

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03300128-2016**  
Application Received: **October 9, 2015**  
Plant Identification Number: **03-54-033-00128**  
Permittee: **Meadowfill Landfill, Inc.**  
Mailing Address: **1488 Dawson Drive, Bridgeport, WV 25427**

*Revised: N/A*

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Physical Location: Bridgeport, Harrison County, West Virginia  
UTM Coordinates: 564.04 km Easting • 4354.44 km Northing • Zone 17  
Directions: From I-79 take Exit 121 (Meadowbrook Road). Turn west onto Meadowbrook Road past the Meadowbrook Mall. Go approximately 1.5 miles and turn right onto Dawson Drive. Follow for approximately 1.5 miles to the landfill entrance.

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### Facility Description

Meadowfill Landfill is a municipal solid waste landfill that began operation in 1994. The landfill has the potential to receive approximately 30,000 tons of waste per month on the approximate 177.7 acre site. Waste is brought to the landfill by truck and disposed of. The waste is spread and compacted with soil placed over the active area each day for cover. The landfill also has a flare for odor control and above ground tanks which are used for leachate treatment and storage.

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Carbon Monoxide (CO)	179.68	10.09
Nitrogen Oxides (NO <sub>x</sub> )	88.23	3.98
Particulate Matter (PM <sub>2.5</sub> )	28.13	7.33

<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2014 Actual Emissions</b>
Particulate Matter (PM <sub>10</sub> ) ( <i>component of TSP</i> )	38.85	20.04
Total Particulate Matter (TSP)	199.86	99.48
Sulfur Dioxide (SO <sub>2</sub> )	10.48	2.10
Volatile Organic Compounds (VOC)	83.58	9.73
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2014 Actual Emissions</b>
HCl	3.08	2.49
Toluene	17.33	2.13
Xylenes	6.14	0.75
Methylene Chloride	5.74	0.70
Perchloroethylene	2.96	0.36
Hexane	2.74	0.34
Ethylbenzene	2.36	0.29
Total HAPs	50.84	8.41
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		
<b>Other Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2014 Actual Emission</b>
Methane	38,650	3,190
Carbon Dioxide	108,314	26,130
Non-Methane Organic Compounds (NMOC)	226.5 Mg	N/A

### Title V Program Applicability Basis

This facility has the potential to emit 179.68 tpy of carbon monoxide, 17.33 tpy of toluene, 50.84 tpy of total HAPs, and has a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters. Due to this facility's design capacity and potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Meadowfill Landfill, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR6	Open burning prohibited
45CSR7	PM limits for manufacturing processes
45CSR11	Standby plans for emergency episodes
45CSR13	Construction permit requirement
45CSR16	New source performance standards
45CSR23	Municipal Solid Waste Landfill emissions

WV Code § 22-5-4(a)(14)  45CSR30 45CSR34 40 CFR Part 60, Subpart Kb 40 CFR Part 60, Subpart WWW 40 CFR Part 61, Subpart M 40 CFR Part 63, Subpart AAAA 40 CFR Part 82, Subpart F	The Secretary can request any pertinent information such as annual emission inventory reporting Operating permit requirement Emission Standards for Hazardous Air Pollutants NSPS for VOC storage vessels NSPS for Municipal Solid Waste Landfills National Emission Standard for Asbestos HAP standards for Municipal Solid Waste Landfills Ozone depleting substances	
State Only:	45CSR4 45CSR17	No objectionable odors. PM emissions from Materials Handling

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-2666A	November 30, 2009	N/A
R13-2596A	June 7, 2016	N/A

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

**Previously Registered under the General Permit** - Previously, this facility had been registered under the General Permit for Municipal Solid Waste Landfills (R30-MSWLGP-2011-03300128). With this renewal, the facility was not registered under the General Permit, and the General Permit for Landfills will not be renewed. Instead, a standard Title V Operating Permit was issued. This required numerous formatting changes and the permit was rewritten for the standard Title V permit format.

