, maintain, and operate according to the manufacturer's specifications the following...	N/A. The Permittee does not utilize an open flare.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.766 – Monitoring of operations)	Section E, #032 (Source IDs 001, 002, 004, C002)	(d) Each owner or operator seeking to demonstrate compliance with §60.762(b)(2)(iii) using a device other than a non-enclosed flare or an enclosed combustor or a treatment system must provide...	N/A.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator seeking to install a collection system that does not meet the specifications in §60.769 or seeking to monitor alternative parameters to those required by §§60.763 through 60.766 must provide information...	N/A. The permittee has not installed an alternate collection system and does not monitor parameters alternate to those established in 40 CFR §§60.763 – 60.766.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Each owner or operator seeking to demonstrate compliance with the 500 parts per million surface methane operational standard in §60.763(d) must monitor surface concentrations of methane according to the procedures in §60.765(c) and the instrument...	SEM of methane is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) Each owner or operator seeking to demonstrate compliance with §60.762(b)(2)(iii) using a landfill gas treatment system must maintain and operate all monitoring systems associated with the treatment system in accordance with the site-specific treatment system monitoring plan required in...	N/A. The landfill owner/operator did not control landfill gas with a treatment system during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(h) The monitoring requirements of paragraphs (b), (c) (d) and (g) of this subsection apply at all times the affected source is operating, except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality...	Monitoring is conducted in accordance with NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.764 – Test methods and procedures)	Section E, #033 (Source IDs 001, 002, 004, C002)	(a)(1) NMOC Emission Rate. The landfill owner or operator must calculate the NMOC emission rate using either Equation 1 provided in paragraph (a)(1)(i) of this section or Equation 2 provided in...	NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.769 – Specifications for active collection systems)	Section E, #034 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with §60.762(b)(2)(i) must site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless...	GCCS design plan submitted on December 20, 2018. This plan demonstrates that the GCCS meets the applicable specifications per Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

January 27, 2023
File No. 02219002.06

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

Subject: Title V Annual Compliance Certification – 2022
Bethlehem Landfill (Title V Permit No. 48-00027)

Dear Mr. Wejkszner

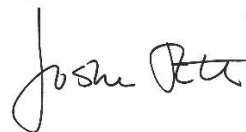
SCS Engineers (SCS) has prepared the enclosed Annual Compliance Certification report for the Bethlehem Landfill covering the 2022 calendar year.

If you have any questions regarding this report, please do not hesitate to contact Mr. David Pannucci at the landfill at (585) 703-4952 or either of the undersigned at (703) 471-6150.

Sincerely,



Christopher Woloszyn, EIT
Senior Project Professional
SCS Engineers



Joshua G. Roth, P.E.
Vice President
SCS Engineers

cc: US EPA, Region III
Astor Lawson
David Pannucci

Enclosure





PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY
COMPLIANCE CERTIFICATION FORM
(25 Pa. Code § 127.513)


Plant Name:	Bethlehem LD/Bethlehem Facility	Owner/Operator:	Bethlehem LDFL Co.
Tax ID/Plant:	22-3575227-1	DEP Facility ID:	549728
Contact Person:	Mr. David Pannucci	Title:	Regional Engineer
Operating Permit #:	48-00027	Phone Number:	(585) 703-4952

For the period of **January 1, 2021 through December 31, 2022**, Bethlehem LD/Bethlehem Facility has been in continuous compliance with all applicable requirements of Permit # **48-00027**, determined by the method(s) of compliance specified in said permit, except for the following potential deviations:

Sect./ Cond. #	Citation #	Source	Potential Deviation	Monitoring Method(s)	Date(s) and Duration(s)	Corrective Action(s) and Comments
<i>No instances of deviations from monitoring requirements as specified in the Title V permit occurred during the reporting 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:	Astor Lawson	Title:	District Manager
Signed:		Date:	1/30/2023

