



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Seneca Landfill
Inspection Date(s): 04/17/2024 – 04/18/2024
Regulatory Program(s): SIP, NSPS, MACT

Company Name: Seneca Landfill
Facility Name: Seneca Landfill
Facility Location: 412 Hartman Rd.
Evans City, PA 16033

Latitude: 40.804184 **Longitude:** -80.085323
County/Parish: Butler County

AFS/ICIS-Air Number: PA000510553
Permit Number: 10-00284
NAICS Code: 562212 **SIC:** 4953
DSB ID #: ECAD-56

Facility Representatives*:	Point of Contact
Elizabet Bertha, EHS Director Phone: 724-816-6149 Email: ebertha@senecalandfill.com	☒
David Smith, General Manager Phone: 724-816-4757 Email: dsmith@senecalandfill.com	☐
Nick Krause, EHS Specialist Phone: 724-316-4850 Email: nkrause@senecalandfill.com	☐

*Additional facility representatives identified in report body and/or on attached sign in sheet

EPA Inspectors:

Alex Everhart, Environmental Scientist, 3ED21
Phone: 215-814-2114 Email: Everhart.Alex@epa.gov
Parmatma, Adhikari, 3ED21
Phone: 215-814-2161 Email: Adhikari.Parmatma@epa.gov

State/Local Inspectors:

Nicholas Hall, Air Quality Inspector
Phone: 814-651-1819 Email: nichall@pa.gov
Alexandra Pullet, Air Quality inspector
Phone: 814-282-8210 Email: apullet@pa.gov

EPA Lead Inspector

Signature

Alex Everhart

Date

1600 John F Kennedy Blvd
Philadelphia, PA 19103-2852

Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Seneca Landfill (Landfill or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on March 29, 2024, via email. On April 16, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Elizabeth (Liz) Bertha, EHS Director, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 421 Hartman Rd. Evans City, PA 16033. The Seneca Landfill is privately owned and operated by Vogel Holdings Inc. The Landfill has an active Gas Collection and Control System (GCCS) connected to a blower that pulls a vacuum on the landfill to transport the landfill Gas (LFG).

The Facility received its most recent Title V operating permit (10-00284) from PADEP on August 25, 2021, with an expiration date of July 31, 2026.

The Facility does not have any potential emissions of criteria pollutants above the major source thresholds. This facility became a Title V facility under the 25 Pa. Code §121.1(iv) definition after the EPA promulgated a rule regulating municipal solid waste landfills under Title V of the Clean Air Act.

The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 63: Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
- 40 CFR Part 60: Subpart Cf – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills
- 40 CFR 60: Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 CFR 61: Subpart M – National Emission Standard for Asbestos
- 40 CFR Part 62: Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills that Commenced Construction on or Before July 17, 2014, and have not been Modified or Reconstructed Since July 17, 2014
- 40 CFR Part 60: Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification on or After May 30, 1991, but Before July 18, 2014

- 40 CFR Part 60: Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification after July 11, 2014
- 40 CFR Part 63: Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

B. Inspection Opening Conference

At 9:00 AM on April 17, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Seneca Landfill was represented by Elizabeth Bertha, EHS Director; David Smith, General Manager; Nick Krause, EHS Specialist; Jacob Young, Project Engineer; and Paul Mendel, Plant Operator. Also, PADEP Air Quality inspectors Nicholas Hall and Alexandra Poullet were present. EPA inspectors, Alex Everhart and Parmatma Adhikari, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Seneca Landfill did not claim any photos or documentation as CBI.

EPA Inspectors explained to the Facility that the inspection was part of a National Enforcement and Compliance Initiative (NECI), and that the inspection would include an opening meeting, a facility walkthrough, and a records review. The Facility was also informed by EPA inspectors that during the walkthrough, photographs would be taken, a FLIR optical gas imaging camera may be used for observing equipment and that surface emission monitoring (SEM) would be performed using either an Inficon IRwin Methane Leak Detector or a Toxic Vapor Analyzer TVA2020. All SEM equipment was calibrated the morning of April 18, 2024. Records of the calibrations are maintained by EPA.

II. Site Activity/Process Description

All responses provided throughout the remainder of the Inspection Report were provided by the Facility personnel identified in the opening conference unless otherwise stated.

At the time of inspection, the Facility stated that they were operating as normal. Seneca Landfill Inc. is a wholly owned subsidiary of Vogel Holding Inc. The Facility operating hours are typically 12:00 AM – 5:30 PM, Monday through Friday, and 12:00 AM -11:00 AM, Saturday. Waste is received through the transfer station from midnight to 4:30 AM, and then waste is emptied directly into the landfill until 3:00 PM. The facility is open to the public Monday through Friday, and 7:00 AM -3:00 PM and Saturdays 7:00 AM -11:00 AM. There are approximately 30 full time employees at the landfill. The Facility stated that the site was initially the location of a strip-mine. The Seneca Landfill began operations at this location in 1965. The total footprint of the facility is approximately 446 acres of which 175 acres are permitted as landfill. Currently 126 of the 175 permitted landfill acres are constructed. The Landfill consists of five separate areas as described below:

- Area A is approximately 17 acres and began operation in the 1960s accepting nonhazardous municipal solid waste; it was closed and capped with 50 ml PVC in 1989.
- Area B began accepting waste in the 1977 and was closed in 1983. Part of Area B was capped with 40 ml HDPE in 1993. All waste from Area B has been relocated to lined cells in order to develop new cells in this area.
- Area C is approximately 24 acres and accepted municipal waste from January 1995 through 2001. Parts of Area C are capped and some of Area C is still active.
- Area D is approximately 100 acres; it began operation in 2001 and is still active. Area D consists of Cells 1-16. This Area is constructed with a double liner system consisting of a Geosynthetic Clay Liner (GCL), High Density Polyethylene (HDPE) liner, leak detection layer, GCL and HDPE liner.
- Area E is approximately 71 acres and began accepting waste in 2021. Area E consists of Cells 17-30. This Area is constructed with a double liner system consisting of a GCL, HDPE liner, leak detection layer, GCL and HDPE liner. Area E consists of Cells 17-30.

