



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Conestoga Landfill
Inspection Date(s): 12/03/2024 - 12/04/2024
Regulatory Program(s): SIP, NSPS, NESHAP

Company Name: Republic Services
Facility Name: Conestoga/ New Morgan Landfill
Facility Location: 420 Quarry Rd
Morgantown, PA 19543

Latitude: 40.170397 **Longitude:** -75.894142
County/Parish: Berks County

AFS/ICIS-Air Number: PA000509799
Permit Number: 06-05085
NAICS Code: 562212 **SIC:** 4953
DSB ID #: ECAD-5624

Facility Representatives*:	Point of Contact
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EPA Inspectors*:

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State/Local Inspectors*:

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*Additional inspectors identified in report body and on attached sign in sheet

DSB ID #: ECAD-53

EPA Lead Inspector
Signature

Alex Everhart
1600 John F Kennedy Blvd
Philadelphia, PA 19103-2852

Date

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 New Morgan Landfill/Conestoga Landfill (CLF or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on November 18, 2024, via email. On December 2, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Mazen Haydar, Environmental Manager, 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 420 Quarry Rd. Morgan, PA 19543 and is privately owned and operated by Republic Services (Republic). The CLF has an active Gas Collection and Control System (GCCS) connected to a blower that pulls a vacuum on the landfills to remove the landfill Gas (LFG).

The Facility received its most recent Title V operating permit (06-05085) from PADEP on October 31, 2022.

The CLF is categorized as a major source of volatile organic compounds (VOC) emissions in a marginal ozone nonattainment area (Berks County). 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 08:15 AM on December 3, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. CLF was represented by Jacob Schmidt, Area Environmental Manager; Mazen Haydar, Environmental Manager; Chris Paoletti, Operations Manager; and Shenna McCarthy, Environmental Manager. Also, present from PADEP were Sydnee White, Compliance Specialist; Bill Laufer, Air Quality Specialist; William Borst, Air Quality District Supervisor; and Julia Olafson, Air Quality Specialist. EPA inspectors, Alex Everhart, Scott Yanos and Owen Ehret presented their credentials and identification 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, Mr. Schmidt 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, and that surface emission monitoring (SEM) would be performed using either an Inficon IRwin Methane Leak Detector or a Toxic Vapor Analyzer TVA2020. EPA informed the facility that immediately following the opening conference EPA inspectors would be performing SEM at the landfills listed in the Facility's Title V permit. All SEM equipment was calibrated the morning of December 3, 2024, prior to arriving onsite. Records of the calibrations are maintained by EPA.

The opening conference concluded at 08:45 AM.

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

II. Observations

Day 1 December 3, 2024

Immediately following the opening conference at 08:45 AM on December 3, 2024, EPA inspectors (Alex Everhart, Scott Yanos and Owen Ehret) and PADEP Inspector (Sydnee White, Bill Laufer, William Borst, and Julia Olafson) were taken to the Landfill by Jacob Schmidt, Mazen Haydar, Chris Paoletti, and Shenna McCarthy to take upwind and downwind methane readings with the Inficon IRwin (IRwin)

methane detector prior to starting the SEM. A measurement of zero (0) parts per million (ppm) was recorded upwind and one (1) ppm was recorded downwind. The Facility indicated that waste in Cells 26a, 26B, 24A, 24B, and 18A was not older than five years and was not at final grade. Given the age of waste in those cells EPA did not include those areas as part of the SEM comparative monitoring.

EPA inspectors began on the northeast side of the “New Hill” by LFG well 3X142. The inspection team walked along the eastern side of the New Hill to the southern on the New Hill side slopes taking reading as they traversed the landfill and at numerous penetrations. There were 26 detections in exceedance of the 500-ppm regulatory limit, as defined in 40 CFR 63.1958(d)(1). While performing SEM numerous areas of erosion and exposed waste were observed on the New Hill. Photos of these areas are shown in the photo included as Attachment 2. A visual plume of steam was observed coming up at penetration 3x90R and a measurement of 2537ppm CH₄ was observed.

Following SEM monitoring of the New Hill the inspection team moved to the Old Hill. The inspection team performed SEM along a section of the southeastern portion of the old hill using the Irwin methane detector that was not under final cover. Four (4) exceedance of the 500 ppm were observed at the Old Hill. The inspection team completed the serpentine path around the Old GROWS Landfill at 2:57 PM.

The following table summarizes the readings in exceedance of the 500-ppm regulatory limit:

New Hill	Exceedance (ppm)	Time	LAT WGS84	LON WGS84
86R2	3700	9:33	40.174184	-75.901726
24Ax1	1391	9:38	40.173777	-75.901836
3x90R	3523	9:46	40.172878	-75.901194
3x37R	3537	9:52		
Downslope 3x37R	521	9:58	40.173537	-75.900439
3x76R2	702	10:03	40.173912	-75.900794
3x55R	1084	10:08	40.174299	-75.901138
3x55R	2706	10:12	40.17427	-75.901126
3x34R	883	10:29	40.17503	-75.901648
NW 3x33	608	10:30	40.175597	-75.901579
3x16	981	10:38	40.174894	-75.90105
3x15	700	11:01	40.174734	-75.900322
Header Cross over	508	11:05	40.174958	-75.900351
3x17R	2079	11:01	40.174734	-75.900322
West of 3x17R	837	11:12	40.175297	-75.900863
3x19	633	11:20	40.17577	-75.901062
NW 3x19	588	11:23	40.175934	-75.901157
3x23	2398	11:33	40.176751	-75.90144
3x24	930	11:39	40.177191	-75.901337
BD25	629	11:41	40.177362	-75.901442
3x27	533	11:51	40.177865	-75.901474
17x1	870	12:08	40.177217	-75.902721
4x2	2599	12:29	40.175769	-75.903362
Header access riser near 4x2	665	12:33	40.176093	-75.903084
4x6	1140	12:48	40.174596	-75.902686
Riser pipe downhill 4x6	1628	12:55	40.174473	-75.902189
Old Hill				
2x134	928	2:03	40.180317	-75.912355
(remonitor by 2x134)	2602	2:09	40.179861	-75.911488
BD15	1668	2:28	40.179279	-75.910249
Vacuum acce+A2:A31ss riser N weather statio	783	2:36	40.178448	-75.909501

Following the SEM at the Old Hill, the EPA inspection team was led to the flare yard. Sources C103, C106, and C108 were observed. None of the flares were operating at the time of inspection. All flow meters indicated zero instantaneous flow. Below is a summary of the readings from the totalizers.

Source	Totalizer Reading
C103	32,031,933 X 100 SCF
C106	45,395 X 100 SCF
C108	1,531,684 SCF

CLF personnel led the inspection team to the “Point of Sale” flow meter and totalizer which serves as the point at which they relinquish control of the LFG to EDL. The instantaneous flow and total flow at the time of observation were, 6,268 SCFM and 1835650 X100 SCF respectively. The inspection team observed the control panels for the flares and noted a minimum temperature set point of 1703° for source C103 and 1663° for source C106. CLF stated they have no inline gas analyzer; however, the EDL does have a gas analyzer at their facility to monitor gas quality of the LFG being delivered to the plant.

After observing the flares, the inspection team was led to the emergency generators (source 201 and 202) located adjacent to the flare yard. Source 201, an 800-kilowatt (KW) CATC27 was observed with 42.5 total operating hours. The maintenance log on the generator indicated that the most recent service was completed at 42.2 hours and consisted of an oil and filter change. CLF stated source 201 only powers the LFG system components in the event of a loss of power. Source 202, a 1,000-kilowatt (KW) CATC32 was observed with 55.2 total operating hours. The maintenance log on the generator indicated that the most recent service was completed at 55.2 hours and consisted of an oil and filter change. CLF stated Source 202 only powers the WWTP in the event of a loss of power. The inspection team was then led into the WWTP and observed one 650 MBH natural gas process heater Power Flame Model JR50A-15. CLF stated that the process heater is used to maintain temperatures of the leachate in the treatment process and that the process heater is listed as an insignificant source in the permit. The inspection team was then led to the maintenance shop. The inspection team observed Source 030 (100 KW Kohler emergency generator). The hour meter reading at the time of observation was 275.3.

The walkthrough concluded at 04:00 PM on December 3, 2024.

III. Site Activity/Process Description

Day 2 December 4, 2024

On Day 2 (12/4/24) of the inspection at 8:00 AM EPA (Alex Everhart, Scott Yanos and Owen Ehret) and PADEP personnel (William Borst and Julia Olafson) met with CLF Representatives (Jacob Schmidt, Mazen Haydar, Chris Paoletti, and Shenna McCarthy) to discuss the Facility process and continue the inspection. CLF is privately owned and operated by Republic Services. The normal hours of operation are from 5:00 AM to 4:00 PM Monday to Friday and Saturday 5:00 AM to 9:00 AM. There are 37 full time Republic employees. New Morgan Borough purchased the property from a private citizen and began operations in 1993. BFI operated CLF from 1993 to 1999 when CLF was purchased by Allied waste. In 2008 Republic Services bought Allied Waste including CLF and has operated the landfill since that time.

The total footprint of the facility is approximately 426 acres of which 276.8 acres are permitted as landfill. Disposal has taken place in two main areas the “Old Hill” which is 160 acres and the “New Hill” which is 116.8. CLF began constructing a landfill cell in 2022 that will tie the Old Hill and New Hill together. Construction of the tie in is anticipated to be complete in 2025. CLF stated that 116.9 acres of

the landfill has been certified closed. CLF's design includes 26 distinct cells. The last permitted expansion of the CLF occurred in October 2005. Currently CLF is permitted to dispose of 54.6 million cubic yards of waste. CLF stated that as of November 15, 2023, there was approximately 9.5 million cubic yards of airspace remaining which equated to approximately seven years of life remaining in the landfill. The Facility stated that all waste received by CLF, except for asbestos that is separated and tracked separately, is placed in the landfill with no sorting or segregation. The majority of waste disposed at CLF is from Southcentral and Southeast Pennsylvania as well as New Jersey. CLF is permitted to receive 1.62 million tons of waste per year and received 937,000 tons of waste in 2023.

CLF generates approximately 36 million gallons of leachate and landfill gas system condensate per year. The Facility has a wastewater treatment plant (WWTP) on site to treat and discharge the leachate and landfill gas system condensate from the landfill. CLF stated they have the ability to truck leachate off site in the event of a spike in leachate production caused by heavy rains. Leachate was last trucked off site in April of 2024. The WWTP has an NPDES permit to discharge 75,000 gallons per day directly into the Conestoga River. In 2023 CLF discharged 18.2 million gallons of leachate. CLF stated the leachate is sampled once per quarter and the discharge is sampled two times per week.