*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 § 121.1] (Definitions)	Section B, #001	Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Prohibition of Air Pollution)	Section B, #002	No person may permit air pollution as that term is defined in the act.	The permittee does not permit air pollution as that term is defined in the act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(c)(4)] (Property Rights)	Section B, #003	This permit does not convey property rights of any sort, or any exclusive privileges.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.446(a) and (c)] (Permit Expiration)	Section B, #004	This operating permit is issued for a fixed term of five years and shall expire on the date specified on Page 1 of this permit. The term and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided...	N/A - Application for Title V renewal not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B, #005	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least 6 months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is...	N/A - Application for Title V renewal not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.450(a)(4) & 127.464(a)] (Transfer of Ownership or Operational Control)	Section B, #006	(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if...	N/A - No change in ownership or operational control.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B, #007	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department...	Site access granted as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B, #008	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following...	Compliance with specific permit conditions is addressed on a condition-by-condition basis as each condition is set forth in Sections C through E.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.512(c)(2)] (Need to Halt or Reduce Activity Not a Defense)	Section B, #009	It shall not be defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B, #010	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit...	Requested information was provided in reasonable timeframe.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code §§ 127.463, 127.512(c)(3) & 127.542] (Reopening and Revising the Title V Permit for Cause)	Section B, #011	(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification...	N/A - Permit not modified, revoked, reopened and reissued or terminated for cause.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.543] (Reopening a Title V Permit for Cause by EPA)	Section B, #012	As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures...	N/A - Permit not reopened and reissued, revoked or terminated for cause by EPA	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.522(a)] (Operating Permit Application Review by the EPA)	Section B, #013	The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of Title V permit application to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required...	N/A - The permittee was not required to provide a copy of the permit application to the EPA during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.541] (Significant Operating Permit Modifications)	Section B, #014	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications...	N/A - No significant permit modifications were completed during reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.1 & 127.462] (Minor Operating Permit Modifications)	Section B, #015	The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA...	N/A - No minor permit modifications were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa Code § 127.450] (Administrative Operating Permit Amendments)	Section B, #016	(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA...	N/A - No administrative amendments were completed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa Code § 127.512(b)] (Severability Clause)	Section B, #017	The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not...	N/A -	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B, #018	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees)...	Fees paid as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B, #019	(a) This permit authorizes De Minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification...	No De Minimis emissions increases occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B, #020	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five years, if the source is reactivated in accordance with the requirements...	N/A – No source was reactivated.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B, #021	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including...	N/A -	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B, #022	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection...	Reports are submitted to the appropriate address.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.441(c) & 127.463(3), Chapter 139; §§ 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B, #023	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures...	Emissions monitoring conducted in compliance with the Title V Permit and additional applicable requirements promulgated under the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B, #024	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit)...	Records maintained and provided if and when requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)] (Reporting Requirements)	Section B, #025	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional...	All reports were submitted as required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B, #026	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certification of compliance with the terms and conditions in this permit...	Reporting completed and submitted to PADEP and EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.3] (Operational Flexibility)	Section B, #027	(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act ...	N/A - No changes made.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B, #028	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident...	N/A - Bethlehem Landfill not currently subject to this requirement per the CAA.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.512(e)] (Approved Economic Incentives and Emission Trading Programs)	Section B, #029	No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.	N/A - No permit revisions occurred during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)] (Permit Shield)	Section B, #030	(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code §121.1) as of the date of permit issuance if either of the following applies...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #001	(a) The permittee may not permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following...	No fugitive emissions were emitted from sources other than those listed in the permit. Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.2] (Fugitive Particulate Matter)	Section C, #002	The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C, Site Level Requirement, Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed. No instances of fugitive particulate matter which passed beyond the landfill's perimeter were observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C, #003	MALODOR EMISSIONS The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property...	Permittee conducts regular (weekly at minimum) monitoring per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent <i>[Reference also Section C #010, #012, & #013]</i>
[25 Pa. Code §123.41] (Limitations)	Section C, #004	(a) A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period...	Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.42] (Exceptions)	Section C, #005	(a) The limitations of SECTION C, Site Level Requirement, Condition #004 shall not apply to a visible emission in any of the following: (1) When the presence of uncombined water...	N/A - Visible emissions in exceedance of the limits given in this permit condition were not observed during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ On-site and off-site odors were noted in a limited number of instances during the regular monitoring conducted by the landfill in accordance with the Title V permit. In each instance, the odor did not constitute a malodor. During the monitoring period PADEP conducted several site inspections, no off-site malodors were noted in PADEP 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 C, #006	The carbon monoxide (CO) emissions from this facility shall be limited to 99.9 tons per years (12 month rolling sum).	Annual emissions reporting. Carbon monoxide emissions did not exceed 99.9 tons during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #007	All sampling, testing and analyses performed in compliance with the requirements of any section of this permit shall be in accordance with Section B – General Title Requirement #023.	Monitoring and testing procedures followed permit and CAA requirements	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #008	(a) If required by the Department, the permittee shall perform a stack test, within the time frame specified by the Department. (b) All performance tests shall be conducted in accordance with 40 CFR Part 60, Section 60.754 and...	N/A - No stack test required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.43] (Measuring techniques)	Section C, #009	(a) Visible emissions may be measured using either of the following: (1) A device approved by the Department and maintained to provide accurate opacity measurements. (2) Observers trained and qualified...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #010	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall conduct weekly inspections of the facility, during daylight hours when the plant is in operation, to detect visible, fugitive and malodor emissions as follows...	The permittee conducts regular (weekly at a minimum) inspections in accordance with the permit. Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements)	Section C, #011	All records, reports and analyses results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with Section B – General Title V Requirement #024, and shall be made available to the Department upon written or verbal request at a reasonable time.	The permittee makes all records available to the Department within a reasonable time frame.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #012	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) The permittee shall, at the conclusion of each weekly inspection, record all occurrences of fugitive and visible emissions, and malodors which deviate from the limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section C, #013	FUGITIVE, VISIBLE AND MALODOR EMISSIONS (a) On a semi-annual basis, the permittee shall compile a report of all logged instances of deviation of the fugitive, visible and malodor emission limitations...	Permittee conducts regular (weekly at minimum) inspections per permit requirements. Records of these monitoring events are regularly reviewed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.513] (Compliance certification)	Section C, #014	The reporting period for the Certificate of Compliance required by Section B – Condition #25, shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1 st .	An annual compliance certification was submitted to the PADEP by March 1.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.21] (Emission Statements)	Section C, #015	(a) Except as provided in subsection (d), this section applies to stationary sources or facilities: (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious,...	Annual Emission Statement report submitted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.3] (Reporting)	Section C, #016	(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year...	N/A - No source report required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #017	(a) A person responsible for any source specified in SECTION C, Site Level Requirement, Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following: (1) Use, where possible, of water or chemicals...	Water is used on roads and parking areas, as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of Certain Fugitive Emissions)	Section C, #018	(a) 25 Pa. Code 123.1(c) requires the person responsible for sources with fugitive emissions potential to take all reasonable actions to prevent particulate matter from becoming airborne...	Fugitive dust control measures implemented per 25 Pa. Code 123.1(c), as needed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section C, #019	The active collection systems must meet the following: (a) Demonstrate that the siting of active collection wells, horizontal collectors, surface collectors, or other extraction devices is of sufficient density throughout...	Active LFG collection system designed and sited in accordance with the permit. As reported in semi-annual operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

