

Fact Sheet



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

Permit Number: **R30-04700111-2018**
Application Received: **November 8, 2017**
Plant Identification Number: **04700111**
Permittee: **Copper Ridge Landfill, LLC**
Facility Name: **Copper Ridge Landfill**
Mailing Address: **P.O. Box 629, Welch, WV 24801**

| | |
|--------------------|---|
| Physical Location: | Welch, McDowell County, West Virginia |
| UTM Coordinates: | 447.36 km Easting • 4,147.73 km Northing • Zone 17 |
| Directions: | I-64/77 south to Exit 44 (Harper Road). Take right off exit onto WV3/Harper Road and go 11 miles until road becomes WV99/Bolt. Stay on WV99 for 4.5 miles, then turn left onto CR15/Bolt Road and go 1.3 miles where Bolt Road becomes CR1/Glen Fork Road, continuing another 6.6 miles to CR5/Saulsville-Ravenscliffe Road. Go 5.5 miles where CR5 becomes WV97. Continue 7.4 miles and turn left onto WV10 (Pineville). Go 0.8 miles and turn right onto WV16. Go 17 miles and make a right onto CR7. Follow CR7 to Capels and the entrance to Copper Ridge Landfill on the right (CR 7/2). |

Facility Description

Copper Ridge Landfill is a 106-acre municipal solid waste landfill that began operation in late 2007 and operates under SIC Code 4953. The landfill accepts municipal solid waste, construction/demolition debris (CDD) and approved residual waste streams. Copper Ridge receives approximately 50,000 tons of waste per month. Waste is brought to the landfill by railcar and truck. The bails from the railcars are loaded onto trucks for transport to the active cell. The waste is spread and compacted. Soil is placed over the active area each day for cover.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|--|-----------------------------|------------------------------|
| Regulated Pollutants | Potential Emissions* | 2017 Actual Emissions |
| Carbon Monoxide (CO) | 38.3 | 0.08 |
| Nitrogen Oxides (NO _x) | 0.53 | 0 |
| Particulate Matter (PM _{2.5}) | 11.48 | 2.93 |
| Particulate Matter (PM ₁₀) | 65.68 | 16.59 |
| Total Particulate Matter (TSP) | 259.22 | 55.86 |
| Sulfur Dioxide (SO ₂) | 0.28 | 0 |
| Volatile Organic Compounds (VOC) | 134 | 9.67 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions* | 2017 Actual Emissions |
|---------------------------------|-----------------------------|------------------------------|
| Acrylonitrile | 2.42 | 0.01 |
| Benzene | 1.08 | 0.02 |
| Ethylbenzene | 3.54 | 0.01 |
| Hexane | 4.12 | 0.02 |
| Methylene | 8.61 | 0.03 |
| Tetrachloroethylene | 4.44 | 0.02 |
| Toluene | 26.0 | 0.04 |
| Trichloroethylene | 2.67 | 0.01 |
| Vinyl Chloride | 3.30 | 0.01 |
| Xylenes | 9.23 | 0.03 |
| Other HAPs (< 10 TPY each) | 10.69 | 0.02 |
| Total | 76.10 | 0.18 |

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

*Note: PTE is for both active and future phases of operation

Non-Methane organic compounds (NMOC) – The NMOC emissions were estimated by USEPA Landfill Gas Emissions Model (LANDGEM) software. The 2017 LANDGEM model shows taking waste until year 2086 with a projected maximum potential NMOC emission rate of 9.1 Mg/yr in year 2086. The NMOC emission rate of 50 Mg/yr, triggering the requirements for the construction of a collection and control system, will never be achieved (it was previously estimated to occur in 2012). Based on the 2017 NMOC Calculations, the emission rate was only 5.817 Mg/yr (because the landfill only processed a small fraction of the waste it's permitted to take). CO, VOC, and HAP emissions were also estimated by using LANDGEM software.