CLF has 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 offsite for recycling and is not burned onsite. Minor maintenance is performed on the pickup trucks while most major maintenance and preventative maintenance is performed on the Facility's three (3) waste compactors. CLF stated that only minor welding occurs.

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

Permit Source ID	Source Description	Notes
201	800 kW diesel fired Caterpillar C27 emergency generator	Only operates LFG system
202	1000 kW diesel fired Caterpillar C32 emergency generator.	Only operates WWTP
030	100 kW diesel fired Kohler emergency generator 100B0ZJ7	Only operates maintenance shop

All maintenance for the Source 201 and 202 is performed by Caterpillar and all maintenance of Source 030 is performed by CLF personnel. CLF stated that these are only run during emergency situations and for readiness testing.

The facility originally installed its GCCS in 1993 in response to PADEP best available control technology requirements. 40 CFR Part 60: Subpart WWW became applicable to the Facility in 2011 when calculated NMOC emission rates exceeded 50 megagrams/year. The latest expansion to the GCCS was

completed in July 2024 with the installation of eight (8) new LFG wells and seven (7) redrilled LFG wells. CLF stated that the GCCS has been installed in accordance with the approved July 2011 Design Plan. The system currently has a design capacity of 11,000 standard cubic feet per minute (SCFM). There are currently 291 LFG collectors installed, CLF was unsure of the breakdown of vertical/horizontal LFG wells and collectors connected to the leachate system. Of the 291 LFG collectors, approximately 106 have pumps in them for dewatering the LFG wells. The liquids from the LFG wells are pumped into sumps of the where it is pumped into the leachate system. The Facility stated that LFG from the GCCS system comes into the Knockout Pot (KOP) from the landfill header, where free liquids fall out. The condensate from the KOP is pumped to the onsite WWTP. The gas then flows through three (3) blowers. The blowers maintain the vacuum set point on the wellfield of approximately 70 inches of water. The gas goes to a “Y” where it is sent via pipe header where it is directed to one of the following:

	Source Description	Notes
Permit Source ID C103	Enclosed Flare #3 (Flare 300)	Max Flow 5000 SCFM
Permit Source ID C106	Enclosed Flare #4 (Flare 400)	Max Flow 5500 SCFM
Permit Source ID C108	Candlestick Flare	Max Flow 500 SCFM
EDL Morgantown (EDL)	Energy Developer	Separate PA Title V Permit 06-05115

CLF stated typically all of the LFG collected by the GCCS is sent via pipeline to EDL Morgantown and the flares only operates when EDL reduces demand or if it experiences a system shut down. On average the GCCS flows 6,000 to 7,000 SCFM of landfill gas. A point-of-sale flow meter is located at the exit of the GCCS skid. CLF stated no treatment of the LFG occurs at CLF and all treatment is done at EDL. CLF stated typically the LFG quality is 49% to 52% methane (CH₄) and 1.1% to 1.3% oxygen (O₂). No permanent gas quality meter is installed at the facility. Gas quality is measured at the GCCS skid on days when on site tuning is done on the well field. CLF stated SCS Field Services (SCS) has performed all LFG system operations and maintenance (O&M) since 2011. In addition to well O&M, SCS also completes the quarterly surface emissions monitoring (SEM). Currently the flares are exercised once per week.

The Facility is in the process of installing continuous LFG pilots to both enclosed flares. . The Facility stated that a Programmable Logic Controllers (PLCs) are used to control the operations of the GCCS including the flare 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 no current Higher Operating Values for temperature from PADEP and they have historically had some however the wells have since been replaced or the HOVs were less than 145 degrees. CLF enclosed flare minimum temperatures are established by performance tests. These temperatures are monitored via thermocouples and must be maintained above 1633° for C103 and 1593° for C104. None of the flares were in operation during the inspection and all LFG was being directed to EDL.

IV. Records Review

Day 2 December 4, 2024

The records review commenced immediately after the facility/process description on December 4, 2024, at 9:45 AM. EPA inspectors reviewed documents requested in the December 2, 2024, email to Mr. Haydar (see Attachment 1). Some records were provided at the time of the inspection by Mr. Haydar; however, Mr. Haydar agreed to provide the remainder of the records after the inspection. Below are the records requested and what was provided:

1. General maps:
 - Map with cover types, include descriptions of the cover
A hard copy of this was provided during the inspection.
 - Landfill cell map and year of first waste placement for each cell
A hard copy of this was provided during the inspection.
2. Flares & controls
 - Flare monitoring data (2021-present)
This information was provided electronically after the inspection.
 - Flare Performance tests (2021-present)
The September 9/14-15/21 Stack test report was reviewed during the inspection.
 - Collected gas flow (2021-present), (ideally 15-minute granularity, if data is saved at higher granularity that is fine too, if it is not kept at that granularity than the most granular form of that data)
This information was provided electronically after the inspection.
3. Migration
 - Migration probe data (2021-present)
This information was provided during the inspection.
 - Record of any corrective actions in response to any observed migration issues
This information was provided during the inspection.
 - Map of probe locations
This information was provided during the inspection.
4. GCCS Design Plan
 - Current plan & approval if applicable
This information was provided electronically after the inspection.
5. GCCS
 - Map of GCCS as built
This information was provided during the inspection.
 - If horizontal wells are used to control areas under NSPS/NESHAP collection requirements, a description of the spacing (vertical and horizontal) and a map of the extent of the collectors
This information has not been provided.
 - Table of wells active at any point 2021-present

