

SCS ENGINEERS

October 3, 2017
File No. 02217001.00

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



Subject: Title V Permit Renewal Application
IESI PA Bethlehem Landfill (Title V Permit No. 48-00027)

Dear Mr. Wejkszner:

On behalf of IESI PA Bethlehem Landfill Corporation, SCS Engineers (SCS) has prepared the enclosed Title V permit renewal application for the renewal of the landfill's Title V operating permit. A total of three (3) completed application packages are included along with the required application fee of \$750.00 and delivery confirmation of the required municipal notifications.

Please do not hesitate to contact either of the undersigned at (703) 471-6150 if there are any questions regarding this submittal.

Sincerely,

Ryan Christman, M.S.
Staff Professional
SCS ENGINEERS

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

REC/JGR

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

Enclosures

S
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PAY Seven hundred fifty and 00 / 100 Dollars Only *****

TO THE COMMONWEALTH OF PENNSYLVANIA
ORDER AIR QUALITY PROGRAM
OF 2 PUBLIC SQUARE
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AMOUNT	\$750.00
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VOID AFTER 180 DAYS

Authorized Signature

⑈ 2412131⑈ ⑆011201539⑆ 2220013774⑈

SCS ENGINEERS



IESI PA Bethlehem Landfill Title V Operating Permit Renewal Application

Prepared for:

IESI PA Bethlehem Landfill

2335 Applebutter Road
Bethlehem, PA 18015-6004
(610) 317-3200

Prepared by:

SCS ENGINEERS
11260 Roger Bacon Drive, Suite 300
Reston, VA 20190
(703) 471-6150

October 2017
File No. 02217001.00

Offices Nationwide
www.scsengineers.com

**IESI PA Bethlehem Landfill
Lower Saucon Township
Northampton County, Pennsylvania
Title V Operating Permit Renewal Application**

Prepared for:

IESI PA Bethlehem Landfill
2335 Applebutter Road
Bethlehem, PA 18015-6004

Prepared by:

SCS ENGINEERS
11260 Roger Bacon Drive, Suite 300
Reston, VA 20190
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1.0 INTRODUCTION

This package addresses the requirements of the Pennsylvania Department of Environmental Protection (PADEP) Air Permitting Program, Title 25 of the Pennsylvania Code, Chapter 127, Subchapter F, as they apply to the application for the renewal of the Title V air operating permit for the IESI PA Bethlehem Landfill (the landfill) located in Bethlehem, Pennsylvania.

The landfill is an active municipal solid waste (MSW) landfill which operates a gas collection and control system (GCCS) in accordance with its current Title V operating permit (No. 48-00027). The GCCS includes an enclosed landfill gas (LFG) flare which provides LFG control in accordance with the Title V operating permit. The landfill also directs a portion of recovered LFG to a third-party landfill gas-to-energy (LFGE) facility. The LFGE facility is separately owned and operated by Bethlehem Renewable Energy, LLC ("BRE") and operates in accordance with separate permit(s) issued to BRE.

The landfill and GCCS are currently subject to the EPA's Standards of Performance for Municipal Solid Waste Landfills, promulgated at 40 CFR Part 60 Subpart WWW (i.e., NSPS Subpart WWW). In addition, the landfill and GCCS are currently subject to the EPA's National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfill, promulgated at 40 CFR Part 63 Subpart AAAA (i.e., NESHAP Subpart AAAA).

The Landfill's current Title V operating permit was issued on April 12, 2013 and will expire on April 12, 2018. This application seeks to renew the Title V operating permit.

2.0 REQUESTED PERMIT MODIFICATIONS

The following is a summary of Title V operating permit modifications requested to be implemented in conjunction with the permit renewal process:

- On September 8, 2017, the PADEP issued Plan Approval 48-00027A for the Southeastern Realignment of the landfill. This plan approval is for the increase in landfill capacity of approximately 3,669,600 cubic yards. This application seeks to incorporate applicable requirements of this Plan Approval into the Title V operating permit.
- On August 29, 2016, the EPA published new Standards of Performance for Municipal Solid Waste Landfills. These new standards are promulgated at 40 CFR Part 60 Subpart XXX (i.e., NSPS Subpart XXX). NSPS Subpart XXX applies to MSW landfills that commence construction, reconstruction, or modification after July 17, 2014.

Upon commencement of construction of the landfill expansion, the landfill will become subject to applicable requirements of NSPS Subpart XXX. This application seeks to incorporate into the Title V operating permit new requirements applicable to the landfill under NSPS Subpart XXX upon commencement of construction of the landfill expansion per Plan Approval 48-00027A.

