

# Fact Sheet



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

Permit Number: **R30-10700121-2016**  
Application Received: **October 1, 2015**  
Plant Identification Number: **03-54-10700121**  
Permittee: **Northwestern Landfill, Inc.**  
Facility Name: **Parkersburg**  
Mailing Address: **510 East Dry Run Road, Parkersburg, WV 26104**

*Revised: NA*

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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

Northwestern Landfill is a municipal solid waste landfill that began operation in 1975. Northwestern Landfill, Inc. owns 349 acres of land bordered by US Route 50 to the North and I-77 to the West. The facility has 133.21 acres permitted for the disposal of solid waste and receives approximately 15,000 to 25,000 tons of waste per month. 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.

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2013 Actual Emissions
Carbon Monoxide (CO)	153.53	11.69
Nitrogen Oxides (NO <sub>x</sub> )	27.51	6.28
Particulate Matter (PM <sub>2.5</sub> )	22.94	NA

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<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2013 Actual Emissions</b>
Particulate Matter (PM <sub>10</sub> )	37.55	NA
Total Particulate Matter (TSP)	199.03	78.83
Sulfur Dioxide (SO <sub>2</sub> )	6.96	1.35
Volatile Organic Compounds (VOC)	25.54	10.16

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2013 Actual Emissions</b>
Toluene	5.178	NA
Xylenes	1.836	NA
Methylene Chloride	1.714	NA
Total HAPs	14.43	8.92

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

*All other HAPs are components of landfill gas with PTE less than one (1) tpy. The PTE was calculated using the USEPA LandGEM model. Potential NMOC emissions are 496.78 Mg/year.*

<b>Other Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2013 Actual Emissions</b>
Carbon Dioxide	32,054	NA
Methane	11,558	NA
NMOC	496.78 Mg	NA

### **Title V Program Applicability Basis**

This facility has the potential to emit 153.53 tpy of carbon monoxide; is subject to 40 C.F.R. 60 Subpart WWW; and has design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, being subject to 40 C.F.R. 60 Subpart WWW, and due to its design capacity, Northwestern Landfill, 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
	45CSR17	To Prevent and Control Particulate Matter Air Pollution from Materials Handling,

	45CSR23	Preparation, Storage and other sources of Fugitive Particulate Matter
	WV Code § 22-5-4 (a) (14)	To Prevent and Control Emissions from Municipal Solid Waste Landfills
	45CSR30	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR34	Operating permit requirement.
	40 C.F.R. Part 60 Subpart WWW	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 61 Subpart M	Standard of Performance for Municipal Solid Waste Landfills
	40 C.F.R. Part 63 Subpart AAAA	National Emission Standard for Asbestos
	40 C.F.R. Part 82 Subpart F	NESHAPs-MACT for Municipal Solid Waste Landfills
State Only:	45CSR4	Ozone depleting substances
		No objectionable odors.

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> )
R13-2592B	09/13/2010	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**

**Previously Registered under the General Permit**

Previously, this facility had been registered under the General Permit for Municipal Solid Waste Landfills (R30-MSWLGP-2011-10700121). With this renewal, the facility was not registered under the General Permit, and the General Permit for Landfills will not be renewed. Instead, it was issued a standard Title V Operating Permit. This required numerous formatting changes and the permit was rewritten for the standard Title V permit format.

**Section 4.0: Requirements for Landfill Operations**

Section 4.0 of this permit was written to address the requirements for the Landfill Operations [Emission Unit IDs: 01-C1, 01-C2, 01-C3, 01-C4, 01-A1, 01-F1]. The table below summarizes each permit condition's contents, regulatory citations, and NSR permit citations:

Condition Number	Summary of Requirements	Regulatory Citation	R13-2592B Condition
4.1.1	Requirements When Reported NMOC Emission Rate is $\geq$ 50 Mg/yr.	45CSR23, 40 C.F.R. §60.757, and 40 C.F.R. §60.754(a)(3)	N/A
4.1.2	Requirements When Reported NMOC Emission Rate is $\geq$ 50 Mg/yr. (when using site specific C <sub>NMOC</sub> )	45CSR23, 40 C.F.R. §60.757 and 40 C.F.R. §60.754(a)(4)	N/A
4.1.3	Installation of a landfill gas collection and control system	45CSR23, 40 C.F.R. §60.752, and 40 C.F.R. §60.753	N/A
4.1.4	LFG Collection and Control System Design Plan	45CSR23 and 40 C.F.R. §60.757(c)	N/A
4.1.5	Compliance dates for 40 C.F.R. 63 Subpart AAAAA	45CSR34, 40 C.F.R. §§63.1945(a),(b),(e), and (f)	N/A
4.1.6	40 C.F.R 63 Subpart AAAAA requires compliance with 40 C.F.R. 60 Subpart WWW	45CSR34, 40 C.F.R. §63.1955(a)(1)	N/A
4.1.7	Contains compliance requirements for 40 C.F.R. 63 Subpart AAAAA if required to install a collection and control system.	45CSR34, 40 C.F.R. §63.1955(b)	N/A
4.1.8	Asbestos standards for active waste disposal sites.	45CSR34, 40 C.F.R. §61.154	NA
4.4.1	Records of all emission data and operating parameters	45CSR23 and 40 C.F.R. §60.758	N/A
4.5.1	Annual NMOC Emission Report	45CSR23 and 40 C.F.R. §60.757(b)	N/A
4.5.2	5-year NMOC Report	45CSR23 and 40 C.F.R. §60.757(b)(1)(ii)	N/A
4.5.3	Revision of 5-year NMOC Report	45CSR23 and 40 C.F.R. §60.757(b)(1)(ii)	N/A
4.5.4	Closure Report	45CSR23 and 40 C.F.R. §60.757(d)	N/A

**Section 5.0: Requirements for Landfill Gas Flare [LGF-1]**

Section 5.0 of this permit was written to address the Landfill Gas Flare (LGF-1).The table below summarizes each permit condition’s contents, regulatory citations, and NSR permit citations:

Condition Number	Summary of Requirements	Regulatory Citation	R13-2592B Condition
5.1.1	Operations and limits for active gas collection system and non-assisted flare	45CSR13, 45CSR§§6-4.1 and 4.3	4.1.1
5.1.2	Operation and Maintenance of Air Pollution Control Equipment	45CSR13, 45CSR§13-5.11.	4.1.2
5.2.1	Visible Emissions Checks	45CSR13	4.2.1
5.2.2	Continuous flame monitoring	45CSR13	4.2.2
5.2.3	Landfill Gas throughput monitoring	45CSR13	4.2.3
5.4.1	Record of Maintenance of Air Pollution Equipment.	45CSR13	4.4.2
5.4.2	Record of Malfunctions of Air Pollution Control Equipment.	45CSR13	4.4.3
5.4.3	Records of VE Checks	45CSR13	4.4.4
5.4.4	Records of periods when flame was absent	45CSR13	4.4.5
5.4.5	Records of VE Opacity tests	45CSR13	4.4.6
5.4.6	Records of dates when flares are put into or out of operation	45CSR13	4.4.7
5.5.1	Reporting of exceedance of allowable VE limit	45CSR13	4.5.1
5.5.2	Submit testing results	45CSR13	4.5.2

## **Non-Applicability Determinations**

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

40 CFR 60, Subpart Kb – All of the tanks at this facility were constructed after July 23, 1984 but have a design capacity less than 75 m<sup>3</sup>. Therefore, none of the tanks at this facility are subject to 40 C.F.R. 60 Subpart Kb.

40CFR§60.757(a)(3): The design capacity of this facility is greater than 2.5 million megagrams and 2.5 million cubic meters. Therefore, amended design capacity reports are not required.

40 C.F.R. 64 – Compliance Assurance Monitoring. This facility does not have a pollutant specific emissions unit with a control device used to meet an applicable standard or limit. 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: Friday, March 11, 2016  
Ending Date: Monday, April 11, 2016

## **Point of Contact**

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

Robert Mullins  
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. 1243 • Fax: 304/926-0478  
Robert.A.Mullins@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.