

COUNTY OF



ALLEGHENY

**Air Quality Program**

301 39<sup>th</sup> Street, Clack Health Center Building 7, Pittsburgh, PA 15201-1811  
ph: 412.578.8103 • 24-hr: 412.687.ACHD (2243) • [www.alleghenycounty.us/healthdepartment](http://www.alleghenycounty.us/healthdepartment)

**SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN**

**APPLICANT INFORMATION**

The Air Pollution Mitigation Plan is submitted by affected facilities to meet the requirements of Allegheny County regulations found in §2106.06 (Mon Valley Air Pollution Episode) of Article XXI.

**01 Facility Information**

Name of Facility	Kelly Run Sanitation, Inc.	
Address	1500 Hayden Boulevard	
City State Zip+4	Elizabeth, PA, 15037	
Permit #	0190	Phone

**02 Environmental Contact Information** (Person to contact regarding technical details of this mitigation plan)

Name/Title	Tom Spears	
Address	1500 Hayden Boulevard	
City State Zip+4	Elizabeth, PA, 15037	
Email	tspears@wm.com	Phone 724-640-2253

**03 Responsible Official Information**

Name/Title	Adam Finley - Director of Disposal Operations	
Address	1500 Hayden Boulevard	
City State Zip+4	Elizabeth, PA, 15037	
Email	afinley@wm.com	Phone 716-492-3402



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**RICH FITZGERALD**  
COUNTY EXECUTIVE

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04

**AFFIDAVIT**

I certify that, subject to the penalties of Title 18Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the operation of the facilities to which this air pollution mitigation plan applies and that the information provided in this mitigation plan is true, accurate and complete to the best of my knowledge, information and belief formed after reasonable inquiry.

Signature:

Date 12/3/21

Typed/Printed Name: Adam Finley





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**05** List all equipment or processes at your facility that emit PM<sub>10</sub> and/or PM<sub>2.5</sub>

1. 1,200 SCFM Enclosed Flare
2. Construction - Screening Operations
3. Construction - Overburden Blasting
4. Borrow Material (Soil) Handling and Storage
5. Operations - Roadway (Paved/Unpaved) Maintenance
6. Landfill Construction and Landfill Operation Activities
7. Gasoline Generator
8. Diesel Air Compressor
9. Two Diesel Light Plants
10. Portable Sources

**WATCH PHASE OF MITIGATION PLAN**

**06** How will your facility ensure that equipment which produces particulate emissions is operating in a manner consistent with optimal engineering practices?

Combustion sources are operated and maintained pursuant to manufacturer specifications to reduce PM emissions. During events, the Landfill will try to minimize combustion source operation to only necessary operation for Landfill operations. This includes minimizing generator, compressor, and light plants operations. Construction activities follow industry standard procedures to reduce PM emissions. During an event, the Landfill will minimize construction activities as much as possible without interfering with construction schedules. Road travel will be minimized to haul related vehicles and watering operations will be increased during an event.

**07** How will your facility ensure that air pollution control equipment is maintained in optimal working condition?

The only air pollution control equipment at the facility is the 1,200 SCFM enclosed flare. The flare is operated and maintained according to manufacturer specifications to ensure optimal working conditions at all times. Any flare malfunction is corrected as soon as possible.

**08** How will your facility ensure that actions taken in blocks 05 and 06 are properly monitored, recorded, and reported to the Health Department?

Hours of operation for generators and light plants is tracked and can be provided to the Health Department upon request. A letter stating that travel was restricted to haul related vehicles, combustion units were minimized as practicable, and watering operations were increased can be provided to the Health Department at the conclusion of the event.

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### SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

#### WARNING PHASE OF MITIGATION PLAN

**09** How will your facility ensure that procedures are in place so enough staff and resources are available to implement the Mon Valley Air Pollution Warning Phase within 24 hours of the notification from ACHD?

Supervisors are placed on the emergency call-out list and will react to any notification as soon as practicable.