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 C, #020	Uncontrolled stripping of VOC from the leachate and/or condensate shall not be permitted.	No uncontrolled stripping of VOC from leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.512] (Operating permit terms and conditions)	Section C, #021	Open storage (ponding or open top tanks) of leachate and/or condensate shall not be permitted except in an emergency.	No open storage of leachate or condensate at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §129.14] (Open Burning Operations)	Section C, #022	(a) Air basins. No person may permit the open burning of material in an air basin. (b) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from...	Open burning is strictly prohibited at the Bethlehem Landfill.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §121.7] (Prohibition of air pollution)	Section C, #023	The permittee shall not permit air pollution as that term is defined in the Pennsylvania Air Pollution Control Act.	The permittee does not permit air pollution as it is defined in the Pennsylvania Air Pollution Control Act.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #001	The permittee shall maintain and demonstrate that the active gas collection system has an overall collection efficiency which is based on at least 80% collection efficiency for the Phase IV landfill area and at least 75% collection efficiency for all other landfill areas.	Collection efficiency is maintained per the permit, as demonstrated by regular calculations.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #002	(a) The landfill shall submit to the Department a collection and control system (GCCS) design plan (Revised July 2018), or submit a collection and control plan for an alternative design prepared by a professional engineer...	Collection and control system plan submitted to PADEP. The plan was most recently updated in December 2018 to address requirements of NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #003	Within thirty months from the start of waste placement in a cell, interim gas extraction components (vertical wells, horizontal collectors, or other acceptable collection device) shall be installed. Effective capture of landfill gas...	Gas extraction components of the LFG collection system installed and operated in accordance with the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCE ID 001 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section D, #004	The owner/operator shall forecast, on an annual basis, the landfill gas generation and collection for the following year. If the forecast indicates...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is monitored and recorded. The current LFG forecast indicates that the capacity of the existing flare is sufficient to control collected LFG.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #001	(a) For paved roadways, the following records shall be maintained on-site and be made available to the Department upon request: (1) Daily log of time and location of any water flushing or vacuum sweeping conducted...	The permittee maintains records of water flushing, and other dust suppression activities per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
SOURCE ID 002 – LANDFILL SURFACE AND ROADWAY [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section D, #002	(a) The owner/operator shall comply with the fugitive emission standards established in this permit. All reasonable actions shall be taken to prevent particulate matter from becoming airborne. (1) All roadways shall be maintained.....	Dust suppression activities conducted per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #001 (Source IDs 001, 002, 004, C002)	(a) In addition to the visible emission limitations of 25 Pa, Code, Section 123.41, the control device shall also be subject to the following additional limitation: (1) No flare shall produce visible flames...	Visible emissions measured by trained observers, where applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP for Source Categories §40 CFR 63.1975] (Subpart AAAA – NESHAP: MSW Landfills – How Do I Calculate the 3-hour Block Average Used to Demonstrate Compliance?)	Section E, #002 (Source IDs 001, 002, 004, C002)	Averages are calculated in the same way as they are calculated in 40 CFR part 60, subpart WWW, except that the data collected during the events listed in paragraphs (a), (b), (c), and (d) of this section are not included in any average computed under this subpart...	3-hour block averages are calculated per permit requirements.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #003 (Source IDs 001, 002, 004, C002)	The landfill owns and operates an enclosed ground flare for the control of LFG emissions. In accordance with Best Available Technology (BAT) requirements for enclosed flares, the flare station includes the following equipment: • An enclosed ground flare designed to combust...	The flare is designed, equipped, and operated in accordance with the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #004 (Source IDs 001, 002, 004, C002)	Source tests shall be conducted on a new or modified flare within 120 days after start-up for: a) either reduction of NMOC by 98 weight percent or reduction of the outlet NMOC concentration to less than 20 parts per million by volume...	N/A - No new or modified flares during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.754] (Subpart WWW – NSPS for MSW Landfills – Test Methods and Procedures)	Section E, #005 (Source IDs 001, 002, 004, C002)	(a)(1) The landfill owner or operator shall calculate the NMOC emission rate using either the equation provided in paragraph (a)(1)(i) of this section or the equation provided in paragraph (a)(1)(ii) of this section. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for Lo, and 4,000 parts per million by volume as hexane for CNMOC...	N/A - The NMOC emission rate was estimated in accordance with the permit and NSPS prior to this reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Operating Permit Terms and Conditions)	Section E, #006 (Source IDs 001, 002, 004, C002)	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 schedule collection system configurations for the forecast year...	The permittee completes an annual forecast of VOC emissions for the following year in conjunction with the annual AIMS report.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #007 (Source IDs 001, 002, 004, C002)	(a) The permittee shall, on a continuous basis, monitor and record the operating temperature of the enclosed flare, in units of degrees Fahrenheit. (b) The permittee shall ensure that the enclosed flare (Control Device) is equipped with all applicable monitoring equipment...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #008 (Source IDs 001, 002, 004, C002)	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 using the EPA Landfill Gas Emissions Model (2.0 or latest version)...	LFG generation rates are estimated using the EPA LandGEM per the permit requirements. The total amount of LFG combusted by the flare is documented during routine landfill inspections.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (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 a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads subject to the provisions of the NSPS are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) A temperature monitoring device equipped with a continuous recorder and having an accuracy of 1 percent of the temperature being measured expressed in degrees Celsius or 0.5 C, whichever is greater...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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...	