- The Portable Crushing Operation (Source ID 755884) no longer operates. As such, this application seeks to remove this emission unit, along with its associated engine (Source 008) and water spray control device (Source C005), from the Title V operating permit.

3.0 INSIGNIFICANT SOURCES

The Landfill operates several insignificant air emission sources which have been determined by the PADEP to be of minor significance under 25 Pa. Code, Chapter 127, Section 127.14(a)(8). Several of these are listed in Section H of the current operating permit. The current inventory of insignificant air emission sources is summarized in **Table 1**.

Table 1 – Inventory of Insignificant Emission Sources

Group	Unit
IS001	Two (2) Backup Emergency Generators ¹ , < 2.5 MMBtu/hr
IS002	Maintenance Shop Furnace/Space Heater ¹ , < 2.5 MMBtu/hr
IS003	Two (2) Odor Control Mister Systems (including pumps) ²
IS004	Portable Light Plant ³
IS005	Portable Air Compressor Generator ³
IS006	6.5 kW Portable Generator ³

Notes:

- 1) Currently listed in Section H of the Title V operating permit. The scale heaters currently listed in the permit's Insignificant Source Inventory have been removed.
- 2) Exempted per PADEP-approved Request for Determination (RFD).
- 3) Insignificant source to add to Section H.

4.0 PERMIT RENEWAL APPLICATION FORMS



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

FOR OFFICIAL USE ONLY

TITLE V OPERATING PERMIT APPLICATION

Section 1 - General Information

1.1 Application Type

Type of permit for which application is made: (Check one)

☐ Initial☒ Renewal Operating Permit No. 48-00027☐ Application Revision - provide date of original Title V Application or OP No.: _____

1.2 Plant Information

Federal Tax ID/Plant Code: 22-3575227-1 Firm Name: IESI PA Bethlehem Landfill Corp.Plant Name: IESI PA Bethlehem LandfillNAICS Code: 562212 SIC Code: 4953Description of NAICS Code: Solid Waste Landfill, Non-hazardousDescription of SIC Code: Refuse SystemsCounty: Northampton Municipality: Lower Saucon TownshipLatitude: 40°37'18.12"N Longitude: 75°18'32.85"WHorizontal Reference Datum: North American Datum of 1983 Horizontal Collection Method: _____ Reference Point: Plant Entrance

1.3 Contact Information

Name: Don Hallock Title: District General ManagerAddress: 2335 Applebutter Road, Bethlehem, PA 18015-6004Telephone Number: 610-317-3200Email Address: donh@wasteconnections.com

1.4 Certification of Truth, Accuracy and Completeness

Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

(Signed) Date: 10/2/2017Name (Typed): Donald HallockTitle: District General Manager

Section 3 - Site Inventory

Give a complete list of all air pollution sources, control equipment, emission points, and fuel material locations within this site.

For renewals, only list sources not included in current Title V Operating Permit or sources which are now subject to Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. If preprinted information is provided, correct and/or add any new sources as necessary. Note: One (1) of the following sections (5, 6 or 7) of the application must be completed for each new source listed here.

Unit ID	Company Designation	Unit Type	CAM
Current Emission Unit Inventory			
001	Landfill Operations	Process	N/A
002	Landfill Surface and Roadway	Process	N/A
004	Leachate Storage	Process	N/A
C002	Landfill Gas Collection/Replacement Flare	Control Device	N/A
	Various Insignificant Sources ¹	Various Insignificant Sources	N/A
New Emission Units to Incorporate into Permit			
001	Southeastern Realignment Increase in Landfill Capacity <i>Request to incorporate applicable requirements of Plan Approval 48-00027A (issued 9/8/17) into operating permit during the renewal process</i>	Process	N/A
Emission Units to be Removed from Permit			
008	CAT C9D1 engine (GP9-48-001) ²	Combustion Unit	
755884	Portable Crushing Operations ²	Process	
C005	Water Sprays ²	Control Device	

Notes:

1. See Introduction for a summary of insignificant air emission sources at the facility.
2. The portable crushing operation, and associated engine and water sprays, no longer operates and can be removed from the operating permit during the renewal process.

Section 4 - Source Group (Optional)**4.1 Source Group Definition**

Define groups of source(s) that are subject to one or more applicable requirements that apply to all source(s) in the group.

For renewals, only list source groups not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current Title V Operating Permit.