- Drill / decommission dates as applicable (*if well was installed pre-2021, drill date not needed*)
 - Well type (horizontal, vertical etc)
 - Location of well (ideally lat/lon but otherwise identify what coordinates are used)
 - Depth of well & depth to perforation
This information has not been provided.
 - Wellhead monitoring and records of tuning (2021-present)
 - Include methane, hydrogen, CO, and flow rate, if available
This information was provided electronically after the inspection.
 - Any wellhead HOVs approvals relevant for 2021-present, along with approvals of any alternative timelines or corrections in that time.
This information was provided electronically after the inspection.
 - Any monitoring of liquid depth in wells (2021-present), including identification of % of perforation obstructed
 - Identification of wells with dewatering pumps
 - Descriptions of any SOPs or internal guidelines that may exist relating to well dewatering
This information has not been provided.
6. Annual/semi-annual reports – for 2021 to present, all:
- NSPS/NESHAP/EG semi-annual reports
This information was provided electronically after the inspection.
 - Air permit compliance reports
This information was provided electronically after the inspection.
 - SSM reports
This information was provided electronically after the inspection.
 - Annual Emission reports
The 2021, 2022 and 2023 Annual Emission reports were reviewed during the inspection.
7. SEM – for 2021 to present:
- Include the most recent SEM reports, or at least as much of it as has been completed even if they are not a part of any final semi-annual
 - All recorded data
 - GPS track of path taken
 - Readings including non-exceedances
 - Records of corrective actions
 - Approvals of any alternatives to expansion of the GCCS or alternative timelines
 - Any guidance or training materials provided for the SEM technicians
 - Explanation for why any areas were not monitored, when applicable
The Q4 2024 SEM Report was provided separately al other SEM reports were provided as part of the Annual/Semiannual Reports that were provided electronically after the inspection.
8. Cover integrity – for 2021 to present:
- Any records of the monthly cover integrity monitoring and associated corrective actions

January 2021 – November 2024 monthly cover integrity monitoring reports were provided electronically after the inspection.

9. Air permits:

- All air permits active for the site in the past five years and their applications
The current Air Permit was provided during the inspection and electronically after the inspection. The Air Permit that expired March 31, 2022, was provided electronically after the inspection.

10. Part 98

- Part 98 Greenhouse Gas Report (2021-present)
The 2021, 2022, and 2023 Reports were reviewed. The facility designated 18.763 % of waste as inert in 2021, 34 % of waste as inert in 2022, and 21% of waste as inert in 2023.
- If the landfill changed the method for calculating emissions in the primary report from Equation HH-6 to Equation HH-8 in the rule (or vice versa), or is reporting using the lower estimate of the two equations, provide an explanation of the basis for that decision
Not Applicable

11. Annual waste deposited tonnages by type from 2021 to present

- Include a list of the primary sources of industrial wastes and a description for any special wastes listed
- Outline of what wastes (if any) are classified as non-degradable for LandGEM maximum expected gas generation (Design Plan) along with the basis for this classification
- Outline of what wastes are classified as “inert” if applicable for Part 98 reporting along with the basis for this classification
This was discussed during the inspection.

12. Any versions of the SSM plan that have been in place 2021-present

A hard copy was reviewed during the inspection.

13. Corporate ownership tree for the permitted entity

This was discussed during the inspection.

14. Any records or reports of additional emissions monitoring activity contracted by the site, including but not limited to drone, satellite, and tower-based monitoring (2021-present)

The Facility indicated that they didn't have any of these records.

15. Log of any citizen complaints received (2021-present) and responsive action if applicable

The Facility indicated that they didn't have any complaints.

16. Solid waste records:

- Most recent Site Operating Plan
- Annual Solid Waste Reports (2021-present)

To date these have not been provided.

17. Provide a listing of all onsite combustion sources. Not listed in the Current Title V permit. For each combustion unit onsite provide:

- The make and model;
This information was provided during the inspection.
- The date of installation;
This information was provided during the inspection.
- Size or rating (MMBtu/hr, HP, kW, etc.);
This information was provided during the inspection.
- Fuel combusted monthly since 2020 to present (gallons, MMcf, etc.);
To date this information has not been provided.

18. Hours of operation 2021-present for all combustion engines;
To date this information has not been provided.

19. Daily Fugitive and Visible emission monitoring records 2021 to Present
This information was provided electronically after the inspection.

20. Maintenance records for all emergency generator 2021- present
This information was provided electronically after the inspection.

V. Closing Conference

Day 2 December 4, 2024

After the records review, EPA inspectors (Alex Everhart, Scott Yanos and Owen Ehret) and PADEP Inspector (William Borst, and Julia Olafson) and CLF Representatives (Jacob Schmidt, Mazen Haydar, Chris Paoletti, and Shenna McCarthy) held 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 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 10:45 AM on December 4, 2024.