N/A - The Permittee does not utilize an open flare for NSPS compliance.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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 provide information satisfactory to the Administrator...	N/A	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(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 provide information...	Alternate collection components and/or monitoring procedures are outlined in semi-annual operational reports, as appropriate.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.756] (Subpart WWW – NSPS for MSW Landfills – Monitoring of Operations)	Section E, #009 (Source IDs 001, 002, 004, C002)	(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). Any...	SEM of methane is conducted quarterly at a minimum. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (Operating Permit Terms and Conditions)	Section E, #010 (Source IDs 001, 002, 004, C002)	Temperatures shall be recorded whenever the flare is in operation. The recording charts or an electronic version shall be made available to the Department upon request...	The flare is equipped with thermocouple(s) to measure and record combustion temperature. Records of combustion temperature are regularly reviewed to evaluate compliance with the applicable combustion temperature limit as established during the most recent performance test and the permit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §135.5] (Recordkeeping)	Section E, #011 (Source IDs 001, 002, 004, C002)	Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.758] (Subpart WWW – NSPS for MSW Landfills – Recordkeeping Requirements)	Section E, #012 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator of an MSW landfill subject to the provisions of 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records...	All records maintained per permit requirements and available as requested.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #013 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(3)(iv)] If an action taken by the permittee during startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's...	NESHAP Subpart AAAA was amended in March 2020. These amendments became effective September 27, 2021 and removed the requirement to maintain an SSM plan and associated SSM reporting and recordkeeping.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.402] (General Provisions)	Section E, #014 (Source IDs 001, 002, 004, C002)	An application, form, report or compliance certification submitted under this subchapter shall contain certification by a responsible official as to truth, accuracy and completeness...	All submissions of an application, form, report or compliance certification certified by a responsible official.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #015 (Source IDs 001, 002, 004, C002)	This landfill is subject to 40 CFR Part 60 Subpart WWW of the Standards of Performance for New Stationary Sources and shall comply...	All requests, reports, applications, etc., submitted to EPA per permit requirements.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.511] (Monitoring and Related Recordkeeping and Reporting Requirements)	Section E, #016 (Source IDs 001, 002, 004, C002)	The permittee shall, on a quarterly basis, submit a report demonstrating that the collection/capture efficiency of the landfill gas collection system was in compliance during the preceding three months...	Collection efficiency of LFG system estimated quarterly and reported to PADEP.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)	Section E, #017 (Source IDs 001, 002, 004, C002)	Except as provided in 60.752(b)(2)(i)(B), (a) Each owner or operator subject to the requirements of this subpart shall submit an initial design capacity report to the Administrator...	N/A - Initial design capacity report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(b) Each owner or operator subject to the requirements of this subpart shall submit an NMOC emission rate report to the Administrator initially and annually thereafter, except as provided for in paragraphs...	N/A - NMOC emission rate estimated and the report submitted in accordance with the permit and NSPS prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Each owner or operator subject to the provisions of 60.752(b)(2)(i) shall submit a collection and control system design plan to the Administrator within one year of the first report, required under paragraph (b) of this section...	N/A - Submission of the Subpart WWW collection and control system design plan was not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(d) Each owner or operator of a controlled landfill shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The administrator may request additional information as may be necessary...	N/A - Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator of a controlled landfill shall submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment...	N/A - No control equipment removal during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.757] (Subpart WWW – NSPS for MSW Landfills – Reporting Requirements)	Section E, #017 (Source IDs 001, 002, 004, C002)	(f) Each owner or operator of a landfill seeking to comply with 60.752(b)(2) using an active collection system designed in accordance with 60.752(b)(2)(ii) shall submit to the Administrator annual reports...	Reports submitted semi-annually to PADEP and EPA.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) Each owner or operator landfill seeking to comply with 60.752(b)(2)(i) shall include the following information with the initial performance test report required under 60.8: (1) A diagram of the collection system...	N/A - Initial report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1965] (Subpart AAAA – NESHAP: MSW Landfills – What is a Deviation?)	Section E, #018 (Source IDs 001, 002, 004, C002)	A deviation is defined in Sec. 63.1990. For purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of this section. (a) A deviation occurs when the control device operating parameter boundaries...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.752] (Subpart WWW – NSPS for MSW Landfills – Standards for Air Emissions from MSW Landfills)	Section E, #019 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...	N/A - Initial design capacity report submitted prior to the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operational Standards for Collection and Control Systems)	Section E, #020 (Source IDs 001, 002, 004, C002)	Each owner or operator of an MSW landfill gas collection and control system used to comply with the provisions of 60.752(b)(2)(ii) of this subpart shall: (a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill...	LFG collection and control system installed and operated in accordance with the permit and NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Operate the collection system with negative pressure at each wellhead except under the following conditions: (1) A fire or increased well temperature. The owner or operator shall record instances...	The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well...	The LFG collection system is operated per permit requirements and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with applicable NSPS default thresholds or in accordance with approved HOVs for select operating wells. In other instances, wellheads are temporarily decommissioned due to declining flows in accordance with PADEP approved procedures. Under these procedures, exceedances of the NSPS pressure levels are not deviations.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHA Subpart AAAA.