Group No.	Source ID (for source(s) in this group)

4.2 Applicable Requirements for Source Groups

For renewals, only list group level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

☐ No changes from current Title V Operating Permit.

Describe and cite all applicable requirements pertaining to all source groups.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

Group No.	Citation No.	Citation Limitation	Limitation Used
01	40 CFR Part 60 Subpart XXX	Control of MSW landfill NMOC emissions	N/A

Section 5 - Combustion Operational Inventory – NOT APPLICABLE

(Complete this section for each combustion source at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new combustion unit listed in Section 3 of this application.

5.1 General Source Information

a. Unit ID: _____ b. Company Designation: _____

c. Plan Approval or Operating Permit No.:

d. Manufacturer: _____ e. Model No.: _____

f. Source Description:

g. Rated Heat Input/Thruput: _____ h. Installation Date: _____

i. Exhaust Temperature	Units	j. Exhaust % Moisture	k. Exhaust Flow Volume:	SCFM
------------------------	-------	-----------------------	-------------------------	------

5.2 CAM Information

Yes No



Emissions unit uses a control device to achieve compliance.



Potential precontrol emissions of applicable pollutant are at least 100 percent of major source amount.

(Addendum 3 must be completed if both boxes are checked "Yes.")

5.3 Exhaust System Components

Explain how the exhaust components are configured:

[illegible]

5.4 Source Classification Code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence

5.5 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)

*FML = Fuel Material Location

5.6 Limitations on Source Operation

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 5.1 of the application.

Maximum amount of hours of source operation per year: _____

Fuel/SCC	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Thruput	Units/Time

5.7 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

☐ No changes from current Title V Operating Permit.

[illegible]

Section 6 - Incinerator Operational Inventory – NOT APPLICABLE

(Complete this section for each incinerator at the site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new incinerator listed in Section 3 of this application.

6.1 General Source Information

- a. Unit ID: _____ b. Company Designation: _____
- c. Plan Approval or Operating Permit No.: _____
- d. Manufacturer: _____ e. Model No.: _____
- f. Source Description: _____
- g. Rated Heat Input/Thruput: _____ h. Installation Date: _____
- i. Exhaust Temperature _____ Units _____ j. Exhaust % Moisture _____ k. Exhaust Flow Volume: _____ SCFM
- l. Incin. Capacity: _____ Lbs/Hr m. Primary Burner Heat Input: _____ Units _____
- n. Exhaust % CO₂: _____ o. Secondary Burner Heat Input: _____ Units _____
- p. Incinerator Class: _____
- q. Waste Type: _____ r. Waste BTU/Lb: _____

6.2 CAM Information

Yes No

- ☐ ☐ Emissions unit uses a control device to achieve compliance with emissions limitations or standards.
- ☐ ☐ Potential precontrol emissions of applicable pollutant are at least 100 percent of the major source amount.

(Addendum 3 must be completed if both boxes are checked "Yes.")

6.3 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow

6.4 Source Classification Code (SCC) Listing for Standard Operation

Fuel / Material	Associated SCC	Max Throughput Rate	Firing Sequence

6.5 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

Maximum amount of hours of source operation per year: _____

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)

*FML = Fuel Material Location

6.6 Limitations on Source Operation

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 6.3 of this application.

Maximum amount of hours of source operation per year: _____

Fuel/Waste	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Thruput	Units/Time

Section 7 - Process Operational Inventory

(Complete this section for each process at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new process listed in Section 3 of this application.

7.1 General Source Information

a. Unit ID: 001 b. Company Designation: Landfill Operations

c. Plan Approval or Operating Permit No.: 48-00027

d. Manufacturer: N/A e. Model No.: N/A

f. Source Description: Municipal solid waste landfill

g. Rated Heat Input/Thruput: N/A h. Installation Date: Operations began circa 1954

i. Exhaust Temperature N/A Units N/A j. Exhaust % Moisture N/A k. Exhaust Flow Volume: Varies SCFM

7.2 CAM Information

Yes No

☒ ☐

Emissions unit uses a control device to achieve compliance with emission limitations or standards.

☒ ☐

Potential precontrol emissions of applicable pollutant are at least 100 percent of the major source amount.

(Addendum 3 must be completed if both are checked "Yes")

7.3 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow
001	Landfill operations	C002	Enclosed ground flare	Varies*
001	Landfill operations	Z002	Fugitive emissions	Varies*

* Captured landfill gas is routed to the enclosed ground flare (C002) as well as to a third-party landfill-gas-to-energy (LFGE) facility which is owned and operated by Bethlehem Renewable Energy (BRE) in accordance with a separate permit(s) issued to BRE. The captured gas flow rate sent to the landfill's enclosed ground flare varies. Overall gas system collection is in accordance with applicable permit requirements (i.e., 80% for the Phase IV landfill area and 75% for all other landfill areas).