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

- EPA observed 29 exceedances (25 on the New Hill and four (4) on the Old Hill) during SEM monitoring on December 3, 2024. The Facility flagged each location for repair at the time of observation. A table of these exceedances is included in section II of this report. EPA informed the Facility that they should be treated as official SEM exceedance and all timelines and remedial actions as specified in 40 CFR 63.1960(c)(4) should be followed.
- Numerous areas of erosion and exposed waste in need of repair were observed while performing SEM on the New Hill, photos have been included in Attachment 2. In accordance with 40 CFR 63.1960(c)(5) CLF must implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.

VI. List of Attachments

- Attachment 1: Email correspondence to Mazen Haydar of records requested to review during inspection
- Attachment 2: Photo Log
- Attachment 3: Inspector Sign-in Sheet
- Attachment 4: IRWIN Calibration Log
- Attachment 5: SEM Log

Everhart, Alex

From: Everhart, Alex
Sent: Monday, December 2, 2024 3:22 PM
To: MHaydar@republicservices.com
Cc: Borst, William; jolafson@pa.gov; Yanos, Scott (he/they); Ehret, Owen (he/him/his)
Subject: Conestoga Landfill Clean Air Act Inspection
Attachments: Conestoga Landfill request email doc list.pdf

Hi Mazen,

As I mentioned on the phone EPA Region 3 will be on-site tomorrow around 8 AM for a Clean Air Act Inspection. We will be joined by some inspectors from PADEP as well. Our plan for tomorrow is to complete surface emission monitoring over a portion of the landfill. Should time allow we will also do some records review as well. If there's not enough time for that on 12/3/24 we will return on 12/4/24 to finish up. I have attached a list of some records that we would like to review as part of the inspection. My contact info is below, feel free to reach out otherwise we will see you in the morning.

Thanks!



Alex Everhart

Enforcement Inspector

Air Section – Air & RCRA Branch

Enforcement & Compliance Assurance Division

US EPA Mid-Atlantic Region

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Conestoga Landfill
EPA Clean Air Act Inspection
December 2024
Records Request

1. General maps:
 - Map with cover types, include descriptions of the cover
 - Landfill cell map and year of first waste placement for each cell
2. Flares & controls
 - Flare monitoring data (2021-present)
 - Flare Performance tests (2021-present)
 - Collected gas flow (2021-present), (*ideally 15-minute granularity, if data is saved at higher granularity that is fine too, if it is not kept at that granularity than the most granular form of that data*)
3. Migration
 - Migration probe data (2021-present)
 - Record of any corrective actions in response to any observed migration issues
 - Map of probe locations
4. GCCS Design Plan
 - Current plan & approval if applicable
5. GCCS
 - Map of GCCS as built
 - If horizontal wells are used to control areas under NSPS/NESHAP collection requirements, a description of the spacing (vertical and horizontal) and a map of the extent of the collectors
 - Table of wells active at any point 2021-present
 - Drill / decommission dates as applicable (*if well was installed pre-2021, drill date not needed*)
 - Well type (horizontal, vertical etc)
 - Location of well (*ideally lat/lon but otherwise identify what coordinates are used*)
 - Depth of well & depth to perforation
 - Wellhead monitoring and records of tuning (2021-present)
 - Include methane, hydrogen, CO, and flow rate, if available
 - Any wellhead HOVs approvals relevant for 2021-present, along with approvals of any alternative timelines or corrections in that time
 - Any monitoring of liquid depth in wells (2021-present), including identification of % of perforation obstructed
 - Identification of wells with dewatering pumps
 - Descriptions of any SOPs or internal guidelines that may exist relating to well dewatering
6. Annual/semi-annual reports – for 2021 to present, all:
 - NSPS/NESHAP/EG semi-annual reports
 - Air permit compliance reports
 - SSM reports
 - Annual Emission reports
7. SEM – for 2021 to present:
 - Include the most recent SEM reports, or at least as much of it as has been completed even if they are not a part of any final semi-annual

- All recorded data
 - GPS track of path taken
 - Readings including non-exceedances
 - Records of corrective actions
 - Approvals of any alternatives to expansion of the GCCS or alternative timelines
 - Any guidance or training materials provided for the SEM technicians
 - Explanation for why any areas were not monitored, when applicable
8. Cover integrity – for 2021 to present:
- Any records of the monthly cover integrity monitoring and associated corrective actions
9. Air permits:
- All air permits active for the site in the past five years and their applications
10. Part 98
- Part 98 Greenhouse Gas Report (2021-present)
 - If the landfill changed the method for calculating emissions in the primary report from Equation HH-6 to Equation HH-8 in the rule (or vice versa), or is reporting using the lower estimate of the two equations, provide an explanation of the basis for that decision
11. Annual waste deposited tonnages by type from 2021 to present
- Include a list of the primary sources of industrial wastes and a description for any special wastes listed
 - Outline of what wastes (if any) are classified as non-degradable for LandGEM maximum expected gas generation (Design Plan) along with the basis for this classification
 - Outline of what wastes are classified as “inert” if applicable for Part 98 reporting along with the basis for this classification
12. Any versions of the SSM plan that have been in place 2021-present
13. Corporate ownership tree for the permitted entity
14. Any records or reports of additional emissions monitoring activity contracted by the site, including but not limited to drone, satellite, and tower-based monitoring (2021-present)
15. Log of any citizen complaints received (2021-present) and responsive action if applicable
16. Solid waste records:
- Most recent Site Operating Plan
 - Annual Solid Waste Reports (2021-present)
17. Provide a listing of all onsite combustion sources. Not listed in the Current Title V permit. For each combustion unit onsite provide:
- The make and model;
 - The date of installation;
 - Size or rating (MMBtu/hr, HP, kW, etc.);
 - Fuel combusted monthly since 2020 to present (gallons, MMcf, etc.);
18. Hours of operation 2021-present for all combustion engines;
19. Daily Fugitive and Visible emission monitoring records 2021 to Present
20. Maintenance records for all emergency generator 2021- present

