

Fact Sheet



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

Permit Number: **R30-03300129-2022**
Application Received: **March 05, 2021**
Plant Identification Number: **033-00129**
Permittee: **S & S Landfill**
Mailing Address: **4439 Good Hope Pike, Clarksburg, WV 26301**

Revised: NA

Physical Location: Clarksburg, Harrison County, West Virginia
UTM Coordinates: 551.08 km Easting • 4341.24 km Northing • Zone 17
Directions: From I-79 take Exit 110. Follow Route 270 west towards West Milford. Go through West Milford to the junction with US Route 19. Turn right onto US Route 19 north. Follow for approximately 1.5 miles to landfill.

Facility Description

S & S Landfill is a municipal solid waste (MSW) management facility that began operation in 1975. The landfill is now closed, but previously accepted less than 10,000 TPY of waste. The final design capacity of the landfill is 2,703,987 Mg and no additional capacity remains.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	194.65	0
Nitrogen Oxides (NO _x)	10.07	0
Particulate Matter (PM _{2.5})	20.44	4.52
Particulate Matter (PM ₁₀)	39.44	5.71

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Total Particulate Matter (TSP)	195.75	47.82
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	25.95	7.59

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Total HAPs (Each individual HAP < 10 TPY)	15.8	4.63

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 2020) is 10.0 Mg/yr. The projected closure year is 2024 with a NMOC emission rate of 11.88 Mg/yr; however, the landfill stopped accepting waste in 2020. The projected NMOC emission rate of 34 Mg/yr, triggering the requirements for the construction of a collection and control system is projected to never occur. 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 183 ppmv as hexane, as determined by Tier 2 testing on December 18-20, 2019.

Title V Program Applicability Basis

This facility has the potential to emit 194.65 tons per year of carbon monoxide. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, S & S 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	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review permits for stationary sources
	45CSR16	New Source Performance Standards
	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 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>)
R13-2721	08/14/2007	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 September 06, 2016. 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 3.5.3, 3.5.5, and 3.5.6 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. Also, this landfill is shut down and most 45CSR23 requirements are no longer applicable

- a. The DAQ received a letter dated January 29, 2021, from Trinity Consultants on behalf of S & S Landfill informing us that the landfill was shut down. They last accepted waste on December 31, 2020. The last time the landfill was tested they used Tier 2 testing and had an NMOC concentration of 10.0 Mg/yr. They have never exceeded an NMOC concentration of 34 Mg/yr which would have required them to install a gas collection and control system. According to 45CSR23 Section 7.2.c.3, the owner or operator is not required to maintain an

operating permit under 45CSR30 for the MSWL after it is closed, if the landfill is not otherwise subject to the requirements of 45CSR30 and if either of the following conditions are met:

- 1) 45CSR§23-7.2.c.3.A . The landfill was never required to install and operate a gas collection and control system under subdivision 7.4 of 45CSR23.
- 2) 45CSR§23-7.2.c.3.B. The landfill meets the conditions for control system removal specified in subdivision 7.4.f.

This landfill was never required to install and operate a gas collection and control system; however, since the landfill's potential emissions of carbon monoxide exceed 100 tons per year, this facility is still required to maintain their Title V permit because they are a major source of criteria pollutant.

The only 45CSR23 requirement S & S is still subject to is the submittal of a closure report as specified in condition 4.5.1.

- b. Permit conditions 4.1.5, 4.1.6, and 4.1.7 were kept in the permit and moved to conditions 4.1.1, 4.1.2, and 4.1.3.

3) Permit conditions were removed from permit section 5.0

- a. Permit condition 5.1.10 was removed since it is a requirement from NSPS Subpart WWW, which the facility is no longer subject to.
- b. Permit conditions 5.1.11 – 5.1.15 were removed because it is stated in 40 CFR §60.18(a)(1) that the requirements are for control devices used to comply with the applicable subparts of 40 CFR 60. S & S have not triggered the requirements for a control device under the landfill NSPS and are no longer subject to the landfill NSPS, so these conditions have been removed.
- c. Conditions 5.2.2 and 5.4.2 were removed since the facility is closed and never had to install a collection and control system. Also, this facility is no longer subject to NSPS Subpart WWW.
- d. Conditions 5.4.3 and 5.4.4 were removed because the facility is no longer subject to NSPS Subpart WWW.

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. 64 – 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.

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) and has estimated uncontrolled emissions less than 50 megagrams per year (Mg/yr) NMOC; 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: January 12, 2022

Ending Date: February 11, 2022

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)

Not applicable.