Currently Cells 1-19 have been constructed and Cell 20 is under construction. The total current design capacity of the landfill is 28,304,853 megagrams. On average the landfill disposes of approximately 730,000 tons of waste per year. The Facility last closed a section of the landfill in 2022 and has its next planned closure of approximately 11 acres scheduled for later in 2024. There are currently 98.56 acres under closure at the facility with 68.46 being under certified final closure and the remainder under a temporary closure cap. The Landfill is permitted to accept a maximum of 6,000 tons of waste per day; however, it only averages approximately 2,800 tons per day. Based on the permitted max waste acceptance rate and average waste acceptance rate the Landfill has approximately 10.5 years of life remaining and 26.7 years of life remaining respectively. The facility stated that they only accept non-friable asbestos.

The Facility has approximately 4.2 million gallons of leachate storage capacity by utilizing three (3) 1-million-gallon concrete storage tanks, and three (3) 416,000-gallon glass lined carbon steel tanks. The Facility has a wastewater treatment plant (WWTP) on site to treat and discharge the leachate from the landfill. The Facility is permitted to discharge 110,000 gallons of leachate per day into the Connoquenessing Creek; however, on average the Facility discharges approximately 50,000 gallons per day. The Facility stated that they only haul leachate off-site when remaining storage capacity drops below 50%. The Facility stated that they have only had to haul leachate off-site once in the last eight years.

The following reciprocating internal combustion engine (RICE) sources are in the Facility's permit:

Permit Source ID	Source Description	Notes
104	335 kW Jenbacher Generator	Only runs on pipeline natural gas November-April
106 & 110	67 horsepower diesel engine	On material screeners that have never been used

301	330 hp diesel emergency generator	WWTP emergency generator, also powers scale house and flare skid.
302	725 hp diesel emergency generator	On-site but not hooked up
111	440 hp Morbark Wood Grinder engine	Last onsite 2 years ago, currently at the Grove Site in Mars, PA.
112	630 hp Vermeer Wood Grinder engine	Last onsite 2 years ago, currently at the Grove Site in Mars, PA.
113	350 hp Rock Crusher diesel engine	Used monthly as needed
114	180 hp 'New' Tipper #1 engine	On-site and used daily
115	180 hp 'Old' Tipper #2 engine	On-site and used daily

The Facility stated that they had approval for installation of two 1,966 hp Jenbacher LFG fueled engines; however, they no longer plan to install them.

The facility stated that they have one maintenance shop on site. The facility stated that no fabrication work or abrasive blasting or painting occurs in the maintenance shop. It is used for completing preventative maintenance and minor repairs on equipment. The facility stated that waste oil is sent off for recycling and is not burned on site. The facility has three fuel storage tanks; one 10,000 gallon offroad diesel storage tank, one 1,000 gallon onroad diesel storage tank, and one 1,000 gallon gasoline storage tank.

The facility first installed a GCCS voluntarily in Area A at the time of closure in the 1980's. The latest expansion is ongoing with the installation of 48 active LFG wells and additional nine LFG wells left to be connected to the active system and approximately 3,000 foot of header piping. The Facility stated that on average the wells are installed 80 feet apart, which is closer than what is specified in the approved GCCS design plan. There are currently 376 LFG wells connected to the GCCS and 9 left to be connected. Of the 376 LFG gas wells approximately 100 have pumps in them for dewatering the LFG wells. The liquids from the LFG wells are pumped into the cleanouts of the leachate system where it can infiltrate back into the landfill. The facility uses two blowers to pull a vacuum of -30 inches of water on the landfill. LFG is pulled through the header pipes where it is directed to an enclosed flare (Source C101) rated for 6,000 standard cubic feet per minute (SCFM) or the Facility's High BTU Gas Plant (HBGP) (Source C103-1). The Facility stated that all of the LFG from the GCCS is currently routed to the HBGP and the flare only operates when preventative maintenance is being performed at the HBGP or if it experiences a system shut down. The HBGP was constructed in 2017 and began operations in 2018 and has a maximum throughput capacity of 4,000 SCFM. The Facility stated that a Supervisory Control and Data Acquisition (SCADA) and Programmable Logic Controllers (PLCs) are used to control the operations of the GCCS including the flare and HBGP. The HBGP has shutdown limits of low methane heating value limit of 955 British thermal units (Btus) and a high oxygen limit of 3%. The Facility stated that GCCS was flowing approximately 2,200 Standard Cubic Feet per Minute (SCFM) the LFG quality at the time of inspection was 60.4% methane, 37.6% carbon dioxide, and 0.1% oxygen. The Facility stated

that all quarterly SEM monitoring required under 40 CFR Part 60: Subpart XXX and 40 CFR Part 63: Subpart AAAA Monthly wellfield tuning is performed by Facility personnel. The Facility stated that the only areas that are excluded as unsafe from SEM monitoring are the active areas. The facility stated that they have not requested any Higher Operating Values for temperature from PADEP and they have historically never had any issues with elevated temperatures in the GCCS. The Facility has four different alternatives in their Title V permit for operations as summarized below:

- Alternative 1: Wells in uncapped areas and leachate collection piping used for gas extraction may be operated at an oxygen level as high as 15 percent.
- Alternative 2: A well may be placed on an inactive list if it exhibits a methane quality that is consistently below 40 percent by volume and an oxygen level that is consistently above 5 percent while the throttle is either closed or slightly open with a negative pressure applied to the well of less than one inch of water column.
- Alternative 3: A well in an area of active waste placement that is inaccessible due to its casing height (generally having a casing height of five feet or greater) may be temporarily placed on the inactive list.
- Alternative 4: A well may be operated at temperatures higher than 55°C (131°F), provided the steps in A through E are followed.