**10** For every process and piece of equipment, list all available methods to reduce PM<sub>2.5</sub>/PM<sub>10</sub> emissions from your four-year hourly average. During an actual warning phase, the actions to reduce emissions must last the length of the episode.

Roadway emissions will be reduced by the following: following posted speed signs, reducing travel to essential vehicles only, and increasing water spraying. Combustion source operation and construction operations will be limited as much as practicable without delaying necessary project timelines. Halting operations is not feasible as the trash trucks will need to be able to dump into the active landfill.

**11** For each piece of equipment and process, determine which emission reduction methods are feasible. List whether each method is feasible or infeasible and provide a justification for your determination.

Roadway emissions will be reduced by the following: following posted speed signs, reducing travel to essential vehicles only, and increasing water spraying. Combustion source operation and construction operations will be limited as much as practicable without delaying necessary project timelines. Halting operations is not feasible as the trash trucks will need to be able to dump into the active landfill.

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**12** How will your facility ensure that actions taken in block 10 are properly monitored, recorded, and reported to the Health Department?

Actions taken to mitigate air pollution during an event will be reported to the health department via letter after such event. The letter will detail the steps taken to reduce emissions and the time in which these methods occurred.

**13** Provide an active spreadsheet containing the following:

- Calculations of your facility's PM<sub>2.5</sub> and PM<sub>10</sub> emissions for each of the past four years (2017-2020) in tons/year for every piece of equipment and process;
- Calculation of average four year emissions of PM<sub>2.5</sub> and PM<sub>10</sub> in lbs/hr for each piece of equipment and process;
- Feasible PM<sub>2.5</sub> and PM<sub>10</sub> emission reductions in lbs/hr that will occur during a warning phase for every piece of equipment and process as well as the facility total; and
- Feasible PM<sub>2.5</sub> and PM<sub>10</sub> emission reductions in percent reduced from the hourly four year average for every piece of equipment and process as well as the facility total percent reduction.

This spreadsheet will be used to calculate actual emission reductions that will be reported to the Health Department after warning phases have ended.

**14** How much time will be required for your facility to implement the emission reductions in block 10?

This will vary based on time of the notification, but it is suspected the methods can be implemented within 8 hours.



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**SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN**

<b>INSTRUCTIONS</b>	
Submission Form for the Air Pollution Mitigation Plan	
<u>Block 01</u> Facility Information	The facility name for the operation at that particular address should be used and not the name of the larger corporation. Use the address for the actual facility and not the company headquarters, if different. The most recent permit number should be included. If it is not known, it can be left blank.
<u>Block 02</u> Environmental Contact Information	Fill in the contact information of the individual (e.g. employee or consultant) who will be contacted to provide environmental technical information for the Air Pollution Mitigation Plan
<u>Block 03</u> Responsible Official Information	This address and phone number are for the office where the responsible official works the majority of the time. See block 04 instructions for information regarding the responsible official.
<u>Block 04</u> Affidavit	This affidavit must be signed by the responsible official. A Responsible Official is a President, Vice President, Secretary, Treasurer, General Partner, General Manager, a member of a Board of Directors, or Owner, depending on business structure. CORPORATION – President, Vice President, Secretary, Treasurer, or duly authorized person BUSINESS – Sole Proprietor or General Partner GOVERNMENT ENTITY – Ranking elected official or principal executive officer
<u>Blocks 05–08</u> Watch Phase of Mitigation Plan	The responses that you provide in blocks 05 through 08 will be specific to your equipment and facility. Below are some general ideas that may help you in how to approach these requirements. <ul style="list-style-type: none"> <li>• Staff related                             <ul style="list-style-type: none"> <li>• Review procedures with employees to ensure all equipment is properly operating in a way to minimize air emissions.</li> <li>• Schedule additional or on-call employees for upcoming shifts to ensure facility is fully staffed for a warning phase.</li> <li>• Conduct a shift meeting(s) to remind employees to prioritize the environmental impact of their operations to reduce emissions.</li> <li>• Share any other procedures which would help ensure sufficient staff levels and available resources to implement a warning phase.</li> </ul> </li> <li>• Equipment related                             <ul style="list-style-type: none"> <li>• Inspect any equipment or processes which may have a potential to increase emissions to ensure proper operation and maintenance.</li> </ul> </li> </ul>



