

To: File  
From: John Legg  
Date: June 6, 2016

*John Legg*  
*6/6/16*

Subject: R13-2596A - Class I Administrative Update to R13-2596  
Meadowfill Landfill, Inc.; Bridgeport Facility  
Company ID No.: 033-00128; Permit No.: R13-2596A

### Timing

May 31, 2016 - Application/Letter Received.  
June 2, 2016 - Application Assigned to Writer.

### Description

In a letter dated May 26, 2016, Waste Management's Douglas R. Hall, II, Senior District Manager, submitted a class I administrative update requesting that permit R13-2596 be administratively updated to remove the 450 horsepower diesel engine for the tire shredder (Emission Unit 2S). The engine was permanently replaced with an electrically powered engine.

### Changes Made to R13-2596

1. The old permit was put into the newer Title V permit format.
2. Old A1 became new 4.1.1.
  - 4.1.1. The throughput to the Tire Shredder (2S) shall not exceed 10 tons of used tires per hour.
3. Old A.2 was omitted because it was about the diesel engine:

~~A.2. The Tire Shredder internal combustion engine shall be a diesel-fired engine (1S) with a maximum rating of 450 (hp) horsepower.~~
4. Old A.3 was a table containing emission limits for the diesel engine and the tire shredder (2S). The engine requirements were deleted. The emission limits for the tire shredder (2S) became new 4.1.2.

~~A.3 Maximum emissions to the atmosphere shall not exceed the limits set forth in the following table:~~

Emission Source	Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
450 hp Diesel Motor (1S)	Particulate Matter-10	0.99	4.34
	Nitrogen Oxides	13.95	61.11
	Sulfur Dioxide	0.93	4.05
	Carbon Monoxide	3.01	13.17
	Volatile Organic Compounds	1.14	4.96
Tire Shredder (2S)	Particulate Matter-10	0.25	1.10

4.1.2. Maximum emissions of Particulate Matter-10 (PM<sub>10</sub>) from the Tire Shredder (2S) to the atmosphere shall not exceed 0.25 lb/hr and 1.10 ton/yr.

5. Old A.4. (which is about a water spray) becomes new 4.1.3.

4.1.3. The permittee shall maintain and operate a water spray on the Tire Shredder (2S) as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from the Tire Shredder (2) and other work areas where mobile equipment is used.

The spray bar shall be equipped with commercially available spray nozzles, of sufficient size and number, so as to provide adequate coverage to the surface being treated.

The pump delivering the water, or solution, shall be of sufficient size and capacity so as to be capable of delivering to the spray nozzle(s) and adequate quantity of water, or solution, and at a sufficient pressure.

6. Old A.5. (which is about opacity) became new 4.1.4. The opacity requirements for the diesel engine were omitted in new 4.1.4.

4.1.4. Except during startup and shutdown, opacity from the Tire Shredder shall not exceed 10 percent based on a six minute block average. In order to determine compliance with this limit the permittee shall conduct monthly visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for the Tire Shredder (2S). These observations shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outline in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, with 24 hours. A 40CFR60 Appendix A, Method 9 evaluations shall not be required if the visible emission condition is corrected within 24 hours and the unit is operated at normal operating conditions with no visible emissions being observed. Records shall be maintained on site reporting the results of each test. Upon observing any visible emissions in excess of twenty percent (20%) opacity, or excess of forty (40%) for any period or periods aggregating more than five (5) minutes in any sixty (60) minute period, the Company shall submit a written report, certified by a responsible official, to the Director of the Division of Air Quality within five (5) days after taking said reading.

7. All the Rule 7 language that was quoted in Old B.1 was moved into the new permit:

§45-7-3.1	became	new 4.1.5.
§45-7-3.7	became	new 4.1.6.
§45-7-4.1	became	new 4.1.7.
§45-7-5.1	became	new 4.1.8.
§45-7-5.2	became	new 4.1.9.
§45-7-8.1	became	new 4.1.10.
§45-7-8.2	became	new 4.1.11.
§45-7-9.1	became	new 4.1.12.

8. One third of the Rule 13 that was quoted in Old B.2 was moved into the new permit:

§45-13-6.1	became	new 4.1.13.
§45-13-10.2	was omitted because it no longer applied:	

~~The Secretary may suspend or revoke a permit if, after six (6) months from the date of issuance, the holder of the permit cannot provide the Secretary, at the Secretary's request, with written proof of a good faith effort that construction, modification, or relocation, if applicable, has commenced. Such proof shall be provided not later than thirty (30) days after the Secretary's request. If construction or modification of a stationary source is discontinued for a period of eighteen (18) months or longer, the Secretary may suspend or revoke the permit.~~

§45-13-10.3	was omitted because it is quoted in the new permit under 2.5.1 as boilerplate:	
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~~The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based or the conditions established in the permit are not adhered to. Upon notice of the Secretary's intent to suspend, modify or revoke a permit, the permit holder may request a conference with the Secretary in accordance with the provisions of W.Va Code § 22-5-5 to show cause why the permit should not be suspended, modified or revoked.~~

9. Old B.3. was changed to take out the diesel engine requirements and appears in the new permit as 4.4.4:

4.4.4. For the purpose of determining compliance with sections 4.1.1 and 4.1.2, the permittee shall keep daily records of the amount of used tires entering the Tire Shredder (2S). These records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.

10. Old B.4 was omitted from the new permit. It was entirely about the diesel motor which was removed.

~~B4. For the purpose of determining compliance with the emission limits in SPECIFIC REQUIREMENTS A.3 for the 450 hp Diesel Motor (1S) as described in SPECIFIC REQUIREMENT A.2, the permittee shall maintain daily records of the diesel fuel consumed and hours of operation for the 450 hp Diesel Motor (1S). These records shall be maintained on-site for a period of not less than five (5) years and certified records shall be made available to the Director or a duly authorized representative of the Director upon request.~~

11. Old B.5 which gave the DAQ's address to forward reports to was omitted. No reports are required by the permit. Also the DAQ address is given in section 3.5.3 of the new permit.

12. Old B.6 was split into two sections: Monitoring Requirement (4.2.1) and Record Keeping Requirements (4.4.5):

4.2.1. The permittee shall inspect all fugitive dust control systems weekly to ensure that they are operated and maintained in conformance with their designs.

4.4.5. The permittee shall maintain records of all scheduled and non-scheduled maintenance. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections (as called for in section 4.2.1), the times fugitive dust control system(s) are inoperable and any corrective actions taken.

13. Old B.7 became 4.4.6 in the new permit:

4.4.6. The permittee shall maintain daily records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. These records shall be maintained on-site for a period of five (5) years and be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.

14. Old Section C, "General Requirements" was omitted because it appears as boilerplate in the new permit:

Old C.1	is in new	new 3.5.4.1
Old C.2	is in new	new 2.5.4
Old C.3	is in new	new 2.5.1
Old C.4	is in new	new 3.3.1.c
Old C.5	is in new	new 2.14
Old C.6	is in new	new 2.16
Old C.7	was not put	

in the new permit: The permittee shall notify the Secretary in writing at least fifteen (15) calendar days prior to actual startup of the operations authorized under this permit.

Old C.8	is in new	2.18
Old C.9	is in new	2.17
Old C.10	is in new	2.5.3