Title V Program Applicability Basis

This facility has the potential to emit 134 TPY of VOC, 26.0 TPY of Toluene, and 76.1 TPY of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Copper Ridge Landfill, LLC 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:

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| Federal and State: | 45CSR6 | Open burning prohibited. |
| | 45CSR11 | Standby plans for emergency episodes. |
| | 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 WWW | Standards of Performance for Municipal Solid Waste Landfills |
| | 40 C.F.R. Part 61, Section 61.154 | Asbestos inspection and removal - Standards for active waste disposal sites |
| | 40 C.F.R. Part 63, Subpart AAAAA | National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills |
| | 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> |
|--------------------------------|------------------|--|
| None | 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

1. Company name was changed from “Capels Landfill, LLC” to “Copper Ridge Landfill, LLC” throughout the permit.
2. Emission Units Table 1.1 – the Trackmobile (Emission Unit L-1) installation date was changed from “2007” to “Future” since it wasn’t installed yet, and units for the Design Capacity were changed from “gal” to “HP” (a typo).
3. Section 4.0 – the “45CSR16” citation was removed from the 40 C.F.R. 60 Subpart WWW related permit requirements, because per 45CSR§16-4.1.b WV DEP didn’t take delegation of 40 C.F.R. 60 Subpart WWW.

Non-Applicability Determinations

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

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| 40 C.F.R. 60 Subpart Kb | The Leachate Tank’s VOL vapor pressure is less than 3.5 kPa |
| 40 C.F.R. 60 Subpart IIII | The engine for the “Trackmobile” locomotive is not a “stationary” internal combustion engine as defined in 40 CFR §60.4219 of this subpart. |
| 40 C.F.R. 63 Subpart ZZZZ | The engine for the “Trackmobile” locomotive is not a “stationary” internal combustion engine as defined in 40 CFR §63.6675 of Subpart ZZZZ. |
| 40 C.F.R. 64 Compliance Assurance Monitoring (CAM) | The facility does not have a pollutant specific emissions unit with a control device to meet an applicable standard or limit. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule. |
| 40 C.F.R. §60.757(a)(3), Subpart WWW | 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. |

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: August 20, 2018
 Ending Date: September 19, 2018

Point of Contact

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

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West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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 October 5, 2018 we received the following comments from Mr. Himanshu Vyas, Environmental Engineer of U.S. EPA, Region III, via email:

1. I noted that the permit does not require any monitoring at the site level nor at the landfill level (Sections 3 and 4 of the permit), but that it could possibly be due to the fact that there are no control devices on site, such as a flare. You concurred that to be the case.
2. I further noted that the emissions summary table seems to reflect the output of the LANDGEM software to estimate emissions from landfills, but I want to make sure the right or most updated version of that software was used.
3. Additionally, and related to this issue, I did not see the emission limits in the draft permit; the emissions summary table includes the PTE, but I am not sure whether the PTE is meant to also be the permit limit for each listed pollutant. Without numeric limits in the permit itself, having them listed in the fact sheet only may not be adequate, since only the terms in the permit are enforceable.
4. Lastly, if the LANDGEM software allows for it, I suggested adding additional related HAPs in the summary table.

Here are responses to the comments above:

1. The facility is subject to the 40 C.F.R. 60 Subpart WWW for landfills and until they exceed an NMOC limit of 50 Mg/yr, they do not trigger any controls or monitoring. They are only subject to the requirement to calculate the NMOC according to the NSPS and submit a report of the NMOC. If NMOC is calculated below 50 Mg/yr, the company doesn't change anything and continues with NMOC calculations (Tier 1). If NMOC is calculated at or above 50 Mg/yr, the company tests actual samples for NMOC (Tier 2). If the test results are below 50 Mg/yr, the company doesn't change anything and continues with NMOC calculations. If the test results are above 50 Mg/yr, it triggers controls and monitoring. According to the 2016 Tier 2 test results, the NMOC concentration was below 50 Mg/yr (at around 6 Mg/yr).
2. The company uses LandGEM 3.02 software for the NMOC calculations.

3. This facility does not have any emission limits. The PTE table in the Fact Sheet does not contain emission limits and is just for informational purposes. We mainly use this section of the Fact Sheet to explain how the facility is subject to Title V, such as, is it major for criteria pollutants, and/or major for one or more HAPs.

4. More HAPs (besides Toluene) were added to the Fact Sheet PTE Table for clarification purposes, however, the Toluene is the only HAP that has PTE above 10 TPY, therefore it was included with the original HAPs PTE table.

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