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	<ul style="list-style-type: none"> <li>• Implement improved operation and maintenance practices beyond standard operating procedures.</li> <li>• Ensure the facility is following the idling requirements under Act 124 of the PA Department of Environmental Protection regulations.</li> <li>• Conduct maintenance on all pollution control equipment.</li> <li>• Share any other procedures which help ensure the facility is operating in a manner consistent with good engineering practices.</li> <li>• Share any other procedures which help ensure the air pollution control equipment is maintained in good working condition.</li> </ul>
<p><u>Block 09</u> Warning Phase of Mitigation Plan</p>	<p>A good starting point in completing this block is to refer to the table found in section II of your facility’s air quality permit titled “Emission Unit Identification” and identify which units emit particulate matter. There may be other equipment, not listed in the section II table, that can be included in the block 09 list.</p>
<p><u>Block 10</u> Warning Phase of Mitigation Plan</p>	<p>Block 10 should explain what actions the facility could possible take to ensure that hourly emissions are reduced.</p> <p>Possible methods include:</p> <ul style="list-style-type: none"> <li>• Reduction in material throughput</li> <li>• Reduction in operating time</li> <li>• Increased use of controls or suppression equipment</li> <li>• Changes in raw materials</li> </ul> <p>Examples of possible actions include:</p> <ul style="list-style-type: none"> <li>• Reduce production by a certain percentage or rate from normal operating conditions. A reduction from a potential maximum production rate will not be accepted if it is too high compared to normal operating rates for the relevant time period, thereby not resulting in an actual reduction in pollution.</li> <li>• Reduce usage of diesel fuel or other PM<sub>2.5</sub> or PM<sub>10</sub> creating fuel types or switch fuel types to lower PM<sub>2.5</sub> or PM<sub>10</sub> as allowed by the relevant permits.</li> <li>• Bring in additional employees to allow the facility to operate in the best environmentally responsible manner.</li> <li>• Delay production to a future day when a mitigation plan is not needed.</li> <li>• Delay any non-essential activities to a future day when a mitigation plan is not needed.</li> <li>• Fully or partially enclose material movement and other work activities which produce dust and other particulate matter (PM<sub>2.5</sub> or PM<sub>10</sub> emissions).</li> <li>• Modify work practices to decrease PM<sub>2.5</sub> or PM<sub>10</sub> emissions such as:</li> </ul>



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	<ul style="list-style-type: none"> <li>○ Slowing material handling</li> <li>○ Fully or partially enclose material movement and other work activities which produce dust and other particulate matter (PM<sub>2.5</sub> or PM<sub>10</sub> emissions).</li> <li>● Stop or decrease unnecessary transportation activities and reduce travel speed on necessary transportation.</li> <li>● Employ additional roadway wetting or other activities to minimize road dust creation.</li> <li>● Add any other measures which reduce PM<sub>2.5</sub> or PM<sub>10</sub> emissions.</li> </ul>
<p><u>Block 11</u> Warning Phase of Mitigation Plan</p>	<p>Emission reduction methods that are feasible can be eliminated from consideration for other reasons as long as adequate justification is given.</p>
<p><u>Block 12</u> Warning Phase of Mitigation Plan</p>	<p>The Health Department will require a report, submitted after the warning phase has ended, itemizing what actions were taken to meet the requirements of the warning phase.</p>
<p><u>Block 13</u> Warning Phase of Mitigation Plan</p>	<p>The spreadsheet must include actual plant emissions of PM<sub>2.5</sub> and PM<sub>10</sub> for all equipment listed in block 09 for each of the past four years (2017-2020) in tons/year. These calculations can be copied directly from the spreadsheets submitted to the Health Department for emissions inventories.</p> <p>For each piece of equipment and process, emissions from the last four years must be provided in tons/year.</p> <p>For each piece of equipment and process, proposed feasible emission reductions must be provided in lbs/hr.</p> <p>The hourly average will be calculated for each unit and process by adding yearly emissions together and dividing by the total number of hours that the unit emitted over four years.</p> <p>In the case of a batch process, calculations will need to take into account the number of hours in each batch and the number of batches in a year.</p>
<p><u>Block 14</u> Warning Phase of Mitigation Plan</p>	<p>Section 2106.06 of county air quality regulations requires that an affected facility is able to implement the requirements of the warning phase within 24 hours.</p>