The Facility stated that LFG from the GCCS system comes into the flare Knockout Pot (KOP) from the landfill header, where free liquids fall out. The condensate is pumped to the onsite WWTP. The gas then flows up through a demister, causing more moisture to be removed from the LFG. From the demister the gas is then pulled through two (2) blowers. The blowers maintain the vacuum set point on the wellfield of approximately 30 inches of water. The gas goes to a “Y” where it is sent via pipe header to either the gas processing plant or the enclosed flare. Gas flow toward the processing plant flows through a treatment vessel filled with “Ferrosorp” media for hydrogen sulfide (H₂S) removal. Then the LFG goes through a booster blower to compress the LFG and push flow to HBGP. The compression of the LFG in the booster blowers heats the gas, so it is then sent through an aftercooler fan. The LFG then flows through Sump “A” and Sump “B” where free liquids can fall out prior to entering the HBGP. Inside the building, flow is sent through a heat exchanger which cools the LFG and removes more liquids. The condensate is removed at the two (2) horizontal scrubbers/filters and sent to the plant condensate tank. LFG is then directed to the two (2) compressors to raise the pressure above 200 PSI and heats the LFG. The LFG then flows through the vertical scrubbers where any moisture is removed. The LFG is then sent to the “Air Liquide” skid for treatment of volatile organic compounds (VOCs). The LFG is then sent through a coalescing filter for moisture removal and a Granular Activated Carbon (GAC) filter. The GAC filter media is changed twice per year. The Air Liquide sends waste LFG to the thermal oxidizer (TOX) and the remaining gas is pipeline quality natural gas. The natural gas is sent to either the onsite compressed natural gas (CNG) fueling station or into the Peoples Natural Gas pipeline. The Facility stated that the waste gas being burned in the TOX is approximately 11% methane. The minimum temperature limit established in the latest performance test of the TOX 1603 °F. The upper

and lower thermocouple temperatures are recorded and monitored by the SCADA/PLC to ensure compliance with the permit limit.

The opening conference concluded at 11:30 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 1:15 PM by Elizabeth Bertha, David Smith, Nick Krause, Jacob Young, and Paul Mendel of Seneca Landfill and PADEP inspectors Nicholas Hall and Alexandra Paullet were also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2).

The tour began by visiting the control room and observing the SCADA screens for the HBGP and flare skid. At the time of observation, the GCCS was flowing 1995 SCFM. The lower thermocouple temperature of the TOX was 1874 °F and the upper thermocouple temperature was 1695 °F. Both were above the permit limit of 1603 °F. The Facility stated that if the temperature drops in the TOX they will receive an alarm and will investigate. The Facility was unsure of the alarm temperature at the time of inspection. The enclosed flare was not in operation and all the LFG from the GCCS was being routed to the HBGP. The Facility stated that the plant runs in 10-minute cycles where pressures build up in the tanks and bleeds off. The Facility stated that Gas quality readings are taken at least once per day with an Elkins gas detection meter and that there is no continuous gas analyzer going to the enclosed flare. Next, the inspection team went to the Flare skid. The Inspection team observed the two GCCS blowers and associated transmission piping to deliver the LFG to the HBGP and Flare. In addition the TOX that is in the near vicinity of the Flare was observed. The Ferrosorp treatment vessel was observed and operation removing Hydrogen sulfide from the LFG. Following the observations of the flare skid and associated blowers and transmission piping the inspection team entered the HBGP building. The LFG transmission lines were followed through the process. The "Air Liquide" was in operation with a pressure of 167. PSI and a temperature of 69.5 °F. One Emerson Rosemount Analytical Model 500 Gas Chromatograph was observed. The Facility stated that it determines the gas quality of the "cleaned gas". The inspection team was then taken to observe two Natural gas process heat boilers. Both boilers were Evergreen Weil-McLain boilers with a heat input rating of 220,000 Btus. Next the Inspection team was taken to observe Source 104 a 335 kW Jenbacher Generator. It was in operation at the time of inspection and had a total operating hour reading of 5,789 hours. The Facility stated that it is a "Combined Heat and Power" (CHP) unit that only runs November through April to warm up the leachate in the WWTP. The inspection team was then led to the WWTP and observed the three (3) 1-million-gallon concrete storage tanks, and three (3) 416,000-gallon glass lined carbon steel tanks on the way. The WWTP was in operation at the time of inspection. The inspection team observed source 301 the 330 hp diesel emergency generator. It was not in operation. The Facility stated that it is tested for readiness the last Monday of every month and annually the oil, air filters, and belts are changed. The hour meter at the time of inspection showed a total of 834.5 hours. The inspection team was then led to source 302 the 725 hp diesel Caterpillar emergency generator. It was not hooked up at the time of inspection and the hour meter was not visible. The Facility stated that it had never been hooked up

or used on-site and no maintenance is performed on it. The inspection team was then led to the Maintenance Shop. Two welders were observed. One Miller CP-200 wire welder and one Miller diesel powered WD-5 stick welder. The Facility stated that they are only used for minor repair. After exiting the Maintenance Shop the inspection team was led to Sources 106 and 110 the two 67 horsepower diesel powered material screening plants. The facility stated that they had been sitting in there current location for numerous years and hadn't been used in the last ten plus years. Next the inspection team was taken to the northern part of the facility where Source 113 the 350 hp Caterpillar Rock Crusher diesel engine. The Facility stated that the crusher operates monthly on an as needed basis. The Facility stated that they have a mining permit as well and sell small amounts of coal that is mined in conjunction with the rocks that are being mined for on-site use. The hour meter on the rock crusher engine was 231 hours. Next the inspection team was taken to the top of the landfill to observe the active face in operation. The Facility stated they try to minimize the size of the working face to an area of 150' x 150' as this helps with odors. The Facility stated that they use auto shredder fluff as an alternate daily cover to soil. The inspection team was then taken to "Shop (2)". The inspection team observed one Zep parts cleaner, One Skat Blast Model 976 abrasive blasting cabinet and one metal lathe. The Facility had previously indicated that no abrasive blasting occurred at the Facility; however, the Skat Blast abrasive blasting cabinet was connected in a functional arrangement and glass bead 6700-50 was stored in the floor beside of the blasting cabinet. After leaving "Shop (2)" the inspection team observed one small flare that was located at the western end of the HBGP building. The Facility stated it is to burn off any residual gas when changing out the media in the GAC units. Day one (04/17/24) of the inspection ended at 4:10 PM and EPA inspectors left the site.

