AFS#42-079-00014 NO AFS # Cost Listed but no # listed

UGI Power Generation

July 27, 2017

RECEIVED
AUG 07 2017
Division Director (3AP00)

**CERTIFIED MAIL NO. 7015 0640 0003 4111 3639**

Enforcement Programs Section (3AT3)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

***RE: UGI DEVELOPMENT COMPANY***
***HUNLOCK CREEK ENERGY CENTER/BROAD MOUNTAIN***
***2017 SEMI-ANNUAL COMPLIANCE CERTIFICATION***

Dear Sir or Madam,

UGI Development Company, Hunlock Creek Energy Center is submitting the 2017 Semi-Annual Compliance Certification Form as required by 25 PA Code; Chapter 127.513. The original form was submitted to Pennsylvania Department of Environmental Protection (PADEP). The form for our Broad Mountain/Hegins facility is also included. The time period covered is January 1 through June 30, 2017.

If you should have any questions or need additional information, please call me at (570) 542-2790.

Sincerely,

Jeffrey T. Steeber

Jeffrey T. Steeber
Health, Safety and Environmental
Hunlock Creek Energy Center

JTS:chet

Originals: PA DEP Northeast Regional Office

UGI Energy Services, Inc.
390 Route 11, Hunlock Creek, PA 18621
www.ugienergy services.com Phone 570-542-5369

UGI Power Generation

July 27, 2017

**CERTIFIED MAIL NO.**

Mr. Norman E. Frederick
PA Department of Environmental Protection
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18701

***RE: UGI DEVELOPMENT COMPANY***
***HUNLOCK CREEK ENERGY CENTER/BROAD MOUNTAIN***
***2017 SEMI-ANNUAL COMPLIANCE CERTIFICATION***

Dear Mr. Frederick,

UGI Development Company, Hunlock Creek Energy Center is submitting the 2017 Semi-Annual Compliance Certification Form as required by 25 PA Code; Chapter 127.513. The form for our Broad Mountain/Hegins facility is also included. The time period covered is January 1 through June 30, 2017.

If you should have any questions or need additional information, please call me at (570) 542-2790.

Sincerely,

Jeffrey T. Steeber

Jeffrey T. Steeber
Health, Safety and Environmental
Hunlock Creek Energy Center

JTS:chet

CC: Enforcement Programs Section (3AT3)

UGI Energy Services, Inc.
390 Route 11, Hunlock Creek, PA 18621
www.ugienergy services.com - Phone 570-542-5369

# PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## BUREAU OF AIR QUALITY
## COMPLIANCE CERTIFICATION FORM

(25 Pa. Code § 127.513)

| | | | |
|---|---|---|---|
| **Plant Name:** | UGI DEVELOPMENT CO/HUNLOCK CREEK ENERGY CENTER | **Owner/Operator:** | UGI DEVELOPMENT COMPANY |
| **Tax ID/Plant:** | 23-1650159-1 | **DEP Facility ID:** | 284013 |
| **Contact Person:** | JEFF STEEBER | **Title:** | ENVIRO HEALTH & SAFETY |
| **Operating Permit #:** | 40-00005 | **Phone Number:** | (570) 542-5369 |

For the period **01/01/2017 - 06/30/2017**, **UGI DEVELOPMENT CO/HUNLOCK CREEK ENERGY CENTER** has been in continuous compliance with all applicable requirements of permit # **40-00005**, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

| Sect./Cond. # | Citation # | Source | Noncompliance | Monitoring Method(s) | Date | Duration | Corrective Action(s) |
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**Certification of Truth, Accuracy and Completeness**

**Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.**

| | | | |
|---|---|---|---|
| **Name:** | Peter M. Quattrini | **Title:** | Plant Manager |
| **Signed:** | | **Date:** | July 28, 2017 |

***This certification must be signed by a responsible official. Any certification submitted without a valid signature will be returned.***

***The owner/operator shall identify any other material information needed in this certification to also comply with section 113(c)(2) of the Clean Air Act. If more spaces are needed, complete additional pages using the format shown in Addendum 1. This certification does not replace requirements pertaining to the submission of malfunction and CEM reports. DO NOT include that information on this form.***