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### SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

### Mitigation Plan Checklist

The following checklist is provided as a list of items required for a complete mitigation plan submission. If at any time you have questions about your application, please call JoAnn Truchan 412-578-7981 or Jayme Graham 412-578-8129.

- Has the responsible official signed and dated the first page (block 04)?
- Have you provided an active spreadsheet showing actual emissions for every piece of equipment and process of PM<sub>2.5</sub> and PM<sub>10</sub> for the past four years in tons per year?
- Does the spreadsheet include the average actual PM<sub>2.5</sub> and PM<sub>10</sub> emissions from every piece of equipment and process for the past four years in lbs/hr?
- Does the spreadsheet include the PM<sub>10</sub> and PM<sub>2.5</sub> reduction that will be achieved from every piece of equipment and process in lbs/hr and % from the four year hourly average during the warning phase?
- Have you provided a complete response for each of the fourteen blocks?



**KELLY RUN SANITATION, INC.  
SUMMARY OF ANNUAL PM EMISSIONS 2017**

ID	Source	PM10 (tons/yr)	PM2.5 (tons/yr)
I002	1,200 SCFM Enclosed Flare	0.28	0.28
F001-1	Construction - Screening Operations	0.02	0.02
F001-2	Construction - Overburden Blasting	0.04	0.04
F001-3	Borrow Material (Soil) Handling and Storage	0.11	0.11
F001-4	Operations - Roadway (Paved/Unpaved) Maintenance	1.46	1.46
F001	Landfill Construction and Landfill Operation Activities	1.63	1.63
G010	Gasoline Generator	0.00	0.00
G011	Diesel Air Compressor	0.00	0.00
G014	Two (2) Diesel Light Plants	0.00	0.00
	<b>Facility Emissions</b>	<b>1.91</b>	<b>1.91</b>

**KELLY RUN SANITATION, INC.  
SUMMARY OF ANNUAL PM EMISSIONS 2018**

ID	Source	PM10 (tons/yr)	PM2.5 (tons/yr)
I002	1,200 SCFM Enclosed Flare	1.00	1.00
F001-1	Construction - Screening Operations	0.00	0.00
F001-2	Construction - Overburden Blasting	0.00	0.00
F001-3	Borrow Material (Soil) Handling and Storage	0.08	0.08
F001-4	Operations - Roadway (Paved/Unpaved) Maintenance	1.56	1.56
F001	Landfill Construction and Landfill Operation Activities	1.64	1.64
G010	Gasoline Generator	0.00	0.00
G011	Diesel Air Compressor	0.00	0.00
G014	Two (2) Diesel Light Plants	0.00	0.00
	<b>Facility Emissions</b>	<b>2.64</b>	<b>2.64</b>

**KELLY RUN SANITATION, INC.  
SUMMARY OF ANNUAL PM EMISSIONS 2019**

ID	Source	PM10 (tons/yr)	PM2.5 (tons/yr)
I002	1,200 SCFM Enclosed Flare	1.02	1.02
F001-1	Construction - Screening Operations	0.01	0.01
F001-2	Construction - Overburden Blasting	0.04	0.04
F001-3	Borrow Material (Soil) Handling and Storage	0.11	0.11
F001-4	Operations - Roadway (Paved/Unpaved) Maintenance	1.89	1.89
F001	Landfill Construction and Landfill Operation Activities	2.05	2.05
G010	Gasoline Generator	0.00	0.00
G011	Diesel Air Compressor	0.00	0.00
G014	Two (2) Diesel Light Plants	0.00	0.00
	<b>Facility Emissions</b>	<b>3.07</b>	<b>3.07</b>

