

# Fact Sheet



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

Permit Number: **R30-10700121-2006**  
Application Received: **February 22, 2006**  
Plant Identification Number: **03-54-10700121**  
Permittee: **Northwestern Landfill, Inc.**  
Mailing Address: **P.O. Box 376, Parkersburg, WV 26102**

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Physical Location: Parkersburg, Wood County, West Virginia  
UTM Coordinates: 457.50 km Easting • 4344.37 km Northing • Zone 17  
Directions: I-77 to US Route 50 east to Dry Run Road. Turn right onto Dry Run Road. Follow for approximately 0.4 miles to landfill.

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### **Facility Description**

The Northwestern Landfill, Inc. (NAICS 562212, SIC 4953) is a 58-acre municipal solid waste landfill that began operation in 1975. Northwestern receives approximately 15,000 to 25,000 tons of waste per month. Waste is brought to the landfill by truck and dumped. The waste is spread and compacted. Soil is placed over the active area each day for cover. Northwestern has a design capacity of 4,366,860 Mg of which 931,000 Mg is inactive, 1,315,860 Mg has been capped and closed, 500,000 Mg is currently active, and 1,620,000 Mg for the future use.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Criteria Pollutants</b>	<b>Potential Emissions</b>	<b>2004 Actual Emissions</b>
Carbon Monoxide (CO)	23.11	0.5
Nitrogen Oxides (NO <sub>x</sub> )	107.2	2.34
Particulate Matter (PM <sub>10</sub> )	108.72	79.84
Total Particulate Matter (TSP)	120.8	79.84
Sulfur Dioxide (SO <sub>2</sub> )	7.10	0.15
Volatile Organic Compounds (VOC)	50	21.9502
Lead (Pb)	Not Applicable	None
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Regulated Pollutants other than Criteria and HAP</b>	<b>Potential Emissions</b>	<b>2004 Actual Emissions</b>
Non Methane Organic Compounds (NMOC)	47.18	40.61 Mg
Hydrogen Sulfide	2.0	1.0584
Class I and Class II	0.1	0.0565
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2004 Actual Emissions</b>
Total HAPs	9.0	5.9645
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		
<p><b>Non-methane organic compounds (NMOC)</b> – The current emission rate estimate (calculated for year 1999) is 0.28 Mg/yr. The projected closure year is 2019 with a projected maximum NMOC emission rate estimate of 47.18 Mg/yr. The NMOC emission rate estimates were calculated using EPA’s Landfill Gas Emissions Model (LandGEM) software. The values used for k and L<sub>o</sub> were 0.0306 year<sup>-1</sup> and 170 m<sup>3</sup>/Mg respectively. The site specific NMOC concentration used in the model was 440 ppmv.</p>		

**Title V Program Applicability Basis**

This facility has the potential to emit over 100 tons per year of Nitrogen Oxides (NO<sub>x</sub>). Therefore, Northwestern Landfill, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

This facility has a design capacity over 2.5 million megagrams and 2.5 million cubic meters. Due to this facility's design capacity, Disposal Service, Inc. Landfill 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 45CSR7  45CSR11 45CSR13  45CSR16 45CSR17  45CSR23  WV Code § 22-5-4 (a) (14)  45CSR30 40 C.F.R. Part 60 Subpart WWW  40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Open burning prohibited. To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations Standby plans for emergency episodes. New Source Review permits for stationary sources New Source Performance Standards To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and other sources of Fugitive Particulate Matter To Prevent and Control Emissions from Municipal Solid Waste Landfills The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Standard of Performance for Municipal Solid Waste Landfills Asbestos inspection and removal Ozone depleting substances
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, 45CSR15, 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> )
R30-07900103-1996	August 7, 2001	PD02-068; Issued: April 18, 2002
		<u>Soil screening machinery. Permit not Required.</u>
		PD02-108; Issued: October 22, 2002
		Paint Spray Operation
		Permit Required
		<u>Permit not pursued by Permittee</u>
R13-2592	September 24, 2004	PD03-083; Issued: September 3, 2003
		Install wood grinding machinery
		Permit Required – R13-2592

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

The changes to the August 22, 2001 Title V Permit were three determinations and one R13 permit. the R13 permit and the three permit determinations are:

1. Permit Determination 02-068 was for the use of soil screening equipment. A permit was not required.
2. Permit Determination 02-108 was for a spray painting operation. A permit was required. The permittee decided not to pursue a permit.
3. Permit Determination 03-083 was for the installation of a wood grinding machinery for the purpose of converting wood waste material into fuel for off-site, wood-fired boiler units. A permit was required. The company submitted a R13 permit application, R13-2592.
4. R13-2592 is for the construction and operation of a "tub grinder" to recycle wood materials into wood chips.

The "tub-grinder" and associated equipment are subject to 45CSR7. This rule sets the following limits:

### 1. 45CSR7 Control of Particulate Matter

#### 45CSR§7-3.1 and 45CSR§7-3.2 45CSR§7-5.1

The tub grinder (S3), 600 HP Diesel Motor (S1), and the 190 HP Diesel Motor (S2) are subject to opacity standard and compliance will be demonstrated by conducting monthly visible emission observations according to 40 C.F.R. Part 60 Appendix A, Method 22 followed by 45CSR7A tests unless corrected within 24 hours. Records are to be kept.

WVDAQ believes that the above periodic monitoring approach for this facility is appropriate. DAQ bases this on the rule's requirements to install, inspect and maintain fugitive dust control systems for equipment identified in the permit for the emission sources for the "tub-grinder" and associated equipment and EPA's prior approval of other similar provisions.

#### 45CSR§7-4.1.

The "tub-grinder" has a permitted limit for PM, which is based on Table 47-7A of 45CSR7 - Process Weight Rate Emission Limit for PM for a type 'a' source operation. The "tub-grinder" allowable particulate matter (PM) stack emission rate is 28 LB/hr that is based on maximum raw material feed rate for 20 tons of wood materials per hour. The permitted emission is 0.25 LB/hr. Therefore, the "tub-grinder" and associated equipment (2 diesel motors) should meet 45CSR7.

## Non-Applicability Determinations

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

<b>40 CFR Part 60 Subpart Kb</b> (July 23, 1984)	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels). There are no volatile organic storage vessels at the facility that have a capacity equal to or greater than 40 cubic meters (10,565 gallons) and were constructed or modified after July 23, 1984. The facility does not have a storage vessel subject to this part.
<b>40 C.F.R. Part 64</b> (10/22/1997)	The facility does not have a pollutant specific emissions unit with a control device to meet an applicable standard or limit. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

It is apparent that a typographic error was made in R13-2592, Specific Requirement A.6 that states “Except during startup and shutdown, opacity from the 600 hp Diesel Motor (S1), 190 hp Diesel Motor (S2), and Tub Grinder (S3) shall not exceed 10 percent based on a six minute block average...”. This requirement is for an indirect heat exchanger (45CSR2), for which the tub grinder (S3), 600 HP Diesel Motor (S1), and the 190 HP Diesel Motor (S2) are not. These sources are subject to 45CSR7, which have a 20 percent opacity requirement. The R13-2592 Engineering Evaluation and the R13-2592 Application concur that the opacity is 20 percent.

### **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: March 21, 2006  
Ending Date: April 20, 2006

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

Wayne Green  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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**

Wayne Green  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. (1258) • Fax: 304/926-0478

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

Not applicable