7.4 Source Classification Code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
N/A	N/A	N/A	N/A

7.5 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)
N/A				

*FML = Fuel Material Location

7.6 Limitations on Source Operation

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: N/A

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Thruput	Units/Time
N/A						

7.7 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current Title V Operating Permit.

Fuel/Product	Citation No.	Citation Limitation	Limitation Used

7.8 Raw Materials

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

Municipal solid waste

7.9 Processing Steps

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials
N/A		

7.10 Request for Confidentiality

Do you request that the information on this page be considered confidential?

☐ Yes ☒ No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

Section 7 - Process Operational Inventory

(Complete this section for each process at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new process listed in Section 3 of this application.

7.1 General Source Information

a. Unit ID: 002 b. Company Designation: Landfill Surface and Roadway

c. Plan Approval or Operating Permit No.: 48-00027

d. Manufacturer: N/A e. Model No.: N/A

f. Source Description: Fugitive particulate matter from landfill surfaces and roadways

g. Rated Heat Input/Thruput: N/A h. Installation Date: Operations began circa 1954

i. Exhaust Temperature N/A Units N/A j. Exhaust % Moisture N/A k. Exhaust Flow Volume: N/A SCFM

7.2 CAM Information

Yes No

☐ ☒

Emissions unit uses a control device to achieve compliance with emission limitations or standards.

☐ ☒

Potential precontrol emissions of applicable pollutant are at least 100 percent of the major source amount.

(Addendum 3 must be completed if both are checked "Yes")

7.3 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow
002	Landfill surface and roadways	Z002	Fugitive PM	100

7.4 Source Classification Code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
N/A			

7.5 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)
N/A				

*FML = Fuel Material Location

7.6 Limitations on Source Operation

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: N/A

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Thruput	Units/Time

7.7 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current Title V Operating Permit.

Fuel/Product	Citation No.	Citation Limitation	Limitation Used

7.8 Raw Materials

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

N/A

7.9 Processing Steps

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials
N/A		

7.10 Request for Confidentiality

Do you request that the information on this page be considered confidential?

☐ Yes ☒ No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

Section 7 - Process Operational Inventory

(Complete this section for each process at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new process listed in Section 3 of this application.

7.1 General Source Information

a. Unit ID: 004 b. Company Designation: Leachate storage

c. Plan Approval or Operating Permit No.: 48-00027

d. Manufacturer: N/A e. Model No.: N/A

f. Source Description: 390,000 gal above-ground storage tank and 1,100,000 gal lagoon for emergency leachate storage.

g. Rated Heat Input/Thruput: N/A h. Installation Date: N/A

i. Exhaust Temperature N/A Units N/A j. Exhaust % Moisture N/A k. Exhaust Flow Volume: N/A SCFM

7.2 CAM Information

Yes No

- ☐ ☒ Emissions unit uses a control device to achieve compliance with emission limitations or standards.
- ☐ ☒ Potential precontrol emissions of applicable pollutant are at least 100 percent of the major source amount.

(Addendum 3 must be completed if both are checked "Yes")

7.3 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow
004	Leachate Storage	Z004	Fugitive VOC/HAPs	100

7.4 Source Classification Code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence
N/A			

7.5 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)
N/A				

*FML = Fuel Material Location

7.6 Limitations on Source Operation

Complete this section if you are requesting a limitation on operational hours and/or a permit limitation on the throughput rate equal to or lower than that stated in Section 7.3 of this application.

Maximum amount of hours of source operation per year: N/A

Fuel	Hours/Day	Days/Week	Days/Year	Hours/Year	Max Thruput	Units/Time

7.7 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current Title V Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current Title V Operating Permit.

Fuel/Product	Citation No.	Citation Limitation	Limitation Used

7.8 Raw Materials

List all of the raw materials used in this process to the extent that this information is needed to determine or regulate emissions.

Leachate

7.9 Processing Steps

To the extent that this information is needed to determine or regulate emissions, list all of the processing steps and raw materials for each step utilized to complete the material or product.

Step	Description	Raw Materials
N/A		

7.10 Request for Confidentiality

Do you request that the information on this page be considered confidential?

☐ Yes

☒ No

If yes, include a justification for confidentiality that meets the requirement of 25 Pa. Code § 127.411(d).

