



Moats, Nikki B <nikki.b.moats@wv.gov>

S&S Landfill Closure Report

1 message

Boehm, Richard A <richard.a.boehm@wv.gov>

Tue, Dec 14, 2021 at 8:19 AM

To: Nikki B Moats <nikki.b.moats@wv.gov>

Attached is the closure report submitted by Trinity on behalf of S&S Landfill.

--

Rich Boehm

Engineer

Division of Air Quality

West Virginia Department of Environmental Protection

304-926-0499 ext. 41246

304-926-0479 fax



Closure Report 1-29-21.pdf

549K



15 Roszel Rd, Ste 105, Princeton, NJ 08540 / P 609.318.5500 / trinityconsultants.com

January 29, 2021

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304



*RE: Landfill Closure Report as required by the MSW Landfill NSPS
Permit ID Number: R30-03300129-2016
Facility ID Number: 033-00129*

Dear Director:

On behalf of S&S Landfill (Plant Identification Number 033-00129), Trinity Consultants is submitting this closure report in accordance with Condition 4.5.4 of Permit Number R30-03300129-2016.

S&S Landfill is currently regulated according to the MSW Landfill NSPS. Under the requirements of the regulations, S&S Landfill must submit a Landfill Closure Report within 30 days of ceasing to accept MSW. The last day of waste acceptance was December 31, 2020. The closure is intended to be permanent.

The design capacity of the landfill is 2,703,987 Mg. The estimated quantity of refuse-in-place is 2,703,987 Mg (based on 2,980,635 tons received). Therefore, there is no additional capacity.

Also note that S&S Landfill is not required to comply with the substantive landfill gas collection and control requirements under the MSW Landfill NSPS.

If you have any questions or comments about the information presented in this letter, please do not hesitate to email me at mtrupin@trinityconsultants.com or call me at 609.318.5500 x1755.

Sincerely,

TRINITY CONSULTANTS

Michael Trupin
Principal Consultant

CC: U.S.E.P.A. Region III (Philadelphia)

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203



Moats, Nikki B <nikki.b.moats@wv.gov>

RE: S & S landfill closure question

14 messages

Moats, Nikki B <Nikki.B.Moats@wv.gov>
To: Michael Trupin <mtrupin@trinityconsultants.com>

Thu, Apr 1, 2021 at 11:26 AM

Hey Mike,

I just wanted to give you a heads up that I'm going to forward this to the inspector so that he'll be able to join in the teams meeting as well.

Nikki

-----Original Appointment-----

From: Michael Trupin <mtrupin@trinityconsultants.com>

Sent: Thursday, April 1, 2021 11:16 AM

To: Moats, Nikki B; Michael Runner (mrunner@wm.com); Joyce Lish

Cc: Steven M. Niehoff - Waste Management (sniehoff@wm.com)

Subject: S & S landfill closure question

When: Monday, April 5, 2021 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Microsoft Teams Meeting

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

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+1 469-844-7998,,996283109# United States, Dallas

Phone Conference ID: 996 283 109#

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From: Michael Trupin
Sent: Thursday, April 1, 2021 11:12 AM
To: Moats, Nikki B <Nikki.B.Moats@wv.gov>
Cc: Michael Runner (mrunner@wm.com) <mrunner@wm.com>; Steven M. Niehoff - Waste Management (sniehoff@wm.com) <sniehoff@wm.com>; Joyce Lish <JLish@trinityconsultants.com>
Subject: RE: S & S landfill closure question

Hey Nikki.

Thanks for your note. We sincerely appreciate you addressing this observation/comment from our Title V Operating Permit Renewal application.

We should likely include landfill representatives in any planned discussion. I'm not sure of everyone's availability, but I'll start with Monday (4/5) at 2:30 PM as a suggestion. Does that work?

Thanks!

Mike

Michael A. Trupin

Principal Consultant

Manager of Consulting Services (NJ)

P 609-318-5500 x1755 M 215-478-1886

Email: mtrupin@trinityconsultants.com

[15 Roszel Road, Suite 105 Princeton, NJ 08540](#)



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From: Moats, Nikki B <Nikki.B.Moats@wv.gov>
Sent: Thursday, April 1, 2021 10:52 AM
To: Michael Trupin <mtrupin@trinityconsultants.com>
Subject: S & S landfill closure question

Hello Mike,

If you've got a few minutes sometime today or next week, could we talk about the S&S landfill closure in Clarksburg, WV and whether or not the Title V and Rule 13 permits are actually needed anymore?

I'm available Monday-Thursday 7:00 – 17:00, I just have a meeting next Monday from 10:30 – 12:00.

Thanks,

Nikki B. Moats

Title V Permit Engineer

304-926-0499 ext 41282

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender's name, sender's email address and know the content is safe.

Michael Trupin <mtrupin@trinityconsultants.com>
To: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>

Thu, Apr 1, 2021 at 11:42 AM

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10-4....no problem. Thanks!

[Quoted text hidden]

Moats, Nikki B <Nikki.B.Moats@wv.gov>
To: Michael Trupin <mtrupin@trinityconsultants.com>

Tue, Apr 27, 2021 at 8:27 AM

Hello Mike,

It's been a few weeks, I just wanted to check in and see if you had any sort of timeframe you could give me on that information to update the R13 in order to possibly no longer have a Title V permit.

Thanks,

Nikki B. Moats

Title V Permit Writer

304-926-0499 ext 41282

[Quoted text hidden]

Michael Trupin <mtrupin@trinityconsultants.com>

Mon, May 3, 2021 at 3:40 PM

To: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>

Cc: "Michael Runner (mrunner@wm.com)" <mrunner@wm.com>, "Steven M. Niehoff - Waste Management (sniehoff@wm.com)" <sniehoff@wm.com>, Joyce Lish <JLish@trinityconsultants.com>

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Hi Nikki.

I'm sending the updated vent flare CO emission calculation to WM for review this afternoon. The emissions will show just under 70 TPY of CO emissions from the twelve (140 cfm each) flares. As discussed, CO PTE will definitely be under 100 TPY for the flares (and the facility). After we forward the calculations to you for review, please let us know how you would like to proceed (regarding the Title V Operating Permit renewal process).

Thank you very much!

[Quoted text hidden]

Moats, Nikki B <Nikki.B.Moats@wv.gov>

Mon, May 3, 2021 at 3:46 PM

To: Michael Trupin <mtrupin@trinityconsultants.com>

Mike,

Thanks for the update. After receiving the information, I know our first plan is to hold a meeting with R13 and Enforcement to look through everything as a group to make sure that we aren't missing anything. I'll let you know about our plans beyond that once the meeting has taken place.

Thanks,

Nikki

[Quoted text hidden]

Michael Trupin <mtrupin@trinityconsultants.com>

Wed, May 5, 2021 at 8:08 AM

To: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>

Cc: "Michael Runner (mrunner@wm.com)" <mrunner@wm.com>, Joyce Lish <JLish@trinityconsultants.com>, "Steven M. Niehoff - Waste Management (sniehoff@wm.com)" <sniehoff@wm.com>

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Hi Nikki.

As mentioned below, please see the attached potential to emit for the passive landfill gas vent flares at S&S Landfill. For future permitting purposes, the facility will utilize this CO PTE (69.25 TPY) instead of the 188.75 TPY listed in the current Title V Operating Permit. The attached calculations are consistent with manufacturer and

industry practices.

We look forward to working with you to document the facility as no longer being Title V applicable.

[Quoted text hidden]

 **20210503-clc-S-S Vent Flare Emissions v1.xlsx**
18K

Moats, Nikki B <Nikki.B.Moats@wv.gov>
To: "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

Thu, May 6, 2021 at 9:56 AM

I got this from S&S landfill yesterday. Do we want to set up a meeting sometime next week with Rich, Jesse, James, and Bev to see what we might need to have them do to not need a Title V permit anymore?

[Quoted text hidden]

 **20210503-clc-S-S Vent Flare Emissions v1.xlsx**
18K

McCumbers, Carrie <carrie.mccumbers@wv.gov>
To: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>

Thu, May 6, 2021 at 10:01 AM

Yes. Do you want to set up the meeting or do you want me to? Do you have any background info to send them prior to the meeting or at least send them this email thread?

[Quoted text hidden]

Moats, Nikki B <Nikki.B.Moats@wv.gov>
To: "McCumbers, Carrie" <carrie.mccumbers@wv.gov>

Thu, May 6, 2021 at 10:09 AM

There's not really too much background info to give, they're just closed now and want to no longer be a part of Title V, which would require a R13 permit mod. I would definitely let them see the e-mail thread though, and I can send the actual excel sheet they sent me over teams if anyone wants to see it. I would appreciate if you could set up the meeting, since you've likely already got sections of your schedule where you already have meetings.

[Quoted text hidden]

Moats, Nikki B <Nikki.B.Moats@wv.gov>
To: Michael Trupin <mtrupin@trinityconsultants.com>
Cc: "Michael Runner (mrunner@wm.com)" <mrunner@wm.com>, Joyce Lish <JLish@trinityconsultants.com>, "Steven M. Niehoff - Waste Management (sniehoff@wm.com)" <sniehoff@wm.com>

Mon, May 10, 2021 at 1:55 PM

Mike,

We've had our meeting about this today. Everything lines up on the end of Title V as long as you can get a Rule 13 permit modification through. As for what all you need to show within the Rule 13 permit modification, after talking with Beverly McKeone, the engineer senior and supervisor for R13, here's what her response was to what we've gotten so far in comparison to what they'll need for R13.

"That is not sufficient. We permitted based on what they told us was their PTE. They have to show something

more to prove their PTE is less (and always has been). The permit is more than 13 years old - so they can't use "calculations consistent with manufacturer and industry practices" from today. Also, They really don't explain what has changed or is different. Is it the flow rate? The methane content of the LFG? do they have a new emission factor? They have to back it up. They can't just reduce emissions by more than half."

I don't believe they'll want you to go through an actual minor modification and instead use one of the classes of administrative amendment; however, it may be best to talk to her directly to see what all things they may accept in R13 to get that number lowered within a modification/admin amendment.

Her extension is 41280 (the same phone number as in my signature) and her e-mail is beverly.d.mckeone@wv.gov

If you've got any Title V questions, feel free to contact me instead.

Sincerely,

Nikki B. Moats

Title V Permit Engineer

304-926-0499 ext 41282

[Quoted text hidden]

Michael Trupin <mtrupin@trinityconsultants.com>

Tue, May 11, 2021 at 5:57 PM

To: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>

Cc: "Michael Runner (mrunner@wm.com)" <mrunner@wm.com>, Joyce Lish <JLish@trinityconsultants.com>, "Steven M. Niehoff - Waste Management (sniehoff@wm.com)" <sniehoff@wm.com>

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Thanks Nikki!

I'll plan to reach out to her to set up a call. I really appreciate your help.

Have a great evening!

[Quoted text hidden]

Michael Trupin <mtrupin@trinityconsultants.com>

Wed, Oct 20, 2021 at 2:32 PM

To: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>

Cc: "Michael Runner (mrunner@wm.com)" <mrunner@wm.com>, Joyce Lish <JLish@trinityconsultants.com>, "beverly.d.mckeone@wv.gov" <beverly.d.mckeone@wv.gov>

Hi Nikki

Per our recent phone calls, I called Beverly McKeone and left a message this afternoon. I'm sure both Beverly and I will update you following a conversation on documenting S&S Landfill as a non-major (i.e., non-Title V) facility.

Thanks for you continued assistance!

[Quoted text hidden]

McKeone, Beverly D <beverly.d.mckeone@wv.gov>

Thu, Oct 21, 2021 at 8:46 AM

To: Michael Trupin <mtrupin@trinityconsultants.com>

Cc: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>, "Michael Runner (mrunner@wm.com)" <mrunner@wm.com>, Joyce Lish <JLish@trinityconsultants.com>, Bev McKeone <beverly.d.mckeone@wv.gov>, Carrie McCumbers <carrie.mccumbers@wv.gov>

Mike,

I did not receive a phone call (or message yesterday). Please call me at 681-313-9077. This is my mobile number (I am working from Home) and we can discuss.

Bev

[Quoted text hidden]

Michael Trupin <mtrupin@trinityconsultants.com>

Thu, Oct 21, 2021 at 9:53 AM

To: "McKeone, Beverly D" <beverly.d.mckeone@wv.gov>

Cc: "Moats, Nikki B" <Nikki.B.Moats@wv.gov>, "Michael Runner (mrunner@wm.com)" <mrunner@wm.com>, Joyce Lish <JLish@trinityconsultants.com>, Carrie McCumbers <carrie.mccumbers@wv.gov>

Hi Bev.

I just left you a voicemail on the mobile number. It sounds like you may have been on another call. Per my message, I'm in good shape before 12 today or most any time tomorrow.

Thanks!

Mike

Michael A. Trupin

Principal Consultant

Manager of Consulting Services (NJ)

P 609-318-5500 x1755 M 215-478-1886

Email: mtrupin@trinityconsultants.com

15 Roszel Road, Suite 105 Princeton, NJ 08540



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Division of Air Quality Permit Application Submittal

Please find attached a permit application for :

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only):
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only):

• Type of NSR Application (check all that apply):

- Construction
- Modification
- Class I Administrative Update
- Class II Administrative Update
- Relocation
- Temporary
- Permit Determination

• Type of 45CSR30 (TITLE V) Application:

- Title V Initial
- Title V Renewal
- Administrative Amendment**
- Minor Modification**
- Significant Modification**
- Off Permit Change

**If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.

• Payment Type:

- Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
- Check (Make checks payable to: WVDEP – Division of Air Quality)

Mail checks to:
WVDEP – DAQ – Permitting
Attn: NSR Permitting Secretary
601 57th Street, SE
Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

• If the permit writer has any questions, please contact (all that apply):

- Responsible Official/Authorized Representative

- Name:
- Email:
- Phone Number:

- Company Contact

- Name:
- Email:
- Phone Number:

- Consultant

- Name:
- Email:
- Phone Number:

March 5, 2021

Ms. Laura M. Crowder, Director
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

*RE: S & S Landfill – Clarksburg, West Virginia
Title V Operating Permit No. R30-03300129-2016
Title V Permit Renewal Application*

VIA E-MAIL: DEPAirQualityPermitting@wv.gov

Dear Ms. Crowder:

Enclosed please find a complete application for the renewal of the Title V Operating Permit (TVOP) referenced above for the S & S Landfill (Landfill) in Clarksburg, West Virginia. This facility is located in Harrison County, West Virginia. The Landfill is currently operating in accordance with West Virginia Department of Environmental Protection (WVDEP) Division of Air Quality Title V Operating Permit R30-03300129-2016 renewed on September 6, 2016. The Operating Permit expires on September 6, 2021.

The Landfill wishes to inform the WVDEP that the TVOP will need to be updated for consistency with the extensive rule changes within 45 CSR 23, which became effective June 1, 2018.¹ These rule changes were finalized when West Virginia developed an initial State Plan to address the Emission Guidelines (NSPS/EG) Subpart Cf in 2018.

Also, 40 CFR Subpart WWW actually will not apply to the Landfill after September 2021 due to recent NSPS and NESHAP rule changes for landfills. 45 CSR 23 will be the applicable regulation for the Landfill. Through this submittal, we would also like to notify the WVDEP that, per 45 CSR 23-7.2.c.3.A, the facility is closed, was never required to install or operate a gas collection and control system and once the facility-wide potential to emit (PTE) can be updated to below major source (Title V) thresholds (for CO and TSP), a Title V Operating Permit will no longer be required. We are requesting that the final 2021 Renewal document include a CO and TSP PTE of less than 100 TPY.

Due to the apparent insignificant nature of the many tanks/wells listed as Miscellaneous Sources in the Title V Operating Permit, we are requesting that the Department consider removing these sources as formal emission units from within the permit. There are no substantive requirements for these sources within the Operating Permit.

¹ Please also note that the public comment period for further rule changes (to 45 CSR 23), based on revisions to the federal performance and emission standards for MSW landfills, ended on July 28, 2020. Once finalized, these additional rule changes will likely need incorporation into this Title V Operating Permit Renewal.

Ms. Laura M. Crowder - Page 2
March 5, 2021

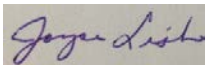
Attached with this cover letter, please find one (1) PDF copy of the complete permit application package, including a signed copy of the required signatory page. This package contains the following:

- ▶ Table of Contents
- ▶ Title V Permit Application Checklist
- ▶ General Application Forms
- ▶ Attachment A – Area Map
- ▶ Attachment B – Plot Plan
- ▶ Attachment C – Process Flow Diagrams
- ▶ Attachment D – Title V Equipment Table
- ▶ Attachment E – Emission Unit Forms
- ▶ Attachment G – Air Pollution Control Form

If you need further clarification or information on any aspect of the renewal application, please contact me by phone at (412) 737-6568, or via email at jlsh@trinityconsultants.com. Thank you for working with us in reviewing this submittal.

Sincerely,

TRINITY CONSULTANTS



Joyce Lish
Senior Consultant

Enclosures:

CC: Michael Runner, Waste Management (via email)
Craig Arnold, Waste Management (via email)
Michael Trupin, Trinity Consultants (via email)

Division of Air Quality Permit Application Submittal

Please find attached a permit application for :

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only):
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only):

• **Type of NSR Application (check all that apply):**

- Construction
- Modification
- Class I Administrative Update
- Class II Administrative Update
- Relocation
- Temporary
- Permit Determination

• **Type of 45CSR30 (TITLE V) Application:**

- Title V Initial
- Title V Renewal
- Administrative Amendment**
- Minor Modification**
- Significant Modification**
- Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENTS to the combined NSR/Title V application.**

• **Payment Type:**

- Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
- Check (Make checks payable to: WVDEP – Division of Air Quality)

Mail checks to:
WVDEP – DAQ – Permitting
Attn: NSR Permitting Secretary
601 57th Street, SE
Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

• **If the permit writer has any questions, please contact (all that apply):**

Responsible Official/Authorized Representative

- **Name:**
- **Email:**
- **Phone Number:**

Company Contact

- **Name:**
- **Email:**
- **Phone Number:**

Consultant

- **Name:**
- **Email:**
- **Phone Number:**

TITLE V RENEWAL

Waste Management – S & S Landfill

Title V Permit Renewal Application/ Clarksburg, West Virginia

Prepared By:

TRINITY CONSULTANTS
Pittsburgh Office
4500 Brooktree Road
Suite 310
Wexford, PA 15090
(724) 935-2611

March 2021

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**TITLE V PERMIT APPLICATION CHECKLIST
FOR ADMINISTRATIVE COMPLETENESS**