**Section 4.0: Requirements for the Active 177 Acre Landfill and Leachate Storage Tanks**

Section 4.0 of this permit was written to address the Active 177 Acre Landfill and the Leachate Storage Tanks. The table below summarizes each permit condition's contents, regulatory citations, and NSR permit citations:

Condition Number	Summary of Requirements	Regulatory Citation
4.1.1.	Requirements when reported NMOC emission rate is $\geq 50$ Mg/yr.	45CSR23, 40 CFR § 60.757, 40 CFR § 60.754(a)(3)

Condition Number	Summary of Requirements	Regulatory Citation
4.1.2.	Requirements when reported NMOC emission rate is $\geq 50$ Mg/yr. (when using site specific $C_{NMOC}$ )	45CSR23, 40 CFR § 60.757, 40 CFR § 60.754(a)(4)
4.1.3.	Installation of a landfill gas collection and control system	45CSR23, 40 CFR § 60.752, 40 CFR § 60.753
4.1.4.	LFG Collection and Control System Design Plan	45CSR23, 40 CFR § 60.757(c)
4.1.5.	Comply with 40CFR60, Subpart WWW	45CSR34, 40 C.F.R. § 63.1955(a)(1)
4.1.6.	Collection and control system MACT requirements	45CSR34, 40 C.F.R. § 63.1955(b)
4.1.7.	Approval of collection and control systems	45CSR34, 40 C.F.R. § 63.1955(c)
4.1.8.	MACT compliance demonstration	45CSR34, 40 C.F.R. § 63.1960
4.1.9.	Asbestos standards for active waste disposal sites	45CSR34, 40 CFR § 61.154
4.4.1.	Records of all emission data and operating parameters	45CSR23, 40 CFR § 60.758
4.4.2.	Records and reports as specified in 40 CFR Part 60 Subpart WWW or EPA approved State plan	45CSR34, 40 C.F.R. § 63.1980(a)
4.4.3.	Records and reports as specified in the general provisions of 40 C.F.R. Part 60 and 40 C.F.R. Part 63 Subpart AAAA, Table 1	45CSR34, 40 C.F.R. § 63.1980(b)
4.4.4.	Record of storage vessel dimensions	45CSR16, 40 CFR § 60.116b(b)
4.5.1.	Annual NMOC emission report	45CSR23, 40 CFR § 60.757(b)
4.5.2.	5-year NMOC report	45CSR23, 40 CFR § 60.757(b)(1)(ii)
4.5.3.	Revision of 5-year NMOC report	45CSR23, 40 CFR § 60.757(b)(1)(ii)
4.5.4.	Closure report	45CSR23, 40 CFR § 60.758 and 40 CFR § 60.757(d)
4.5.5.	Report excessive vapor pressure	45CSR16, 40 CFR § 60.116b(d)

**Section 5.0: Requirements for Flares [GV-1 through GV-12 and LGF-1]**

Section 5.0 of this permit was written to address the Flares. The table below summarizes each permit condition's contents, regulatory citations, and NSR permit citations:

Condition Number	Summary of Requirements	Regulatory Citation	R13- 2666 Condition
5.1.1.	PM limit for flares GV-1 through GV-12	45CSR§6-4.1., 45CSR13	4.1.1.
5.1.2.	Opacity limit for all flares	45CSR§§6-4.3. and 4.4, 45CSR13	4.1.2.
5.1.3.	Operation limit for LGF-1	45CSR13	4.1.3.
5.1.4.	Limits for LGF-1	45CSR§6-4.1., 45CSR13	4.1.4.
5.1.5.	Operation and maintenance of air pollution equipment	45CSR§13-5.11., 45CSR13	4.1.5.
5.1.6.	Emissions of Unburned or partially burned particles prohibited	45CSR§6-4.5.	N/A

Condition Number	Summary of Requirements	Regulatory Citation	R13- 2666 Condition
5.1.7.	Flare operation and design	45CSR§6-4.6.	N/A
5.2.1.	Visible emissions monitoring	45CSR13	4.2.1.
5.2.2.	Monitor presence/absence of flame	45CSR13	4.2.2.
5.2.3.	Record and determine amount of landfill gas to LGF-1	45CSR13	4.2.3.
5.3.1.	Stack tests for flares (PM)	45CSR§6-7.1.	N/A
5.3.2.	Flare compliance assessment	45CSR13	4.3.1.
5.4.1.	Records of visible emission checks	45CSR13	4.4.4.
5.4.2.	Record of maintenance of air pollution control equipment	45CSR13	4.4.2.
5.4.3.	Record of malfunction of air pollution control equipment	45CSR13	4.4.3.
5.4.4.	Records of times when the flame is absent	45CSR13	4.4.5.
5.4.5.	Record of flare design evaluation	45CSR13	4.4.6.
5.4.6.	Records of visible emission tests conducted	45CSR13	4.4.7.
5.4.7.	Records of flare operations	45CSR13	4.4.8.
5.5.1.	Reports of visible emission exceedances	45CSR13	4.5.1.
5.5.2.	Submit flare compliance assessments	45CSR13	4.5.2.