Section 8 - Control Device Information (duplicate this section as needed)

For renewals, review and correct any pre-printed information and add additional sections for any new control device listed in Section 3 of this application.

8.1 General Control Device Information

- a. Unit ID: C002
 b. Company Designation: Landfill Gas Collection/Replacement Flare
 c. Used by Source(s): 001
 d. Type: Enclosed ground flare
 e. Pressure Drop in H₂O: N/A f. Capture Efficiency: Varies*
 g. Scrubber Flow Rate (GPM): N/A
 h. Manufacturer: John Zink i. Model No.: Enclosed Ground Flare
 j. Installation Date: December 2003

* Captured landfill gas is routed to the enclosed ground flare (C002) as well as to a third-party landfill-gas-to-energy (LFGE) facility which is owned and operated by Bethlehem Renewable Energy (BRE) in accordance with a separate permit(s) issued to BRE. The captured gas flow rate sent to the landfill's enclosed ground flare varies. Overall gas system collection is in accordance with applicable permit requirements (i.e., 80% for the Phase IV landfill area and 75% for all other landfill areas).

8.2 Control Device Efficiencies for this Control Device:

Pollutant Name	CAS No.	Estimate Control Efficiency	Basis for Efficiency Estimate
Non-methane organic compounds	N/A	98% or 20 ppmv	Manufacturer/Source Testing
Volatile organic compounds	N/A	98% or 20 ppmv	Manufacturer/Source Testing
Hazardous air pollutants	N/A	98%	Manufacturer/Source Testing

Section 9 - Stack/Flue Information (duplicate this section as needed)

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

9.1 General Stack/Vent Information

a. Unit ID: S001 b. Company Designation: Enclosed flare stack

c. Discharge Type: Vertical unobstructed opening

d. Diameter (ft): 12 Height (ft): 50 Base Elevation (ft): 455 (approx.)

e. Exhaust Temperature: Min. 1,500°F (typ.) Exhaust % Moisture: N/A Exhaust Velocity: _____

f. Exhaust Volume: Varies ACFM Exhaust Volume: Varies SCFM

g. Distance to Nearest Property Line (ft): 200 ft (approx.)

h. Weather Cap?: ☐ Yes ☒ No

i. Used by Sources: 001

j. Latitude: 40°37'22.09" N Longitude: 75°18'22.18" W

Horizontal Reference Datum: _____ Horizontal Collection Method: _____ Reference Point: Center of flare skid

a. Unit ID: _____ b. Company Designation: _____

c. Discharge Type: _____

d. Diameter (ft): _____ Height (ft): _____ Base Elevation (ft): _____

e. Exhaust Temperature: _____ Exhaust % Moisture: _____ Exhaust Velocity <<V2>>: _____

f. Exhaust Volume: _____ ACFM Exhaust Volume: _____ SCFM

g. Distance to Nearest Property Line (ft): _____

h. Weather Cap?: ☐ Yes ☐ No

i. Used by Sources: _____

j. Latitude: _____ Longitude: _____

Horizontal Reference Datum: _____ Horizontal Collection Method: _____ Reference Point: _____

Section 10 - Fuel Material Location (FML) Information (Optional) – NOT APPLICABLE

For renewals, review and correct any pre-printed information and add additional sections for any new FML listed in Section 3 of this application.

10.1 Fuel Material Location Information

a. FML ID No.: _____ b. Name: _____

c. Capacity: _____ Units: _____ d. Fuel: _____

e. Maximum Fuel Characteristics: If fuel is coal, what is the moisture content? _____

% Ash _____ % Sulfur: _____ BTU Content: _____ Units: _____

f. Used by Source: _____

a. FML ID No.: _____ b. Name: _____

c. Capacity: _____ Units: _____ d. Fuel: _____

e. Maximum Fuel Characteristics: If fuel is coal, what is the moisture content? _____

% Ash _____ % Sulfur: _____ BTU Content: _____ Units: _____

f. Used by Source: _____

a. FML ID No.: _____ b. Name: _____

c. Capacity: _____ Units: _____ d. Fuel: _____

e. Maximum Fuel Characteristics: If fuel is coal, what is the moisture content? _____

% Ash _____ % Sulfur: _____ BTU Content: _____ Units: _____

f. Used by Source: _____

Section 11 - Compliance Plan for the Facility

- | | | Yes | No |
|------|--|-------------------------------------|--------------------------|
| 11.1 | Will your facility be in compliance with all applicable requirements at the time of permit issuance and continue to comply with these requirements during the permit duration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11.2 | Will your facility be in compliance with all applicable requirements presently scheduled to take effect during the term of the permit? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11.3 | Will these requirements be met by the regulatory required dates? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

If you checked "No" in Part 11.1, 11.2 or 11.3, answer the following questions:

- 11.4 Identify applicable requirement(s) for which compliance is not or will not be achieved:

Source ID No.	Citation No.