A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a Title V permit application. Any submittal will be considered incomplete if the required information is not included.*	
	A signed copy of the application (“Certification” page must be signed and dated by a Responsible Official as defined in 45CSR30)
	*Table of Contents (needs to be included but not for administrative completeness)
	Facility information
	Description of process and products, including NAICS and SIC codes, and including alternative operating scenarios
	Area map showing plant location
	Plot plan showing buildings and process areas
	Process flow diagram(s), showing all emission units, control equipment, emission points, and their relationships
	Identification of all applicable requirements with a description of the compliance status, the methods used for demonstrating compliance, and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the source is not in compliance
	Listing of all active permits and consent orders (if applicable)
	Facility-wide emissions summary
	Identification of Insignificant Activities
	ATTACHMENT D – Title V Equipment Table completed for all emission units at the facility except those designated as insignificant activities
	ATTACHMENT E – Emission Unit Form completed for each emission unit listed in the Title V Equipment Table (ATTACHMENT D) and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the emission unit is not in compliance
	ATTACHMENT G – Air Pollution Control Device Form completed for each control device listed in the Title V Equipment Table (ATTACHMENT D)
	ATTACHMENT H – Compliance Assurance Monitoring (CAM) Plan Form completed for each control device for which the “Is the device subject to CAM?” question is answered “Yes” on the Air Pollution Control Device Form (ATTACHMENT G)
	General Application Forms signed by a Responsible Official
	Confidential Information submitted in accordance with 45CSR31

11. Mailing Address		
Street or P.O. Box: 4439 Good Hope Pike		
City: Clarksburg	State: WV	Zip: 26301-
Telephone Number: (304) 745-3234	Fax Number: (304) 745-4840	

12. Facility Location		
Street: 4439 Good Hope Pike	City: Clarksburg	County: Harrison
UTM Easting: 551.08 km	UTM Northing: 4,341.24 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: From I-79 take exit 110. Follow WV 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 approximately 1.5 miles to the landfill on the right.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). Pennsylvania Maryland	
Is facility located within 100 km of a Class I Area¹? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the area(s). Otter Creek Wilderness Area Dolly Sods Wilderness Area	
If no, do emissions impact a Class I Area¹? <input type="checkbox"/> Yes <input type="checkbox"/> No		
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and James River Face Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: Adam Finley		Title: Director of Disposal Operations Senior District Manager
Street or P.O. Box: 100 Rangos Lane		
City: Washington	State: PA	Zip: 15301-
Telephone Number: (724) 206-7940	Fax Number:	
E-mail address: afinley@wm.com		
Environmental Contact: Michael Runner		Title: Mgr. Environmental Protection
Street or P.O. Box: 1488 Dawson Drive, Suite 101		
City: Bridgeport	State: WV	Zip: 26330-
Telephone Number: (681) 758-5719	Fax Number:	
E-mail address: mrunner@wm.com		
Application Preparer: Joyce Lish		Title: Senior Consultant
Company: Trinity Consultants, Inc.		
Street or P.O. Box: 4500 Brooktree Road, Suite 310		
City: Wexford	State: PA	Zip: 15090-
Telephone Number: (412)737-6568	Fax Number:	
E-mail address: jlish@trinityconsultants.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Sanitary Landfill	Waste disposal	562212	4953

Provide a general description of operations.

The S & S Grading, Inc. S & S is a municipal solid waste landfill (MSW) facility that began operation in 1975. The facility is 65.87 acres. 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.

- 15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.
- 16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."
- 17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS	<input type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	

19. Non Applicability Determinations
<p>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</p> <p>40CFR60.757(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.</p> <p>40CFR64.</p> <p>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.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p>

19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

- 45CSR§6-3.1. – Open burning
- 45CSR§6-3.2. – Open burning exemptions
- 40 C.F.R. §61.145(b) and 45CSR34 – Asbestos
- 45CSR§4-3.1. State-Enforceable only – Odor
- 45CSR§11-5.2. – Standby plan for reducing emissions
- W.Va. Code § 22-5-4(a)(14) – Emission inventory
- 40 C.F.R. 82, Subpart F – Ozone-depleting substances
- 45CSR§17-3.1. – Fugitive particulate matter

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- W.Va. Code § 22-5-4(a)(15) and 45CSR13 – Stack testing
- 45CSR§30-5.1.c.2.A. – Monitoring information
- 45CSR§30-5.1.c.2.B. – Retention of records
- 45CSR§30-5.1.c. State-Enforceable only – Odors
- 45CSR§30-5.1.c. Monitor dust control systems and maintain records of dust control
- 45CSR§§30-4.4. and 5.1.c.3.D. – Responsible official
- 45CSR§30-5.1.c.3.E. – Reporting requirements for confidential information
- 45CSR§30-8. – Certified emissions statement
- 45CSR§30-5.3.e. – Compliance certification
- 45CSR§30-5.1.c.3.A. – Semi-annual monitoring reports
- 45CSR§30-5.1.c.3.C. - Deviations
- 45CSR§30-5.1.c.3.B. – Reporting of deviations
- 45CSR§30-4.3.h.1.B. – New applicable requirements

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	<100 TPY*
Nitrogen Oxides (NO _x)	10.07
Lead (Pb)	
Particulate Matter (PM _{2.5}) ¹	20.44
Particulate Matter (PM ₁₀) ¹	39.44
Total Particulate Matter (TSP)	<100 TPY*
Sulfur Dioxide (SO ₂)	
Volatile Organic Compounds (VOC)	25.95
Hazardous Air Pollutants ²	Potential Emissions
Total HAPs (each HAP < 10tpy)	15.8
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Hydrogen Sulfide	1.60
Carbon Dioxide (CO ₂)	33,113
NMOC	77.81 Mg
Methane	12,069
<p>¹PM_{2.5} and PM₁₀ are components of TSP.</p> <p>²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.</p> <p>(*) Landfill Operations have ceased at the facility. TSP emissions from paved/unpaved road traffic, landfill operations and other activities will effectively no longer exist. Landfill gas generation will continue to decrease year after year, thus eliminating the likelihood of utilizing the passive solar flares. Any potential, future operations of the passive flares will have negligible CO emissions (that certainly will not exceed Title V thresholds).</p>	

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input checked="" type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input checked="" type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input checked="" type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input checked="" type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input checked="" type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input checked="" type="checkbox"/>	18. Emergency road flares.
<input checked="" type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: <u>Chippers</u> <u>Rock crushers</u> <u>Portable compressors</u> _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input checked="" type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input checked="" type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input checked="" type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input checked="" type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input checked="" type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input checked="" type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input checked="" type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input checked="" type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input checked="" type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input checked="" type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input checked="" type="checkbox"/>	40. Ozone generators.

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input checked="" type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input checked="" type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input type="checkbox"/>	54. Steam vents and safety relief valves.
<input checked="" type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input checked="" type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the Title V Equipment Table and provide it as ATTACHMENT D .
26. Emission Units
For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E .
For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F .
27. Control Devices
For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H .