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY

COMPLIANCE CERTIFICATION FORM

(25 Pa. Code § 127.513)

## ADDENDUM 1

For the period **01/01/2017 - 06/30/2017, UGI DEVELOPMENT CO/HUNLOCK CREEK ENERGY CENTER** has been in continuous compliance with all applicable requirements of permit # **40-00005**, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

| Sect./Cond. # | Citation # | Source | Noncompliance | Monitoring Method(s) | Date | Duration | Corrective Action(s) |
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| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]<br><br>(Permit Renewal) | Section B | (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air M... | Hunlock Creek Energy Center does not operate under a Title V Permit. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]<br><br>(Inspection and Entry) | Section B | (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:<br><br>(1) Enter at reasonable times upo... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]<br><br>(Compliance Requirements) | Section B | (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:<br><br>(1) Enforcement action<br><br>(2) Permit termination, revocation... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]<br><br>(Duty to Provide Information) | Section B | (a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.<br><br>(b) Upon request, the ... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code § 127.541]<br><br>(Significant Operating Permit Modifications) | Section B | When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.704, 127.705 & 127.707]<br><br>(Fee Payment) | Section B | (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).<br><br>(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.14(b) & 127.449] | Section B | (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior | Company Policy is to operate in a safe manner and to comply with all | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| (Authorization for De Minimis Emission Increases) | | issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written ... | environmental regulations that affect our facilities. | |
| [25 Pa. Code §§ 127.11a & 127.215]<br><br>(Reactivation of Sources) | Section B | (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source wil... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 121.9 & 127.216]<br><br>(Circumvention) | Section B | (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction,... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.402(d) & 127.513(1)]<br><br>(Submissions) | Section B | (a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:<br><br>Regional Air Program Manager<br><br>PA Department of Environmental Protection<br><br>(At the address given on the permit transmittal letter,<br><br>or otherwise notified) | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| | | (b) Any repor... | | |
| [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]<br><br>(Sampling, Testing and Monitoring Procedures) | Section B | (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable re... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.511 & Chapter 135]<br><br>(Recordkeeping Requirements) | Section B | (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:<br><br>(1) The date, place (as defined in the permit) and time of sampling or measurements.<br><br>(2) The dates the analyses were performed.<br><br>... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)] | Section B | (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| (Reporting Requirements) | | permittee shall comply with any additional applicable reporting requirements promulgated under the Clean ... | | |
| [25 Pa. Code § 127.513]<br><br>(Compliance Certification) | Section B | (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, includi... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]<br><br>(Risk Management) | Section B | (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site S... | Company Policy is to operate in a safe manner and to comply with all environmental regulations that affect our facilities. | ☒Continuous<br><br>☐Intermittent |

# PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## BUREAU OF AIR QUALITY
## COMPLIANCE CERTIFICATION FORM

(25 Pa. Code § 127.513)

| | | | |
|---|---|---|---|
| **Plant Name:** | UGI DEV CO/HEGINS | **Owner/Operator:** | UGI DEV CO |
| **Tax ID/Plant:** | 23-1650159-2 | **DEP Facility ID:** | 712577 |
| **Contact Person:** | JEFF STEEBER | **Title:** | ENVIRNM HEALTH & SAFETY |
| **Operating Permit #:** | 54-00074 | **Phone Number:** | (570) 542-5369 |

For the period **01/01/2017 - 06/30/2017**, **UGI DEV CO/HEGINS** has been in continuous compliance with all applicable requirements of permit # **54-00074**, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

| Sect./Cond. # | Citation # | Source | Noncompliance | Monitoring Method(s) | Date | Duration | Corrective Action(s) |
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## Certification of Truth, Accuracy and Completeness

**Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after**

reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

| | | | |
|---|---|---|---|
| **Name:** | Peter M. Quattrini | **Title:** | Plant Manager |
| **Signed:** | | **Date:** | July 27, 2017 |

***This certification must be signed by a responsible official. Any certification submitted without a valid signature will be returned.***

***The owner/operator shall identify any other material information needed in this certification to also comply with section 113(c)(2) of the Clean Air Act. If more spaces are needed, complete additional pages using the format shown in Addendum 1. This certification does not replace requirements pertaining to the submission of malfunction and CEM reports. DO NOT include that information on this form.***

