

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 10, 2006.

Permit Number: **R30-03300128-2006**
Application Received: **March 20, 2009**
Plant Identification Number: **03-54-03300128**
Permittee: **Meadowfill Landfill, Inc.**
Mailing Address: **Route 2, Box 68, Bridgeport, WV 26330**

Permit Action Number: *SM01* Revised: *February 23, 2010*

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 landfill.

Facility Description

The Meadowfill Landfill, Inc. (NAICS 562212, SIC 4953) is comprised of 100 acres. Meadowfill Landfill has a total design capacity of 6,457,394 Mg of which 834,248 Mg is inactive capacity, 4,521,009 Mg is active capacity, and 1,102,137 Mg is future capacity. The landfill accepts an average of 20,000 tons per day.

This significant modification (SM01) covers changes included in recently revised Permit R13-2666A (issued on November 30, 2009). Meadowfill is permitted to operate up to twelve(12) solar powered flares (Emission Unit IDs GV-1 through GV-12) located at various locations on the landfill in accordance with

R13-2666 and R30-03300128-2006. Currently six (6) flares have been installed. The purpose of this modification is to install and operate one (1) skid-mounted flare(Emission Unit ID LFG-1) in addition to the existing solar flares. The existing and proposed flares are designed to combust landfill gas to achieve improved odor control at the facility.

Emissions Summary

As the result of the significant modification (SM01) here are the following PTE changes:

Pollutant	Change in Potential Emissions (+ or -), TPY
Carbon Monoxide (CO)	+147.8
Nitrogen Oxides (NO _x)	+27.2
Particulate Matter (PM ₁₀)	+6.7
Sulfur Dioxide (SO ₂)	+6.5
Volatile Organic Compounds (VOC)	+2.1
Hazardous Air Pollutants	+5.5

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the 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 Particulate Matter (PM₁₀) and Carbon Monoxide (CO). Due to this facility's design capacity and its potential to emit over 100 tons of criteria pollutants, 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	To Prevent and control Air Pollution From Combustion of Refuse
	45CSR13	Construction permit requirement.
	45CSR30	Operating permit requirement.
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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	11/30/2009	

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 B" which may be downloaded from DAQ's website.

Determinations and Justifications

1. The Title V significant modification (SM01) includes the following changes approved under R13- 2666A (issued on November 30, 2009), and incorporated into Title V significant modification permit, R30-03300128-2006(SM01):

Emission Unit ID, LGF-1 has been added to section 1.0, Emission Units Table due to installation of a skid-mounted flare.

Section 5.0 has been updated to include R13- 2666A requirements for new skid-mounted flare (Emission Unit ID, LGF-1).

Conditions 5.1.4 (45CSR§6-4.5), 5.1.5 (45CSR§6-4.6) and 5.1.6 (45CSR§6-6.1) from the previous Title V permit were omitted from R13-2666A. Provisions 45CSR§§6-4.5 and 4.6 are applicable, and were included in this permit as conditions 5.1.6 and 5.1.7. Provision 45CSR§6-6.1 is not appropriate for this particular facility and was not needed to be listed in this permit.

2. **45CSR6 -To Prevent and Control Air Pollution From Combustion of Refuse**

The particulate matter emission limit for Flare, LGF-1 was determined by the following formula (45CSR§6-4.1):

$$\begin{aligned}
 \text{PM Emissions (LB/hr)} &= F \times \text{Incinerator Capacity (tons/hr)} \\
 \text{Where: } F &= 5.43 \text{ (for an incinerator capacity less than 15,000 lbs/hr)} \\
 \text{Incinerator Capacity} &= (10,900\text{lb/ hr}) \times (0.0005 \text{ ton/lb}) = 5.45\text{tons/hr} \\
 \text{PM Emissions (LB/hr)} &= (5.43) \times (5.45\text{tons/hr}) = 29.5 \text{ lb/ hr}
 \end{aligned}$$

Per 45CSR§6-4.1, this flare will have an allowable particulate matter emission limit of 29.5 pounds per hour (based on predicted generation rate of 10,900 lb/hr for 2009). Per R13-2666A, the particulate matter emission limit for Flare, LGF-1 is 1.53 pounds per hour. Therefore, the allowable 45CSR§6-4.1 limit was streamlined with the more stringent R13-2666A particulate matter emission limit.

Per 45CSR§6-4.3, the visible particulate matter emissions from each flare shall not exceed twenty (20%) percent opacity. Per R13-2666A, each flare shall be operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours. Therefore, the (45CSR§6-4.3 limit) 20% opacity limit was streamlined with the more stringent R13-2666A limit.

3. The Title V permit boilerplate has been revised such that a new Section 1.2 Table has been added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. Also, the underlying authority for any conditions from the R13, R14, and/or R19 permits has been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table.
4. EPA Region 3 has requested that all annual compliance certifications be submitted electronically (e-mail), so the permit templates have been updated in conditions 3.5.3 and 3.5.5.

Non-Applicability Determinations

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

40 CFR 64 – The new flare does not have a control device and is not a major source of HAPs. Therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this flare.

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: January 7, 2010
Ending Date: February 8, 2010

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

Beena Modi
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

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.

Point of Contact

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

None