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

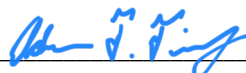
b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Adam Finley	Title: Director of Disposal Operations
-------------------	--

Responsible official's signature:

Signature:  Signature Date: 3/4/21
 (Must be signed and dated in blue ink)

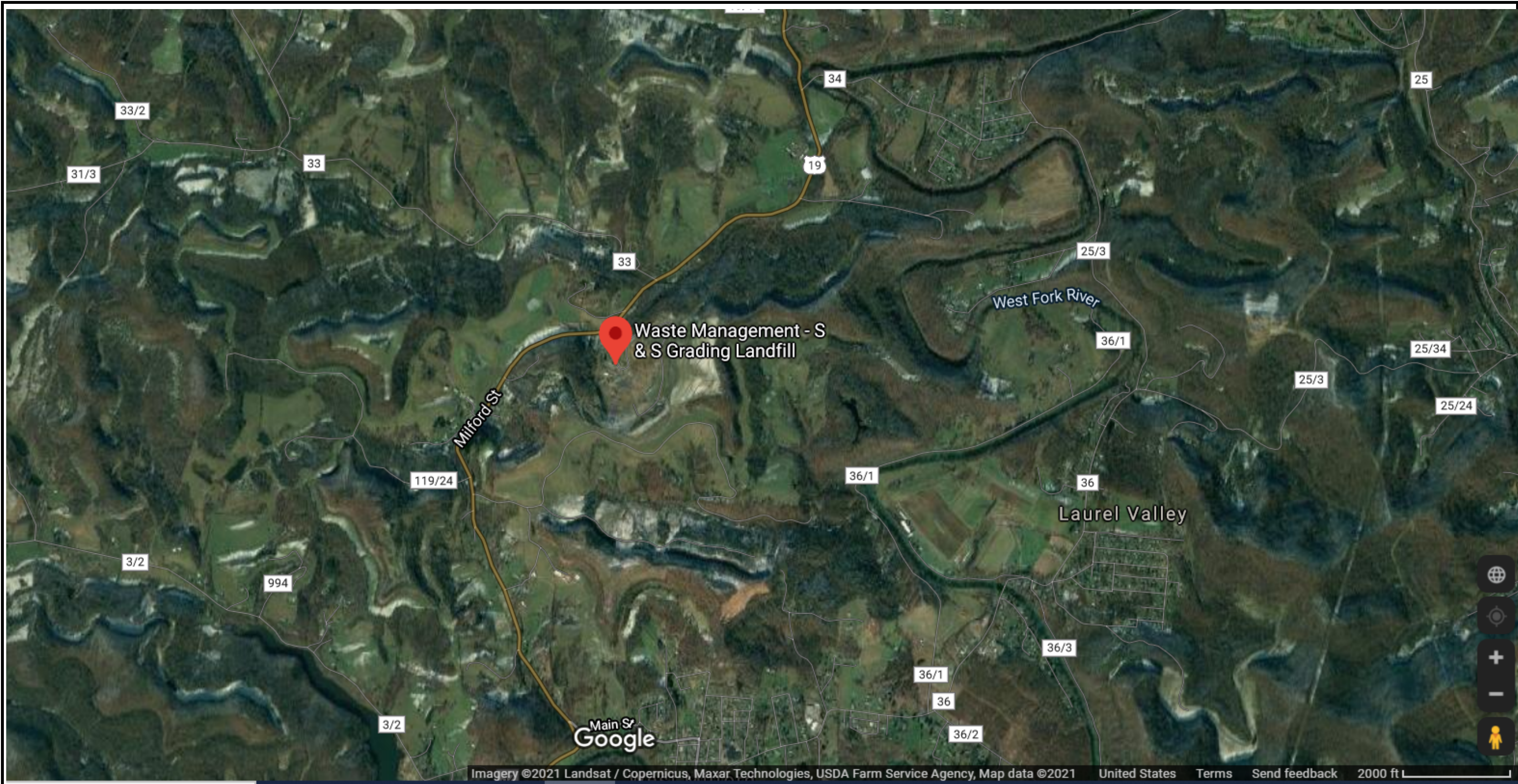
Received
 March 5, 2021
 WV DEP/Div of Air Quality

Note: Please check all applicable attachments included with this permit application:

<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input type="checkbox"/>	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/dag, requested by phone (304) 926-0475, and/or obtained through the mail.

ATTACHMENT A
Area Map



Title: Area Map

 <p>PREPARED BY TRINITY CONSULTANTS</p>	<p>Waste Management - S & S Landfill Clarksburg West Virginia</p>	<p>PROJECT 213101.0014</p>	<p>DATE March 2021</p>	<p>SHEET 1 of 1</p>	<p>REV 001</p>
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ATTACHMENT B

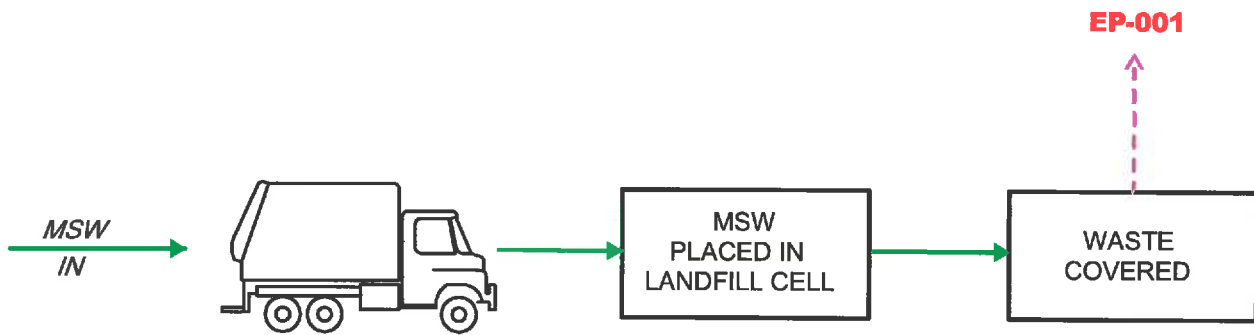
Plot Plan(s)

ATTACHMENT C

Process Flow Diagram(s)

LEGEND

-  PROCESS FLOW
-  FUGITIVE EMISSIONS
- EP-001** EMISSION POINT



S&S LANDFILL, INC.

**Regulation 30 Permit Application
Facility Process Flow Diagram**

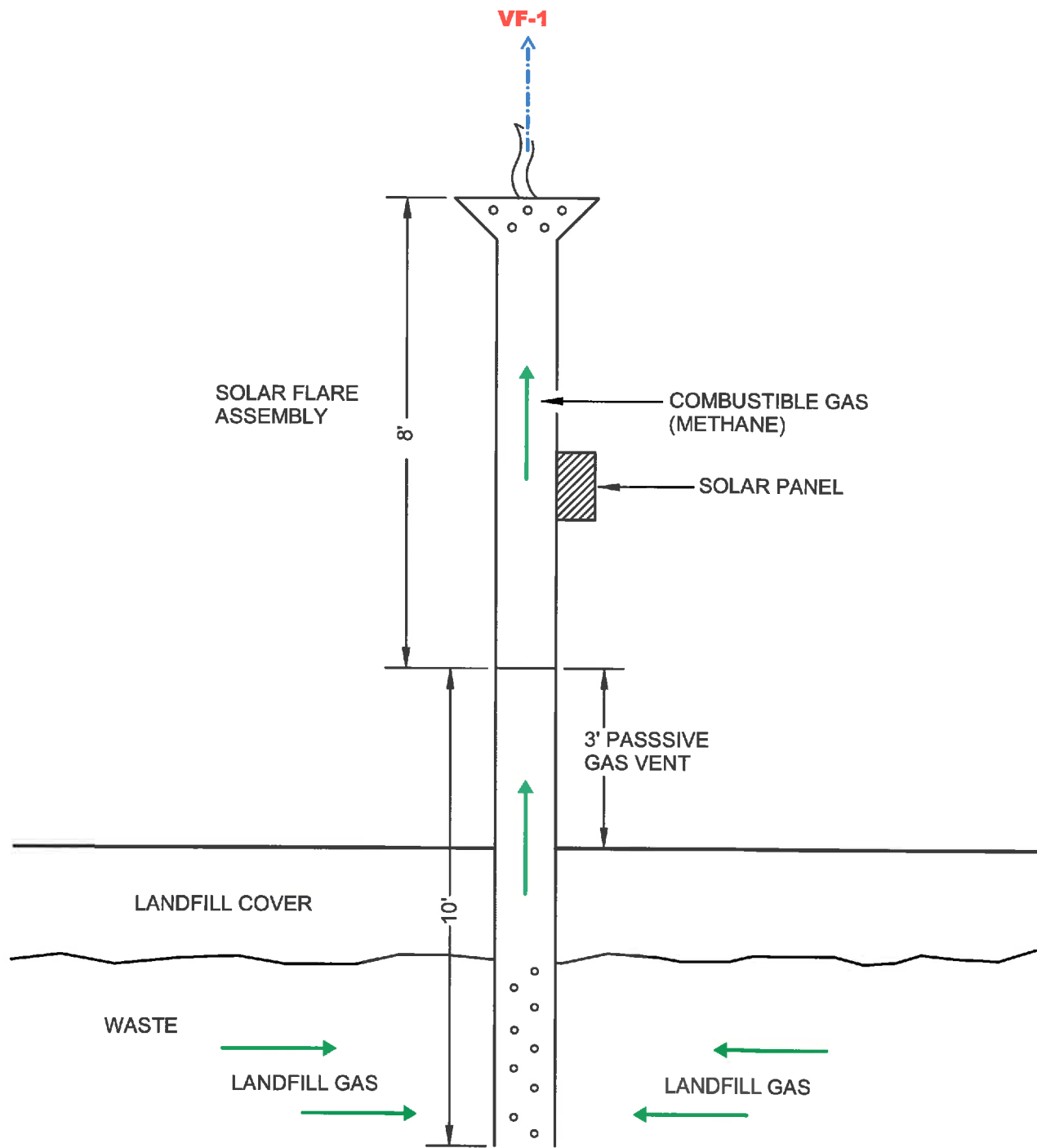
Drawn by	RLR / SARC	10/10
Engineer	JJK / LLS	10/10
Checked by	JJK / LLS	10/10
		Date

Scale NONE

**Attachment C
FIGURE 3**

Prepared by *MSES consultants, inc.*

T



LEGEND

- PROCESS FLOW
- AIR EMISSION FLOW
- VF-1** EMISSION POINT

S&S LANDFILL, INC.		
Regulation 30 Permit Application Flare Process Flow Diagram		
Drawn by <u>LFL / SARC</u> 10/10 Engineer <u>JJK / LLS</u> 10/10 Checked by <u>JJK / LLS</u> 10/10	Scale NONE	Attachment C FIGURE 4
Prepared by <i>MSES consultants, inc.</i>	Date	

ATTACHMENT D - Emission Units Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID ¹	Emission Point ID ¹	Emission Unit Description	Year Installed/Modified	Design Capacity	Control Device ¹
01-C1	001	Old MSW – Closed and Capped	1975	268,500 Mg	None
01-C2	001	Old Asbestos Area – Closed and Capped	1981	657,400 Mg	None
01-A1	001	Phase 1 Area	1994	408,600 Mg	None
01-A2	001	Phase 2 Area	1995	529,300 Mg	None
01-A3A	001	Phase 3A Area	1997	80,800 Mg	None
01-A3B	001	Phase 3B	2001	265,000 Mg	None
01-A3C	001	Phase 3C	2003	183,900 Mg	None
01-A3D	001	Phase 3D	2004	483,500 Mg	None
01-A4	001	Phase 4A	2008	932,400 Mg	None
1	T1	Sanitary Waste Water Tank	1990	1,000 gal	None
2	T2	Leachate Open Top Tank	1997	215,135 gal	None
3	T3	Leachate Open Top Tank	1993	103,122 gal	None
4	T4	High Sulfur Diesel Fuel Storage Tank	1994	1,000 gal	None
4b	T4b	Diesel Fuel Storage Tank	2001	100 gal	None
5	T5	Leachate Pump Station Wet Well	1993	6,000 gal	None
6a	T6a	Used Oil/Antifreeze Storage Tank	NA	55 gal	None
6b	T6b	Four Tanks (hydraulic, gear, lube oil)	1994	275 gal each	None
7a	T7a	Low Sulfur Diesel Fuel Storage Tank	2002	550 gal	None
7b	T7b	Unleaded Gasoline Storage Tank	2003	550 gal	None
GV-1 – GV-12	VF-1 – VF-12	Passive Landfill Gas Vents	2011	140 cfm each	Flares

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: C1, C2, A1, A2, A3A, A3B, A3C, A3D, A4	Emission unit name: Landfill Operations	List any control devices associated with this emission unit: None
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Pre-existing (closed and capped) landfill area (Old MSW and Old Asbestos Area)
 Existing landfill area (Phase 1, Phase 2, Phase 3, Phase 4)

Manufacturer: NA	Model number: NA	Serial number: NA
----------------------------	----------------------------	-----------------------------

