



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Disposal Service, Inc. Sanitary Landfill
Inspection Date(s): 04/03/2024
Regulatory Program(s): SIP, NSPS, MACT
Company Name: Disposal service, Inc.
Facility Name: Sanitary Landfill
Facility Location: 100 State Rte 34 S,
Hurricane, WV 25526
Latitude: 38.4027 **Longitude:** -82.0208
County/Parish: Putnam County
AFS/ICIS-Air Number: WV00007900103
Permit Number: R30-07900103-2021
NAICS Code: 562212 **SIC:** 4953
DSB ID #: ECAD - 55

Facility Representatives: **Point of Contact**

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Carlos Stover, Lead Operator ☐

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EPA Inspectors:

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EPA Lead Inspector

Signature

Parmatma Adhikari

Date

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Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Disposal Service, Inc. Sanitary Landfill (DSI or Facility) to verify compliance with applicable State and Federal regulations. The West Virginia Department of Environmental Protection (WVDEP) was notified of the inspection on March 18, 2024, via email. On April 1, 2024, EPA notified the Facility of the planned inspection via phone. EPA emailed a list of records for review to Craig Arnold, Landfill District Manager, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in this report.

A. Summary of the Facility

The Facility is located at 1100 State Rte 34 S, Hurricane, WV 25526 and is privately owned and operated by Waste Management. The Facility received its most recent Title V Operating Permit (R30-07900103-2021) from WVDEP on August 3, 2021.

This facility is not a major source of Hazardous Air Pollutants (HAPs) and other criteria pollutants nor collocated with a major source. It is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³), but its estimated uncontrolled emissions are not equal to or greater than 50 megagrams per year (Mg/yr) NMOC. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 60: Subpart Cf – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills
- 40 CFR 61: Subpart M – National Emission Standard for Asbestos
- 40 CFR Part 60: Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification on or After May 30, 1991, but Before July 18, 2014
- 40 CFR Part 60: Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification after July 11, 2014

B. Inspection Opening Conference

At 09:00 AM on April 3, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Sanitary Landfill was represented by Craig Arnold (Landfill District Manager), Mike Runner (Environmental Protection Manager) and Carlos Stover (Lead Operator). Also, Ryan Harbison, WVDEP Environmental Inspector Supervisor, was present. EPA inspectors, Parmatma Adhikari and Alex Everhart presented their credentials and explained the purpose of the visit was to

conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the Facility representatives of their right to claim any confidential business information (CBI). At that time, Mr. Arnold did not claim any photos or documentation as CBI.

EPA Inspectors explained to the Facility that the inspection was part of a National Enforcement and Compliance Initiative (NECI), and that the inspection would include an opening meeting, a facility walkthrough, and a records review. The Facility was also informed by EPA inspectors that during the walkthrough, photographs would be taken.

II. Site Activity/Process Description

The DSI Landfill is a municipal solid waste landfill, privately owned and operated by Waste Management. The landfill accepts municipal solid waste, construction, demolition debris, excluding asbestos waste, and approved residual waste streams from Putnam, Cabell, and Kanawha Counties. Waste is brought in by truck, dumped, and covered with soil daily. The landfill gas generated by the decomposition of the waste is collected via vertical and horizontal wells and routed to torch flares (tiki torches) where it is burned prior to being vented to the atmosphere. The landfill's regular hours of operation are from 6:30 AM to 3:00 PM, Mondays to Fridays, and 7:00 AM to 11:00 AM on Saturdays. Every 2nd Wednesday of each month, the Sanitary Landfill allows the public to drop off waste for free. There are four full-time employees (3 operators and one mechanic) onsite every day. Mr. Arnold stated that DSI was initially opened in 1972, was privately owned by the Cummins family, and was ultimately bought by Waste Management in 1996.

Mr. Arnold stated that the DSI Landfill encompasses approximately 335 acres of the 363-acre property. The landfill contains nine cells, three phases, and has a total design capacity of approximately 13.2 million cubic yards. About 24 acres are closed, with a High-Density Polyethylene (HDPE) liner on top, but the bottom is unlined. Phase 1 covers 44.5 acres, Phase 2 covers 40.2 acres, and the rest of the landfill area is separated for Phase 3, which has yet to be permitted. There are almost 18 months of airspace left in Phases 1 and Phase 2 has a design capacity of approximately 20 years. Mr. Arnold mentioned that cell construction for Phase 2 will begin in 2025, and initial waste will be placed in Phase 2 in late 2025. The Facility typically receives 450 tons of waste per day, and the total waste in Phase 1 is 4,380,484 tons as of January 1, 2024. Mr. Arnold stated that all waste is delivered via residents or Waste Management's fleet of hauling trucks, and no waste is brought in via railcar.

