

# Fact Sheet



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

Permit Number: **R30-03300128-2022**  
Application Received: **February 15, 2021**  
Plant Identification Number: **03-54-03300128**  
Permittee: **Meadowfill Landfill, Inc.**  
Mailing Address: **1488 Dawson Drive, Bridgeport, WV 26330**

*Revised: NA*

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Physical Location: Bridgeport, Harrison County, West Virginia  
UTM Coordinates: 564.04 km Easting • 4354.44 km Northing • Zone 17  
Directions: From I-79 take Exit 121 (Meadowbrook Road). Turn west onto Meadowbrook Road past the Meadowbrook Mall. Go approximately 1.5 miles and turn right onto Dawson Drive. Follow for approximately 1.5 miles to the landfill entrance.

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### Facility Description

Meadowfill Landfill is a municipal solid waste landfill that began operation in 1994. The landfill has the potential to receive approximately 30,000 tons of waste per month on the approximate 177.7 acre site. Waste is brought to the landfill by truck and disposed of. The waste is spread and compacted with soil placed over the active area each day for cover. The landfill also has a flare for odor control and above ground tanks which are used for leachate treatment and storage.

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	192.92	17.77

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<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2020 Actual Emissions</b>
Nitrogen Oxides (NO <sub>x</sub> )	42.32	3.9
Particulate Matter (PM <sub>2.5</sub> )	26.48	11.33
Particulate Matter (PM <sub>10</sub> )	37.33	19.92
Total Particulate Matter (TSP)	198.61	125.49
Sulfur Dioxide (SO <sub>2</sub> )	9.59	1.12
Volatile Organic Compounds (VOC)	96.18	15.94
<b>Hazardous Air Pollutants</b>		
Toluene	7.83	3.81
Xylenes	2.78	1.35
HCl	1.05	0.12
Methylene Chloride	2.63	1.28
Perchloroethylene	1.34	0
Hexane	1.22	0.60
Ethylbenzene	1.06	0.52
Total HAPs	22.78	10.62

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

**Non-methane organic compounds (NMOC)** – The current emission rate estimate (calculated for year 2019) is 57.78 Mg/yr. The projected closure year is 2023. The projected NMOC emission rate of 34 Mg/yr, triggering the requirements for the construction of a collection and control system has already occurred, and the gas collection and control (GCCS) plan for this facility was approved on November 18, 2020. The NMOC emission rate estimates were calculated using EPA’s Landfill Gas Emissions Model (LandGEM) software. The values used for k and Lo were “0.050 year<sup>-1</sup>” and “170 m<sup>3</sup>/Mg” respectively. The site specific NMOC concentration used in the model was 443 ppmv as hexane, as determined by Tier 2 testing on June 30, 2019.

**Title V Program Applicability Basis**

This facility has the potential to emit 192.92 tpy of carbon monoxide and has design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and due to its design capacity, Meadowfill Landfill, Inc., is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

**Legal and Factual Basis for Permit Conditions**

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

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

Federal and State:	45CSR6 45CSR11 45CSR13  45CSR23  WV Code § 22-5-4 (a) (14)  45CSR30 45CSR34  40 C.F.R. Part 61 Subpart M 40 C.F.R. Part 63 Subpart AAAAA  40 C.F.R. Part 82 Subpart F	Open burning prohibited. Standby plans for emergency episodes. New Source Review permits for stationary sources To Prevent and Control Emissions from Municipal Solid Waste Landfills The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Emission Standards for Hazardous Air Pollutants National Emission Standard for Asbestos NESHAPs-MACT for Municipal Solid Waste Landfills Ozone depleting substances
State Only:	45CSR4 45CSR17	No objectionable odors. 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> )
R13-2666A	November 30, 2009	N/A

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

This is a renewal of the Title V permit which was issued on August 15, 2016. Changes to the most recent version of the Title V permit consist of the following:

- 1) **The Title V boilerplate was updated.**

- a. Permit conditions 3.5.3, 3.5.5, and 3.5.6 were updated to the most recent version of the boilerplate.
- 2) Title V permit section 4.0 had major changes due to 40 CFR 60 Subpart WWW changes that were published on March 26, 2020, and changes to 45CSR23 effective on June 1, 2021.**
- a. The Meadowfill Landfill is a MSWL that commenced construction, reconstruction, or modification on or after May 30, 1991, but before July 14, 2014 and is subject to the requirements of 40 CFR 60 Subpart WWW. According to 40CFR§60.750(d), an affected facility must continue to comply with 40 CFR 60 Subpart WWW until it becomes subject to the more stringent requirements in an approved and effective state or federal plan that implements 40 CFR 60 Subpart Cf or it modifies or reconstructs after July 17, 2014 and becomes subject to 40 CFR 60 Subpart XXX. 45CSR23, effective on June 1, 2021 implements 40 CFR 60 Subpart Cf, so the Meadowfill Landfill is now subject to the requirements of 45CSR23 instead of 40 CFR 60 Subpart WWW. Therefore, Title V permit Section 4.0's former conditions from 40 CFR 60 Subpart WWW were replaced with the conditions from 45CSR§23-7. Conditions within 45CSR§23-7 for a MSWL having a design capacity less than 2.5 million megagrams or 2.5 million cubic meters were not included because the Meadowfill Landfill exceeds these design limits.
  - b. This facility is currently required to have an active collection system and control device installed because of their NMOC emissions. The plan for the active collection system and control device was approved on November 18, 2020. Since the NMOC emissions have triggered the requirements for an active collection system and control device, requirements under 45CSR23 to calculate or report NMOC emissions were not included in the Title V permit.
  - c. For some of the gas collection and control system requirements, 45CSR23 provided the option of complying with the requirements of 40 CFR 63, Subpart AAAA. The permittee will comply with 40 CFR 63 Subpart AAAA and the 45CSR23 conditions have been written to reflect that in the Title V permit.
  - d. The 45CSR§23-7.9.a requirement to submit an initial design capacity report and the 45CSR§23-7.9.d requirement to submit a collection and control system design plan were not included in the Title V permit because the initial design capacity report has been submitted and the collection and control system design plan has been submitted and approved.
  - e. Condition 4.2.3 and Appendix A were added to include the landfill gas collection and control system plan approved on November 18, 2020.
- 3) Title V Permit Section 6.0 was added due to 40 CFR 63 Subpart AAAA changes that were published on March 26 of 2020.**
- a. This facility was already subject to subpart AAAA and formerly had conditions 4.1.5, 4.1.6, 4.1.7, 4.1.8, 4.4.2, and 4.4.3 dedicated to this regulation, but with the large amount of changes to the regulation, it was instead moved to its own section. The Meadowfill Landfill is subject to 40 CFR 63 Subpart AAAA because it is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year NMOC.
  - b. The landfill gas collection and control system must be installed and started up within 30 months after the first annual report in which the NMOC emission rate equals or exceeds 50 Mg/yr. For the Meadowfill Landfill, this date is March 26, 2022.

- c. Since the NMOC emissions have triggered the requirements for an active collection system and control device, requirements under 40 CFR 63 Subpart AAAA to calculate or report NMOC emissions were not included.
- d. The requirements under 40 CFR §§63.1981(a) through (d) to submit an initial design capacity report, amended design capacity report, NMOC emission rate report, and a collection and control system design plan were not included in the Title V permit because they have been submitted.

**4) Other Changes to the Title V Permit**

- a. The previous section 6.0 for the Tire Shredder (2S) was removed. Permit R13-2596A was made inactive on November 17, 2021. The equipment associated with the Tire Shredder (shown below) was removed from the Emission Units Table.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
2S	2E	Tire Shredder	2004	10 ton/hr	None

- b. 40 CFR 60 Subpart Kb requirements were removed from section 4.0. According to 40CFR§60.110b(b), this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa). Tanks LST001 and LST002 have a capacity greater than 151 m<sup>3</sup> and they store a liquid with a maximum true vapor pressure less than 3.5 kPa, therefore these tanks are not subject to 40 CFR 60 Subpart Kb.

**Non-Applicability Determinations**

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

40 CFR 60, Subpart Kb – Tanks LST001 and LST002 have a capacity greater than 151 m<sup>3</sup> and they store a liquid with a maximum true vapor pressure less than 3.5 kPa. All of the other tanks at this facility have a design capacity less than 75 m<sup>3</sup>. Therefore, none of the tanks at this facility are subject to 40 C.F.R. 60 Subpart Kb.

40 C.F.R. 64 – Compliance Assurance Monitoring. The permittee does not have any pollutant specific emissions units (PSEU) at this facility that satisfy the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control device regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

**Request for Variances or Alternatives**

None.

**Insignificant Activities**

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

### **Comment Period**

Beginning Date: November 30, 2021  
Ending Date: December 30, 2021

### **Point of Contact**

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

Nikki Moats  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41282  
Nikki.B.Moats@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

**(Choose)** Not applicable.

**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit