

Talking Points from Clean Air Council
“Slate Belt Heat Recovery Center, LLC Air Quality Plan Approval
Application No: 48-00111A”

#1: Nowhere in Synagro's "Air Quality Plan Approval Application" do they acknowledge that Northampton County is out of attainment for both the 2008 Ozone standard and the 2006 Particulate Matter (PM) 2.5 standard.

These are the EPA pages for both the landfill and the landfill gas facility and under the tab for "environmental conditions" you can see the nonattainment status.

<https://echo.epa.gov/detailed-facility-report?fid=110064155319>

<https://echo.epa.gov/detailed-facility-report?fid=110012591187>

Also here for PM2.5:

<https://www3.epa.gov/airquality/greenbook/rbcty.html>

In Table 1 of "Attachment A: Application Narrative and Regulatory Review" the applicant incorrectly lists the "Title V Thresholds" for pollutants as if Northampton County was in attainment of both Ozone and Particulate Matter. It doesn't even list the PM2.5 levels or thresholds, just PM10.

At the bottom of page 3 of this EPA document it lists "a significant emissions rate for PM10 of 15 tpy" <https://www.epa.gov/sites/production/files/2015-07/documents/pm25guid.pdf>

Synagro is proposing to emit 15.47 tpy of PM10 in an area that does not attain PM2.5 standards.

#2: Most egregious is the purported "single source determination" made at the bottom of page 7 of Attachment A. Emissions from Synagro's proposal, the Grand Central Sanitary Landfill and the Green Knight Energy Center (GKEC) should be aggregated as these three facilities constitute an assembly line for Synagro's fuel source, landfill gas. The project is by definition a business partnership of these three entities. Synagro has proposed to "to permit and construct a biosolids processing facility which will be sited on a parcel of land owned by Grand Central Sanitary Landfill (GCSL) in Plainfield Township, Northampton County, Pennsylvania."

Given Northampton County's poor air quality and the interconnections of this proposal, all three pollution sources should be aggregated (added together) in permitting. Synagro seeks the advantages of coordinating with GCSL and GKEC without the accompanying pollution standards.

The application is available here:

http://www.delawareriverkeeper.org/sites/default/files/Air%20SBHRC-Plan-Approval-Application_X%20%282018-03-20%29.pdf