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY

COMPLIANCE CERTIFICATION FORM

(25 Pa. Code § 127.513)

## ADDENDUM 1

For the period **01/01/2017 - 06/30/2017**, **UGI DEV CO/HEGINS** has been in continuous compliance with all applicable requirements of permit # **54-00074**, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

| Sect./Cond. # | Citation # | Source | Noncompliance | Monitoring Method(s) | Date | Duration | Corrective Action(s) |
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| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]<br><br>(Permit Renewal) | Section B | (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air M... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]<br><br>(Inspection and Entry) | Section B | (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:<br><br>(1) Enter at reasonable times upo... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]<br><br>(Compliance Requirements) | Section B | (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:<br><br>(1) Enforcement action<br><br>(2) Permit termination, revocation... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.411(d) & | Section B | (a) The permittee shall furnish to the Department, within a | Company Policy is to comply with all environmental regulations | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| 127.512(c)(5)]<br><br>(Duty to Provide Information) | | reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.<br><br>(b) Upon request, the ... | affecting the Broad Mountain Facility. | |
| [25 Pa. Code § 127.541]<br><br>(Significant Operating Permit Modifications) | Section B | When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.704, 127.705 & 127.707]<br><br>(Fee Payment) | Section B | (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).<br><br>(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §§ 127.14(b) & 127.449]<br><br>(Authorization for De Minimis Emission Increases) | Section B | (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| [25 Pa. Code §§ 127.11a & 127.215]<br><br>(Reactivation of Sources) | Section B | (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source wil... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §§ 121.9 & 127.216]<br><br>(Circumvention) | Section B | (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction,... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §§ 127.402(d) & 127.513(1)]<br><br>(Submissions) | Section B | (a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:<br><br>Regional Air Program Manager<br><br>PA Department of Environmental Protection<br><br>(At the address given on the permit transmittal letter,<br><br>or otherwise notified)<br><br>(b) Any repor... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter | Section B | (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements | Company Policy is to comply with all environmental regulations | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| 139; & 114(a)(3), 504(b) of the CAA]<br><br>(Sampling, Testing and Monitoring Procedures) | | of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable re... | affecting the Broad Mountain Facility. | |
| [25 Pa. Code §§ 127.511 & Chapter 135]<br><br>(Recordkeeping Requirements) | Section B | (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:<br><br>(1) The date, place (as defined in the permit) and time of sampling or measurements.<br><br>(2) The dates the analyses were performed.<br><br>... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]<br><br>(Reporting Requirements) | Section B | (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code § 127.513]<br><br>(Compliance | Section B | (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, | Company Policy is to comply with all environmental regulations affecting the Broad | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| Certification) | | the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and condit ons in this permit, for the previous year, includi... | Mountain Facility. | |
| [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]<br><br>(Risk Management) | Section B | (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident preventicn provisions) and the Federal Chemical Safety Information, Site S... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §123.1]<br><br>(Prohibition of certain fugitive emissions) | Section C - I. Restrictions - Emission Restriction(s) | (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:<br><br>(1) Construction or demolition of buildings or structures.<br><br>(2) Grading, paving and maintenance of roads and streets.<br><br>(3) Use of roads and streets.... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §123.2]<br><br>(Fugitive particulate matter) | Section C - I. Restrictions - Emission Restriction(s) | A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C, Site Level Requirement, Condition #001 if the emissions are visible at the point the emissions pass outside the | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| | | person's property. | | |
| [25 Pa. Code §123.31]<br><br>(Limitations) | Section C - I. Restrictions - Emission Restriction(s) | MALODOR EMISSIONS<br><br>A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §123.41]<br><br>(Limitations) | Section C - I. Restrictions - Emission Restriction(s) | (a) A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:<br><br>(1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.<br><br>(2) Equ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §123.42]<br><br>(Exceptions) | Section C - I. Restrictions - Emission Restriction(s) | (a) The limitations of SECTION C, Site Level Requirement, Condition #004 shall not apply to a visible emission in any of the following instances: | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| | | (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.<br><br>(2) When the emission results ... | | |
