

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00300036-2015**
Application Received: **October 5, 2015**
Plant Identification Number: **003-00036**
Permittee: **LCS Services, Inc.**
Mailing Address: **P. O. Box 1070, Hedgesville, WV 25427**

Revised: N/A

Physical Location:	Hedgesville, Berkeley County, West Virginia
UTM Coordinates:	243.35 km Easting • 4384.46 km Northing • Zone 17
Directions:	From I-81, take exit for State Route 9 (Berkeley Springs/Hedgesville); Go approximately 6 miles to Hedgesville and turn right onto County Route 901; Go approximately 1 mile, and take a left onto County Route 3/2 (Allensville Road); Go approximately 0.8 miles on Allensville Road and landfill entrance is on left.

Facility Description

SIC Code – 4953. North Mountain Sanitary Landfill is a municipal solid waste landfill that began operation in 1991. The landfill has the potential to receive approximately 120,000 tons of waste per year on the approximate 468.7 acre site of which 67 acres is permitted for waste disposal. 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

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Carbon Monoxide (CO)	134.23	6.35
Nitrogen Oxides (NO _x)	7.16	3.41
Particulate Matter (PM _{2.5})	20.87	Not Available
Particulate Matter (PM ₁₀)	24.23	Not Available
Total Particulate Matter (TSP)	101.82	56.6
Sulfur Dioxide (SO ₂)	3.00	0.92
Volatile Organic Compounds (VOC)	13.62	1.13

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2014 Actual Emissions
Total HAPs (each HAP < 10tpy)	7.37	2.56
HCl	4.12	1.16

Some of the above HAPs may be counted as PM or VOCs.

The Facility has estimated uncontrolled emissions less than 50 megagrams per year (Mg/yr) of NMOC.

Title V Program Applicability Basis

This facility has a design capacity over 2.5 million megagrams and 2.5 million cubic meters. Also, this facility has the potential to emit over 100 tons per year of Carbon Monoxide (CO). Due to this facility's design capacity and its potential to emit over 100 tons of criteria pollutants, LCS Services, 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.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review permits for stationary sources
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
	45CSR17	To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and other sources of Fugitive Particulate Matter
	45CSR23	To Prevent and Control Emissions from Municipal Solid Waste Landfills

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
	40 C.F.R. Part 60 Subpart WWW	Standard of Performance for Municipal Solid Waste Landfills
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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>)
R13-2590	10-20-2004	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-2011-00300036). With this renewal, the facility was not registered under the General Permit, and the General Permit for Landfills will not be renewed. Instead, it was issued a standard Title V Operating Permit. This required numerous formatting changes and the permit was rewritten for the standard Title V permit format.

Section 4.0: Requirements for the Active 67 Acre Landfill

Section 4.0 of this permit was written to address the Active 67 Acre Landfill and the Flare (Emission Unit IDs: 001 and Flare). The table below summarizes each permit condition's contents, regulatory citations, and NSR permit citations:

Condition Number	Summary of Requirements	Regulatory Citation	R13-2590 Condition
4.1.1	Requirements When Reported NMOC Emission Rate is ≥ 50 Mg/yr.	45CSR23, 40 C.F.R. §60.757, and 40 C.F.R. §60.754(a)(3)	N/A
4.1.2	Requirements When Reported NMOC Emission Rate is ≥ 50 Mg/yr. (when using site specific C_{NMOC})	45CSR23, 40 C.F.R. §60.757 and 40 C.F.R. §60.754(a)(4)	N/A
4.1.3	Installation of a landfill gas collection and control system	45CSR23, 40 C.F.R. §60.752, and 40 C.F.R. §60.753	N/A
4.1.4	LFG Collection and Control System Design Plan	45CSR23 and 40 C.F.R. §60.757(c)	N/A
4.1.5	Visible emissions from the flare (E1) limited to 20% opacity	45CSR§6-4.3	B.1
4.1.6	Condition 4.1.6. does not apply to smoke less than 40% percent opacity, for a period or periods aggregating no more than 8 minutes per start-up.	45CSR§6-4.4	B.1
4.1.7	No emission of particles of unburned or partially burned refuse or ash from the flare (E1) which are large enough to be individually distinguished in the open air.	45CSR§6-4.5	B.1
4.1.8	No objectionable odors from the flare (E1)	45CSR§6-4.6	B.1
4.1.9	No person shall construct, modify or relocate any incinerator without first obtaining a permit	45CSR§6-6.1	N/A
4.1.10	Only landfill gas generated from the municipal solid waste contained in the North Mountain Sanitary Landfill shall be burned in the flare (E1)	N/A	A.1
4.1.11	Use of an ultraviolet beam sensor and thermocouple at the pilot light or the flame itself to indicate the continuous presence of a flame in the flare.	N/A	A.2
4.1.12	Exit gas velocity limits from the flare (E1)	N/A	A.3
4.1.13	Emission limits from the flare (E1)	N/A	A.4 and B.1
4.1.14	Maximum landfill gas throughput to the flare (E1)	N/A	A.6
4.1.15	98% minimum destruction efficiency for the flare (E1)	N/A	A.5
4.1.16	HAPs identified in Permit Application R13-2590 as potential material constituents of the landfill gas utilized by the flare system (E1)	N/A	B.6
4.2.1	Visible emission checks of the flare (E1) to demonstrate compliance with 4.1.5 and 4.1.6.	45CSR§30-5.1.c.	N/A
4.3.1	Stack tests for the flare (E1)	45CSR§6-7.1.	N/A
4.4.1	Records of all emission data and operating parameters	45CSR23 and 40 C.F.R. §60.758	N/A
4.4.2	Records of the amount of landfill gas consumed/fed to the flare system to demonstrate compliance with conditions 4.1.12-4.1.15.	N/A	B.4
4.4.3	Documentation of all malfunctions of the flare system (E1)	N/A	B.5
4.4.4	Recordkeeping of the VEs required by Condition 4.2.1	45CSR§30-5.1.c.	N/A
4.5.1	Annual NMOC Emission Report	45CSR23 and 40 C.F.R. §60.757(b)	N/A
4.5.2	5-year NMOC Report	45CSR23 and 40 C.F.R. §60.757(b)(1)(ii)	N/A
4.5.3	Revision of 5-year NMOC Report	45CSR23 and 40 C.F.R. §60.757(b)(1)(ii)	N/A
4.5.4	Closure Report	45CSR23 and 40 C.F.R. §60.757(d)	N/A
4.5.5	Reporting of VE violations	45CSR§30-5.1.c.	N/A

Section 5.0: Requirements for Leachate Pretreatment Tanks

Section 5.0 of this permit was written to address the Leachate Pretreatment Tanks (Emission Unit IDs: 009A and 009B). The table below summarizes each permit condition's contents, and regulatory citations:

Condition Number	Summary of Requirements	Regulatory Citation
5.2.1	Keep copies of all records required by 40CFR§60.116b	45CSR16, 40CFR§60.116b(a)
5.2.2	Records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel	45CSR16, 40CFR§60.116b(b)
5.2.3	Notification requirements when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values	45CSR16, 40CFR§60.116b(d)
5.2.4	Requirements for each vessel storing a waste mixture of indeterminate or variable composition	45CSR16, 40CFR§60.116b(f)

Non-Applicability Determinations

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

40CFR§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.

40CFR61, Subpart M—National Emission Standard for Asbestos: The facility does not accept asbestos waste.

40CFR64—Compliance Assurance Monitoring (CAM): The facility does not have a pollutant specific emissions unit with a control device used to meet an applicable standard or limit. The flare is for odor control and not to comply with any emission limits. Therefore, the facility is not subject to the CAM rule.

40 CFR 63, Subpart AAAA—NESHAP for Municipal Solid Waste Landfills: This facility is not subject to AAAA because: This MSW landfill is not a major source of HAPs; The MSW landfill is not collocated with a major source of HAPs; The MSW landfill is an area source with a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) but estimated uncontrolled emissions are less than 50 megagrams per year (Mg/yr) NMOC; and, this MSW landfill does not include a bioreactor, as defined in 40 C.F.R §63.1990.

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, November 17, 2015
Ending Date: Thursday, December 17, 2015

Point of Contact

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

Rex Compston, P.E.
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Division of Air Quality
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Charleston, WV 25304
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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)

Not applicable.