

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 21, 2016.

Permit Number: **R30-00300036-2016**
Application Received: **April 30, 2019**
Plant Identification Number: **003-00036**
Permittee: **LCS Services, Inc.**
Mailing Address: **P. O. Box 1070, Hedgesville, WV 25427**

Permit Action Number: *MM02* Revised: *September 17, 2019*

Physical Location: Hedgesville, Berkeley County, West Virginia
UTM Coordinates: 243.35 km Easting • 4384.46 km Northing • Zone 18S
Directions: From I-81, take exit for State Route 9 (Berkeley Springs/Hedgesville); Go approximately 6 miles to Hedgesville and turn right onto County Route 901; Go approximately 1 mile, and take a left onto County Route 3/2 (Allensville Road); Go approximately 0.8 miles on Allensville Road and landfill entrance is on left.

Facility Description

SIC Code – 4953. North Mountain Sanitary Landfill is a municipal solid waste landfill that began operation in 1991. The landfill has the potential to receive approximately 120,000 tons of waste per year on the approximate 468.7 acre site of which 67 acres is permitted for waste disposal. 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.

This modification incorporates the changes made in R13-2590B to increase the sulfur dioxide emission limit due to the increase in hydrogen sulfide concentration in the landfill gas (LFG).

Emissions Summary

The change in potential emissions associated with the minor modification (MM02) is as follows:

Change in Potential Emissions	
Pollutant	Change in Potential Emissions (+ or -), TPY
Sulfur Dioxide (SO ₂)	+73.22

Title V Program Applicability Basis

Due to this facility's design capacity over 2.5 million megagrams and 2.5 million cubic meters, LCS Services, 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR10	To Prevent and Control Air Pollution From the Emission of Sulfur Oxides
	45CSR13	Preconstruction permits for minor sources.
	45CSR30	Operating permit requirement.
State Only:	N/A	

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>)
R13-2590B	July 9, 2019	

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

- ❖ Changes from R13-2590B have been incorporated in the Title V permit. These changes include the following:
 - SO₂ limits were updated in Table 4.1.5.a of this permit.
 - Condition 4.1.5.f was updated in the permit.
 - The standard of 45 CSR§10-5.1 was added as condition 4.1.5.g. and former condition 4.1.5.g. was renumbered as 4.1.5.h.
 - Conditions 4.2.3 and 4.2.4 were updated.
 - Condition 4.2.5 was added in the permit.
 - Condition 4.5.6 was added to require the permittee to report exceedances of the allowable Rule 10 standard to the Director within 5 days of the receipt of the analytical results.

- ❖ In addition to this change, the contact information for EPA in condition 3.5.3 was also revised.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:
None

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: Not Applicable for minor modifications.
Ending Date: N/A

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.