

# Fact Sheet



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

Permit Number: **R30-06900071-2017**

Application Received: **March 3, 2016**

Plant Identification Number: **03-54-069-00071**

Permittee: **American Disposal Services of West Virginia, Inc. d.b.a. Short Creek Landfill**

Mailing Address: **258 North Fork, Short Creek, WV 26003**

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Physical Location: Short Creek, Ohio County, West Virginia  
UTM Coordinates: 530.57 km Easting • 4444.10 km Northing • Zone 17  
Directions: From the city of Wheeling, take Route 2 North, turn right onto Girty Point Road and follow Road to landfill

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### Facility Description

The Short Creek Landfill (SCL) (NAICS 562212, SIC 4953) is a non-hazardous municipal solid waste (MSW) landfill that began operation in approximately 1986. The site consists of 280 acres of permitted area, including 113 acres of permitted disposal area. Of the 113 acres, 34 acres make up the closed landfill and 79 acres make up the active landfill. Currently 52 acres of the 79 acres of active area have been developed. Short Creek has a portable rock crushing and sizing plant.

The landfill has a total design capacity of approximately 12.69 million tons of municipal solid waste (MSW) and consists of two segregated fill areas designated Landfill A and Landfill B. Waste placement in Landfill A began in approximately 1986 and continued through 2000. The total MSW placement in these areas is approximately 1.83 million tons.

Landfill A encompasses approximately 34 acres and is a certified closed and capped pre-Subtitle D disposal area, underlain by a natural clay liner, with a compacted clay soil cover. Landfill A has two separate areas; one consists of 11 acres of Construction/Demolition (CD) waste area, which has no gas collection and control system (GCCS) components. The second portion of Landfill A is MSW disposal area, approximately 23 acres; an active GCCS is installed and operating in this area. Waste placement in Landfill B began in 2001 and is expected to continue through 2057, given the current rate of waste acceptance.

Landfill B has a MSW capacity of approximately 10.86 million tons. The total permitted area for waste disposal in Landfill B is approximately 79 acres. Currently, 52 acres has been developed, underlain by a double composite base liner system. The final cover system for Landfill B will consist of a composite geosynthetic/low permeability soil barrier.

Short Creek receives approximately 250,000 tons of waste per year. The landfill currently accepts municipal solid waste and in the past also accepted construction/demolition/debris (CDD) waste. Site operations include disposal of solid waste, compaction of same, and daily cover with native soil. Site waste decomposes and generates methane and non-methane VOCs.

### Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions</b>
Carbon Monoxide (CO)	126.31	42.79
Nitrogen Oxides (NO <sub>x</sub> )	37.38	8.83
Particulate Matter (PM <sub>2.5</sub> )	9.47	3.26
Particulate Matter (PM <sub>10</sub> )	30.24	12.33
Total Particulate Matter (TSP)	70.60	40.76
Sulfur Dioxide (SO <sub>2</sub> )	6.41	2.22
Volatile Organic Compounds (VOC)	9.22	5.53
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions</b>
Total HAPs	7.37	4.02
<b>Regulated Pollutants other than Criteria and HAP</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions</b>
Non Methane Organic Compounds (NMOC)	70.93	13.26

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

### Title V Program Applicability Basis

This facility has a design capacity over 2.5 million megagrams and 2.5 million cubic meters and the landfill has the potential to emit 126.31 tons per year of carbon monoxide (CO). Due to this facility's design capacity and the potential to emit over 100 tons per year of criteria pollutant, Short Creek Landfill is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	To prevent and control PM from Manufacturing Processes
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permits
	45CSR16	New Stationary Sources Standards of Performance
	45CSR23	To Prevent and Control Emissions from Municipal Solid Waste Landfills
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 60 Subpart Kb	Standard of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984
	40 C.F.R. Part 60 Subpart XXX	Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014
	40 C.F.R. Part 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart AAAA	National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and other sources of Fugitive Particulate Matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-2822A	January 6, 2015	

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**

The following changes occurred at the facility since its previous renewal on September 16, 2011:

1. On June 16, 2015, a minor modification MM01 was issued. It incorporated the requirements from Permit R13-2822A, which authorized the installation of replacement Rock Crushing equipment.
2. Old Requirements 4.1.9 and 4.1.10 were moved to new Section 7.0 "Leachate Open Top Tanks" and were re-numbered to 7.4.1 and 7.5.1.
3. Requirement 4.1.10 - 4.1.12 were added to cover 40 C.F.R. 63 Subpart AAAA applicable conditions. These requirements replaced existing requirements 5.1.12, 5.1.13, 5.4.6, 5.4.7.
4. 40 C.F.R. Part 60 Subpart XXX - this new rule became effective on October 28, 2016. Short Creek Landfill was issued a solid waste expansion permit to construct on June 25, 2015 and they commenced construction on the facility-wide expansion after July 17, 2014 (and before August 29, 2016), therefore they are subject to 40 C.F.R. Part 60 Subpart XXX per 40 C.F.R. §60.760(a). At the same time, Short Creek Landfill facility is subject to 40 C.F.R. Part 60 Subpart WWW per 40 C.F.R. 63 Subpart AAAA §63.1930. There has not been any revision to the Subpart AAAA to include applicability of the 40 C.F.R. 60 Subpart XXX yet, so while the facility is now subject to the Subpart XXX, the Subpart AAAA still requires compliance with the Subpart WWW.

The company submitted Initial Design Capacity Report (DCR) required per 40 CFR §§60.762(a) and a Non-Methane Organic Compound (NMOC) Emission Rate Report per 40 CFR §§60.762(b)(1) on November 28, 2016.

As per 40 C.F.R. Part 60 Subpart XXX condition §60.762(b)(2)(ii) (requirement 4.1.2), the permittee is required to install a collection and control system that captures the gas generated within the landfill within 30 months after the first annual report in which the NMOC emission rate equals or exceeds 34 megagrams per year or the most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 megagrams per year based on Tier 2 or if the Tier 4 surface emissions monitoring shows a surface methane emission concentration of 500 parts per million methane or greater. The NMOC emission rate exceeded the threshold of 34 megagrams per year as reported in the initial NMOC report submitted on November 28, 2016. An initial GCCS design plan will be submitted within 12 months and will be implemented within 30 months of the submittal of the initial NMOC emission rate report discussed above.

As was required per 40 C.F.R. Part 60 Subpart WWW condition §60.752(b)(2)(ii) (former requirement 4.1.2), the permittee already installed a collection and control system that captures the gas generated within the landfill (since the NMOC emission rate exceeded the former threshold of 50 megagrams per year in 2000). Recently, the permittee submitted a revised "Landfill Gas Collection and Control System (GCCS) Design Plan" that supersedes all other previous GCCS Design Plans. It was

approved on August 18, 2016. The plan will be implemented within 18 months of August 18, 2016. The company's intention is to use the GCCS per the requirements of the Subpart WWW until 30 months from the initial Subpart XXX NMOC report submission on November 28, 2016, and then the GCCS will be operated under requirements of the Subpart XXX.

### Non-Applicability Determinations

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

<b>40 C.F.R. § 60.767 (a)(3), Subpart XXX</b>	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.
<b>40 C.F.R. Part 64</b>	This is the third permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first and second renewals. As a result of the installation of replacement rock crushing equipment (per minor modification MM01), there were no PSEU created. Therefore, CAM is not applicable.
<b>40 CFR Part 60, Subpart OOO</b>	The rock crushing and sizing plant processes a maximum of 125 tons of rock per hour. In accordance with 40 CFR § 60.670(c)(2), portable plants with capacities of 136 megagrams per hour (150 tons per hour) or less are exempt from this NSPS.

2. Old Requirements 4.1.11, 4.5.3, 4.5.4, 5.1.14 and 5.5.2 were deleted since they didn't have any citations and were found unnecessary.

### Request for Variances or Alternatives

None.

### Insignificant Activities

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

### Comment Period

Beginning Date: January 16, 2017  
Ending Date: February 15, 2017

### Point of Contact

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

Natalya V. Chertkovsky-Veselova  
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. 1220 • Fax: 304/926-0478  
natalya.v.chertkovsky@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)**

On February 15, 2017 we received comments from the company. As the result, the following changes were made:

- 1) In the Permit – on page 26 in the requirement 4.2.5 the typo was corrected in the citation from “40 C.F.R §60.755(e)” to “40 C.F.R §60.765(e)”.
- 2) In the Fact Sheet – on page 1 in the “Facility Description” Section the phrase “115 acres of permitted disposal area” was changed to “113 acres of permitted disposal area”, and the phrase “81 acres make up the active landfill” was changed to “79 acres make up the active landfill”, since the old numbers were typos inconsistent with the number in the next sentences.