

Fact Sheet



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

Permit Number: **R30-04700111-2024**
Application Received: **April 10, 2023**
Plant Identification Number: **047-00111**
Permittee: **Copper Ridge Landfill, LLC**
Facility Name: **Copper Ridge Landfill**
Mailing Address: **P.O. Box 629, Welch, WV 24801**

Physical Location:	Welch, McDowell County, West Virginia
UTM Coordinates:	447.36 km Easting • 4,147.73 km Northing • Zone 17
Directions:	I-64/77 south to Exit 44 (Harper Road). Take right off exit onto WV3/Harper Road and go 11 miles until road becomes WV99/Bolt. Stay on WV99 for 4.5 miles, then turn left onto CR15/Bolt Road and go 1.3 miles where Bolt Road becomes CR1/Glen Fork Road, continuing another 6.6 miles to CR5/Saulsville-Ravenscliffe Road. Go 5.5 miles where CR5 becomes WV97. Continue 7.4 miles and turn left onto WV10 (Pineville). Go 0.8 miles and turn right onto WV16. Go 17 miles and make a right onto CR7. Follow CR7 to Capels and the entrance to Copper Ridge Landfill on the right (CR 7/2).

Facility Description

Copper Ridge Landfill is a 106-acre municipal solid waste landfill (MSWL) that began operation in late 2007 and operates under SIC Code 4953. The landfill accepts municipal solid waste, construction/demolition debris (CDD) and approved residual waste streams. Copper Ridge receives approximately 50,000 tons of waste per month. Waste is brought to the landfill by railcar and truck. The bails from the railcars are loaded onto trucks for transport to the active cell. The waste is spread and compacted. Soil is placed over the active area each day for cover.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions*	2022 Actual Emissions
Carbon Monoxide (CO)	38.3	2.09
Nitrogen Oxides (NO _x)	0.53	None Reported
Particulate Matter (PM _{2.5})	12.04	2.69
Particulate Matter (PM ₁₀)	66.57	12.62
Total Particulate Matter (TSP)	264.59	51.50
Sulfur Dioxide (SO ₂)	0.28	None Reported
Volatile Organic Compounds (VOC)	134	72.89
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions*	2022 Actual Emissions
Acrylonitrile	2.42	0.18
Benzene	1.07	0.08
Carbon Disulfide	0.32	0.02
Carbon Tetrachloride	<0.01	<0.01
Carbonyl Sulfide	0.21	0.02
Chlorobenzene	0.20	0.02
Chloroform	<0.01	<0.01
Ethyl Benzene	3.53	0.26
Ethylene Dibromide	<0.01	<0.01
Hexane	4.12	0.30
Mercury	<0.01	<0.01
Methyl Isobutyl Ketone	1.38	0.10
1,1,2,2 - Tetrachloroethane	1.34	0.10
Toluene	26.0	1.92
Trichloroethylene	2.66	0.20
Vinyl Chloride	3.30	0.24
Xylenes	9.22	0.68
Other HAPs (<10 TPY each)	20.29	1.23
Total	76.10	5.39

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

*Note: PTE is for both active and future phases of operation

Non-Methane organic compounds (NMOC) – The current emission rate estimate (calculated for the year 2023) is 22.67 Mg/yr. The projected closure year is 2086. The projected NMOC emission rate of 34 Mg/yr, triggering the requirements for the construction of a collection and control system will be reached in 2032. The NMOC emission rate estimates were calculated using EPA’s Landfill Gas Emissions Model (LandGEM) software. The values used for k and L₀ were “0.050 year⁻¹” and “170 m³/Mg” respectively. The site specific NMOC concentration used in the model was 590.4 ppmv as hexane, as determined by Tier 2 testing on March 21, 2023.