**Section 6.0: Requirements for Tire Shredder** - The previous permit renewal noted that the Tire Shredder Diesel motor (1S) was removed and replaced with an electric engine with no applicable requirements. An administrative update to remove the requirements for the diesel motor was issued as Permit R13-2596A, therefore requirements for the diesel motor were not included in Section 6.0. of the Title V permit. The table below summarizes each permit condition's contents, regulatory citations, and NSR permit citations

Condition Number	Summary of Requirements	Regulatory Citation	R13- 2596 Condition
6.1.1.	Throughput limit	45CSR13	4.1.1.
6.1.2.	PM <sub>10</sub> emission limit	45CSR13	4.1.2.
6.1.3.	Maintain water spray	45CSR13	4.1.3.
6.1.4.	Smoke, PM emissions	45CSR§§7-3.1. & 3.2., 45CSR13	4.1.5.
6.1.5.	Visible emissions from storage structures	45CSR§7-3.7., 45CSR13	4.1.6.
6.1.6.	PM emission limit	45CSR§7-4.1., 45CSR13	4.1.7.
6.1.7.	Flow straightening devices	45CSR§7-4.12.	N/A
6.1.8.	Fugitive emissions	45CSR§7-5.1., 45CSR13	4.1.8.
6.1.9.	PM control of plant premises	45CSR§7-5.2., 45CSR13	4.1.9.
6.1.10	Unavoidable malfunctions	45CSR§7-9.1., 45CSR13	4.1.12.

Condition Number	Summary of Requirements	Regulatory Citation	R13- 2596 Condition
6.1.11.	Operation and maintenance of air pollution control equipment	45CSR§13-5.11., 45CSR13	4.1.14.
6.2.1.	Visual emissions monitoring	45CSR13	4.1.4.
6.2.2.	Fugitive dust control inspections	45CSR13	4.2.1.
6.3.1.	Testing for PM	45CSR§7-8.1., 45CSR13	4.1.10.
6.3.2.	Director may conduct testing	45CSR§7-8.2., 45CSR13	4.1.11.
6.3.3.	Testing for compliance	45CSR§13-6.1., 45CSR13	4.1.13.
6.4.1.	Record of maintenance of air pollution control equipment	45CSR13	4.4.2.
6.4.2.	Record of malfunction of air pollution control equipment	45CSR13	4.4.3.
6.4.3.	Records of amount of used tires	45CSR13	4.4.4.
6.4.4.	Maintenance records	45CSR13	4.4.5.
6.4.5.	Records of dust suppressants used	45CSR13	4.4.6.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR §60.757 (a)(3) - The design capacity of this facility is greater than 2.5 million megagrams and 2.5 million cubic meters. Therefore, amended design capacity reports are not required.

40 CFR Part 64 - The permittee does not have any pollutant specific emissions units (PSEU) at this facility that satisfy the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control device regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

### Request for Variances or Alternatives

None.

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: Tuesday, June 28, 2016  
Ending Date: Thursday, July 28, 2016

### Point of Contact

All written comments should be addressed to the following individual and office:

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304

Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478  
Bobbie.Scroggie@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

US EPA commented that monitoring for visible emissions from the flares and the tire shredder needed to be more frequent. US EPA suggested a daily monitoring schedule. WV DAQ noted that the flares and tire shredder have very low emissions and operate on an occasional basis, therefore it was not practicable to daily monitor a source that is not operated on a daily basis. The monitoring requirements were not changed.

US EPA commented that the monitoring requirement for visible emissions for the tire shredder did not specify what a sufficient time interval was, therefore the permit was changed to require that the sufficient time interval be no less than one (1) minute.