EPA inspectors arrived for Day two (04/18/24) of the inspection at 8:45 AM and held a brief opening conference at 9:00 AM. Elizabeth Bertha, David Smith, Nick Krause, Jacob Young, and Paul Mendel of Seneca Landfill and PADEP inspector Nicholas Hall were present for Day 2 of the inspection. The Facility informed the inspectors that they were operating as normal and all the LFG from the GCCS was going to the HBGP. EPA inspectors first used the FLIR optical gas imaging camera to observe the various vents of the HBGP and the enclosed flare. No leaks were identified at the time. EPA inspectors discussed the SEM plan with the Facility and reviewed the serpentine path the Facility uses to complete SEM monitoring. The Facility stated and indicated on the serpentine path drawing that they only perform SEM in areas under final cover and not areas that are not under final cover. EPA inspectors questioned the facility on the ages of waste in place that are not under final cover and the Facility provided a drawing and delineated the age of the oldest waste in place for Cells 13-19. The Facility indicated that waste in Cells 13A, 13B and 14A was older than five years old even though the areas weren't under final cover or at final grade. EPA inspectors informed the facility that SEM would be performed in the areas where waste was older than five years in accordance with 40 CFR 63.1960(c). EPA Inspectors calibrated the IRwin at 10:22 and the inspection team began the SEM in Area C by LFG well SP04 in Cell 13A. The Inspection team worked to the north then west and back to the south and east traversing through Cells 13B, 13A, 14A and 11A. There were four detections in exceedance of the 500 ppm regulatory limit, as defined in 40 CFR 63.1958(d)(1). The Inspection team finished in Area C at 11:55

AM. The inspection team then moved to Area A and began SEM by traversing a loop from the southwest corner to the northeast and back. There were no SEM exceedances of 500 PPM in Area A. The following table summarizes the readings in exceedance of the 500 ppm regulatory limit:

Timestamp	Reading PPM	Latitude	Longitude
4/18/2024 10:42	822	40.81362	-80.082
4/18/2024 11:05	743	40.811937	-80.0827
4/18/2024 11:12	1646	40.81162	-80.0825
4/18/2024 11:20	564	40.811662	-80.0815

The inspection team finished the SEM at 1:00 PM. The inspection team then returned to the HBGP and observed the TOX and all associated piping with the FLIR. No leaks were detected at the time of viewing. The inspection team was then led to the CNG filling station compressor station. The compressor station utilizes electric compressor to fill holding tank that supply CNG to vehicles. EPA inspectors viewed the piping and vents of the compressor station with the FLIR and did not observe any leaks during the inspection. The walkthrough concluded at 1:30 PM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 1:45PM. EPA inspectors reviewed documents requested in the April 16, 2024, email to Elizabeth Bertha (see Attachment 1). Some records were provided at the time of the inspection by Elizabeth Bertha; however, Elizabeth Bertha agreed to provide the remainder of the records after the inspection. Below are the records requested and what was provided:

1. Facility plot plan which depicts the entire landfill surface and the existing gas collection system;
A hard copy of this was provided during the inspection.
2. Facility map showing the Serpentine path for SEM monitoring;
A hard copy of this was provided during the inspection
3. Facility map showing each penetration monitored as required by 40 CFR 63 AAAA.
A hard copy of this was provided during the inspection
4. Site map showing all of the permitted landfill cells;
A hard copy of this was provided during the inspection
5. Copy of the most recent NMOC emission rate report which includes the NMOC emission (Mg/yr) rate and supporting calculations;
The February 2024 NMOC report was reviewed indicating 1.28 Mg/year
6. Provide a record of the facility's actual annual air emissions, from January 1, 2020 through December 31, 2023, for all regulated air pollutants (NOx, SOx, CO, VOCs, HAPs, and PM);

7. Provide a listing of all onsite combustion sources. Not listed in the Current Title V permit. For each combustion unit onsite provide:
 - a. The make and model;
 - b. The date of installation;
 - c. Size or rating (MMBtu/hr, HP, kW, etc.);
 - d. Fuel combusted monthly since 2020 to present (gallons, MMcf, etc.);*This information was discussed during the inspection.*
8. Copies of any performance tests conducted on any source to determine emission rates, concentrations or compliance since 2000;
This information was provided electronically after the inspection.
9. Identify any periods when the GCCS was not operable or was out of service since 2020 to present;
Hard Copies of the Startup Shutdown and Malfunction logs were provided.
10. Records of monthly wellhead pressure, temperature, Nitrogen or Oxygen monitoring January 2020 to the present;
This information was provided electronically after the inspection
11. Any initial notifications, notifications of compliance status, or periodic reports submitted to EPA or PADEP pursuant to 40 CFR Part 60 Subpart WWW, 40 CFR Part 62 Subpart OOO, or 40 CFR Part 63 Subpart MACT AAAA since 2018;
This information was provided electronically after the inspection.
12. Copy of the SEM monitoring plan and SEM monitoring records from 2020 to present;
This information was provided and reviewed electronically during the inspection.
13. Copies of all Title V Annual/Semiannual compliance certifications from 2020 to present;
This information was provided electronically after the inspection.
14. Copies of all High Operating Values (HOVs) approvals from PADEP and/or EPA;
This was discussed during the inspection and the facility does not have any HOVs.
15. Quarterly reports of the VOC emissions from petroleum contaminated soils used as daily landfill cover January 2020 to present;
This was discussed during the inspection and while the Facility is approved to use petroleum contaminated soils they have not.
16. Monthly records of Petroleum Contaminated soil received from January 2020 to Present;
This was discussed during the inspection and while the Facility is approved to use petroleum contaminated soils they have not.
17. Daily Fugitive and Visible emission monitoring records January 2020 to Present;
The following Daily Landfill Inspection Reports were reviewed: 4/18/24; 4/25/24; 4/27/22; and 9/1/22.