| [25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section C - II. Testing Requirements | All sampling, testing and analyses performed in compliance with the requirements of any section of this permit shall be done in accordance with General Title V Requirement #021. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §139.1]<br><br>(Sampling facilities.) | Section C - II. Testing Requirements | Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be pr... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §139.11]<br><br>(General requirements.) | Section C - II. Testing Requirements | (a) As specified in 25 Pa. Code Section 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.<br><br>(b) As... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code | Section C - III. Monitoring | | Company Policy is to comply with all | ☒Continuous |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| §123.43]<br><br>(Measuring techniques) | Requirements | (a) Visible emissions may be measured using either of the following:<br><br>(1) A device approved by the Department and maintained to provide accurate opacity measurements.<br><br>(2) Observers, trained and qualified, to measure plume opacity with the naked eye... | environmental regulations affecting the Broad Mountain Facility. | ☐Intermittent |
| [25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section C - III. Monitoring Requirements | FUGITIVE, VISIBLE AND MALODOR EMISSIONS<br><br>(a) The permittee shall conduct weekly inspections of the facility perimeter, during daylight hours when the plant is in operation, to detect visible, fugitive, and malodor emissions as follows:<br><br>(1) Visible emissions in excess of the limits stated in S... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section C - III. Monitoring Requirements | If requested by the Department, the permittee shall perform a stack test, in accordance with the provisions of the most current publication of the DEP Source Testing Manual and Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, within the time frame specified by... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §127.511] | Section C - IV. Recordkeeping Requirements | All records, reports and analyses results generated in | Company Policy is to comply with all | ☒Continuous |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| (Monitoring and related recordkeeping and reporting requirements.) | | compliance with the requirements of any section of this permit shall be maintained in accordance with General Title V Requirement #022, Section (b), and shall be made available to the Department upon written or verbal request at a reasonable ti... | environmental regulations affecting the Broad Mountain Facility. | ☐Intermittent |
| [25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section C - IV. Recordkeeping Requirements | FUGITIVE, VISIBLE AND MALODOR EMISSIONS<br><br>(a) The permittee shall keep a logbook of weekly facility inspections performed. The logbook shall include the name of the company representative performing the inspections, any instances of exceedances of visible emissions limitations, visible fugitive emis... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section C - V. Reporting Requirements | (a) The permittee shall, within one (1) hour of identifying an occurrence, notify the Department at (570) 826-2511of any malfunction ,which results in, or may possibly be resulting in, emissions of air contaminants in excess of the limitations specified in, or established pursuant to, this operati... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| [25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section C - V. Reporting Requirements | FUGITIVE AND VISIBLE EMISSIONS<br><br>(a) On a semi-annual basis, the permittee shall compile a report of all logged instances of deviation of the fugitive or visible emission limitations that occured and the actions taken in response to them. This report shall be submitted to the | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| | | Department.<br><br>(b) If no... | | |
| [25 Pa. Code §127.513]<br><br>(Compliance certification.) | Section C - V. Reporting Requirements | The reporting period for the certificate of compliance required by Condition #024 of SECTION B, shall be for the previous calendar year, and it shall be submitted within sixty (60) days after the specified period but no later than March 1st. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §135.3]<br><br>(Reporting) | Section C - V. Reporting Requirements | (a) The owner or operator shall submit by March 1 of each year, a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §123.1]<br><br>(Prohibition of certain fugitive emissions) | Section C - VI. Work Practice Standards | (a) A person responsible for any source specified in SECTION C, Site Level Requirement, Condition #001, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:<br><br>(1) Use, where possible, of water o... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br>☐Intermittent |
| [25 Pa. Code §129.14]<br><br>(Open burning | Section C - VI. Work Practice Standards | (a) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner | Company Policy is to comply with all environmental regulations affecting the Broad | ☒Continuous<br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| operations) | | that:<br><br>(1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.<br><br>... | Mountain Facility. | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - I. Restrictions - Emission Restriction(s) | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>The following emission limitations for these landfill gas-fired turbines for which construction commenced on or after July 1, 1972 and where BAT requirements have not been previously established shall apply:... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - I. Restrictions - Emission Restriction(s) | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) Each landfill gas-fired turbine meets the requirements of 40 CFR Subpart KKKK therefore the turbines are not subject to the applicable requirements of 40 CFR Part 60, Subpart GG, Standards of Performanc... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE | Section D - I. Restrictions - Emission Restriction(s) | The landfill gas-fired turbines shall be only fueled by landfill gas | Company Policy is to comply with all environmental regulations affecting the Broad | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| [25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | | (LFG) from the Landfill. | Mountain Facility. | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - I. Restrictions - Emission Restriction(s) | There are two (2) Solar Tauras simple cycle turbines at this facility fueled by landfill gas (LFG) from the Landfill to produce up to approximately 11 MW electricity. The turbines are Model Taurus 60, rated at 5.5 MW capacity, firing rate of 2,650 cf/min., and rated heat input of 60.76 MMBTU/hr. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4320]<br><br>(What emission limits must I meet for nitrogen oxides (NOX)?) | Section D - I. Restrictions - Emission Restriction(s) | (a) You must meet the emission limits for NOX specified in Table 1 to this subpart, which is stated in SECTION E, GROUP 1, Condition #001.<br><br>(b) If you have two or more turbines that are connected to a single generator, each turbine must meet the emission limits for NOX. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED | Section D - I. Restrictions - Emission Restriction(s) | For each stationary combustion turbine burning at least 50 | Company Policy is to comply with all environmental regulations | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4330]<br><br>(What emission limits must I meet for sulfur dioxide (SO2)?) | | percent biogas on a calendar month basis, as determined based on total heat input, you must not cause to be discharged into the atmosphere from the affected source any gases that contain SO2 in excess of 65 ng SO2 /J (0.15 lb SO2 /MMBtu) he... | affecting the Broad Mountain Facility. | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4333]<br><br>(What are my general requirements for complying with this subpart?) | Section D - I. Restrictions - Emission Restriction(s) | (a) You must operate and maintain your stationary combustion turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of | Section D - I. Restrictions - Emission Restriction(s) | (a) If you are not using water or steam injection to control NOX emissions, you must perform annual performance tests in accordance with §60.4400 to demonstrate continuous compliance. If the NOX emission result from the performance | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| Performance for New Stationary Sources §40 CFR 60.4340]<br><br>(How do I demonstrate continuous compliance for NOX if I do not use water or steam injection?) | | test is less than or equal to 75 percent of the NOX emission limit... | | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - II. Testing Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee shall perform a source test on the each turbine covered by this Operating Permit. Each turbine shall be stack tested for NOX, CO, NMOC, HAPs, SO2, and visible emissions. Stack testing for... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - III. Monitoring Requirements | In accordance with the NSPS requirements in 40 CFR § 60.334 (relating to monitoring of operations), the permittee shall, on a daily basis, sample the landfill gas being fired for nitrogen and sulfur content. The permittee may submit an alternative plan for sampling of the above compounds to the Dep... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED | Section D - III. Monitoring Requirements | Emission Calculations are as follows: | Company Policy is to comply with all environmental regulations | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
|---|---|---|---|---|
| TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | | (a) NOx emission factor = 11.49 lb. NOx/hr. (Manufacture's Guarantee)<br><br>Hours of operation = 8,584 hrs. (98% maximum capacity factor for year)<br><br>Number of Turbines = 2<br><br>NOx = 11.49 lbs. NOx/hr. * 8,584 hrs. /yr. * ton/2000 lbs. = 49.3 tons NOx /year per turbine.<br><br>... | affecting the Broad Mountain Facility. | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4355]<br><br>(How do I establish and document a proper parameter monitoring plan?) | Section D - III. Monitoring Requirements | (a) The steam or water to fuel ratio or other parameters that are continuously monitored as described in §§60.4335 and 60.4340 must be monitored during the performance test required under §60.8, to establish acceptable values and ranges. You may supplement the performance test data with engineerin... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 | Section D - III. Monitoring Requirements | You must monitor the total sulfur content of the fuel being fired in the turbine, except as provided in §60.4365. The sulfur content of the fuel must be determined using total sulfur | Company Policy is to comply with all environmental regulations affecting the Broad | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| Standards of Performance for New Stationary Sources §40 CFR 60.4360]<br><br>(How do I determine the total sulfur content of the turbine's combustion fuel?) | | methods described in §60.4415. Alternatively, if the total sulfur content of the gaseous fuel during the most recent... | Mountain Facility. | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4370]<br><br>(How often must I determine the sulfur content of the fuel?) | Section D - III. Monitoring Requirements | The frequency of determining the sulfur content of the fuel must be as follows:<br><br>(a) Gaseous fuel. If you elect not to demonstrate sulfur content using options in §60.4365, and the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined a... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR | Section D - III. Monitoring Requirements | If you choose the option to monitor the sulfur content of the fuel, excess emissions and monitoring downtime are defined as follows:<br><br>(a) For samples of gaseous fuel and for oil samples obtained using daily sampling, flow proportional sampling, or sampling | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| 60.4385]<br><br>(How are excess emissions and monitoring downtime defined for SO2?) | | from the unit's storage tank, an excess... | | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4415]<br><br>(How do I conduct the initial and subsequent performance tests for sulfur?) | Section D - III. Monitoring Requirements | (a) You must conduct an initial performance test, as required in §60.8. Subsequent SO2 performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). There are three methodologies that you may use to conduct the performance tests.... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section D - IV. Recordkeeping Requirements | The permittee shall record the hours of operations of these sources on a yearly basis. These records shall be made available to the Department upon request. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

