

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FIELD OPERATIONS - BUREAU OF AIR QUALITY



**OPERATING PERMIT**

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

Permit No.	<u>OP-09-0024</u>	Source(s)	<u>Facility VOC and NOx RACT</u>
Owner	<u>Tullytown Resource Recovery Facility (Waste Management of PA, Inc.)</u>	Air	<u></u>
Address	<u>200 Bordertown Road</u>	Cleaning	<u></u>
	<u>Tullytown, PA 19007</u>	Device	<u></u>
Attention	<u>Ed Kucowski</u>	Location	<u>200 Bordertown Road</u>
	<u>Site Engineer</u>		<u>Tullytown Borough</u>
			<u>Bucks County</u>

This permit is subject to the following conditions:

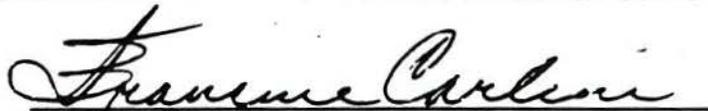
1. That the source(s) and any associated air cleaning devices are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of all applicable plan approvals issued;
  - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

**(SEE ADDITIONAL CONDITIONS ATTACHED)**

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued 07/14/1997

~~Expires 07/14/2002~~

  
Francine Carlini  
Regional Manager  
Air Quality

cc: Division of Permits, RCSOB  
Administration  
SEFO  
Re 30 (RN)289-4

OPERATING PERMIT CONDITIC  
PERMIT NO. OP-09-0024  
TRRF (WASTE MANAGEMENT OF PA, INC.)

**CONDITIONS (CONTINUED):**

3. This Reasonably Available Control Technology (RACT) operating permit is issued to Tullytown Resource Recovery Facility (TRRF) of Waste Management of PA, Inc. for the operation of their NOx and VOC emitting sources located at Tullytown Borough, Bucks County.
4. This operating permit supersedes the existing operating permit No. 09-322-001.
5. The sources covered by this operating permit are:
  - the entire landfill not including Southern Expansion
  - an enclosed flare
6. The Landfill
  - A. The landfill shall have landfill gas collection and control systems to capture the gas generated within the landfill.
  - B. The owner/operator shall annually calculate the NonMethane Organic Compound (NMOC) emission rate and Volatile Organic Compound (VOC) emission rate using the procedures specified in 40 CFR Section 60.754 or as subsequently amended.
  - C. The collection system shall be such that it can handle the maximum expected gas flow rate from the entire area of the landfill.
  - D. The collection system shall be designed to minimize off-site migration of the subsurface gas.
  - E. The collection efficiency of the gas management system for the final design of the landfill at closure shall be not less than a minimum of 90%.
  - F. The landfill gas shall be monitored for nitrogen or oxygen contents on a daily basis until landfill closure whereafter a proposed alternate schedule may be submitted for approval by the Department.
7. The Enclosed Flare
  - A. The enclosed flare covered under this operating permit shall burn on-site landfill gas only, except when auxiliary fuel is used during restart or start-up.
  - B. The owner/operator shall operate the flare at a minimum of 1500°F for a minimum residence time of 0.3 seconds. The flue gas temperature shall be monitored and recorded.

OPERATING PERMIT CONDITIONS  
PERMIT NO. OP-09-0024  
TRRF (WASTE MANAGEMENT OF PA, INC.)

CONDITIONS (CONTINUED):

- C. The flare shall be equipped with a pilot and shall be designed to meet the criteria for automatic system shutoff if a flame-out occurs.
- D. The flow rate of the landfill gas to the enclosed flare shall not exceed 3250 scfm.
- E. The enclosed flare shall be operated to reduce VOC content of the landfill gas by 98 weight percent.
- F. The flow rate of the landfill gas to the enclosed flare shall be recorded continuously and shall be provided to the Department annually.
- G. There is no restriction on the operating hours of the flare.

8. Emissions

- A. Emissions of VOC from the enclosed flare shall be limited to 0.84 lb/hr and 3.69 tons/year.
- B. Emissions of NOx from the enclosed flare shall be limited to 8.87 lbs/hr and 38.85 tons/year.

9. Stack Test

- A. Within one hundred and eighty (180) days after receiving this operating permit, the owner/operator shall conduct stack tests to determine the emissions of VOC from the enclosed flare. Tests shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139.
- B. At least thirty (30) days prior to the test, the Regional Air Quality Manager shall be informed of the date and time of the test.
- C. At least thirty (60) days prior to the test, the owner/operator shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.
- D. Within thirty (30) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

OPERATING PERMIT CONDITION  
PERMIT NO. OP-09-0024  
TRRF (WASTE MANAGEMENT OF PA, INC.)

CONDITIONS (CONTINUED):

10. RACT Compliance Protocol

- A. As per 25 Pa. Code Section 129.93(c), the presumptive RACT emission limitations shall be the installation, maintenance and operation of the enclosed flare in accordance with manufacturers specifications.
- B. An inspection and cleaning of the fuel-burning equipment shall be conducted annually.
- C. A major overhaul of the flare shall be conducted in accordance with manufacturers specifications on a periodic schedule.
- D. The inspection shall include the fuel nozzles or the flame pattern or characteristics.
- E. Adjustments in the combustion process shall be conducted if necessary to minimize the formation of NO<sub>x</sub> and the extent possible, CO.
- F. Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper operation shall be conducted in accordance with manufacturers specifications.
- G. A log shall be kept to record the annual inspection, cleaning and adjustments performed. This log shall contain at a minimum the date of the tuning procedure, the name of the service company and technicians, the operating load after the procedure has been completed, the NO<sub>x</sub> and CO emissions rate at the operating condition and the excess oxygen rate.
- H. The NO<sub>x</sub>, CO and excess oxygen testing shall be conducted with portable metering equipment in accordance with applicable manufacturers calibration and operating procedures.

11. Recordkeeping and Reporting Requirements

- A. The permittee shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with NO<sub>x</sub> and VOC RACT requirements of 25 Pa. Code §§129.91-129.94.
- B. The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of §§129.91-129.94 are met.
- C. Data required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.

OPERATING PERMIT CONDITIC  
PERMIT NO. OP-09-0024  
TRRF (WASTE MANAGEMENT OF PA, INC.)

CONDITIONS (CONTINUED):

- D. Records shall be retained for at least two years and shall be made available to the Department upon request.

12. General Requirements

A. Malfunctions

The company, within 24 hours of identifying an occurrence, shall notify the Department, at 610-832-6241, of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.

- B. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
- C. The expiration date shown on this RACT operating permit is for state purposes. For Federal enforcement purposes, the conditions of the operating permit which pertains to the implementation of the RACT regulations shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA).

OPERATING PERMIT CONDITIONS  
PERMIT NO. OP-09-0024  
TRRF (WASTE MANAGEMENT OF PA, INC.)

CONDITIONS (CONTINUED):

- D. Revisions to any emission limitations incorporated in this operating permit will require resubmission as a revision to the Pa. State Implementation Plan. The applicant shall bear the costs of public hearings and notifications required for EPA approval as stipulated in 25 Pa. Code §129.91(h).
  - E. This RACT approval applies to the emissions of NO<sub>x</sub> and VOC pollutants only.
13. Schedule for compliance shall be as follows:
- A. All provisions of RACT proposed by TRRF and approved by the Department shall be implemented immediately upon receiving this operating permit.

Re 30 (RN)289-5