18. Most recent Design Capacity Report;
This information was provided and reviewed electronically during the inspection.
19. Annual/semi-annual Reports submitted pursuant to 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAA;
This information was provided electronically after the inspection.
20. GCCS SSM records from January 2020 to Present;
The SSM records were reviewed from January 2023, August 2023, March 2022, and July 2022.
21. The current amount of solid waste in-place and year by year acceptance rate;
This information was provided electronically after the inspection.
22. Hours of operation January 2020 to present for all combustion engines;
This information was provided electronically after the inspection.
23. Quarterly sampling results of LFG going to Steam boiler for Sulfur and Nitrogen January 2020 to Present;
This was discussed during the inspection and while the Facility is approved to use LFG they have not and only use pipeline natural gas to fire the boilers.
24. Continuous and 3-hr rolling block average Thermal Oxidizer upper chamber temperatures January 2020 to Present;
This information was provided electronically after the inspection
25. Records/reports of all monitoring downtime for the Thermal Oxidizer temperature Monitor January 2020 to Present;
This information was provided electronically after the inspection
26. Records of calibrations for all flowmeters and thermocouples used on-site January 2020 to Present;
Hard copies of Calibration Certificates were provided and reviewed.
27. Continuous Temperature and Flow records for all flares onsite January 2020 to Present;
This information was provided electronically after the inspection
28. Records of landfill gas to the LFG treatment system and bypasses of the system January 2020 to Present; and
This information was provided electronically after the inspection
29. Hourly operating logs for all "Exempt Engines" on a monthly basis from January 2020 to Present.
This information was provided electronically after the inspection

V. Closing Conference

After the records review, EPA inspectors, Elizabeth Bertha, David Smith, Nick Krause, Jacob Young, and Paul Mendel of Seneca Landfill and PADEP inspectors Nicholas Hall had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 2:26 PM.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by the Facility.

- SEM is not being performed in accordance with 40 CFR 63.1960(c) in all areas where waste is older than five years in accordance with 40 CFR 63.1960(c). Portions of Cell 13A and 13B are not included in the serpentine path.
- Sources 106 and 110 have been sitting in the same location greater than 12 months and may no longer be a nonroad engine as defined by 40 CFR 1068.30 “Nonroad engine” and therefore be subject to the requirement listed in 40 CFR Part 63: Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine.
- One 725 hp diesel emergency generator (Source 302) is not connected and the Facility indicated that no annual maintenance is performed on it as required by 40 CFR Part 63: Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine.
- EPA’s SEM identified four exceedances above 500 PPM, which are identified above. EPA inspectors reminded the Facility of the regulatory requirement to correct the leaks and re-monitor within 10 calendar days. Furthermore, if re-monitoring still shows exceedances, then additional corrective action must be taken within 10 days of the second exceedance.

VI. List of Attachments

- Attachment 1: Email correspondence to Elizabeth Bertha of records requested to review during inspection
- Attachment 2: Photo Log
- Attachment 3: Sign in Sheet

Everhart, Alex

From: Everhart, Alex
Sent: Tuesday, April 16, 2024 6:44 PM
To: ebertha@senecalandfill.com
Cc: Adhikari, Parmatma
Subject: 4/16/24 EPA Records/documents request
Attachments: EPA Records request Seneca LF.pdf

Hi Liz,

As I mentioned on the phone this afternoon, we plan to be onsite around 9:00 am tomorrow (4/16/24) for a Clean Air Act inspection. I have attached a list of documents/records we would like to see as part of the inspection. If you could please have the maps I listed in 1-4 printed (this may be all on 1 map if you have one showing all these) for us when we start tomorrow that would be great. If anything comes up between now and tomorrow morning feel free to reach out at the contact info below.

Thanks,



Alex Everhart

Enforcement Inspector

Air Section – Air & RCRA Branch

Enforcement & Compliance Assurance Division

US EPA Mid-Atlantic Region

Phone: 215-814-2114

Email: Everhart.Alex@epa.gov

Seneca Landfill
EPA Clean Air Act Inspection
April 17-18, 2024
Records Request

1. Facility plot plan which depicts the entire landfill surface and the existing gas collection system;
2. Facility map showing the Serpentine path for SEM monitoring;
3. Facility map showing each penetration monitored as required by 40 CFR 63 AAAA.
4. Site map showing all of the permitted landfill cells;
5. Copy of the most recent NMOC emission rate report which includes the NMOC emission (Mg/yr) rate and supporting calculations;
6. Provide a record of the facility's actual annual air emissions, from January 1, 2020 through December 31, 2023, for all regulated air pollutants (NO_x, SO_x, CO, VOCs, HAPs, and PM);
7. Provide a listing of all onsite combustion sources. Not listed in the Current Title V permit. For each combustion unit onsite provide:
 - a. The make and model;
 - b. The date of installation;
 - c. Size or rating (MMBtu/hr, HP, kW, etc.);
 - d. Fuel combusted monthly since 2020 to present (gallons, MMcf, etc.);
8. Copies of any performance tests conducted on any source to determine emission rates, concentrations or compliance since 2000;
9. Identify any periods when the GCCS was not operable or was out of service since 2020 to present;
10. Records of monthly wellhead pressure, temperature, Nitrogen or Oxygen monitoring January 2020 to the present;
11. Any initial notifications, notifications of compliance status, or periodic reports submitted to EPA or PADEP pursuant to 40 CFR Part 60 Subpart WWW, 40 CFR Part 62 Subpart OOO, or 40 CFR Part 63 Subpart MACT AAAA since 2018;
12. Copy of the SEM monitoring plan and SEM monitoring records from 2020 to present;
13. Copies of all Title V Annual/Semiannual compliance certifications from 2020 to present;
14. Copies of all High Operating Values (HOVs) approvals from PADEP and/or EPA;

15. Quarterly reports of the VOC emissions from petroleum contaminated soils used as daily landfill cover January 2020 to present;
16. Monthly records of Petroleum Contaminated soil received from January 2020 to Present;
17. Daily Fugitive and Visible emission monitoring records January 2020 to Present;
18. Most recent Design Capacity Report;
19. Annual/semi-annual Reports submitted pursuant to 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAA;
20. GCCS SSM records from January 2020 to Present;
21. The current amount of solid waste in-place and year by year acceptance rate;
22. Hours of operation January 2020 to present for all combustion engines;
23. Quarterly sampling results of LFG going to Steam boiler for Sulfur and Nitrogen January 2020 to Present;
24. Continuous and 3-hr rolling block average Thermal Oxidizer upper chamber temperatures January 2020 to Present;
25. Records/reports of all monitoring downtime for the Thermal Oxidizer temperature Monitor January 2020 to Present;
26. Records of calibrations for all flowmeters and thermocouples used on-site January 2020 to Present;
27. Continuous Temperature and Flow records for all flares onsite January 2020 to Present;
28. Records of landfill gas to the LFG treatment system and bypasses of the system January 2020 to Present;
29. Hourly operating logs for all "Exempt Engines" on a monthly basis from January 2020 to Present.

