

Fact Sheet



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

Permit Number: **R30-10700121-2021**
Application Received: **October 23, 2020**
Plant Identification Number: **03-54-10700121**
Permittee: **Northwestern Landfill, Inc.**
Facility Name: **Parkersburg**
Mailing Address: **510 East Dry Run Road, Parkersburg, WV 26104**

Revised: NA

Physical Location: Parkersburg, Wood County, West Virginia
UTM Coordinates: 457.50 km Easting • 4344.37 km Northing • Zone 17
Directions: I-77 to US Route 50 east to Dry Run Road. Turn right onto Dry Run Road. Follow for approximately 0.4 miles to landfill.

Facility Description

Northwestern Landfill is a municipal solid waste landfill (MSWL) that began operation in 1975. Northwestern Landfill, Inc. owns 349 acres of land bordered by US Route 50 to the North and I-77 to the West. The facility has 133.21 acres permitted for the disposal of solid waste and receives approximately 15,000 to 25,000 tons of waste per month. Waste is brought to the landfill by truck and disposed of. The waste is spread and compacted with soil placed over the active area each day for cover.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	153.53	39.31
Nitrogen Oxides (NO _x)	27.51	8.63
Particulate Matter (PM _{2.5})	22.94	10.19

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Particulate Matter (PM ₁₀)	37.55	19.16
Total Particulate Matter (TSP)	199.03	104.37
Sulfur Dioxide (SO ₂)	6.96	2.53
Volatile Organic Compounds (VOC)	25.54	10.17

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Toluene	5.22	2.57
Xylenes	1.85	0.91
HCl	5.5	0.28
Total HAPs	20.39	8.92

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 60.87 Mg/yr. The projected closure year is 2024 with a projected maximum NMOC emission rate estimate of 81.71 Mg/yr. 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 is currently under review. 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⁻¹” and “170 m³/Mg” respectively. The site specific NMOC concentration used in the model was 339 ppmv as hexane, as determined by Tier 2 testing on December 16-17, 2019 and January 8, 2020.

Title V Program Applicability Basis

This facility has the potential to emit 153.53 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, Northwestern Landfill, Inc., is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review permits for stationary sources
	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 61 Subpart M	National Emission Standard for Asbestos
	40 C.F.R. Part 63 Subpart AAAA	NESHAPs-MACT for 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>)
R13-2592B	09/13/2010	N/A

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

Determinations and Justifications

This is a renewal of the Title V permit which was issued on April 26, 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 Northwestern 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 Northwestern 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 Northwestern 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. They are currently Tier 2 with NMOC emissions of 60.87 Mg/yr. NMOC emissions must be reported annually, or a 5 year-projection must be provided in lieu of the annual report in accordance with condition 4.5.2.c.
- c. The reports required under conditions 4.5.1 and 4.5.2 were submitted in 2019.

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, and 4.1.7 dedicated to this rule, but with the large amount of changes to the rule, it was instead moved to its own section.

Non-Applicability Determinations

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

40 CFR 60, Subpart Kb – All of the tanks at this facility were constructed after July 23, 1984 but have a design capacity less than 75 m³. 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 facility is not CAM applicable because the flare (LGF-1) is used to control VOC and its PTE is less than 100 tons per year.

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: September 2, 2021
Ending Date: October 4, 2021

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. 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)

None.