

ALLEGHENY COUNTY HEALTH DEPARTMENT
Air Quality Program

SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES
ON THE PROPOSED ISSUANCE OF ALLIED WASTE SYSTEMS OF PENNSYLVANIA,
LLC - IMPERIAL LANDFILL
OPERATING PERMIT NO. 0068-OP25

[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on April 24, 2025. The public comment period ended on June 2, 2025.]

1. **COMMENT:** Condition III.12.b. Allied waste requests ACHD to revise the annual certification report date to 2026 before issuing the permit. (1 Commenter)

RESPONSE: The Department made the requested change.

2. **COMMENT:** Condition III.15.d.3. Allied waste requests ACHD to revise the semiannual report dates as appropriate based on issuance date of the final permit. (1 Commenter)

3. **RESPONSE:** The Department made the requested change.

4. **COMMENT:** Condition V.A.1.a. Allied Waste requests ACHD to revise the word “offgas” to “off gas” as stated in RACT I. (Commenter)

RESPONSE: The Department made the requested change.

5. **COMMENT:** Condition V.A.1.d. Allied Waste requests ACHD to correct the word “permit” to “permittee”. (Commenter)

RESPONSE: The Department made the requested change.

6. **COMMENT:** Condition V.A.1.h. Allied Waste requests ACHD to please remove the reference to 5 percent oxygen and 20 percent nitrogen as this standard is no longer applicable. (Commenter)

RESPONSE: This is a SIP approved RACT I requirement, and the Department cannot remove it without revising the SIP. Therefore, the condition remains unchanged.

7. **COMMENT:** Condition V.A.4.o.2. Allied Waste requests ACHD to remove the reference to 5 percent oxygen and 20 percent nitrogen as these are no longer exceedance threshold. (Commenter)

RESPONSE: The Department acknowledges that the 5 percent oxygen and 20 percent nitrogen are no longer an exceedance threshold. However, the Department cannot remove the requirements as requested because that is how it is stated in the subpart (and see also the response to comment #6 above). Moreover, the requirement provides an exception to the recordkeeping. Specifically, the facility is not required to keep the oxygen and nitrogen records in certain situations as stated in Condition V.A.4.o.2.a below and demonstrating compliance with the requirement in V.A.4.o.2.a (§63.1958(c)) does not require nitrogen and oxygen standards.

“The permittee must keep records of each wellhead temperature monitoring value of greater than 55 °C (131 °F), each wellhead nitrogen level at or above 20%, and each wellhead oxygen level at or above 5%, except:

When the permittee is subject to the provisions of 63 subpart AAAA and seeks to demonstrate compliance with the compliance provisions for wellhead temperature in condition §63.1958(c), but no later than September 27, 2021, the records

of each wellhead temperature monitoring value of 62.8 degrees Celsius (145 degrees Fahrenheit) or above instead of values greater than 55 degrees Celsius (131 degrees Fahrenheit)."

8. **COMMENT:** Condition V.B.3.a. Allied Waste is requesting to reduce the observation period to 30 minutes based on the Applicability Determination from the USEPA dated March 13, 2008 (see appendix A below for the EPA determination letter). Additionally, enclosed flares rarely have visible emissions as combustion temperatures are high enough to promote complete combustion. (Commenter)

RESPONSE: Based on the past three (3) years of enclosed flare FCE inspection reports, which demonstrated compliance with visible emissions requirements, and in consideration of the EPA determination letter referenced in Appendix A below, the Department has made the changes as requested and referenced the EPA determination letter in the Technical Support Document.

9. **COMMENT:** Condition VI.B. Please change the fuel usage from natural gas to liquified petroleum gas. (Commenter)

RESPONSE: The Department made the requested change.

10. **COMMENT:** Calculation Spreadsheet. For PM emissions from roads (construction, soil, and waste), ACHD revised the control efficiency in the emissions calculation spreadsheet from 85% to 90% but the text still references 85%. However, the text still references 85% and should be corrected accordingly. (Commenter)

RESPONSE: The Department made the requested change.

List of Commenters

Name	Affiliation
Mike Contestabile	Weaver Consultants Group, on behalf of Allied Waste Systems.

APPENDIX A

EPA Determination Letter

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 13 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Laura Niemann
Environmental Information Logistics, LLC
130 E. Main Street
Caledonia, MI 49316

Dear Ms. Nieman:


We have evaluated your request in the letter dated March 4, 2008, in which you ask permission to use alternative test procedures for determining fuel gas heat content and visible emissions for nine passive flares at the Pitsch Sanitary Landfill in Ionia County, Michigan. The landfill is subject to 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. Within these requirements, open flares are required to have their fuel gas net heating value determined from three 30-minute Method 3C samples, and their visible emissions determined over 2-hour periods using Method 22.

You are proposing to shorten the Method 3C requirement to a single 30-minute test supplemented by two methane readings from a hand-held combustible gas meter, since the nine flares will be combusting similar landfill gas. You also propose to reduce the required 2-hour visible emissions test using Method 22 to 30 minutes per flare. You note that landfill gas combustion is similar to natural gas combustion and should not result in visible emissions.

We believe your request to shorten the Methods 3C and 22 testing times as described above is justified. We therefore approve your request to use these alternative procedures at the Pitsch Sanitary Landfill in Ionia County, Michigan. Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please contact Foston Curtis at (919)541-1063, or you may e-mail him at curtis.foston@epa.epa.gov.

Sincerely,


Conniesue Oldham, Ph.D, Group Leader
Source Measurement Technology Group

cc: Foston Curtis, E143-02, RTP
Jeff Gahris, Region 5
Terry Madden, Michigan DEQ

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)