**KELLY RUN SANITATION, INC.  
SUMMARY OF ANNUAL PM EMISSIONS 2020**

ID	Source	PM10 (tons/yr)	PM2.5 (tons/yr)
I002	1,200 SCFM Enclosed Flare	0.32	0.32
F001-1	Construction - Screening Operations	0.01	0.01
F001-2	Construction - Overburden Blasting	0.00	0.00
F001-3	Borrow Material (Soil) Handling and Storage	0.23	0.23
F001-4	Operations - Roadway (Paved/Unpaved) Maintenance	1.96	1.96
F001	Landfill Construction and Landfill Operation Activities	2.20	2.20
G010	Gasoline Generator	0.00	0.00
G011	Diesel Air Compressor	0.00	0.00
G014	Two (2) Diesel Light Plants	0.00	0.00
	<b>Facility Emissions</b>	<b>2.51</b>	<b>2.51</b>

**KELLY RUN SANITATION, INC.  
SUMMARY OF SHORT TERM EMISSIONS POTENTIAL REDUCTIONS**

ID	Source	MAX PM10 (lb/hr) <sup>1</sup>	MAX Reduction PM10 (lb/hr) <sup>2</sup>	Potential Event PM10 (lb/hr) <sup>3</sup>	% Reduction	PM2.5 (lb/hr) <sup>1</sup>	MAX Reduction PM2.5 (lb/hr) <sup>2</sup>	Potential Event PM2.5 (lb/hr) <sup>3</sup>	% Reduction	Comments
I002	1,200 SCFM Enclosed Flare	0.56	0.00	0.56	0.00%	0.56	0.00	0.56	0.00%	Must be able to operate 24/7
F001-1	Construction - Screening Operations	0.13	0.00	0.13	0.00%	0.12	0.00	0.12	0.00%	Must be able to operate to meet construction needs
F001-2	Construction - Overburden Blasting	0.02	0.02	0.00	100.00%	0.02	0.02	0.00	100.00%	Will make every effort not to blast during an event if it won't cause construction delays
F001-3	Borrow Material (Soil) Handling and Storage	0.72	0.00	0.72	0.00%	0.71	0.00	0.71	0.00%	Must be able to operate to meet construction needs
F001-4	Operations - Roadway (Paved/Unpaved) Maintenance	1.75	0.88	0.88	50.00%	0.20	0.10	0.10	50.00%	50% Reduction due to limiting traffic and increased water spraying
F001	Landfill Construction and Landfill Operation Activities	2.62	0.89	1.73	34.01%	1.04	0.11	0.93	10.99%	
G001-10	Gasoline Generator	0.01	0.01	0.00	100.00%	0.01	0.01	0.00	100.00%	100% Reduction if operation can be avoided
G001-11	Diesel Air Compressor	0.07	0.07	0.00	100.00%	0.07	0.07	0.00	100.00%	100% Reduction if operation can be avoided
G001-14	Two (2) Diesel Light Plants	0.07	0.07	0.00	100.00%	0.07	0.07	0.00	100.00%	100% Reduction if operation can be avoided
	<b>Facility Emissions</b>	<b>3.34</b>	<b>1.05</b>	<b>2.29</b>	<b>31.38%</b>	<b>1.76</b>	<b>0.27</b>	<b>1.49</b>	<b>15.41%</b>	

1. Maximum hourly emissions rate from each source  
2. Estimated potential emission reduction during PM event  
3. Estimated hourly emissions rate from each source when considering avoidance measures taken.