Attachment 2:

PHOTO LOG

Facility: Seneca Landfill

Location: 412 Hartman Rd., Evan City, PA 16033

Inspection Date: 04/17/2024 – 04/18/2024

EPA Inspector(s): Alex Everhart and Parmatma Adhikari

Photographer: Parmatma Adhikari

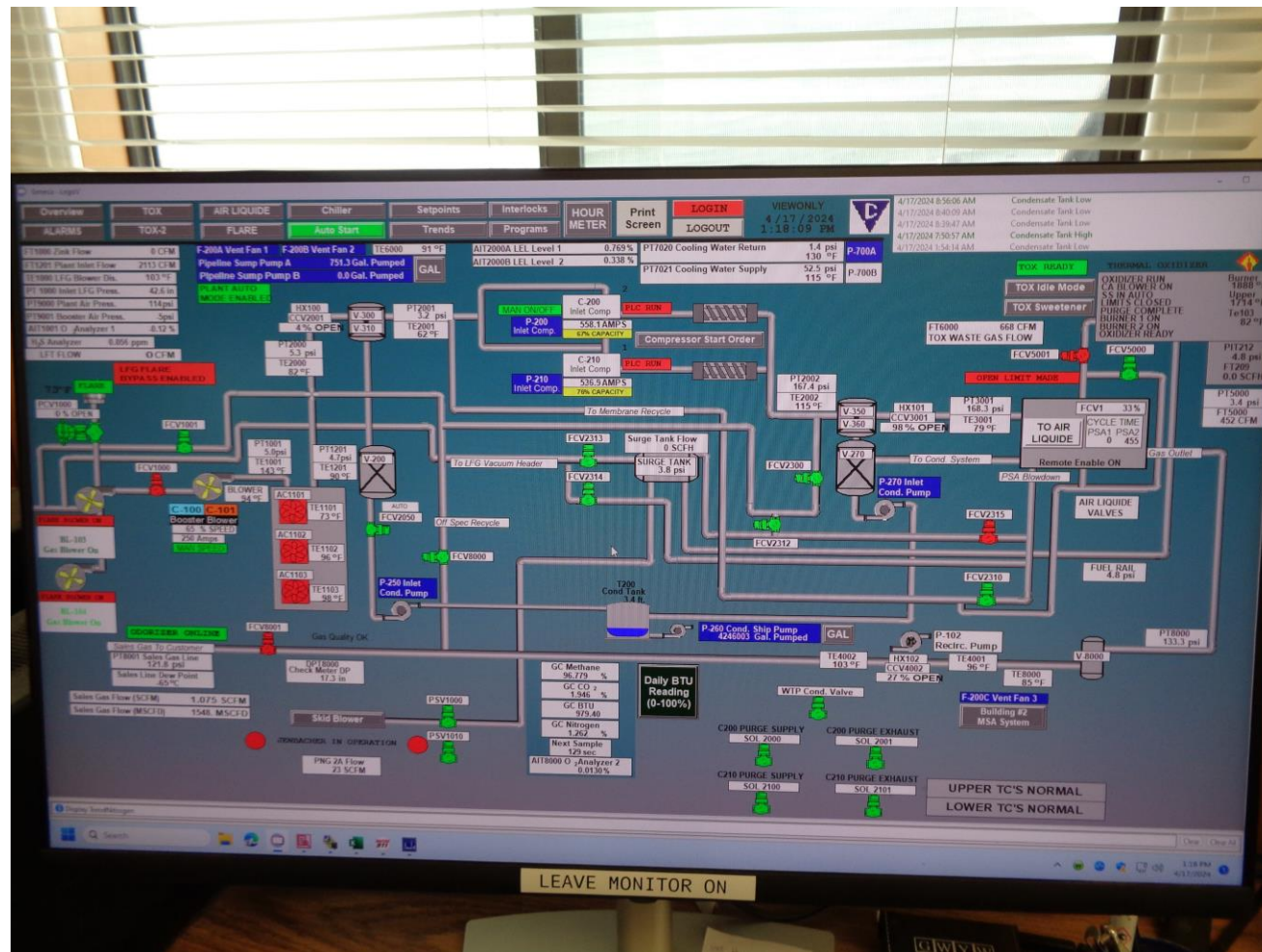


Photo Number: 1

Photo Description: HBGP SCADA Screen



Photo Number: 2

Photo Description: GCCS Vacuum Blowers



Photo Number: 3

Photo Description: GCCS Flare Source C101



Photo Number: 4

Photo Description: GCCS Flare System piping and Hydrogen Sulfide Treatment Vessel on left of photo



Photo Number: 5

Photo Description: Thermal Oxidizer Source C103



Photo Number: 6

Photo Description: LFG Entry point to High BTU Gas Plant Building



Photo Number: 7

Photo Description: Concrete Leachate Tank



Photo Number: 8

Photo Description: C200 Compressor Display Screen



Photo Number: 9

Photo Description: Compressor



Photo Number: 10

Photo Description: Process Heat exchanger from Boiler

WEIL-McLAIN

CERTIFIED

MAWP WATER (PRESS. D'EAU MAX. ADMISSIBLE) ... 80 PSI (552.0 kPa)
MAX. WATER TEMP. (TEMP. MAX. D'EAU) ... 200 F (93 C)
MIN. RELIEF VALVE CAPACITY ... 220 LB/HR OR MBH
(OUVERTURE MIN. DE SOUPE DE DETENTE) ... (64.5 kW)
Canadian registration no. (Num. d'matricule Canadien) ... 8571.7CL

ENERGY STAR

ANSI CERTIFIED

QR Code

Boiler Model (Modele de Chaudiere) ... EVG 220

Series No. (Numero De Serie) ... 1

Type of Gas (Type de Gaz) ... Natural (Naturel)

Maximum Input (Entree Maximum) [0 - 2,000 Ft] ... 220,000 Btu/hr (64.5 kW)
[2,001 - 4,500 Ft] ... 198,000 Btu/hr (58.0 kW)

Minimum Input (Entree Minimum) [0 - 2,000 Ft] ... 22,000 Btu/hr (6.4 kW)
[2,001 - 4,500 Ft] ... 20,000 Btu/hr (5.9 kW)

Inlet Gas Pressure (Pression de gaz d'entree)
Maximum ... 14.0 "wc (3.5 kPa)
Minimum ... 3.5 "wc (0.9 kPa)

Manifold Gas Pressure (Pression de gaz au collecteur)
Maximum ... 0.0 "wc (0.0 kPa)

Heating Capacity (Capacite de chauffage)
Net Output Rating (Sortie Nette), Water (Eau) ... 206,000 Btu/hr (60.4 kW)
179 MBH (52.5 kW)

Electrical input 8.4 amperes, 120 volts, 60 hertz
(Entree electrique 8.4 ampères, 120 volts, 60 hertz)

Note: Add amp rating to electrical input for each additional output up to three outputs.
Maximum 2.2 amps per output.
(Note: Ajouter A l'ampérage de l'alimentation électrique l'ampérage de chaque charge
supplémentaire jusqu'à un maximum de trois charges et 2.2 amps par charge.)