- 11.4.1. Briefly describe how compliance with this/these applicable requirement(s) will be achieved:

11.4.2. Provide a detailed schedule of compliance for the noncomplying sources or activities identified in this section of the application. Include an enforceable sequence of corrective actions with milestone and projected compliance dates.

Date	Action/Milestone

11.4.3. Indicate the submittal frequency for the progress report (s): _____

11.4.4. Starting date for the submittal of the progress report(s): _____

Section 12 – Alternative Operating Scenario (optional) – NOT APPLICABLE

(Duplicate this section for each source participated in this alternative scenario.)

12.1 General Information

- a. Alternative Operating Scenario Name or ID No.: _____
- b. Source ID No.: _____ c. Source Name: _____
- d. Source Type (check one): ☐ Combustion ☐ Incineratory ☐ Process
- e. Give a brief description of this alternative scenario stating how it is different from the standard operation:

12.2 Operational Flexibility Request

Check all that apply.

- ☐ Alternative exhaust system component configuration
If this box is checked, complete Sections 12.3 and 12.7
- ☐ Alternative type of fuel usage replacing or in addition to an existing fuel in standard operation.
If this box is checked, complete Sections 12.4 and/or 12.5 and 12.7
- ☐ Alternative process method replacing or in addition to a process SCC existing in standard operation.
If this box is checked, complete Section 12.6 and 12.7

12.3 Exhaust System Components

Specify the complete exhaust system component configuration for this alternative operating scenario.

From Component Type	From Component Number	To Component Type	To Component Number	Percent Flow	Begin Date	End Date

12.4 Source Classification Code (SCC) Listing for Alternative Operation

Give a complete listing of all fuels burned, products produced by a process or waste incinerated for this alternative operating scenario.

Fuel	Associated SCC	Max Throughout Rate	Firing Sequence

12.5 Alternative Fuel Physical Characteristics

Give a complete listing of all fuels physical characteristics for this alternative operating scenario.

SCC/Fuel Burned	FML	% Sulfur	% Ash	BTU Content (Units)

12.6 Alternative Process/Product Description

Give a complete listing of all fuels physical characteristics for this alternative operating scenario.

- a. Briefly describe the change(s) in raw materials and/or process methods used in this operating scenario, if applicable:

- b. Provide and briefly describe the process SCC associated with this alternative operating scenario:

Process SCC:		SCC Description:	
c. Alternative Product(s):			

Section 13 – Compliance Certification**13.1 Schedule for Compliance Certification Submission**

- a. Frequency of Submittal: Annual
- b. Schedule specified in current Title V
Operating Permit or proposed starting date: March 1

13.2 Monitoring Compliance

Is the site identified in this application in compliance with all applicable requirements and compliance certification requirements:

☒ Yes ☐ No

If "NO", describe which requirements are not being met:

13.3 Certification of Compliance

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I certify that I have the authority to submit this Permit Application on behalf of the applicant herein and that based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.

(Signed) _____

Date 10/2/2017

Name (Type) Donald Hallock

Title: District General Manager

5.0 ADDENDUMS

Addendum A: Source Applicable Requirements

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

[illegible]



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

Addendum 1
Method Of Compliance Worksheet

SECTION 1. APPLICABLE REQUIREMENT

Federal Tax Id: 23-1712936 Firm Name: IESI PA Bethlehem Landfill Corporation

Plant Code: 1 Plant Name: IESI PA Bethlehem Landfill

Applicable Requirement for: (please check only one box below)

- ☐ The entire site
- ☒ A group of sources, Group ID: 001
- ☐ A single source, Unit ID:
- ☐ Alternative Scenario, Scenario Name:

Citation #: 40 CFR 60 Subpart XXX

Compliance Method based upon: ☒ Applicable Requirement ☐ Gap Filling Requirement

Method of Compliance Type: (Check all that applies and complete all appropriate sections below)