Mr. Arnold stated that the Facility does not have a leachate storage tank, but it does have a 600,000 gallon leachate pond. He stated leachate is directly discharged from the leachate pond to the Hurricane Wastewater Treatment Plant (WWTP). He stated that the Facility produces approximately 31,958 gallons of leachate per day, however these amounts fluctuate based on precipitation. All waste is covered at the end of the day, and the Facility typically uses tarps as an alternative daily cover for dirt. Mr. Arnold stated that the Facility tries to keep a small working area of 100'x100'.

Mr. Arnold stated that the Facility has four above ground storage tanks. They are summarized below:

Tank Description	Size	Contents
Tank 1	1,000 Gallons	Propane
Tank 2	250 Gallons	Used oil and antifreeze
Tank 3	8,000 Gallons	Diesel
Tank 4	500 Gallons	Gasoline

Mr. Arnold stated that there is one emergency generator at the Facility. It is a 60 HZ Yamaha gasoline generator, Model RD906812B, Power rated 6800 W and installed in 2013. The Facility also has one portable diesel water pump and one propane heater for comfort heat in the mechanical shop. The Facility does not have any additional combustion sources. Also, the Facility does not have a paint booth or abrasive blaster.

Mr. Arnold stated that the Sanitary Landfill is currently a Tier 2 Facility with a NMOC emissions of approximately 8 Mg/yr and the Facility was not required to install an active collection system and control device because of their NMOC emissions. Mr. Arnold stated that the facility is permitted to use 20 passive solar sparking flares; however, they are currently only using eight at this time. He stated that all of the flares are currently connected to the leachate system.

According to 40 C.F.R. § 60.750(d), an affected facility must continue to comply with 40 C.F.R. Part 60 Subpart WWW until it becomes subject to the more stringent requirements in an approved and effective state or federal plan that implements 40 C.F.R. Part 60 Subpart Cf, or it modifies or reconstructs after July 17, 2014, and becomes subject to 40 C.F.R. Part 60 Subpart XXX. West Virginia 45CSR23 implements 40 C.F.R. Part 60 Subpart Cf, therefore DSI Landfill is now subject to the requirements of 45CSR23 instead of 40 C.F.R. Part 60 Subpart WWW.

The opening conference concluded at 10:17 AM

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:20 AM by Criag Arnold, Mike Runner and Carlos Stover of Waste Management and Ryan Harbison of WVDEP was also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2).

EPA inspectors were first led to the mechanical shop. Carlos Stover, Lead Operator, mentioned that no painting or abrasive blasting is performed in the maintenance shop, only minor repairs, and preventative maintenance for landfill equipment. One Miller Bobcat 250 stick welder is attached to the service truck. Mr. Stover mentioned that welding is rarely used in the shop, and they typically order only one 50 lb box of welding rods per year. Inspectors observed a propane heater that provides comfort heat in the shop. The inspection team also observed a 1,000-gallon propane tank, and 250-gallon used oil and antifreeze tank behind the shop. Mr. Stover mentioned Safety Clean picked used oil every other month.

Next, the inspection team was taken to the working face of the landfill. At the time of inspection, waste was being unloaded by a Waste Management hauling truck. Mr. Arnold mentioned that the current working face is in Cell 4, stage 2, and Cell 3, stage A. The inspection team then observed the torch flares (tiki torches) that are located in various locations of the landfill. Mr. Arnold mentioned that the Facility has been permitted up to 20 flares to burn excess gas. At the time of the inspection, eight (8) flares were installed and operational. The flares have been in use in the same locations for a long time, but the Facility will occasionally move the locations if conditions or gas flow is excessive in certain areas. He mentioned that the first four flares were installed in March 2014, numbers five and six were installed in May 2021, number seven was installed in October 2021, and number eight was installed in September 2023. Mr. Arnold mentioned that the flares are rated for a gas flow rate of 5 to 50 scfm of Landfill Gas (LFG), but a separate flow meter is not installed on the flare.

Then the inspection team observed one, 8000 gallons diesel tank. Mr. Arnold mentioned that the diesel is used to fuel landfill equipment only not for waste hauling trucks. Next the inspection team was taken to observe diesel water pump where inspection team observed a Yamar model portable water diesel pump. Mr. Arnold mentioned that the pump is used to fill water truck for dust suppression. The Facility also installed a water system to wash mud and dust off the truck tires; the pump was also used to fill the water system tank. At the time of the inspection, the pump was not operating.

Following the observation of the diesel water pump, the inspection team was led to the 600,000 gallon leachate pond. Three sediment ponds (1A, 2A, and 3A) were also observed near the leachate pond. Mr. Arnold stated that water discharges directly into Charlie's Creek from the sediment ponds. Mr. Arnold mentioned that the Facility does not recirculate leachate; it is discharged to the Hurricane Wastewater Treatment Plant. The sludge from the leachate pond is removed every three years. Then, the inspection team advanced toward the office building to observe the emergency generator. Outside the generator building, the inspection team observed one 500-gallon gasoline tank. The inspection team observed the RD906812B model Yamaha portable generator. At the time of inspection, the generator was not operating. The inspection team couldn't find the hours of operation of the generator. The inspection team couldn't conduct surface emission monitoring due to the rain.

The walkthrough concluded at 11:30 AM

IV. Records Review

The records review commenced immediately after the plant walkthrough at 11:30 AM. EPA inspectors reviewed documents requested in the April 1, 2024, email to Craig Arnold (see Attachment 1). Records were provided at the time of the inspection by Craig Arnold and Mike Runner. Below are the records requested and all the requested information was provided during the inspection.

1. Facility plot plan, which depicts the entire landfill surface and the existing gas collection system.
2. Site map showing all the permitted landfill cells.
3. Copy of any Title V permit applications submitted since issuance of last permit renewal.

4. Total amount of waste in place (tons) in each cell and the total waste in place (tons) and date it began accepting waste.
5. Year by year waste acceptance rates.
6. The current design capacity (Mg) and the date(s) the design capacity was modified, if applicable.
7. Copy of the NMOC emission rate report, which includes the NMOC emission (Mg/yr) rate and supporting calculations, including copies of any Tier II site-specific testing.
8. Provide a record of the facility's actual annual air emissions, from January 1, 2019, through December 31, 2023, for all regulated air pollutants (NO_x, SO_x, CO, VOCs, and HAPs).
9. Copies of any performance tests conducted on any source to determine emission rates, concentrations, or compliance since 2000.
10. Records of monthly wellhead pressure, temperature, Nitrogen, or Oxygen monitoring from January 1, 2019, to the present.
11. Copies of all Title V Annual/Semiannual compliance certifications from January 1, 2019 to present.
12. Any annual Greenhouse Gas (GHG) reporting submitted to the EPA or WVDEP since January 1, 2019.
13. Visible emission monitoring records from January 1, 2019, to the present.

V. Closing Conference

Following the record review, EPA and WVDEP inspectors, Mr. Arnold, Mr. Runner, and Mr. Stover held a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 12:15 PM.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by DSI.

- Monthly visible emission logs for July and November 2020 were missing. According to Title V Operating Permit R30-07900103-2021 condition 5.2.1, the facility shall conduct visible emission checks at least once per calendar month.

VI. List of Attachments

- Attachment 1: Email correspondence to Craig Arnold of records requested to review during inspection
- Attachment 2: Photo Log

Adhikari, Parmatma

From: Adhikari, Parmatma
Sent: Tuesday, April 2, 2024 1:19 PM
To: carnold@wm.com
Cc: Everhart, Alex; mrunner@wm.com; ryan.t.harbison@wv.gov
Subject: CAA Inspection_ Disposal Service, Inc. sanitary landfill - 4/3/24
Attachments: EPA Records request_.docx

Dear Mr. Arnold:

As discussed over our phone call yesterday, EPA Region 3 will conduct a Clean Air Act (CAA) inspection of the Disposal Service, Inc. sanitary landfill in Hurricane, WV, on April 03, 2024. My colleague Alex Everhart, an inspector from WVDEP, and I anticipate arriving at the Facility at 9:00 AM. We would like to begin with an opening meeting that will provide EPA with the Facility's current and historical operations and a brief overview of its process(es).

The scope of the inspection will include, but may not be limited to, a review of all air pollution sources, a facility walk-through (during which photographs will be taken), and a review of records. To help facilitate the inspection, I would appreciate the records in the attached documents made available for review.

Please confirm receipt of this message, and don't hesitate to contact me with any questions.

Thanks!

Parmatma Adhikari

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215-814-2161

Attachment 2: PHOTO LOG

Facility: Disposal Service, Inc. Sanitary Landfill

Location: 100 State Rte 34 S, Hurricane, WV 25526

Inspection Date: 04/03/2024

EPA Inspector(s): Parmatma Adhikari & Alex Everhart

Photographer: Alex Everhart



Photo Number: 1

Photo Description: Miller Bobcat 250 Stick Welder



Photo Number: 2

Photo Description: Propane Heater in the Mechanical Shop



Photo Number: 3

Photo Description: Used Oil and Antifreeze Tank



Photo Number: 4

Photo Description: Crystal Clean Parts Cleaner



Photo Number: 5

Photo Description: Overview of Mechanical Shop



Photo Number: 6

Photo Description: Landfill Area



Photo Number: 7

Photo Description: Working Face of the Landfill



Photo Number: 8

Photo Description: Working Face of the Landfill



Photo Number: 9

Photo Description: Overview of Landfill



Photo Number: 10

Photo Description: Light Tower



Photo Number: 11

Photo Description: Torch Flares (Tiki Torches)



Photo Number: 12

Photo Description: Diesel Tank



Photo Number: 13

Photo Description: Portable Water Pump



Photo Number: 14

Photo Description: Leachate Pond



Photo Number: 15

Photo Description: Water System



Photo Number: 16

Photo Description: Emergency Generator