Design certified under (La conception a sous) ... ANS Z21.13 - 2017/CSA 4.9 - 2017
Low Pressure Boiler

523 S New Street — Eden, North Carolina — 27288 — 3623

For installation on combustible flooring.
For either DIRECT VENT (Vent Category IV)
or for installation using indoor combustion
air (Vent Category II) refer to boiler manual
or subsequent addendum(s) for installation
requirements.

Required clearance from combustible
material for closet installation:
Top 8.5" ... Rear 0"
Right Side 2.50" ... Left Side 2.50"
Flue Conn. (PVC) 0.20" ... Bottom 0.00"
Front 0.50" ... Minimum Wall Thickness: None
Maximum Wall Thickness: 24.0"

*For required clearance from combustible
when using polypropylene or stainless steel
venting refer to manufacturer's instructions.
For ease of service, provide clearance to
remove front door, and junction box cover.

This appliance requires a special venting
system. Refer to boiler manual
550 - 100 - 131 for parts list and method of
installation.

Installer seulement sur un plancher
combustible.

Pour installation avec évacuation direct
(Catégorie IV) ou avec air comburant
(Catégorie II). Voir le manuel de la

Dégagement requis des matières
combustibles pour une installation dans un
placard:
Dessus 216 mm ... Cote droit 64 mm
Conn cond (PVC) 5.0 mm
Arrière 0 mm ... Cote gauche 64 mm
Avant 12.7 mm ... Bas 0.0 mm
Épaisseur de paroi minimale: aucun
Épaisseur de paroi maximale: 203.2 mm
- Pour le dégagement des matériaux
combustibles requis lors de l'utilisation
conduit en polypropylène ou en acier
inoxydable se référer aux instructions du
fabricant.

Afin de faciliter l'entretien, fournissez un
dégagement pour enlever la porte avant, et
le couvert de boîte de raccordement.

Cet appareil exige une système de
ventilation special. Consultez le manuel de
chaudiere, numero de piece 550 - 100 - 131
pour obtenir une liste des pieces et une
methode d'installation.

550201425 D

Photo Number: 11

Photo Description: Boiler Data Plate



Photo Number: 12

Photo Description: HBGP Process Natural Gas Boilers



Photo Number: 13

Photo Description: GE Generator Data Plate (Source 104)

B		BRYAN		H	
FLEXIBLE TUBE BOILERS					
MODEL NO	CL 120-W-GT		YEAR BUILT	1993	
SERIAL NO	74707		BRYAN NO	930835	
INPUT MAX/MIN	1200/600		MBH	NAT'L BD. NO. 34177	
OUTPUT	960		MBH	RELIEF VALVE SETTING	45 PSIG
HTG SURFACE	145		SQ FT	MIN RELIEF VALVE CAP	1450 PPH
MAX WP WATER	60		PSIG	MAX WP STEAM	PSIG
NATURAL GAS DATA					
MAXIMUM INPUT	1200		CFH	MINIMUM INPUT	600 CFH
SUPPLY PRESSURE: MINIMUM	7		IN WC	MAXIMUM	5 PSIG
MANIFOLD PRESSURE:	3.5		IN WC	ORIFICE SIZE	26 DMS
PROPANE DATA					
MAXIMUM INPUT			CFH	MINIMUM INPUT	CFH
SUPPLY PRESSURE: MINIMUM			IN WC	MAXIMUM	PSIG
MANIFOLD PRESSURE:			IN WC	ORIFICE SIZE	DMS
OIL DATA					
MAXIMUM INPUT			GPH	MINIMUM INPUT	GPH
CONTROL CIRCUIT VOLTAGE	120		PHASE	1	CYCLES 60 AMPS
MOTOR CIRCUIT VOLTAGE			PHASE		CYCLES AMPS
DO NOT INSTALL ON COMBUSTIBLE FLOORING					

Photo Number: 14

Photo Description: Detroit Diesel Generator Data Plate Source 301



Photo Number: 15

Photo Description: : Detroit Diesel Generator Hour Meter



Photo Number: 16

Photo Description: : Detroit Diesel Generator Model Number



Photo Number: 17

Photo Description: CAT Generator Source 302



Photo Number: 18

Photo Description: An Overview of Maintenance Shop



Photo Number: 19

Photo Description: An Overview of Maintenance Shop



Photo Number: 20

Photo Description: Sources 106 and 110 Overview (Portable Screen)



Photo Number: 21

Photo Description: Sources 106 and 110 Overview (Portable Screen)