² See also regular reports from the period.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.753] (Subpart WWW – NSPS for MSW Landfills – Operational Standards for Collection and Control Systems)</p>	<p>Section E, #020 (Source IDs 001, 002, 004, C002) <i>Continued...</i></p>	(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly. SEM results submitted to PADEP and EPA via semi-annual NSPS operational reports.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit and NSPS. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ^{1,2} <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and NSPS and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action shall be taken...	NSPS monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
<p>GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)</p>	<p>Section E, #021 (Source IDs 001, 002, 004, C002)</p>	(a) Except as provided in 60.752(b)(2)(i)(B), the specified methods in paragraphs (a)(1) through (a)(6) of this section shall be used to determine whether the gas collection system is in compliance with 60.752(b)(2)(ii)...	Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit and NSPS (and documented in semi-annual NSPS operational reports).	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent
		(b) For purposes of compliance with 60.753(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.752(b)(2)(i). Each well shall...	Wells installed and operated in accordance with NSPS schedule and design plan.	<input checked="" type="checkbox"/> Continuous ² <input type="checkbox"/> Intermittent

¹ See also regular operational reports from the period.

² The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHA Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)	Section E, #021 (Source IDs 001, 002, 004, C002)	(c) The following procedures shall be used for compliance with the surface methane operational standard as provided in 60.753(d). (1) After installation of the collection system, the owner or operator shall monitor surface concentrations of methane...	SEM of methane is conducted quarterly at a minimum. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices...	SEM is conducted in accordance with applicable methods and the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) The provisions of this subpart apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction, shall not exceed 5 days for collection systems...	NESHAP Subpart AAAA was amended in March 2020. These amendments became effective September 27, 2021 and removed the requirement to maintain an SSM plan and associated SSM reporting and recordkeeping.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.759] (Subpart WWW – NSPS for MSW Landfills Specifications for Active Collection Systems)	Section E, #022 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with 60.752(b)(2)(i) shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas...	Active LFG collection system designed, sited, and constructed in accordance with the permit. As reported in semi-annual operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 60 NSPS §40 CFR 60.755] (Subpart WWW – NSPS for MSW Landfills – Compliance Provisions)	Section E, #022 (Source IDs 001, 002, 004, C002)	(b) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall construct the gas collection devices using the following equipment or procedures: (1) The landfill gas extraction components...	Active LFG collection system constructed and equipped in accordance with the permit. As reported in semi-annual NSPS operational reports, operational data supports the effectiveness of the LFG collection system design.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) Each owner or operator seeking to comply with 60.752(b)(2)(i)(A) shall convey landfill gas to a control system in compliance with 60.752(b)(2)(iii) through collection header pipe(s). The gas mover equipment shall be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment...	Active collection system conveys LFG to a control system via a header pipe in accordance with the permit. Gas mover equipment of the LFG system is sized in accordance with the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 61 NESHAP §40 CFR 61.12] (Compliance with standards and maintenance requirements)	Section E, #023 (Source IDs 001, 002, 004, C002)	In accordance with 40 CFR 61.12(c), the owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice...	Each stationary source is operated and maintained in accordance with the permit and to meet or exceed NESHAP requirements for good air pollution control practices. As reported in semi-annual operational reports, operational data supports the effectiveness of stationary source operation and maintenance.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [40 CFR Part 63 NESHAP §40 CFR 63.1980] (Subpart AAAA – NESHAP: MSW Landfills – What Records and Reports Must I Keep and Submit?)	Section E, #024 (Source IDs 001, 002, 004, C002)	[Additional authority for this permit condition is also derived from 40 CFR 63.6(e)(1)(i) and (ii)] (a) During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires the operator reduce emissions from the affected source to the greatest extent...	NESHAP Subpart AAAA was amended in March 2020. These amendments became effective September 27, 2021 and removed the requirement to maintain an SSM plan and associated SSM reporting and recordkeeping.