- ☒ Monitoring ☐ Testing ☒ Reporting
- ☒ Record Keeping ☒ Work Practice Standard

Section 2: Monitoring

1. Monitoring device type (stack test, CEM, etc.): LFG Wellhead Monitoring; Monitoring of surface methane emissions
2. Monitoring device location: Individual gas collection wellheads per NSPS Subpart XXX; SEM monitoring in a serpentine pattern per NSPS Subpart XXX; Enclosed flare monitoring

Describe all parameters being monitored along with the frequency and duration of monitoring each parameter:

Wellhead monitoring (monthly) for gauge pressure, nitrogen or oxygen, and temperature; SEM – quarterly for methane; flare temperature and flow

3. How will data be reported: In regular NSPS/MACT reports per 40 CFR 60 Subpart XXX (semi-annual).

Section 3: Testing

- | | |
|--|--|
| 1. Reference Test Method Description: | None (Initial source NMOC testing previously conducted at existing enclosed ground flare per Title V operating permit) |
| 2. Reference Test Method Citation: | N/A |

Section 4: Record Keeping

Describe what parameters will be recorded and the frequency of recording:

Records will be recorded and maintained in accordance with 40 CFR §60.768.

Section 5: Reporting

Describe what is to be reported and the frequency of reporting:

In accordance with 40 CFR §60.767

- | | |
|---------------------------------|---|
| 1. Reporting start date: | Per current facility reporting schedule |
|---------------------------------|---|

Section 6: Work Practice Standard

Describe any work practice standards:

The landfill and gas collection and control system shall be operated in accordance with 40 CFR §§60.760 – 60.769.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

ADDENDUM 3 CAM APPLICABILITY WORKSHEET FOR SOURCES

SECTION A. GENERAL INFORMATION																																																
Federal Tax ID	22-3575227																																															
Firm Name	IESI PA Bethlehem Landfill Corp.																																															
Plant Code	Source I.D. 001																																															
Control Type	Enclosed ground flare	AIRS Code No.		Pollutant	VOC, NMOC, HAPs																																											
Control Make	Varies	Control Model No.	Varies	Control Efficiency	Control device efficiency of 98% or 20 ppmv*																																											
Control I.D.	C002/S001	Source or Emission Unit Name	Landfill Operations																																													
<i>*Captured landfill gas is routed to the enclosed ground flare (C002) as well as to a third-party landfill-gas-to-energy (LFGE) facility which is owned and operated by Bethlehem Renewable Energy (BRE) in accordance with a separate permit(s) issued to BRE. The captured gas flow rate sent to the landfill's enclosed ground flare varies. Overall gas system collection is in accordance with applicable permit requirements (i.e., 80% for the Phase IV area and 75% for all other landfill areas).</i>																																																
SECTION B. MONITORING																																																
<p>The emissions unit is exempted from CAM because the emission limitations or standards are:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 10%;">Yes</td> <td style="width: 10%;">No</td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Proposed by the EPA Administrator after November 15, 1990 pursuant to Sections 111 or 112 of the Clean Air Act.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Stratospheric ozone protection requirements under Title VI of the Act.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Acid Rain Program requirements pursuant to sections 404-407(b) or 410 of the Clean Air Act</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Approved under an emissions trading program.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>An emissions cap that meets the requirements specified in 40 CFR § 70.4(b)(12).</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Determined by a continuous compliance method that does not use an assumed control factor</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Requirements for a backup utility power emissions unit as defined in § 72.2 which:</td> </tr> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Is owned by a municipality and</td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Is exempt from all Part 75 monitoring requirements</td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Is operated solely for providing power during peak electrical demand or emergency situations</td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Has annual average emissions (for previous 3 years) of less than 50% of the major source cut off and emissions are expected to remain below 50 %</td> </tr> </table>						Yes	No		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Proposed by the EPA Administrator after November 15, 1990 pursuant to Sections 111 or 112 of the Clean Air Act.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stratospheric ozone protection requirements under Title VI of the Act.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Acid Rain Program requirements pursuant to sections 404-407(b) or 410 of the Clean Air Act	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Approved under an emissions trading program.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	An emissions cap that meets the requirements specified in 40 CFR § 70.4(b)(12).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Determined by a continuous compliance method that does not use an assumed control factor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Requirements for a backup utility power emissions unit as defined in § 72.2 which:		Yes	No		<input type="checkbox"/>	<input type="checkbox"/>	Is owned by a municipality and		<input type="checkbox"/>	<input type="checkbox"/>	Is exempt from all Part 75 monitoring requirements		<input type="checkbox"/>	<input type="checkbox"/>	Is operated solely for providing power during peak electrical demand or emergency situations		<input type="checkbox"/>	<input type="checkbox"/>	Has annual average emissions (for previous 3 years) of less than 50% of the major source cut off and emissions are expected to remain below 50 %
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	<input type="checkbox"/>	<input type="checkbox"/>	Has annual average emissions (for previous 3 years) of less than 50% of the major source cut off and emissions are expected to remain below 50 %																																													
SECTION C. CAM STATUS																																																
Yes	No																																															
<input type="checkbox"/>	<input checked="" type="checkbox"/>	CAM applies (be sure to include appropriate citation numbers under Source Applicable Requirements section of the application)																																														
<input type="checkbox"/>	<input checked="" type="checkbox"/>	CAM Plan is attached or has been submitted																																														
<input type="checkbox"/>	<input checked="" type="checkbox"/>	An Implementation Plan is attached																																														

APPENDIX A

Air Quality Compliance Review Form



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

Type of Compliance Review Form Submittal (check all that apply)

☐ Original Filing

Date of Last Compliance Review Form Filing:

☒ Amended Filing

5/5/2017

Type of Submittal

☐ New Plan Approval

☐ New Operating Permit

☒ Renewal of Operating Permit

☐ Extension of Plan Approval

☐ Change of Ownership

☐ Periodic Submission (@ 6 mos)

☐ Other: _____

SECTION A. GENERAL APPLICATION INFORMATION

Name of Applicant/Permittee/("applicant")
(non-corporations-attach documentation of legal name)

IESI PA Bethlehem Landfill Corporation

Address

2335 Applebutter Road

Bethlehem, PA 18015-6004

Telephone

610-317-3200

Taxpayer ID#

22-3575227

Permit, Plan Approval or Application ID#

Title V Permit No. 48-00027

Identify the form of management under which the applicant conducts its business (check appropriate box)

☐ Individual

☐ Syndicate

☐ Government Agency

☐ Municipality

☐ Municipal Authority

☐ Joint Venture

☐ Proprietorship

☐ Fictitious Name

☐ Association

☐ Public Corporation

☐ Partnership

☐ Other Type of Business, specify below:

☒ Private Corporation

☐ Limited Partnership

Describe below the type(s) of business activities performed.

Landfill operations.

SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
IESI PA Corporation	Knoxville, TN 37919	Delaware corporation	52-2175834	Intermediate parent
IESI Corporation	The Woodlands, TX 77380	Delaware corporation	75-2712191	Intermediate parent
Waste Connections Holdings Ltd.	Vaughn ON, L4K 0E3	Ontario corporation	76854 4322	Intermediate parent
Waste Connections of Canada Inc.	Vaughn ON, L4K 0E3	Ontario corporation	86680 8298	Intermediate parent
IESI-BFC Holdings Inc.	Vaughn ON, L4K 0E3	Ontario corporation	85807 1467	Intermediate parent
Waste Connections, Inc.	Vaughn ON, L4K 0E3	Ontario corporation	80578 6555	Ultimate parent

SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"

Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
IESI PA Blue Ridge Landfill Corporation	PO Box 399 Scotland, PA 17254	Franklin County/Greene Township	717-709-1700	Affiliate w/ operations in PA
Waste Connections of Maryland, Inc.	265 Brookview Centre Way, Suite 205 Knoxville TN 37919	Carroll County, MD	888-886-1121	Affiliate w/ operations in PA

Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.

Name	Business Address

List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).

Name		Business Address		
Kurt Shaner		265 Brookview Centre Way, Suite 205 Knoxville, TN 37919		
Robert McReynolds		99 Wood Ave South Suite 1001 Iselin, NJ 08830		
Donald Hallock		2335 Applebutter Road Bethlehem, PA 18015		

Plan Approvals or Operating Permits. List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
IESI PA Bethlehem Landfill	48-00027	Northampton County/Lower Saucon Township	4/12/2013	4/12/2018
IESI PA Bethlehem Landfill	48-00027A	Northampton County/Lower Saucon Township	9/8/2017	3/7/2019
IESI PA Blue Ridge Landfill	28-05015	Franklin County/Greene Township	9/22/2015	9/30/2020

Compliance Background. (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
11/13/2010	IESI PA Bethlehem Landfill	48-00027	Failure to control malodorous air contaminants	Notice of Violation	Corrected/Abated	\$ 0
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date

CONTINUING OBLIGATION. Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

VERIFICATION STATEMENT

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.


Signature10/2/2017
Date

Donald Hallock

Donald Hallock
Name (Print or Type)

District General Manager

Title