Photo Number: 22

Photo Description: Area D, Temporary Capped Area



Photo Number: 23

Photo Description: Active Working Face



Photo Number: 24

Photo Description: Zep Parts Washer

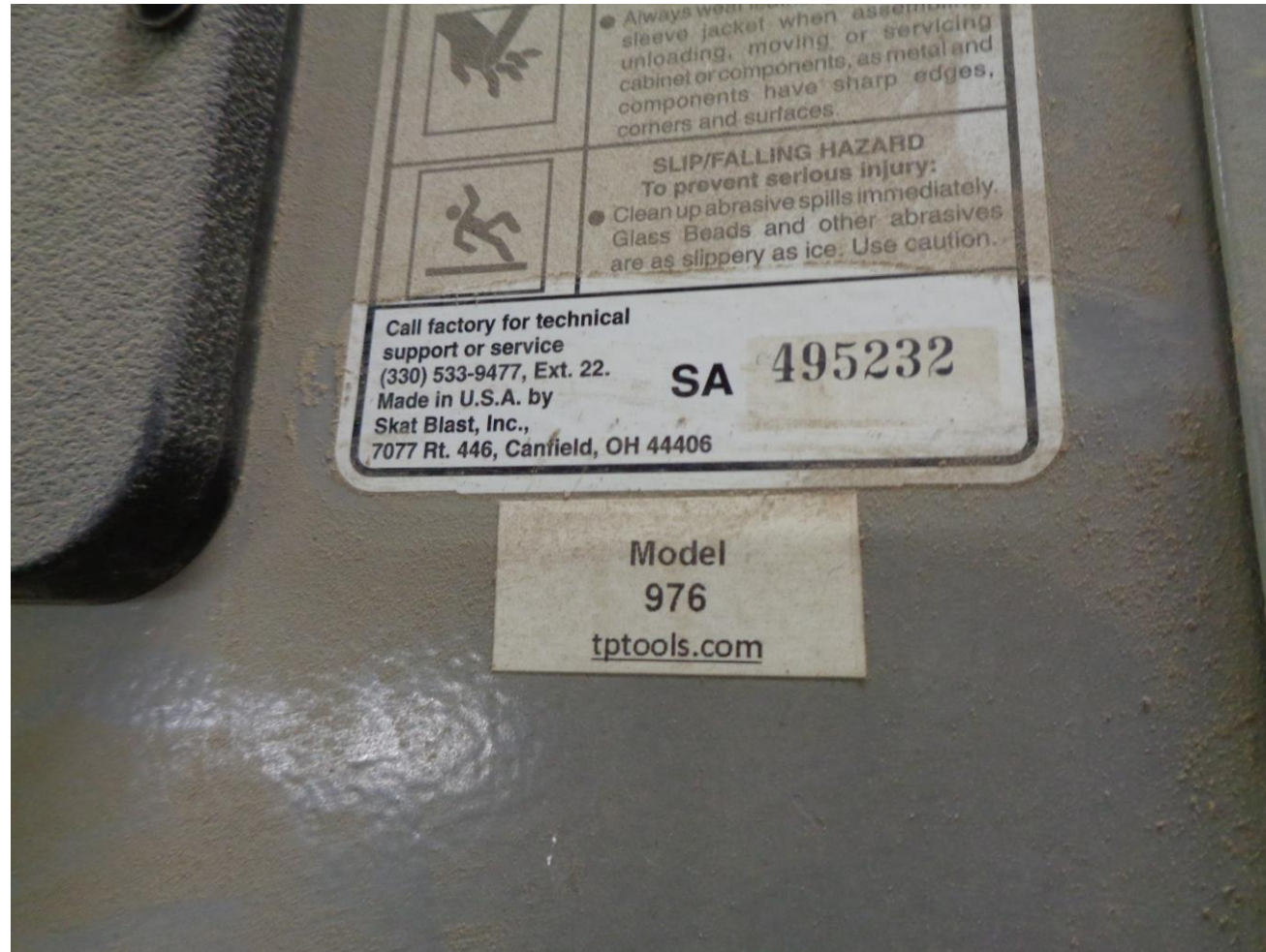


Photo Number: 25

Photo Description: Skat Blast Abrasive blaster Information sticer



Photo Number: 26

Photo Description: Skat Blast abrasive blast cabinet



Photo Number: 27

Photo Description: Abrasive Blasting Media



Photo Number: 28

Photo Description: Machinery Equipment



Photo Number: 29

Photo Description: Small Flair Located at the Western end of the HBGP Building



Photo Number: 30

Photo Description: Small Leachate seep and location of SEM exceedance



Photo Number: 31

Photo Description: Area A Capped Area



Photo Number: 32

Photo Description: CNG Filling Station Natural Gas Compressor



Photo Number: 33

Photo Description: CNG Filling Station Compressors

Inspection Sign-In Sheet

Facility: *Seneca Landfill*

Date: *4/17/2024*

Name	Affiliation	Title	Phone Number & Email
Alex Everhart	EPA	Enforcement Inspector	215-814-2114 Everhart.Alex@EPA.gov
Parmatma Adhikari	"	"	215-814-2161 Adhikari.Parmatma@epa.gov
Alexandra Paullet	PADEP	AQ Inspector	814-282-8210 apaullet@pa.gov
Nicholas Hall	PADEP	AQ Inspector	814-651-1819 nichall@pa.gov
PAUL MENDEL	SENECA LANDFILL	PLANT OPERATOR	724-816-8338 PAULM@senecalandfill.com
Jacob Young	Seneca Landfill	Project Engineer	724-841-4978 JYoung@senecalandfill.com
STEVE LOHE	SENECA LANDFILL	MAINTENANCE	724-816-6864 steveny@senecalandfill.com
DAVID SMITH	SENECA LANDFILL	GENERAL MANAGER	724-816-4757 dsmith@senecalandfill.com
NICK KRAUSE	Seneca Landfill MIG	EHS Specialist	724-316-4850 N.Krause@senecalandfill.com
Elizabeth Bertha	Senecalandfill	EHS Director	(724) 816-6149 ebertha@senecalandfill.com

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Facility: Seneca Landfill

Date: 4/18/24

Name	Affiliation	Title	Phone Number & Email
Alex Everhart	EPA	Enforcement Inspector	215-814-2114 Everhart.Alex@EPA.gov
Parmatma Adhikan	"	"	215-814-2161 Adhikan.Parmatma@epa.gov
Nicholas Hall	PA DEP	Air Quality Inspector	814-651-1819 nichall@pa.gov
PAUL MENDEL	SENECA LANDFILL	PLANT OPERATOR	724-816-8338 PAUL.M@senecalandfill.com
Jacob Young	Seneca Landfill	Project Engineer	724-841-4978 JYoung@senecalandfill.com
DAVID SMITH	SENECA LANDFILL	GENERAL MANAGER	724-816-4757 dsmith@senecalandfill.com
Nick Krause	Seneca Landfill	EHS Specialist	724-316-4850 nKrause@senecalandfill.com
Elizabeth Bertha	Seneca Landfill	EHS Director	(724) 816-6149 ebertha@senecalandfill.com