

Fact Sheet



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

Permit Number: **R30-10300034-2022**
Application Received: **October 5, 2021**
Plant Identification Number: **03-54-10300034**
Permittee: **Lackawanna Transport Company**
Facility Name: **dba Wetzel County Sanitary Landfill**
Mailing Address: **Route 1, P.O. Box 156A, New Martinsville, WV 26155**

Physical Location: New Martinsville, Wetzel County, West Virginia
UTM Coordinates: 512.33 km Easting • 4383.75 km Northing • Zone 17
Directions: From the city of New Martinsville take Route 2 South. Go one mile south. Turn left onto Rt. 180 to the landfill.

Facility Description

The Lackawanna Transport Company dba Wetzel County Sanitary Landfill (WCSL) (NAICS 562212, SIC 4953) is a non-hazardous municipal solid waste (MSW) landfill that began operation in 1960. The facility is a 238-acre municipal solid waste landfill. The disposal area is 139 acres. The maximum monthly tonnage accepted is 9,999 tons/month. The landfill accepts municipal solid waste, asbestos, construction/demolition debris (CDD), and approved residual waste. There is also a biosolids composting facility at the landfill, which has been in operation since 2001.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2021 Actual Emissions
Carbon Monoxide (CO)	18.60	1.54
Nitrogen Oxides (NO _x)	79.53	5.39
Particulate Matter (PM _{2.5})	1.28	0.61
Particulate Matter (PM ₁₀)	8.52	4.03
Total Particulate Matter (TSP)	50	4.03
Sulfur Dioxide (SO ₂)	14.59	<0.01
Volatile Organic Compounds (VOC)	36.22	5.39

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2021 Actual Emissions
Acrylonitrile	0.27	0.13
Benzene	0.12	0.06
Xylene	1.04	0.48
Methyl Isobutyl Ketone	0.15	0.07
Toluene	2.94	1.36
Vinyl Chloride	0.37	0.17
Carbon Disulfide	0.42	0.01
Triethylamine*	0.44	0.99

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

* - Triethylamine is reported for the year 2021 as having an actual emissions of 0.99 tpy; however, this is believed to be in error since the only process that emits triethylamine is reported in the State and local Emissions Inventory System (SLEIS) as having ran for 0 hours across the entirety of the last several years and the 45CSR13 limit in section 7.0 of the permit for this process is 0.44 tpy.

Non-methane organic compounds (NMOC) – The current emission rate estimate (calculated and sent as part of the permit application) is 23.8 Mg/yr. The projected closure year is 2060 with a projected maximum NMOC emission rate estimate of 25.7 Mg/yr. The projected NMOC emission rate of 34 Mg/yr, triggering the requirements for the construction of a collection and control system will not occur within the lifespan of the landfill. 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 214 ppmv as hexane, as determined by Tier 2 testing on December 4-5, 2018.

Title V Program Applicability Basis

This facility has a design capacity over 2.5 million megagrams and 2.5 million cubic meters. Therefore, Lackawanna Transport Company dba Wetzel County Sanitary Landfill (WCSL) 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.
	45CSR7	To prevent and control particulate air pollution from manufacturing process operations.
	45CSR13	Construction permit requirement.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. Part 60
	45CSR23	To Prevent and Control Emissions from Municipal Solid Waste Landfills
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60 Subpart OOO	Standards of Performance for nonmetallic mineral processing plants
	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 (if any)
R13-2463	May 15, 2002	
R13-2476A	December 17, 2004	
R13-2731	May 7, 2007	

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 April 17, 2017. Changes to the most recent version of the Title V permit consist of the following:

- Section 3.0
 - Permit conditions 3.5.3, 3.5.5, and 3.5.6 were updated to the most recent version of the boilerplate.
- 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.
 - The Wetzel County 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 Wetzel County 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 Wetzel County Sanitary Landfill exceeds these design limits.
 - 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 23.8 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.
 - The reports required under conditions 4.5.1 and 4.5.2 were submitted in 2019.
 - Permit condition 4.1.10 was renumbered to condition 4.1.8.
- Section 5.0
 - Former conditions 5.1.10, 5.2.2, 5.4.2, and 5.4.3 were removed from the permit since the facility is now subject to 45CSR23 instead of 40 CFR 60 Subpart WWW due to the changes published to Subpart WWW on March 26, 2020.
 - CO-R23-E-2002-05 has been executed and further inspections haven't shown any additional noncompliance, and for archaic consent orders, there were no completion dates or close-outs. It has been determined that this consent order now points to 45CSR23 conditions contained with section 4.0 instead of 40 CFR 60 Subpart WWW where applicable.

- Former conditions 5.1.16, 5.1.17, 5.4.4, and 5.4.5 were removed from the permit because the facility is no longer subject to 40 CFR 63 Subpart AAAA and no longer required to have a gas collection and control system (GCCS) plan. The facility started using Tier 2 procedures in December 2018 which lowered their NMOC emissions to below 50 Mg/yr.

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 XXX - Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014. This subpart does not apply to the facility since it has not been constructed, reconstructed or modified after July 17, 2014.

40 C.F.R. Part 64 - This is the fourth permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first renewal since the facility did not have any pollutant specific emissions units (PSEU) that satisfied all of the applicability criteria requirements of 40 CFR § 64.2 (a). and there have been no changes at the facility that have triggered CAM applicability since.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

None.

Comment Period

Beginning Date: August 3, 2022

Ending Date: September 2, 2022

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
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.