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| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section D - IV. Recordkeeping Requirements | [Authority for this condition is also derived from 25 Pa. Code, §127.83 and 40 CFR §52.1(j)(2)]<br><br>The permittee shall maintain the following records:<br><br>(a) Data which clearly demonstrates that the heat input for each turbine never exceeds its rated capacity.<br><br>(b) Data which clearly demonstrates that ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - IV. Recordkeeping Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee shall record the following:<br><br>(i) Monthly amount of landfill gas fired in each turbine.<br><br>(ii) 12-month rolling total amount of landfill gas fired in each turbine.<br><br>(iii) Hours o... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512] | Section D - V. Reporting Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) Within sixty (60) days after completion of a stack test, the complete test report, including all operating conditions, shall be | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

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| (Operating permit terms and conditions.) | | submitted to the Department for approval.<br><br>(b) Any planned or unplanned t... | | |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4375]<br><br>(What reports must I submit?) | Section D - V. Reporting Requirements | (a) For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this subpart, you must submit reports of excess emissions and monitor downtime, in accordance with §60.7(c). Excess emissions must be reported for all per... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4380]<br><br>(How are excess emissions and monitor downtime defined for NOX ?) | Section D - V. Reporting Requirements | For the purpose of reports required under §60.7(c), periods of excess emissions and monitor downtime that must be reported are defined as follows:<br><br>(a) For turbines required to monitor combustion parameters or parameters that document proper operation of the NOX emission controls:<br><br>(1) ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL | Section D - VI. Work Practice Standards | These conditions were obtained from Operating Permit No. 54- | Company Policy is to | ☒Continuous |