Title V Program Applicability Basis

This facility has the potential to emit 134 TPY of VOC, 26.0 TPY of Toluene, and 76.1 TPY of total HAPs. It also 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 its 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, Copper Ridge Landfill, LLC 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.
	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.
	45CSR34	Emission Standards For Hazardous Air Pollutants
	40 C.F.R. Part 61, Section 61.154	Asbestos inspection and removal - Standards for active waste disposal sites
	40 C.F.R. Part 63, Subpart AAAA	National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent And Control Particulate Matter Air Pollution From Materials Handling, Preparation, Storage And Other Sources Of Fugitive Particulate Matter

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>)
None	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

This is a renewal of the Title V permit which was issued on October 10, 2018. Changes to the most recent version of the Title V permit consist of the following:

1) The Title V boilerplate was updated.

- a. Permit conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2. were updated to the most recent version of the boilerplate.

2) Title V permit section 4.0 had major changes due to 40 CFR 60 Subpart WWW changes that were published on March 26, 2020, and changes to 45CSR23 effective on June 1, 2021.

- a. The Copper Ridge Landfill is a MSWL that commenced construction, reconstruction, or modification on or after May 30, 1991, but before July 14, 2014 and is subject to the requirements of 40 CFR 60 Subpart WWW. According to 40CFR§60.750(d), an affected facility must continue to comply with 40 CFR 60 Subpart WWW until it becomes subject to the more stringent requirements in an approved and effective state or federal plan that implements 40 CFR 60 Subpart Cf or it modifies or reconstructs after July 17, 2014 and becomes subject to 40 CFR 60 Subpart XXX. 45CSR23, effective on June 1, 2021 implements 40 CFR 60 Subpart Cf, so the Copper Ridge Landfill is now subject to the requirements of 45CSR23 instead of 40 CFR 60 Subpart WWW. Therefore, Title V permit Section 4.0's former conditions from 40 CFR 60 Subpart WWW were replaced with the conditions from 45CSR§23-7. Conditions within 45CSR§23-7 for a MSWL having a design capacity less than 2.5 million megagrams or 2.5 million cubic meters were not included because the Copper Ridge Landfill exceeds these design limits.
- b. This facility is not currently required to have an active collection system and control device installed because of their NMOC emissions. They are currently Tier 2 with NMOC emissions of 22.67 Mg/yr. NMOC emissions must be reported annually, or a 5 year-projection must be provided in lieu of the annual report in accordance with condition 4.5.2.c.
- c. The reports required under conditions 4.5.1 and 4.5.2 were submitted in 2019.

d. Permit condition 4.1.9 for the asbestos disposal area was renumbered to condition 4.1.8.

3) Title V Permit Section 5.0 was added due to 40 CFR 63 Subpart AAAA changes that were published on March 26, 2020 and amended on October 13, 2020 and February 14, 2022.

a. This facility was already subject to subpart AAAA and formerly had conditions 4.1.1 and 4.1.7 dedicated to this regulation, but with the large number of changes to the regulation, the subpart AAAA requirements were moved to their own section. The Copper Ridge Landfill is subject to 40 CFR 63 Subpart AAAA because it is a major source of HAPs as defined in §63.2 of 40 C.F.R. 63 Subpart A.

Non-Applicability Determinations

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

40 C.F.R. 60 Subpart Kb	The Leachate Tank’s VOL vapor pressure is less than 3.5 kPa.
40 C.F.R. 60 Subpart IIII	The engine for the “Trackmobile” locomotive is not a “stationary” internal combustion engine as defined in 40 CFR §60.4219 of this subpart.
40 C.F.R. 63 Subpart ZZZZ	The engine for the “Trackmobile” locomotive is not a “stationary” internal combustion engine as defined in 40 CFR §63.6675 of Subpart ZZZZ.
40 C.F.R. 64 Compliance Assurance Monitoring (CAM)	The facility does not have any pollutant specific emissions units (PSEU) that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a). [i.e., (1) have pre-control 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: February 20, 2024
Ending Date: March 21, 2024

Point of Contact

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

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/414-1282
Nikki.b.moats@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)

No comments were received.