Construction date: 1975	Installation date: MM/DD/YYYY	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): approximately 2,703,987 Mg

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: 24 hr/day, 365 days/year
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
--	--

Maximum design heat input and/or maximum horsepower rating: NA	Type and Btu/hr rating of burners: NA
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

NA

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		5.90
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		16.14
Particulate Matter (PM ₁₀)		35.14
Total Particulate Matter (TSP)		<100 TPY*
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		23.90
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total		15.84
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Carbon Dioxide		33,113
Methane		12,069
Hydrogen Sulfide		1.60
NMOC		77.81 Mg
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>USEPA LandGEM 3.02 software with regulatory default values, and AP-42 Chapters 11.9.1, 13.2.1, 11.2.2, and 11.2.4.</p> <p><i>(*) Landfill Operations have ceased at the facility. TSP emissions from paved/unpaved road traffic, landfill operations and other activities will effectively no longer exist. Landfill gas generation will continue to decrease year after year, thus eliminating the likelihood of utilizing the passive solar flares. Any potential, future operations of the passive flares will have negligible CO emissions (that certainly will not exceed Title V thresholds).</i></p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45CSR23, 40CFR60.757, and 40CFR60.754(a)(2). Requirements When Reported NMOC Emission Rate is \geq 50 Mg/yr.

45CSR23, 40CFR60.757, and 40CFR60.754(a)(3). Requirements When Reported NMOC Emission Rate is \geq 50 Mg/yr. (when using site specific C_{NMOC})

45CSR23, 40CFR60.752, and 40CFR60.753. Standards for Landfill and Gas Collection and Control. Design parameters for a landfill gas collection and control system which conforms to 40CFR60.759. Standards applicable once over 50 Mg/yr threshold.

45CSR23, 40CFR60.757(c). LFG Collection and Control System Design Plan.

Note: 45CSR23 has been revised and is no longer consistent with the current operating permit. The facility will work with WVDEP to determine applicable changes (including a revised NMOC “threshold” of 34 Mg/yr).

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45CSR23, 40CFR60.758. Maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit.

45CSR23, 40CFR60.757(b). Annual NMOC Emission Report.

45CSR23, 40CFR60.757(b)(1)(ii). 5-year NMOC Report and Revision of 5-year NMOC Report.

45CSR23, 40CFR60.757(d) and 40CFR60.758. Closure Report

Note: 45CSR23 has been revised and is no longer consistent with the current operating permit. The facility will work with WVDEP to determine applicable changes (including a revised NMOC “threshold” of 34 Mg/yr).

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: GV-1 through GV-12	Emission unit name: Passive Landfill Gas Vents	List any control devices associated with this emission unit: Flares VF-1 through VF-12
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The flares are mounted to a landfill gas vent. The purpose of the flares is to provide improved odor control at the facility. The flare is equipped with a solar panel and battery. A charge is stored in the battery that is connected to a spark plug. The spark ignites the combustible gas.

Manufacturer: Landfill Services Corp. (flare)	Model number: Solar Spark Vent Flare CF-5 (flare)	Serial number:
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Construction date: 2011	Installation date: 2011	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 140 cfm of landfill gas each

Maximum Hourly Throughput: 8,400 cubic feet per hour each	Maximum Annual Throughput: 73.59 mmcf/yr each	Maximum Operating Schedule: 8760 hours/year
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners: NA
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

8,400 cubic feet per hour of landfill gas per flare. 100,800 cu ft/hr for all 12.
73.59 mmcf per year of landfill gas per flare. 883.08 mmcf per year for all 12.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Landfill Gas	NA	NA	Minimum 200

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	43.10	<100 TPY*
Nitrogen Oxides (NO _x)	2.30	10.07
Lead (Pb)		
Particulate Matter (PM _{2.5})		4.30
Particulate Matter (PM ₁₀)		4.30
Total Particulate Matter (TSP)	0.98	4.30
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

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Emissions are potential to emit for a total of 12 flares.

() Landfill Operations have ceased at the facility. TSP emissions from paved/unpaved road traffic, landfill operations and other activities will effectively no longer exist. Landfill gas generation will continue to decrease year after year, thus eliminating the likelihood of utilizing the passive solar flares. Any potential, future operations of the passive flares will have negligible CO emissions (that certainly will not exceed Title V thresholds).*

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45CSR13, R13-2721, 5.1.1. 45CSR§6-4.1. Flare (VF-1 – VF-12) emissions to the atmosphere shall not exceed the following limits: 0.19 lb/hr and 0.84 tpy of nitrogen oxides per flare and 2.30 lb/hr and 10.07 tpy of nitrogen oxides for 12 flares. 3.59 lb/hr and 15.73 tpy of carbon monoxide per flare and 43.10 lb/hr and 100 tpy of carbon monoxide for 12 flares. 0.09 lb/hr and 0.36 tpy of particulate matter per flare and 0.98 lb/yr and 4.30 tpy of particulate matter for 12 flares.

45CSR13, R13-2721, 5.1.2. Only landfill gas generated from the municipal solid waste contained in the Clarksburg (Harrison County) Landfill shall be routed to and combusted in the flares (VF-1 – VF-12).

45CSR13, R13-2721, 5.1.3. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications an electronic ignition system with a panel indicator light to verify the presence of the ignition spark which is applied continuously each 1.5 seconds regardless of flare ignition status.

45CSR13, R13-2721, 5.1.4. Each flare system (VF-1 – VF-12) shall be designed to achieve a minimum destruction efficiency of 98% for volatile organic compounds (VOCs).

45CSR13, R13-2721, 5.1.5. The amount of landfill gas consumed/fed to each flare (VF-1 – VF-12) shall not exceed 140 scf/min and 73.59 mmscf/yr.

45CSR6.4-3. Emission of Visible Particulate Matter. -- No person shall cause or allow emission of smoke into the atmosphere from any incinerator which is twenty percent (20%) opacity or greater.

45CSR13, R13-2721, 5.1.6; 45CSR§6-4.4. The provisions of 45CSR6-4.3. shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up.

45CSR13, R13-2721, 5.1.7; 45CSR§6-4.5. The emission of particles of unburned or partially burned refuse of ash from the flare which are large enough to be individually distinguished in the open air shall not be allowed or permitted.

45CSR13, R13-2721, 5.1.8; 45CSR§6-4.6. The flares, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

45CSR13, R13-2721, 5.1.9, 45CSR23, 40 C.F.R. §60.752 (b)(2) and (b)(2)(iii)(A). If the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, the owner or operator shall route all the collected gas to a control system that complies with the requirements in 40 C.F.R. §60.752(b)(2)(iii)(A). (a) An open flare designed and operated in accordance with 40 C.F.R. §60.18.