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| GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | | 328-002GP22 approved 4/23/2008.<br><br>Any permittee authorized to operate landfill gas-fired turbines under this Operating Permit must comply with the terms and conditions of the Operating Permit. The landfill gas-fired turbines shall be:<br><br>(a) ... | comply with all environmental regulations affecting the Broad Mountain Facility. | ☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - VI. Work Practice Standards | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee, at a minimum, shall conduct leak checks on the landfill gas handling and processing equipment.<br><br>(b) The permittee shall perform an annual adjustment and/or tune-up on each unit, which s... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT01 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - VII. Additional Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee meets the requirements of 40 CFR Subpart KKKK therefore the turbines are not subject to the applicable requirements specified in 40 CFR Part 60, Subpart GG (relating to standards of perfor... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL | Section D - I. Restrictions - | These conditions were obtained from Operating Permit No. 54- | Company Policy is to | ☒Continuous |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Emission Restriction(s) | 328-002GP22 approved 4/23/2008.<br><br>The following emission limitations for these landfill gas-fired turbines for which construction commenced on or after July 1, 1972 and where BAT requirements have not been previously established shall apply:... | comply with all environmental regulations affecting the Broad Mountain Facility. | ☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - I. Restrictions - Emission Restriction(s) | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) Each landfill gas-fired turbine meets the requirements of 40 CFR Subpart KKKK therefore the turbines are not subject to the applicable requirements of 40 CFR Part 60, Subpart GG, Standards of Performanc... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - I. Restrictions - Emission Restriction(s) | The landfill gas-fired turbines shall be only fueled by landfill gas (LFG) from the Landfill. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code | Section D - I. Restrictions - Emission Restriction(s) | There are two (2) Solar Tauras simple cycle turbines at this facility fueled by landfill gas (LFG) from the Landfill to produce up to approximately 11 MW electricity. The turbines are Model Taurus 60, rated at 5.5 MW capacity, firing rate of 2,650 cf/min., | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| §127.512]<br><br>(Operating permit terms and conditions.) | | and rated heat input of 60.76 MMBTU/hr. | | |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4320]<br><br>(What emission limits must I meet for nitrogen oxides (NOX)?) | Section D - I. Restrictions - Emission Restriction(s) | (a) You must meet the emission limits for NOX specified in Table 1 to this subpart, which is stated in SECTION E, GROUP 1, Condition #001.<br><br>(b) If you have two or more turbines that are connected to a single generator, each turbine must meet the emission limits for NOX. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4330]<br><br>(What emission limits must I meet for sulfur dioxide | Section D - I. Restrictions - Emission Restriction(s) | For each stationary combustion turbine burning at least 50 percent biogas on a calendar month basis, as determined based on total heat input, you must not cause to be discharged into the atmosphere from the affected source any gases that contain SO2 in excess of 65 ng SO2 /J (0.15 lb SO2 /MMBtu) he... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| (SO2)?) | | | | |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4333]<br><br>(What are my general requirements for complying with this subpart?) | Section D - I. Restrictions - Emission Restriction(s) | (a) You must operate and maintain your stationary combustion turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4340]<br><br>(How do I demonstrate continuous compliance for NOX if I do not use water or steam injection?) | Section D - I. Restrictions - Emission Restriction(s) | (a) If you are not using water or steam injection to control NOX emissions, you must perform annual performance tests in accordance with §60.4400 to demonstrate continuous compliance. If the NOX emission result from the performance test is less than or equal to 75 percent of the NOX emission limit... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☐Continuous<br><br>☐Intermittent |

| Citation | Permit Section | Terms & Conditions Contained in the Permit | Means of Determining Compliance Status | Compliance with Terms & Conditions was: |
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| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - II. Testing Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee shall perform a source test on the each turbine covered by this Operating Permit. Each turbine shall be stack tested for NOX, CO, NMOC, HAPs, SO2, and visible emissions. Stack testing for... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - III. Monitoring Requirements | In accordance with the NSPS requirements in 40 CFR § 60.334 (relating to monitoring of operations), the permittee shall, on a daily basis, sample the landfill gas being fired for nitrogen and sulfur content. The permittee may submit an alternative plan for sampling of the above compounds to the Dep... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - III. Monitoring Requirements | Emission Calculations are as follows:<br><br>(a) NOx emission factor = 11.49 lb. NOx/hr. (Manufacture's Guarantee)<br><br>Hours of operation = 8,584 hrs. (98% maximum capacity factor for year)<br><br>Number of Turbines = 2 | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

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| | | NOx = 11.49 lbs. NOx/hr. * 8,584 hrs. /yr. * ton/2000 lbs. = 49.3 tons NOx /year per turbine.<br><br>... | | |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4355]<br><br>(How do I establish and document a proper parameter monitoring plan?) | Section D - III. Monitoring Requirements | (a) The steam or water to fuel ratio or other parameters that are continuously monitored as described in §§60.4335 and 60.4340 must be monitored during the performance test required under §60.8, to establish acceptable values and ranges. You may supplement the performance test data with engineerin... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4360]<br><br>(How do I determine the total sulfur content of the turbine's combustion | Section D - III. Monitoring Requirements | You must monitor the total sulfur content of the fuel being fired in the turbine, except as provided in §60.4365. The sulfur content of the fuel must be determined using total sulfur methods described in §60.4415. Alternatively, if the total sulfur content of the gaseous fuel during the most recent.. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