Attachment 2: PHOTO LOG

Facility: Conestoga Landfill

Location: 420 Quarry Rd, Morgantown, PA 19543

Inspection Date: 12/3-4/2024

EPA Inspector(s): Alex Everhart, Scott Yanos

Photographer: Owen Ehret



Photo Number: 1

Photo Description: East slope of cell 16



Photo Number: 2

Photo Description: 3x86R2



Photo Number: 3

Photo Description: 24Ax1



Photo Number: 4

Photo Description: East slope opposite way



Photo Number: 5

Photo Description: 3x90R



Photo Number: 6

Photo Description: Downslope 3x37R



Photo Number: 7

Photo Description: East slope downslope erosion



Photo Number: 8

Photo Description: NW 3x33 downslope



Photo Number: 9

Photo Description: Mattress near 3x17



Photo Number: 10

Photo Description: NW 3x19 bare spot



Photo Number: 11

Photo Description: Upslope erosion near BD25



Photo Number: 12

Photo Description: East slope exposed trash



Photo Number: 13

Photo Description: Old hill



Photo Number: 14

Photo Description: Flares and blowers overview



Photo Number: 15

Photo Description: Emergency generators

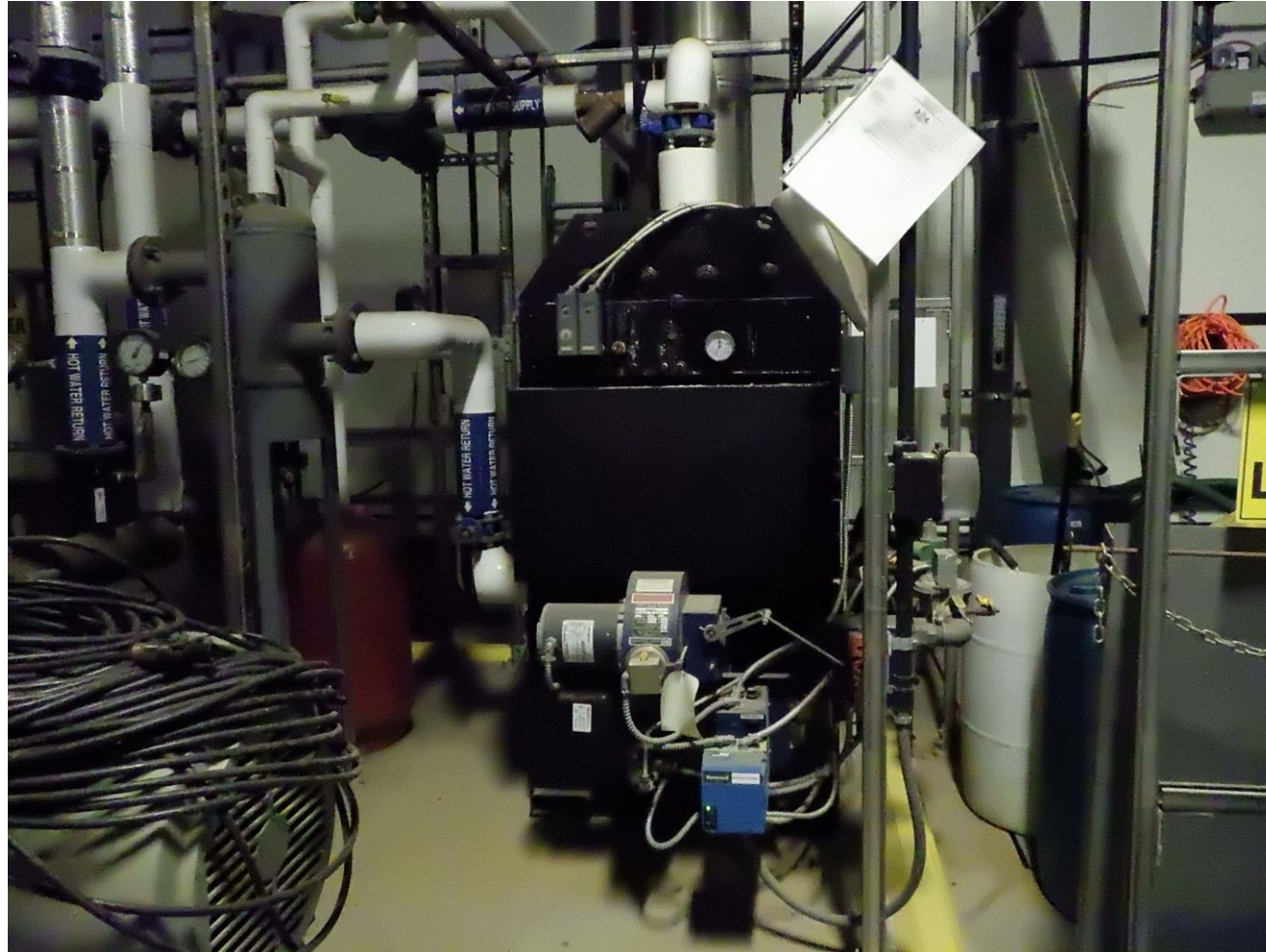


Photo Number: 16

Photo Description: Leachate treatment system boiler



Photo Number: 17

Photo Description: Boiler plate



Photo Number: 18

Photo Description: Shop emergency generator plate



Photo Number: 19

Photo Description: Welder



Photo Number: 20

Photo Description: Heated power washer

Inspection Sign-In Sheet

Facility: Conestoga Landfill (New Morgan Landfill)

Date: 12/3/24

Name	Affiliation	Title	Phone Number & Email
Alex Everhart	EPA	Enforcement Inspector	215-814-2114 Everhart.Alex@EPA.gov
Scott Yanos	EPA	Enforcement Inspector	215-814-2128 Yanos.Scott@epa.gov
OWEN EHRET	EPA	ENFORCEMENT INSPECTOR	215-814-2129 ehret.owen@epa.gov
Sydnee White	PA DEP	Compliance Specialist	484 250 7511 Sywhite@pa.gov
BILL LAUFER	PA DEP	AQ SPECIALIST	484 250-7504 WLAUFER@PA.GOV
JULIA OLAFSON	PA-DEP SCRO	AIR QUALITY SPECIALIST	610-916-0126 jolafson@pa.gov
William Borst	PA DEP	Air Quality District Supervisor	717-503-7550 wborst@pa.gov
JACOB SCHMIDT	REPUBLIC SERVICES	AREA ENVIRONMENTAL MGR	281-205-0712 jschmidt4@republicservices.com
