

Fact Sheet



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

Permit Number: **R30-03300129-2016**
Application Received: **October 9, 2015**
Plant Identification Number: **033-00129**
Permittee: **S & S Landfill**
Mailing Address: **Route 5, Box 559, Clarksburg, WV 26301**

Physical Location: Clarksburg, Harrison County, West Virginia
UTM Coordinates: 551.08 km Easting • 4341.24 km Northing • Zone 17
Directions: From I-79 take Exit 110. Follow 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 for approximately 1.5 miles to landfill.

Facility Description

S & S Landfill (NAICS 562212, SIC 4953) is a 65.87 acre municipal solid waste landfill that began operation in 1975. S&S receives approximately 120,000 tons of waste per year. The S & S Landfill has a design capacity of 5,517,700 Mg of which approximately 925,900 Mg have been capped and closed, 1,951,100 Mg is currently active, and 2,640,700 Mg is for future use.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	194.65	1.64
Nitrogen Oxides (NO _x)	10.07	0
Particulate Matter (PM _{2.5})	20.44	4.63
Particulate Matter (PM ₁₀)	39.44	6.76
Total Particulate Matter (TSP)	195.75	51.22
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	25.95	6.79

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Total HAPs (Each HAP<10 TPY)	15.8	4.19

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

Regulated Pollutant other than Criteria & HAP	Potential Emissions	2015 Actual Emissions
Non Methane Organic Compounds (NMOC)	77.81 Mg	4.0Mg

Title V Program Applicability Basis

This facility has the potential to emit 194.65 tons per year of CO. Additionally, this facility has a design capacity over 2.5 million megagrams and 2.5 million cubic meters. Due to this facility's design capacity and potential to emit over 100 tons per year of a criteria pollutant, S & S 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.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review permits for stationary sources
	45CSR16	New Source Performance Standards
	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.
	40 C.F.R. Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
	40 C.F.R. Part 60 Subpart WWW	Standard of Performance for Municipal Solid Waste Landfills
	40 C.F.R. Part 61	Asbestos inspection and removal
	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>)
R13-2721	8/14/2007	

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

Previously Registered under the General Permit

Previously, this facility had been registered under the General Permit for Municipal Solid Waste Landfills (R30-MSWLGP-2011-03300129). With this renewal, the facility was not registered under the General Permit, and the General Permit for Landfills will not be renewed. Instead, it was issued a standard Title V Operating Permit. This required numerous formatting changes and the permit was rewritten for the standard Title V permit format.

Section 4.0: Requirements for Landfill Areas and Leachate Open Top Tanks

Section 4.0 of this permit was written to address the requirements for the Landfill Operations [Landfill Areas and Leachate Open Top Tanks (2 and 3)]. The table below summarizes each permit condition's contents and regulatory citations:

Condition Number	Summary of Requirements	Regulatory Citation
4.1.1	Requirements When Reported NMOC Emission Rate is \geq 50 Mg/yr.	45CSR23, 40 C.F.R. §60.757, and 40 C.F.R. §60.754(a)(3)
4.1.2	Requirements When Reported NMOC Emission Rate is \geq 50 Mg/yr. (when using site specific C_{NMOC})	45CSR23, 40 C.F.R. §60.757 and 40 C.F.R. §60.754(a)(4)
4.1.3	Installation of a landfill gas collection and control system	45CSR23, 40 C.F.R. §60.752, and 40 C.F.R. §60.753
4.1.4	LFG Collection and Control System Design Plan	45CSR23 and 40 C.F.R. §60.757(c)
4.1.5	Standards of Performance for Volatile Organic Liquid Storage Vessels	45CSR16, 40 C.F.R. § 60.116b (b)
4.1.6	Standards of Performance for Volatile Organic Liquid Storage Vessels	45CSR16, 40 C.F.R. § 60.116b (c)
4.1.7	Standards of Performance for Volatile Organic Liquid Storage Vessels	45CSR16, 40 C.F.R. § 60.116b (d)
4.4.1	Records of all emission data and operating parameters	45CSR23 and 40 C.F.R. §60.758
4.5.1	Annual NMOC Emission Report	45CSR23 and 40 C.F.R. §60.757(b)
4.5.2	5-year NMOC Report	45CSR23 and 40 C.F.R. §60.757(b)(1)(ii)
4.5.3	Revision of 5-year NMOC Report	45CSR23 and 40 C.F.R. §60.757(b)(1)(ii)
4.5.4	Closure Report	45CSR23 and 40 C.F.R. §60.757(d)