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| fuel?) | | | | |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4370]<br><br>(How often must I determine the sulfur content of the fuel?) | Section D - III. Monitoring Requirements | The frequency of determining the sulfur content of the fuel must be as follows:<br><br>(a) Gaseous fuel. If you elect not to demonstrate sulfur content using options in §60.4365, and the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined a... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4385]<br><br>(How are excess emissions and monitoring downtime defined for SO2?) | Section D - III. Monitoring Requirements | If you choose the option to monitor the sulfur content of the fuel, excess emissions and monitoring downtime are defined as follows:<br><br>(a) For samples of gaseous fuel and for oil samples obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE | Section D - III. Monitoring Requirements | (a) You must conduct an initial performance test, as required in §60.8. Subsequent SO2 performance tests shall be conducted | Company Policy is to comply with all environmental regulations affecting the Broad | ☒Continuous<br><br>☐Intermittent |

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| [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4415]<br><br>(How do I conduct the initial and subsequent performance tests for sulfur?) | | on an annual basis (no more than 14 calendar months following the previous performance test). There are three methodologies that you may use to conduct the performance tests.... | Mountain Facility. | |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting requirements.) | Section D - IV. Recordkeeping Requirements | The permittee shall record the hours of operations of these sources on a yearly basis. These records shall be made available to the Department upon request. | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.511]<br><br>(Monitoring and related recordkeeping and reporting | Section D - IV. Recordkeeping Requirements | [Authority for this condition is also derived from 25 Pa. Code, §127.83 and 40 CFR §52.1(j)(2)]<br><br>The permittee shall maintain the following records:<br><br>(a) Data which clearly demonstrates that the heat input for each | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

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| requirements.) | | turbine never exceeds its rated capacity.<br><br>(b) Data which clearly demonstrates that ... | | |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - IV. Recordkeeping Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee shall record the following:<br><br>(i) Monthly amount of landfill gas fired in each turbine.<br><br>(ii) 12-month rolling total amount of landfill gas fired in each turbine.<br><br>(iii) Hours o... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - V. Reporting Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) Within sixty (60) days after completion of a stack test, the complete test report, including all operating conditions, shall be submitted to the Department for approval.<br><br>(b) Any planned or unplanned t... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of | Section D - V. Reporting Requirements | (a) For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this subpart, you must submit reports of excess emissions and monitor downtime, in accordance with | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

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| Performance for New Stationary Sources §40 CFR 60.4375]<br><br>(What reports must I submit?) | | §60.7(c). Excess emissions must be reported for all per... | | |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4380]<br><br>(How are excess emissions and monitor downtime defined for NOX ?) | Section D - V. Reporting Requirements | For the purpose of reports required under §60.7(c), periods of excess emissions and monitor downtime that must be reported are defined as follows:<br><br>(a) For turbines required to monitor combustion parameters or parameters that document proper operation of the NOX emission controls:<br><br>(1) ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - VI. Work Practice Standards | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>Any permittee authorized to operate landfill gas-fired turbines under this Operating Permit must comply with the terms and conditions of the Operating Permit. The landfill gas-fired turbines shall be:<br><br>(a) ... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |

Certification of Continuous or Intermittent Compliance
54-00074 - UGI DEV CO/HEGINS

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| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - VI. Work Practice Standards | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee, at a minimum, shall conduct leak checks on the landfill gas handling and processing equipment.<br><br>(b) The permittee shall perform an annual adjustment and/or tune-up on each unit, which s... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |
| CT02 - LANDFILL GAS FIRED TURBINE<br><br>[25 Pa. Code §127.512]<br><br>(Operating permit terms and conditions.) | Section D - VII. Additional Requirements | These conditions were obtained from Operating Permit No. 54-328-002GP22 approved 4/23/2008.<br><br>(a) The permittee meets the requirements of 40 CFR Subpart KKKK therefore the turbines are not subject to the applicable requirements specified in 40 CFR Part 60, Subpart GG (relating to standards of perfor... | Company Policy is to comply with all environmental regulations affecting the Broad Mountain Facility. | ☒Continuous<br><br>☐Intermittent |