Mazen Haydar	REPUBLIC SERVICES	ENVIRONMENTAL MGR	717.887.0478 mhaydar@republicservices.com
CHRIS PAOLETTI	REPUBLIC SERVICES	OPERATIONS MANAGER	215-821-4150 CPAOLETTI@REPUBLICSERVICES.COM
Sheena McCarthy	REPUBLIC SERVICES	ENVIRONMENTAL MGR	850-394-9113 smccarthy2@republicservices.com
RICH GELDWICZ	REPUBLIC SERVICES	AREA VICE PRESIDENT	610-574-2917 RGELDWICZ@REPUBLICSERVICES.COM

Inspection Sign-In Sheet

Facility: Conestoga Landfill (New Morgan Landfill)

Date: 12/4/24

Name	Affiliation	Title	Phone Number & Email
Alex Everhart	EPA	Enforcement Inspector	215-814-2114 Everhart.Alex@EPA.gov
Scott Yaros	EPA	Enforcement Inspector	215-814-2128 Yaros.Scott@epa.gov
OWEN EHRET	EPA	ENFORCEMENT INSPECTOR	215-814-2129 ehret.owen@epa.gov
Sheena McCarthy	REPUBLIC SERVICES	environmental mgr.	850-394-9613 smccarthy2@republicservices.com
JULIA M OLAFSSON	PA-DEP SCRO	AQ SPECIALIST	610-916-0126 jolafson@pa.gov
William Borst	PA-DEP SCRO	AQDS	717-503-7550 wborst@pa.gov
CHRISTOPHER PAOLETTI	REPUBLIC SERVICES	OPS MANAGER	215-821-4150 CPAOLETTI@REPUBLICSERVICES.COM
Mazen Haydar	REPUBLIC SERVICES	ENVIRONMENTAL MGR	717.887.0478 mhaydar@republicservices.com
JACOB SCHMIDT	REPUBLIC SERVICES	AREA ENVIRONMENTAL MGR	254-205-0712 JSCHMIDT4@REPUBLICSERVICES.COM

PART 1
CALIBRATION PRECISION TEST RECORD

LANDFILL NAME: Conestoga landfill

DATE: 12/3/2024

TIME: 9:08 AM ☒ PM ☐

INSTRUMENT MAKE: Inficon MODEL: IRwin S/N: 92005435

CALIBRATION GAS STANDARD: 500 ppm (7) (check cal. gas cert. - should be 500 ppm)

MEASUREMENT #1:

Meter Reading for Zero Air: 0 ppm (1)

Meter Reading for Calibration Gas: 494 ppm (2)

MEASUREMENT #2:

Meter Reading for Zero Air: 0 ppm (3)

Meter Reading for Calibration Gas: 495 ppm (4)

MEASUREMENT #3:

Meter Reading for Zero Air: 0 ppm (5)

Meter Reading for Calibration Gas: 494 ppm (6)

CALCULATE PRECISION:

$$\frac{|(7)-(2)| + |(7)-(4)| + |(7)-(6)|}{3} \times \frac{1}{(7)} \times \frac{100}{1}$$
$$= +1\%$$

PERFORMED BY: Alex Everhart

CALIBRATION GAS CERTIFICATION DATA AND EXPIRATION DATE:

Zero Gas Serial Number: 304-402692062 Span Gas Serial Number: 304-402692063-1
Zero Gas Expiration Date: 3/16/2027 Span Gas Expiration Date: 3/16/2027