45CSR13, R13-2721, 5.1.10, 45CSR16, 40 C.F.R. §60.18(c)(1). Flares shall be designed for and operated with no visible emissions as determined by the method specified in 40CFR60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

5CSR13, R13-2721, 5.1.11; 45CSR16, 40 C.F.R. §60.18(c)(2). Flares shall be operated with a flame present at all times, as determined by the methods specified in 40CFR60.18(f).

45CSR13, R13-2721, 5.1.12; 45CSR16, 40 C.F.R. §60.18(c)(3)(ii). The non-assisted open flare shall have a net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater. The net heating value of the gas being combusted shall be determined by the methods specified in 40CFR60.18(f)(3).

45CSR13, R13-2721, 5.1.13; 45CSR16, 40 C.F.R. §60.18(c)(4)(i). The non-assisted open flare shall be designed for

and operated with an exit velocity, as determined by the methods specified in 40CFR60.18(f)(4), less than 18.3 m/sec (60 ft/sec), except as provided in 40CFR60.18(c)(4)(ii) and (iii).

45CSR13, R13-2721, 5.1.14; 45CSR16, 40 C.F.R. §60.18(e). Flares used to comply with provisions of 40CFR60 Subpart A shall be operated at all times when emissions may be vented to them.

45CSR13, R13-2721, 4.1.2; 45CSR§13-5.11. Operation and Maintenance of Air Pollution Control Equipment. The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

45CSR13, R13-2721, 4.1.3. Record of Malfunctions of Air Pollution Control Equipment. For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved. b. Steps taken to minimize emissions during the event. c. The duration of the event. d. The estimated increase in emissions during the event. For each such case associated with an equipment malfunction, the additional information shall also be recorded: e. The cause of the malfunction. f. Steps taken to correct the malfunction. g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45CSR13, R13-2721, 5.2.1. Monthly Method 22 visible emission checks shall be conducted to determine compliance with opacity limits.

45CSR13, R13-2721, 5.2.2; 45CSR23, 40 C.F.R. §60.756(c). Each owner or operator seeking to comply with 40CFR60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment: (1) a heat sensing device; (2) a device to record flow.

45CSR13, R13-2721, 5.3.1; 45CSR§6-7.1. The operator of any incinerator may be required to conduct stack tests for the flares to determine the particulate matter loading using 40CFR60, Appendix A, Method 5.

45CSR13, R13-2721, 5.4.1. The permittee shall maintain records of all monitoring data required for opacity, documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9.

45CSR13, R13-2721, 5.4.2; 45CSR23, 40 C.F.R. §§60.758(b) and (b)(4). The owner or operator of a controlled landfill shall keep up-to-date, readily accessible records for the life of the control equipment of the data listed in 40CFR60.758(b)(4) as measured during the initial performance test or compliance determination. Records of subsequent test or monitoring shall be maintained for a minimum of 5 years. Records of control device vendor specifications shall be maintained until removal.

45CSR13, R13-2721, 5.4.3; 45CSR23, 40 C.F.R. §60.758(c)(4). The owner or operator of a controlled landfill shall keep up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.

45CSR13, R13-2721, 5.4.4; 40 C.F.R. §63.1980(a). Each owner or operator shall keep records and reports as specified in 40CFR60 Subpart WWW or EPA approved State plan that implements 40CFR60 Subpart CC, whichever applies to your landfill, with one exception: You must submit the annual report described in 40CFR60.757(f) every 6 months.

45CSR13, R13-2721, 5.4.5. The permittee shall maintain accurate records of the amount of landfill gas consumed/ fed to the flare system. Compliance with the annual consumption limit shall be determined using a 12- month rolling total A 12-month rolling total shall mean the sum of natural gas consumed at any given time for the previous twelve (12) calendar months. Said records shall be maintained on site for a period of five (5) years. Said records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request and shall be certified by a responsible official upon the submittal.

45CSR13, R13-2721, 5.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observations using Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: The results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s) and any corrective measures taken or planned.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 2 and 3	Emission unit name: Leachate Open Top Tanks	List any control devices associated with this emission unit: NA
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Storage vessels containing leachate

Manufacturer:	Model number:	Serial number:
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Construction date: MM/DD/YYYY	Installation date: MM/DD/YYYY	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 103,122 gallons and 215,135 gallons

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: 24 hrs/day, 365 days/year
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating: NA	Type and Btu/hr rating of burners: NA
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

NA

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		1.0
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

USEPA TANKS 4.0

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

40 CFR 60.116b(b)
40 CFR 60.116b(c)
40 CFR 60.116b(d)

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

40 CFR 60.116b(b) The owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the source.

40 CFR 60.116b(c) Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

40 CFR 60.116b(d) The owner or operator of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa shall notify the Administrator and Secretary within 30 days when the maximum true vapor pressure of the liquid exceeds 5.2 kPa.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 1, 4, 4b, 5, 6a, 6b, 7a, 7b	Emission unit name: Storage Tanks	List any control devices associated with this emission unit: NA
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Storage vessels containing sanitary wastewater, leachate, high and low diesel fuel, used oil, antifreeze, hydraulic oil, gear oil, lube oil, and unleaded gasoline

Manufacturer:	Model number:	Serial number:
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Construction date: MM/DD/YYYY	Installation date: MM/DD/YYYY	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 55 to 6,000 gallons

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: 24 hrs/day, 365 days/year
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u> X </u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating: NA	Type and Btu/hr rating of burners: NA
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

NA

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)			
Nitrogen Oxides (NO _x)			
Lead (Pb)			
Particulate Matter (PM _{2.5})			
Particulate Matter (PM ₁₀)			
Total Particulate Matter (TSP)			
Sulfur Dioxide (SO ₂)			
Volatile Organic Compounds (VOC)		0.35	
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>USEPA TANKS 4.0</p>			

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: VF-1 – VF-12	List all emission units associated with this control device. GV-1 – GV-12
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Manufacturer: Landfill Services Corp.	Model number: Solar Spark Vent Flare CF-5	Installation date: 2011
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Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input checked="" type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator		<input type="checkbox"/> Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC	100%	98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Maximum 140 cfm of landfill gas can be burned per flare. Minimum Btu value is 200.

Is this device subject to the CAM requirements of 40 C.F.R. 64? Yes No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** The Landfill NSPS effective date does not require compliance with CAM.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Method 22-like visible emissions checks. Presence of a flame.