

Fact Sheet



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

Permit Number: **R30-00300036-2021**
Application Received: **July 15, 2020**
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 18
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 (MSWL) 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	2019 Actual Emissions
Carbon Monoxide (CO)	96.14	44.1
Nitrogen Oxides (NO _x)	21.07	9.8
Particulate Matter (PM _{2.5})	23.09	3.0
Particulate Matter (PM ₁₀)	26.45	18.4
Total Particulate Matter (TSP)	104.04	20.2
Sulfur Dioxide (SO ₂)	83.53	23.9
Volatile Organic Compounds (VOC)	14.32	0.31

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2019 Actual Emissions
Other HAPs	7.6	1.0
Toluene	0.7	0.7
HCl	3.2	1.1

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

Non-methane organic compounds (NMOC) – The current emission rate estimate (calculated for year 2017) is 2.6 Mg/yr. The projected closure year is 2054 with a projected maximum NMOC emission rate estimate of 4.0 Mg/yr. The projected NMOC emission rate of 34 Mg/yr, triggering the requirements for the construction of a collection and control system, is estimated to never occur based on current waste acceptance rates. The NMOC emission rate estimates were calculated using EPA’s Landfill Gas Emissions Model (LandGEM) software. The values used for k and Lo were “0.050 year⁻¹” and “170 m³/Mg” respectively. The site specific NMOC concentration used in the model was 26.7 ppmv as hexane, as determined by Tier 2 testing in September 2017.

Title V Program Applicability Basis

This facility has a design capacity over 2.5 million megagrams and 2.5 million cubic meters. Due to this facility’s design capacity, 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

	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 61	Asbestos inspection and removal
	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>)
R13-2590B	07/9/2019	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 January 21, 2016 and modified on November 16, 2018 (MM01) and September 17, 2019 (MM02). Changes to the most recent version of the Title V permit consist of the following:

- 1) **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 North Mountain Sanitary 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 North Mountain Sanitary 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 North Mountain Sanitary 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; however, they have voluntarily installed one for odor control purposes. They are currently Tier 2 with NMOC emissions of 2.6 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 condition 4.5.1 and 4.5.2 were submitted on May 22, 2019.
- d. Permit conditions 4.1.5, 4.1.6, 4.2.1-4.2.5, 4.4.2, 4.4.3, 4.5.5, and 4.5.6 were kept in the permit with updated numbering.

2) Title V Section 5 changes

- a. 40 CFR 60 Subpart Kb requirements were removed from Section 5. According to 40CFR§60.110b(b), this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa). Tank 009A and 009B have a capacity greater than 151 m³ and they store a liquid with a maximum true vapor pressure less than 3.5 kPa, therefore these tanks are not subject to 40 CFR 60 Subpart Kb.

Non-Applicability Determinations

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

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

40CFR64—Compliance Assurance Monitoring (CAM): The facility is not CAM applicable because the flare (C2) is used to control VOC and its PTE is less than 100 tons per year.

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: May 14, 2021
Ending Date: June 14, 2021

Point of Contact

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

Nikki Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41282
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)

The DAQ received a letter on May 24, 2021 from an individual regarding odors from North Mountain Sanitary Landfill. Additionally, the DAQ received a letter dated June 11, 2021 from the Berkeley County Solid Waste Authority concerning landfill gas odors from the North Mountain Sanitary Landfill. The letters requested that the applicant no longer be allowed to discharge landfill gas odors outside of the landfill's property but did not specifically raise issues with any conditions of the Title V permit. The DAQ has determined that all current applicable requirements regarding odors have been included within the Draft/Proposed permit issued on May 14, 2021; therefore, no changes were made because of the letters received.