PART 2

RESPONSE TIME TEST RECORD

LANDFILL NAME: Conestoga landfill

DATE: 12/3/2024

TIME: 9:08 AM ☒ PM ☐

INSTRUMENT MAKE: Inficon

MODEL: IRwin

S/N: 92005435

MEASUREMENT #1:

Stabilized Reading Using Calibration Gas:	<u>494</u>	ppm
90% of the Stabilized Reading:	<u>444</u>	ppm
Time to reach 90% of Stabilized Reading After Switching from Zero Air to Calibration Gas:	<u>3</u>	seconds (1)

MEASUREMENT #2:

Stabilized Reading Using Calibration Gas:	<u>495</u>	ppm
90% of the Stabilized Reading:	<u>445</u>	ppm
Time to reach 90% of Stabilized Reading After Switching from Zero Air to Calibration Gas:	<u>3</u>	seconds (2)

MEASUREMENT #3:

Stabilized Reading Using Calibration Gas:	<u>494</u>	ppm
90% of the Stabilized Reading:	<u>444</u>	ppm
Time to reach 90% of Stabilized Reading After Switching from Zero Air to Calibration Gas:	<u>3</u>	seconds (3)

CALCULATE RESPONSE TIME:

$$\frac{(1)+(2)+(3)}{3}$$

= 3 SECONDS (MUST BE LESS THAN 30 SECONDS)

PERFORMED BY: Alex Everhart

PART 3

STABILIZED READING AND BACKGROUND DETERMINATION

LANDFILL NAME: Conestoga landfill

DATE: 12/3/2024

TIME: 9:08 AM ☒ PM ☐

INSTRUMENT MAKE: Inficon

MODEL: IRwin

S/N: 92005435

Stabilized Reading Determination Procedure

Calibration gas standard: 500 ppm

MEASUREMENT #1:

Stabilized Reading Using Calibration Gas: 494 ppm

MEASUREMENT #2:

Stabilized Reading Using Calibration Gas: 495 ppm

MEASUREMENT #3:

Stabilized Reading Using Calibration Gas: 494 ppm

Stable instrument reading:
$$\frac{\text{Measurement \#1} + \text{Measurement \#2} + \text{Measurement \#3}}{3}$$

Stable instrument reading: 494 ppm

Background Determination Procedure

1. Upwind Reading (highest in 30 seconds): 0 ppm (1)

2. Downwind Reading (highest in 30 seconds): 1 ppm (2)

Calculate Background Value:

$$\frac{(1) + (2)}{2}$$

Background = 1 ppm

PERFORMED BY: Alex Everhart

LANDFILL NAME: Conestoga landfill

DATE: 12/3/2024

Site Information

Section 1 - Weather Data			
Weather Recorded From: ☐ On-Site Weather Station ☐ Portable Device ☒ Other <i>If "OTHER", describe device utilized for the collection of weather information below.</i>			
Phone			
Beginning of Monitoring Event		End of Monitoring Event	
Time:	9:08 AM	Time:	3:12 PM
Temperature:	29 °F	Temperature:	37 °F
Barometer:	30.31 " Hg	Barometer:	N/A " Hg
Humidity:	65 %	Humidity:	N/A %
Wind Speed:	8 mph	Wind Speed:	11 mph
Wind Direction:	E °	Wind Direction:	E °

Conestoga Landfill SEM Log

New Hill	Exceedance (ppm)	Time	LAT WGS84	LON WGS84
86R2	3700	9:33	40.174184	-75.901726
24Ax1	1391	9:38	40.173777	-75.901836
3x90R	3523	9:46	40.172878	-75.901194
3x37R	3537	9:52		
Downslope 3x37R	521	9:58	40.173537	-75.900439
3x76R2	702	10:03	40.173912	-75.900794
3x55R	1084	10:08	40.174299	-75.901138
3x55R	2706	10:12	40.17427	-75.901126
3x34R	883	10:29	40.17503	-75.901648
NW 3x33	608	10:30	40.175597	-75.901579
3x16	981	10:38	40.174894	-75.90105
3x15	700	11:01	40.174734	-75.900322
Header Cross over	508	11:05	40.174958	-75.900351
3x17R	2079	11:01	40.174734	-75.900322
West of 3x17R	837	11:12	40.175297	-75.900863
3x19	633	11:20	40.17577	-75.901062
NW 3x19	588	11:23	40.175934	-75.901157
3x23	2398	11:33	40.176751	-75.90144
3x24	930	11:39	40.177191	-75.901337
BD25	629	11:41	40.177362	-75.901442
3x27	533	11:51	40.177865	-75.901474
17x1	870	12:08	40.177217	-75.902721
4x2	2599	12:29	40.175769	-75.903362
Header access riser near 4x2	665	12:33	40.176093	-75.903084
4x6	1140	12:48	40.174596	-75.902686
Riser pipe downhill 4x6	1628	12:55	40.174473	-75.902189
Old Hill				
2x134	928	2:03	40.180317	-75.912355
(remonitor by 2x134)	2602	2:09	40.179861	-75.911488
BD15	1668	2:28	40.179279	-75.910249
Vacuum acce+A2:A31ss riser N weather station	783	2:36	40.178448	-75.909501