Section 5.0: Requirements for Landfill Flares

Section 5.0 of this permit was written to address the Flares (Emission Point ID: VF-1-VF-12). The table below summarizes each permit condition's contents and regulatory citations:

Condition Number	Summary of Requirements	Regulatory Citation	R13-2721 Condition
5.1.1	Flare emissions limits	45CSR13 and 45CSR§6-4.1	5.1.1
5.1.2	Flare Limitations and Standards	45CSR13	5.1.2
5.1.3	Flare Limitations and Standards	45CSR13	5.1.3
5.1.4	Flare Limitations and Standards	45CSR13	5.1.4
5.1.5	Flare Limitations and Standards	45CSR13	5.1.5
5.1.6	Emission of Visible Particulate Matter	45CSR§6-4.3	N/A
5.1.7	Emission Standards for Incinerators and Incineration	45CSR13 and 45CSR§6-4.4	5.1.6
5.1.8	No emission of particles of unburned or partially burned refuse or ash from the flares large enough to be individually distinguished in the open air	445CSR13 and 5CSR§6-4.5	5.1.7
5.1.9	Objectionable Odors	45CSR13 and 45CSR§6-4.6.	5.1.8
5.1.10	Standards for air emissions from municipal solid waste landfills	45CSR13, 45CSR23 and 40 C.F.R. §60.752 (b)(2) and (b)(2)(iii)(A)	5.1.9
5.1.11	General control device and work practice requirements	45CSR13, 45CSR16 and 40 C.F.R. §60.18(c)(1)	5.1.10
5.1.12	General control device and work practice requirements	45CSR13, 45CSR16 and 40 C.F.R. §60.18(c)(2)	5.1.11
5.1.13	General control device and work practice requirements	45CSR13, 45CSR16 and 40 C.F.R. §60.18(c)(3)(ii)	5.1.12
5.1.14	General control device and work practice requirements	45CSR13, 45CSR16 and 40 C.F.R. §60.18(c)(4)(i)	5.1.13
5.1.15	General control device and work practice requirements	45CSR13, 45CSR16 and 40 C.F.R. §60.18(e)	5.1.14
5.1.16	Operation and Maintenance of Air Pollution Control Equipment	45CSR13 and 45CSR§13-5.11.	4.1.2

Condition Number	Summary of Requirements	Regulatory Citation	R13-2721 Condition
5.1.17	Record of Malfunctions of Air Pollution Control Equipment	45CSR13	4.1.3
5.2.1	Visible emission checks of the vent flares	45CSR13	5.2.1
5.2.2	Comply with 40 C.F.R. §60.752(b)(2)(iii)	45CSR13, 45CSR23 and 40 C.F.R. §60.756(c)	5.2.2
5.3.1	Stack testing of the flares	45CSR13 and 45CSR§6-7.1	5.3.1
5.4.1	Record of Monitoring	45CSR13	5.4.1
5.4.2	Record of Flare Monitoring	45CSR13, 45CSR23 and 40 C.F.R. §§60.758(b) and (b)(4)	5.4.2
5.4.3	Records of Flare Pilot Flame Monitoring	45CSR13, 45CSR23 and 40 C.F.R. §60.758(c)(4)	5.4.3
5.4.4	Records and reports as specified in 40 C.F.R. Part 60 Subpart WWW or EPA approved State plan	45CSR13, 45CSR34 and 40 C.F.R. § 63.1980(a)	5.4.4
5.4.5	Record of the amount of landfill gas consumed/fed to the flare system	45CSR13	5.4.5
5.5.1	Reporting of violation(s) of the allowable visible emission requirement	45CSR13	5.5.1.

Non-Applicability Determinations

The following requirement has been determined not to be applicable to the subject facility due to the following:

- **40 CFR 64-Compliance Assurance Monitoring.** The facility was found not to be subject to CAM at the time of the previous renewal. There were no new emission units or control devices added at the facility that would require a CAM applicability analysis. Therefore, a CAM determination is 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: Tuesday, July 19, 2016
 Ending Date: Thursday, August 18, 2016

Point of Contact

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

Beena Modi
 West Virginia Department of Environmental Protection
 Division of Air Quality
 601 57th Street SE
 Charleston, WV 25304
 Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
 Beena.j.modi@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)

Not applicable.