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(Operating permit terms and conditions)</p>	<p>Section E, #025</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>The permittee shall comply with the requirements of NSPS Subpart WWW until the more stringent requirements of NSPS Subpart XXX apply pursuant to 40 CFR §60.462(b)(2)(ii). At that time, compliance with the more stringent NSPS Subpart XXX shall be deemed compliance with NSPS Subpart WWW for purposes of compliance with 40 CFR Part 63, Subpart AAAA.</p>	<p>The landfill became subject to NSPS Subpart XXX on September 25, 2017 with the commencement of construction of the Southeast Realignment expansion. As such, the landfill submitted a Subpart XXX initial design capacity and initial NMOC emission rate report on December 21, 2017 and submitted a Subpart XXX GCCS design plan submitted on December 20, 2018. The landfill became subject to the operational requirements of Subpart XXX on June 21, 2020.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>GROUP 01 – LANDFILL OPERATIONS</p> <p>[25 Pa. Code §127.512]</p> <p>(40 CFR §60.762 – Standards for air emissions from municipal solid waste landfills)</p>	<p>Section E, #026</p> <p>(Source IDs 001, 002, 004, C002)</p>	<p>(a) Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume shall submit an initial design capacity report to the Administrator...</p>	<p>Subpart XXX initial design capacity submitted on December 21, 2017.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.762 – Standards for air emissions from municipal solid waste landfills)	Section E, #026 (Source IDs 001, 002, 004, C002)	(b) Each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, must either comply with paragraph (b)(2) of the section or calculate an NMOC emission rate for the landfill using the procedures specified in §60.764. The NMOC emission rate must... (1) N/A – NMOC emission rate greater than 34 megagrams per year (2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either: (i) submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in §60.767... (ii) Install and start up a collection and control system that captures the gas generated within the landfill as required...	Subpart XXX collection and control system design plan submitted on December 20, 2018. The landfill became subject to the operational requirements of 40 CFR §60.762(b)(2)(ii) on June 21, 2020.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) For purposes of obtaining an operating permit under Title V of the Clean Air Act, the owner or operator of an MSW landfill subject to the subpart with a design capacity less than 2.5 million megagrams or 2.5 million cubic meters is not subject to the requirement to obtain an operating permit for the landfill under part 70 or 71 of this chapter, unless the landfill is otherwise subject to either part 70 or 71.	N/A - The landfill's design capacity exceeds 2.5 million megagrams or 2.5 million cubic meters.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(d) When an MSW landfill subject to this subpart is closed as defined in this subpart, the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of this chapter for the landfill if the landfill is not otherwise...	N/A - Landfill actively receiving MSW and is not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR Part §60.760 – Applicability, designation of affected source, and delegation of authority)	Section E, #027 (Source IDs 001, 002, 004, C002)	(a) The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction, or modification after July 17, 2014. Physical or operational changes made to an MSW landfill solely to comply with subparts Cc, Cf, or WWW of this part are not considered construction, reconstruction, or modification for the purposes of this section.	The landfill became subject to 40 CFR Part 60, Subpart XXX on September 25, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) The following authorities are retained by the Administrator and are not transferred to the state: §60.764(a)(5).	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(c) Activities required by or conducted pursuant to a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), or state remedial action are not considered construction, reconstruction, or modification for purposes of this subpart.	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.765 – Compliance Provisions)	Section E, #028 (Source IDs 001, 002, 004, C002)	(a) Except as provided in §60.767(c)(2), the specified methods in paragraphs (a)(1) through (6) of this section must be used to determine whether the gas collection system is in compliance with §60.762(b)(2)(ii). (1) For the purposes of calculation the maximum...	Work practices, operations, monitoring, and recordkeeping of the gas collection system are conducted in accordance with the permit (and documented in semi-annual operational reports).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) For purposes of compliance with 60.763(a), each owner or operator of a controlled landfill shall place each well or design component specified in the approved design plan as provided in 60.767(c). Each well...	Wells installed and operated in accordance with permit and design plan. A site plan showing the GCCS layout, system expansion, etc. is reported in semi-annual operational reports.	

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.765 – Compliance Provisions)	Section E, #028 (Source IDs 001, 002, 004, C002)	(c) The following procedures must be used for compliance with the surface methane operational standard as provided in 60.763(d). (1) After installation of the collection system...	SEM of methane is conducted quarterly at a minimum. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section or §60.764(a)(6) must comply with the following instrumentation specifications and procedures for...	SEM is conducted in accordance with applicable EPA methods and the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) The provisions of this subpart apply at all times, including periods of startup, shutdown or malfunction. During periods of startup, shutdown, and malfunction, you must comply with the work practice specified in §60.763(e) in lieu of the compliance provisions in §60.765.	The permittee operates a GCCS in compliance with the applicable requirements. See also semi-annual operational reports detailing GCCS operation.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.763 – Operational standards for collection and control systems)	Section E, #029 (Source IDs 001, 002, 004, C002)	Each owner or operator of an MSW landfill with a gas collection and control system used to comply with the provisions of §60.762(b)(2) must: (a) Operate the collection system such that gas is collected from each...	LFG collection and control system installed and operated in accordance with the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Operate the collection system with negative pressure at each wellhead except under the following conditions: (1) A fire or increased well temperature. The owner or operator shall record instances...	The LFG collection system is operated per permit requirements, and each wellhead is monitored for negative pressure monthly (at minimum). Monitoring data is reviewed regularly and reported, as required, on a semi-annual basis.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.763 – Operational standards for collection and control systems)	Section E, #029 (Source IDs 001, 002, 004, C002)	(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well. A higher operating value demonstration must be submitted to the Administrator for approval and must include supporting data demonstrating that the elevated...	The LFG collection system is operated per permit requirements, and each wellhead is monitored monthly (at minimum). Active wells operated in accordance with applicable operational standards for temperature.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing...	The LFG collection system is operated per permit requirements, and SEM is conducted quarterly at a minimum. SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 60.762(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system...	The flare is designed and operated in accordance with the permit. The flare is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(f) Operate the control or treatment system at all times when collected gas is routed to the system.	The flare is operated in accordance with the permit and is equipped with an automatic control valve, designed to close immediately upon flare shutdown.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action must be taken...	Monitoring exceedances are remediated in accordance with the NSPS, and follow-up testing is conducted, as required, to verify compliance with the NSPS.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	<p>(a) Design capacity report. Each owner or operator subject to the requirements of this subpart must submit an initial design capacity report to the Administrator.</p> <p>(1) Submission. The initial design capacity report fulfills the requirements of the notification of the date construction is commenced as required by §60.7(a)(1) and must be submitted no later than:</p> <p>(i) November 28, 2016 for landfill that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016; or</p> <p>(ii) Ninety days after the date of commenced construction, modification, or reconstruction for landfills that commence construction, modification, or reconstruction after August 29, 2016.</p> <p>(2) ...</p>	Subpart XXX initial design capacity report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		<p>(b) NMOC emission rate report. Each owner or operator subject to the requirements of this subpart must submit an NMOC emission rate report following the procedure specified in paragraph (i)(2) of this section to the Administrator initially and annually thereafter, except as provided for in paragraph (b)(1)(ii) of this section. The Administrator may...</p> <p>(1) The NMOC emission rate report must contain...</p> <p>(i) The initial NMOC emission rate report may be combined with the initial design capacity report required...</p> <p>(A) November 28, 2016, for landfills that commenced construction, modification, or reconstruction after July 17, 2014, but before August 29, 2016, or</p> <p>(B) Ninety days after the date of commenced construction, modification...</p>	Subpart XXX initial NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(c) Collection and control system design plan. Each owner or operator subject to the provision of §60.762(b)(2) must submit a collection and control system design plan...	Subpart XXX collection and control system design plan submitted on December 20, 2018.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(d) Revised design plan. The owner or operator who has already been required to submit a design plan under paragraph (c) of this section must submit a revised design plan to the Administrator for approval as follows: (1) At least 90 days before expanding operations to an area not covered by the previously approved design plan. (2) Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator according to paragraph (c) of this section.	N/A - Revised design plan not required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Closure report. Each owner or operator of a controlled landfill must submit a closure report to the Administrator within 30 days of waste acceptance cessation. The Administrator may...	N/A - Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Equipment removal report. Each owner or operator of a controlled landfill must submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment. (1) The equipment removal report must contain the following items: (i) A copy of the closure report submitted...	N/A - Landfill actively receiving MSW; not yet at closure.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(g) Annual report. The owner or operator of a landfill seeking to comply with §60.762(b)(2) using an active collection system designed in accordance with §60.762(b)(2)(ii) must submit to the Administrator, following the procedure specified in paragraph (i)(2) of this section, annual reports...	Reports submitted semi-annually to PADEP and EPA.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(h) Initial performance test report. Each owner or operator seeking to comply with §60.762(b)(2)(iii) must include the following information with the initial performance test report required under §60.8	N/A - Initial performance test report not required during the reporting period. Initial performance test report submitted to PADEP in 2004.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(i) Electronic reporting. The owner or operator must submit reports electronically according to paragraphs (i)(1) and (2) of this section. (1) Within 60 days after the date of completing... (2) Each owner or operator required to submit reports...	Reporting conducted in accordance with NSPS Subpart XXX. The EPA has not yet established templates for NSPS operational reports on the US EPA's Central Data Exchange (CDX).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(j) Corrective action and the corresponding timeline. The owner or operator must submit according to paragraphs (j)(1) and (j)(2) of this section. (1) For corrective action that is required according...	N/A - No root cause analyses or corrective action analyses required during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(k) Liquids addition. The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meter that has employed leachate recirculation or added liquids...	N/A - The landfill does not employ leachate circulation.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.767 – Reporting Requirements)	Section E, #030 (Source IDs 001, 002, 004, C002)	(l) Tier 4 notification. (1) The owner or operator of an affected landfill with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must provide a notification of the date(s) upon which it intends to demonstrate site-specific surface methane emissions are below 500 parts per million methane, based on...	N/A - Tier 4 testing not applicable.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.768 – Recordkeeping requirements)	Section E, #031 (Source IDs 001, 002, 004, C002)	(a) Except as provided in §60.767(c)(2), each owner or operator of an MSW landfill subject to the provision of §60.762(b)(2)(ii) and (iii) must keep for at least 5 years...	Landfill maintains applicable records in accordance with NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.766 – Monitoring of operations)	Section E, #032 (Source IDs 001, 002, 004, C002)	Except as provided in §60.762(c)(2): (a) Each owner or operator seeking to comply with 60.762(b)(2)(ii)(C) for an active gas collection system must install a sampling port and a thermometer...	Each well is equipped with the required monitoring devices and monitored monthly (at minimum). Wellheads are monitored monthly (at a minimum).	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(b) Each owner or operator seeking to comply with §60.762(b)(2)(iii) using an enclosed combustor must calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment: (1) A temperature monitoring device equipped...	The flare is equipped with the required monitoring devices and equipment in accordance with the permit.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(c) Each owner or operator seeking to comply with 60.762(b)(2)(iii) using a non-enclosed flare must install, calibrate, maintain, and operate according to the manufacturer's specifications the following...	N/A - The Permittee does not utilize an open flare.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.766 – Monitoring of operations)	Section E, #032 (Source IDs 001, 002, 004, C002)	(d) Each owner or operator seeking to demonstrate compliance with §60.762(b)(2)(iii) using a device other than a non-enclosed flare or an enclosed combustor or a treatment system must provide...	N/A	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(e) Each owner or operator seeking to install a collection system that does not meet the specifications in §60.769 or seeking to monitor alternative parameters to those required by §§60.763 through 60.766 must provide information...	N/A - The permittee has not installed an alternate collection system and does not monitor parameters alternate to those established in 40 CFR §§60.763 – 60.766.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(f) Each owner or operator seeking to demonstrate compliance with the 500 parts per million surface methane operational standard in §60.763(d) must monitor surface concentrations of methane according to the procedures in §60.765(c) and the instrument...	SEM of methane is conducted quarterly (at a minimum). SEM results submitted to PADEP and EPA via semi-annual operational reports.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
		(g) Each owner or operator seeking to demonstrate compliance with §60.762(b)(2)(iii) using a landfill gas treatment system must maintain and operate all monitoring systems associated with the treatment system in accordance with the site-specific treatment system monitoring plan required in...	N/A - The landfill owner/operator did not control landfill gas with a treatment system during the reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
		(h) The monitoring requirements of paragraphs (b), (c) (d) and (g) of this subsection apply at all times the affected source is operating, except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality...	Monitoring is conducted in accordance with NSPS Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.764 – Test methods and procedures)	Section E, #033 (Source IDs 001, 002, 004, C002)	(a)(1) NMOC Emission Rate. The landfill owner or operator must calculate the NMOC emission rate using either Equation 1 provided in paragraph (a)(1)(i) of this section or Equation 2 provided in...	NMOC emission rate report submitted on December 21, 2017.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent
GROUP 01 – LANDFILL OPERATIONS [25 Pa. Code §127.512] (40 CFR §60.769 – Specifications for active collection systems)	Section E, #034 (Source IDs 001, 002, 004, C002)	(a) Each owner or operator seeking to comply with §60.762(b)(2)(i) must site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless...	GCCS design plan submitted on December 20, 2018. This plan demonstrates that the GCCS meets the applicable specifications per Subpart XXX.	<input checked="" type="checkbox"/> Continuous ¹ <input type="checkbox"/> Intermittent

¹ The Bethlehem Landfill became subject to the operational requirements of NSPS Subpart XXX beginning June 21, 2020. Also, on March 26, 2020, the USEPA published amendments to Subpart AAAA. In accordance with Subpart AAAA, the permittee began compliance with the revised requirements of Subpart AAAA on September 27, 2021. Thus, in accordance with Condition E#025 of the permit, the permittee is no longer subject to NSPS Subpart WWW and the permittee complies with the more stringent applicable requirements of NSPS Subpart XXX and NESHAP Subpart AAAA.